

CIIC Government Housing Management Policy 2025



Introduction

Turanga memeitaki (wellbeing) is the central focus of Te Ara Akapapa'anga Nui, the National Sustainable Development Agenda 2020+ (NSDA)¹. Specifically, the management of government housing is relevant to the following goals of the NSDA:

- Goal 1: Wellbeing for all
- Goal 2: Welfare and equity
- Goal 14: A sustainable population

Having a home is a human right, it is a critical factor to wellbeing, it is closely connected to economic wellbeing, social wellbeing and health.

Cook Islands Government Housing

The Cook Islands Government maintains a stock of 45 government houses at the time of drafting this policy. Government housing is managed by the Cook Islands Investment Corporation (CIIC) on behalf of the Government, in accordance with the Cook Islands Investment Corporation Act 1998.

The CIIC vision is to provide:

Quality assets and empower our people, our places, our future.

Ko te turanga tiratiratu i te puapinga o te iti tangata ka riro te reira i te akamatutu i te tupu'anga o te iti tangata, to tatou tango, no te tuatau ki mua

Government housing is provided to meet four specific needs/categories of government housing as set out below. (The rationale for these categories of government housing, eligibility and allocation is described in further detail later in this Policy, in the sections relevant to each category.) Categories of government housing are:

1. **Social Housing** – provision for low-income households that require assistance with housing. Prioritisation is given to those from the Pa Enua who do not have access to land ownership or suitable accommodation on Rarotonga.

¹ [NSDA Documents, pmoffice.gov.ck](https://pmoffice.gov.ck/NSDA-Documents)

2. **Parliamentary Housing** – housing stock made available to Parliamentary Services for Members of Parliament who are eligible based on requirements of the Remuneration Tribunal Act 2005, the Remuneration Tribunal Order 2019 and the Civil List Act 2005.
3. **Specialist Public Sector Housing** – housing provision for specialist public sector employees whose skills or expertise are essential to their government agency and their primary place of residence is outside Rarotonga.
4. **Discretionary** – allocation of a government house for the provision of services which directly impacts or is beneficial to the wellbeing of Cook Islands people.

Challenges to Managing Government Housing

CIIC and the Cook Islands Government faces several significant structural and operational challenges in the effective management and equitable distribution of its limited housing stock. These challenges directly impact the wellbeing of Cook Islands families and hinder the Government's ability to respond to housing demand on Rarotonga.

Challenges include:

1. Limited housing stock (45 houses) to meet diverse needs. At the time of drafting this Policy, there is a waitlist of 30 applicants for Social Housing, 3 for Parliamentary Housing and 1 for Specialist Public Sector Housing. However, it should be noted that the Ministry of Education and Te Marae Ora (two major employers of qualifying specialist public sector employees) turn to the private sector, bypassing government housing, due to its inability to meet their need.
2. Restricted access to land on Rarotonga combined with the moving of rental housing to the short-term market, is reducing the availability and increasing the cost of long-term rental housing. Those relocating to Rarotonga from the Pa Enua are particularly impacted. This also significantly impacts critical public services such as education and health, where housing is a barrier to recruitment.
3. The absence of a formal written policy document to manage government housing hinders CIIC's ability to manage the government housing stock in a clear, accountable and strategic way without formal guidelines or enforcement powers. CIIC has been challenged in enforcing consistent eligibility criteria.
4. The issues of unclear eligibility criteria and limited enforcement mechanisms have also contributed to inefficiencies and perceptions of inequity. The lack of clear and consistently applied eligibility rules further constrains access to housing.
5. Providing housing is only one part of supporting the wellbeing of individuals and families. Tenants may face complex social and economic challenges including low income, job security and limited access to support services.

In summary, the equitable allocation of a very limited housing stock remains a core challenge. Government housing must support multiple and often conflicting priorities — from ensuring safe and affordable accommodation for vulnerable families, to fulfilling statutory entitlements for Members of Parliament, to securing skilled professionals in essential public service roles and providing for services which contribute to the wellbeing of Cook Islands people. With only 45 government houses available, meeting these competing demands in a fair and transparent manner is complex, and requires a robust

framework that balances need, ensures accountability, and is informed by up-to-date data and cross-agency collaboration.

At the time of drafting this Policy, it is noted that work is being proposed by CIIC to undertake a housing study to understand the current housing market on Rarotonga and predict future housing needs. This housing study is contemplated in the Economic Development Strategy 2030². The housing study is intended to better inform a Government approach or strategy in respect of housing.

Policy Rationale

The rationale for this Policy is to ensure that a limited but vital public resource, government housing, is used strategically and fairly to support national priorities and the wellbeing of Cook Islanders. Specifically, this Policy:

1. ***Supports National Development Goals:*** this Policy aligns with the NSDA, specifically goals 1 and 2 – Wellbeing for All and Welfare and Equity, by ensuring that government housing contributes meaningfully to social wellbeing, economic wellbeing and equity. It also ensures that government housing complies with legislative requirements.
2. ***Addresses Housing Needs:*** supports the provision of secure, affordable housing in the context of growing pressures on the long-term rental housing market on Rarotonga and ensure that Cook Islanders have access to one of the most basic determinants of wellbeing – a home.
3. ***Ensures Equitable and Transparent Allocation:*** with only 45 houses available, there is a critical need to ensure that housing is allocated equitably and based on clear criteria prioritising socially and economically disadvantaged households, Members of Parliament in line with statutory requirements, specialist public sector workers essential to delivering services.
4. ***Empowers CIIC to Fulfil its Mandate:*** the absence of clear policy has limited CIIC's authority, consistency and effectiveness. This Policy empowers CIIC with a clear mandate, establishes defined processes for eligibility, allocation, tenancy terms, management and enforcement. It strengthens CIIC's ability to coordinate with other agencies and support tenant wellbeing.

² Cook Islands Economic Development Strategy 2030, Objective 1: Improving equity & access for all, Action 1.3 – Rarotonga housing market study.

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CIIC Government Housing Management Policy 2025

1.0 Purpose and Objectives

- 1.1 This Policy seeks to establish a clear, transparent and equitable framework for the management of government housing.
- 1.2 In support of this purpose, the following Policy objectives are set:
- (a) **Ensure equitable and transparent allocation of government housing:** to prioritise access to housing based on clearly defined eligibility criteria, with particular attention to low-income households, especially those from the Pa Enua, Members of Parliament and specialist public sector employees.
 - (b) **Promote the wellbeing of Cook Islands people and families:** to provide secure, safe and affordable housing that contributes to the physical, social and economic wellbeing of individuals and households, in alignment with the NSDA.
 - (c) **Strengthen operational management and accountability:** to empower CIIC to manage government housing efficiently through consistent process, defined roles and responsibilities, and clear compliance mechanisms.
 - (d) **Support strategic use of limited housing stock:** to ensure that all government houses are allocated and maintained in a way that maximises their value, responds to demand, and supports the delivery of public services.
 - (e) **Foster collaboration with relevant agencies:** to improve inter-agency coordination, including with Parliamentary Services and INTAFF, in supporting tenants and strengthening housing outcomes.
 - (f) **Establish a system for continuous monitoring, evaluation and learning:** to track performance, assess impact, and inform policy improvement through regular monitoring and evaluation.

2.0 Scope

- 2.1 This Policy applies to:
- (a) All CIIC Board members, Managers and staff involved in decision-making for and the management of government housing.
 - (b) Parliamentary Services staff involved in the management of government housing.
 - (c) Tenants of government houses.

3.0 Roles and Responsibilities

- 3.1 The CIIC Land and Legal General Manager is the Policy Owner and has responsibilities for this Policy, including:
- (a) Exercising responsibilities in accordance with the terms of this Policy;

- (b) Ensuring communication of, and access to, this Policy for all relevant CIIC Board members and staff, that of other Government Agencies and government housing tenants;
- (c) Ensuring the policy is publicly available on the CIIC website;
- (d) Overseeing compliance with this Policy; and
- (e) Monitoring and review of this Policy including carrying out the Monitoring, Evaluation and Learning (MEL) Plan.

5.2 Other responsibilities include:

- (a) The CIIC Board shall exercise discretion in accordance with the terms of this Policy and contribution to the MEL Plan.
- (b) The CIIC Chief Executive Officer (CIIC CEO) shall carry out responsibilities in accordance with the terms of this Policy.
- (c) The CIIC Tenancy Relationship Manager shall carry out responsibilities in accordance with the terms of this Policy.
- (d) The CIIC Asset Management General Manager shall be responsible to oversee maintenance and repair work in relation to government housing and contribute data to the MEL Plan.
- (e) The CIIC Policy Developer shall be responsible for preparation of the Evaluation Report in accordance with the MEL Plan.
- (f) Parliamentary Services shall exercise responsibilities in accordance with section 9 of this policy.
- (g) The Ministry of Internal Affairs (INTAFF) shall engage with CIIC in respect of referrals as outlined in section 28 of this Policy.

4.0 Relevant Legislation and Policy

4.1 Legislation and Policy relevant to this Policy includes:

- (a) Civil List Act 2005³;
- (b) Cook Islands Building Code 2019⁴;
- (c) Cook Islands Economic Development Strategy 2030⁵;
- (d) Cook Islands Economic Recovery Roadmap 2022⁶;
- (e) Cook Islands Immigration Act 2021⁷;
- (f) Cook Islands Investment Corporation Act 1998⁸;
- (g) Property Law Act 1952⁹;
- (h) Remuneration Tribunal Act 2005¹⁰;

³ [Laws of the Cook Islands, Civil List Act 2005](#)

⁴ [Cook Islands Building Code 2019, ici.gov.ck](#)

⁵ [Cook Islands Economic Development Strategy 2030, mfem.gov.ck](#)

⁶ [Cook Islands Economic Recovery Roadmap, mfem.gov.ck](#)

⁷ [Laws of the Cook Islands, Cook Islands Immigration Act 2021](#)

⁸ [Laws of the Cook Islands, Cook Islands Investment Corporation Act 1998](#)

⁹ [Laws of the Cook Islands, Property Law Act 1952](#)

¹⁰ [Laws of the Cook Islands, Remuneration Tribunal Act 2005](#)

- (i) Remuneration Tribunal Order 2019¹¹; and
- (j) Te Ara Akapapa'anga Nui, the National Sustainable Development Agenda 2020+ (NSDA)¹².

5.0 Definitions

Term	Definition
Applicant	A person submitting an application to be a government housing tenant.
CIIC CEO	The CIIC Chief Executive Officer.
Cook Islander	According to section 21 of the Cook Islands Immigration Act 2021 means: (a) a person who is part of the Maori race indigenous to the Cook Islands; and (b) includes a person descended from a person referred to in paragraph (a).
Dependent	Children under the age of 18. Individuals with a disability or other circumstances (such as age or infirmed) who are unable to support themselves financially.
Discretionary category	Government housing which can be allocated, at the discretion of the CIIC Board, for provision of services which directly impact or are beneficial to the wellbeing of Cook Islands people.
Government housing/house	Properties owned by the Cook Islands Government and managed by CIIC, including housing in the following three categories: • Social Housing; • Parliamentary Housing; • Specialist Public Sector Housing; and • Discretionary Housing.
Landlord	CIIC acting on behalf of the Cook Islands Government.
Long-term housing	Housing that is intended to be occupied as a principle place of residence for a continuous period of 12 months or more.
Social Housing	Government housing which is for the benefit of low-income households seeking assistance with housing.
Parliamentary Housing	Government housing reserved for Members of Parliament, as allocated by Parliamentary Services.

¹¹ [Remuneration Tribunal Order 2019, parliament.gov.ck](#)

¹² [NSDA Documents, pmoffice.gov.ck](#)

Permanent Resident	According to section 34 of the Cook Islands Immigration Act 2021 means: (a) is a permanent resident by descent; or (b) is granted permanent residence under section 42 and, if 18 years or over, has taken the oath required by section 44 [of the Cook Islands Immigration Act 2021]; or (c) has been granted permanent residence status by the issue of a certificate by the Minister under section 38 [of the Cook Islands Immigration Act 2021].
Principal place of residence	The property/place where the Applicant/Tenant/ Principal Tenant would ordinarily reside.
Principal Tenant	The Tenant that enters into the tenancy with CIIC by signing the Tenancy Agreement.
Specialist Public Sector Housing	Government housing for specialist public sector employees whose skills or expertise are essential to their government agency and their principal place of residence is outside Rarotonga.
Tenant	A person who occupies a property which is rented from the Cook Islands Government and managed by CIIC.
Written Notice or Notice in Writing	Shall be given by email correspondence or written correspondence delivered to either the place of residence or the offices of the party.

6.0 Policy Principles

6.1 The following principles underpin this Policy and are a guide to the interpretation, implementation and application of this Policy:

- (a) Contributing to the wellbeing of Cook Islands families and people;
- (b) Provision of safe and fit for purpose housing in accordance with the Cook Islands Building Code 2019;
- (c) Clear and transparent processes for the management of government housing;
- (d) Equitable allocation of government housing;
- (e) Efficient and effective management of government housing; and
- (f) Collaboration with other Government agencies.

Government Housing Categories

7.0 Allocation of Government Housing to Categories

7.1 Government Houses are allocated to the government housing categories on the basis of minimum number or percentage as set out in Table 1 of this Policy. To ensure equitable allocation of government housing, no less than 62 per cent of housing should be allocated to social housing.

7.3 Table 1 shows percentage of housing allocation to each category of government housing allocated at the time of drafting this Policy (June 2025) and minimum allocation proposed under this Policy.

Table 1: Allocation of government houses in June 2025 and minimum allocation proposed under this Policy

Housing Category	Current Allocation	Minimum allocation proposed under policy
Social Housing	69 per cent (31 houses)	62 per cent
Parliamentary Housing	13 per cent (6 houses)	8 houses (based on requirements of the Remuneration Tribunal Order 2019) (based on housing stock of 45 houses this is equivalent of 18 per cent)
Specialist Public Sector Housing	9 per cent (4 houses)	13 per cent
Discretionary	7 per cent (3 houses)	Discretionary

Note:

- At June 2025 2 per cent are vacant (1 house).
- Discretionary government houses are currently allocated to Te Are Manu, Te Vaerua Rehabilitation and Blackrock Apii Potiki.

7.4 Until allocations are in accordance with the minimum allocation outlined in this Policy, allocation to those categories which are not currently compliant with this Policy should be prioritised.

8.0 Social Housing

8.1 *Rationale for Social Housing*

8.1.1 Accessibility of land on Rarotonga, combined with the moving of rental housing to the short-term market is reducing the availability and increasing the cost of long-term rental housing, making it inaccessible to some, particularly low-income households. This Policy aims to

provide low-income Cook Islands' families access to affordable housing, whilst they find more permanent accommodation.

- 8.1.2 Prioritisation is given to those from the Pa Enua who do not have access to land ownership or suitable accommodation on Rarotonga. This prioritisation ensures equitable access to affordable housing for Cook Islanders from the Pa Enua.

8.2 Eligibility for Social Housing

- 8.2.1 A person will be eligible to apply for Social Housing where:

- (a) The Applicant is a Cook Islander or Permanent Resident, as those terms are defined at section 5 of this Policy and in the Immigration Act 2021¹³;
- (b) The Applicant is 18 years or older; and
- (c) Meets the following criteria in relation to income and assets:
 - (i) Total household income is less than \$NZD42,538¹⁴ per annum and the Applicant has provided a list of proposed occupants, their ages and proof of income for each working member of the household aged 16 years or older. The CIIC Tenancy Relationship Manager can apply a 3 per cent increase for each dependent¹⁵ residing in the home with the Applicant.¹⁶
 - (ii) The Applicant does not own or is not part owner of a property in which they could reside on Rarotonga.

8.3 Allocation of Social Housing

- 8.3.1 Once eligibility of an Applicant is confirmed, prioritisation should guide allocation of Social Housing:
- (a) Priority 1: if the Applicant is from the Pa Enua and does not have access to land ownership or suitable accommodation on Rarotonga.
 - (b) Priority 2: date of eligible application.

¹³ Immigration Act 2021 at sections 21 and 34, refer to section 5.0 of this Policy

¹⁴ [2021 Census of Population and Dwellings, stats.gov.ck](https://stats.gov.ck/2021-Census-of-Population-and-Dwellings), shows that the average household income on Rarotonga at the time of the census was \$52,516. Low-income is determined to be 75% or less of the average household income. An increase of 8% is allowed, being a 2% annual inflation adjustment between 2021 and 2025. It is noted that median income would be preferable as it is less affected by high-income outliers and better reflects a "typical" household. Median income data is not available from the census. The last median income data available was in the Household Income and Expenditure Survey (HIES) 2015-2016, which is now out of date. Should a new HIES be conducted this threshold may be updated in accordance with new data.

¹⁵ Refer to the definition of dependent at section 5.0 of this Policy.

¹⁶ The increase for dependents reflects that larger households have greater living costs. The increase is intended to be an equitable adjustment to account for household size and composition.

8.4 Tenancy Term and Rent

- 8.4.1 The tenancy shall commence from the date provided in the Tenancy Agreement and the term shall be specified in the Tenancy Agreement, ordinarily being a term of two years.
- 8.4.2 Social Housing is not intended to be indefinite, but rather assistance to tenants until they can transition to more permanent accommodation. Tenants are expected to actively seek long-term housing solutions during their tenancy. CIIC will, where possible, refer tenants to relevant agencies or programmes that may assist in achieving permanent housing outcomes.
- 8.4.3 While there is no formal cap on the number of times a Social Housing Tenancy Agreement may be renewed, provided that the Tenant remains eligible according to the terms set out at clause 8.2 of this Policy, it is this Policy's intent that Social Housing serves as a transitional form of support. Accordingly, it is expected that tenants will seek and secure long-term housing after a maximum to two tenancy renewals (equivalent to 6 years of continuous occupancy). CIIC recognises that individual circumstances may vary and continued tenancy beyond this period may be considered where justified by ongoing eligibility and demonstrated need, however, tenants are required to provide a housing transition plan as part of any renewal request beyond the second term.
- 8.4.4 It is the responsibility of the Tenant/Principal Tenant to advise CIIC if there is any change to their circumstances which may impact eligibility (for example, change of occupants, change to household income etc.). The CIIC Tenancy Relationship Manager will send annual reminders to the Principal Tenant to comply with this responsibility.
- 8.4.5 Should a Tenant/Principal Tenant seek to renew their Tenancy Agreement at the end of a term, they will be required to supply updated information confirming their eligibility, per clause 8.2 and 25 of this Policy, before a renewal is approved.
- 8.4.6 Rental rates are specified in the Tenancy Agreement. Rental rates are standardised across Social Housing based on number of bedrooms. Rental rates for Social Housing are based on discounted market rates per section 14.0 of this Policy.

9.0 Parliamentary Housing

9.1 Background to and Rationale for Parliamentary Housing

- 9.1.1 The provision of Parliamentary Housing complies with requirements of the Remuneration Tribunal Act 2005, the Remuneration Tribunal Order 2019 and the Civil List Act 2005. Specifically, section 9(1) to (3) of the Remuneration Tribunal Order 2019 requires allocation of housing, or provision of a housing allowance, to the following Members of Parliament:
- (a) The Prime Minister;
 - (b) The Deputy Prime Minister; and
 - (c) The Speaker, Ministers and Leader of the Opposition, where a house is available.

- (d) Section 9(4) provides that every other Member is entitled to receive a housing allowance.

This totals a provision of 8 government houses.

- 9.1.2 According to the Remuneration Tribunal Order 2019, Parliamentary Housing is provided for the purpose of being a residence for an eligible Applicant and their immediate family. The reality however, is that some Parliamentary Housing has been used in some cases, particularly those elected as representatives of the Pa Enua, to provide housing for members of their constituency for education purposes, medical referrals or for those who are vulnerable and unable to find alternative accommodation on Rarotonga. The use of Parliamentary Housing in this manner serves to reduce the number that may otherwise be on the government housing waitlist and prioritise those from the Pa Enua which is in accordance with the approach of this Policy.
- 9.1.3 It is noted that the Remuneration Tribunal Order 2019 is due for review. For example, it is noted that there is a discrepancy between the housing allowance indicated in the Remuneration Tribunal Order 2019 and the reality of market rental rates and the above purpose for which government housing is used. It is recommended that such review should take account of this Policy, in particular, housing allocation and allowances. This accords with the recommendation of Parliamentary Services during consultation on this Policy.

9.2 *Management of Parliamentary Housing*

- 9.2.1 Parliamentary Services shall be responsible for all engagement with the Applicant/ Primary Tenant. CIIC shall be responsible for all inspection, maintenance and repair work in relation to Parliamentary Housing. Both the Primary Tenant and Parliamentary Services shall be signatories to the tenancy agreement with CIIC.
- 9.1.4 Applications for Parliamentary Housing are to be submitted to Parliamentary Services. Parliamentary services shall maintain a waitlist of applications.
- 9.1.5 Parliamentary Services shall determine eligibility and allocation of Parliamentary Housing.
- 9.1.6 Given the limited Parliamentary Housing stock available, when determining eligibility and allocation of Parliamentary Housing, the following priority guidelines should be considered by Parliamentary Services:
 - (a) Priority 1: allocation in accordance with the requirements of any relevant legislation, order and/or regulations.
 - (b) Priority 2: allocation where the Applicant does not have a residence on Rarotonga. An exception to this is where the government house will be used to meet housing needs for Pa Enua constituents.
 - (c) Priority 3: date of eligible application.

- 9.1.7 Where a Parliamentary House is provided furnished, the tenant and CIIC must agree and sign a written list of the furnishings in the house at the time of occupation, which are to remain the property of the Cook Islands Government. The written list must be annexed to the Tenancy Agreement. Where it is agreed that CIIC is to purchase furnishings on behalf of the Primary Tenant, which is to be repaid by the Primary Tenant, this must be agreed in writing at the time of execution of the Tenancy Agreement, including clear and fair terms as to repayment, and annexed to the Tenancy Agreement.

9.3 *Tenancy Term and Rent*

- 9.3.1 The tenancy shall commence from the date provided in the Tenancy Agreement and the term shall be specified in the Tenancy Agreement.
- 9.1.8 The tenancy may continue for as long as the Principal Tenant meets the eligibility requirements as determined by Parliamentary Services. If the Principal Tenant's term in Parliament comes to an end or the Principal Tenant is no longer eligible for a government house, the Principal Tenant/Tenants must vacate the Parliamentary House within 90 days of it being declared that they no longer hold a seat in Parliament.
- 9.1.9 Rental rates are specified in the Tenancy Agreement. Rental rates are standardised across Parliamentary Housing based on number of bedrooms.

10.0 *Specialist Public Sector Housing*

10.1 *Rationale for Specialist Public Sector Housing*

- 10.1.1 A skilled Government labour service is important to sustain and support Government's initiatives to grow and develop the Cook Islands. Locality offers an appropriate level of appeal to attract and retain highly skilled or specialist Government professionals whose principal place of residence is outside of Rarotonga.
- 10.1.2 Housing issues can be a barrier to recruiting overseas specialist public sector employees. The Ministry of Education and Te Marae Ora, two major employers of qualifying specialist public sector employees, turn to the private sector, bypassing government housing, due its inability to meet their need.
- 10.1.3 At the time of drafting this policy, CIIC and the Ministry of Financial and Economic Management are exploring alternative programmes to support housing for overseas specialist public sector employees.

10.2 *Eligibility for Specialist Public Sector Housing*

- 10.2.1 In order to be eligible, the public sector employee must provide written correspondence from their Government Agency employer which includes:
- (a) That the Applicant is an employee of their Government Agency;

- (b) The Applicant's field of expertise and why their skills are essential to the business of the Government Agency; and
- (c) That the Applicant's principal place of residence is located outside of Rarotonga, either overseas or the Pa Enua.

10.2.2 While there is no formal income cap, Applicant's earning more than \$80,000 per annum may not be eligible unless the position is deemed critical or difficult to recruit for. CIIC will consider such applications on a case-by-case basis, in consultation with the relevant Government Agency. For this clause, relevant considerations will be:

- (a) The role to be performed by the applicant is essential to the delivery of core Government functions or public services; and
- (b) It is difficult to recruit or retain locally in the role, due to skills shortages or specialised qualifications requirements.

10.2.3 Prioritisation is given to health and education who both have high demand for qualifying specialist public sector employees.

10.3 Allocation of Specialist Public Sector Housing

10.3.1 Once eligibility of an Applicant is confirmed, the following prioritisation should guide allocation of Public Sector Social Housing:

- (a) Priority 1: if the Applicant is an employee of the Ministry of Education or Te Marae Ora.
- (b) Priority 2: Date of eligible application.

10.4 Tenancy Term and Rent

10.4.1 The tenancy shall commence from the date provided in the Tenancy Agreement and the term shall be specified in the Tenancy Agreement.

10.4.2 There is no limit on the number of terms a Principal Tenant may occupy a Government House, provided that the Principal Tenant remains eligible according to the terms set out at clause 10.2 of this Policy.

10.4.3 Where appropriate, the Government Agency that is the employer of the Principal Tenant, shall be included in communication regarding management of the Government House.

10.4.4 It is the responsibility of the Principal Tenant to advise CIIC if there is any change to their circumstances which may impact eligibility. The CIIC Tenancy Relationship Manager will send annual reminders to the Principal Tenant to comply with this responsibility.

10.4.5 Should a Principal Tenant seek to renew their Tenancy Agreement at the end of a term, they will be required to supply updated information confirming their eligibility, per section 10.2 and 25 of this Policy, before a renewal is approved.

10.4.6 Rental rates are specified in the Tenancy Agreement. Rental rates are standardised across Specialist Public Sector Housing based on number of bedrooms.

11.0 Discretionary Category

11.1 *Rationale for Discretionary Category*

11.1.1 Due to the isolation of the Cook Islands, small population and limited resources, it can be difficult for certain services and initiatives to secure a sustainable funding base in order to maintain and increase their scope of operations. Those services may directly impact or are beneficial to the wellbeing of Cook Islands people.

11.1.2 Where the provision of a government house for such services and initiatives would benefit the wellbeing of the Cook Islands community and people, the CIIC Board can use its discretion to allocate an appropriate government house for such service or initiative for temporary use. This will only be considered on a case-by-case basis by the CIIC Board.

11.2 *Eligibility for Discretionary Category*

11.2.1 In order to be eligible for consideration by the CIIC Board, the Applicant must demonstrate that:

- (a) The initiative, programme or service that the Applicant intends to provide contributes directly to one of the goals under the NSDA; and
- (b) The initiative, programme or service operates on a not-for-profit basis.

11.2.2 In exercising their discretion to allocate a government house, the CIIC Board must be satisfied that the Applicant meets the requirement at 11.2.1 and that allocation of a government house to the Applicant would not contravene the minimum allocation requirements of other government housing categories, set out at section 7.0 of this Policy.

11.3 *Tenancy Term and Rent*

11.3.1 The tenancy shall commence from the date provided in the Tenancy Agreement and the term shall be specified in the Tenancy Agreement.

11.1.3 It is the responsibility of the Tenant/Principal Tenant to advise CIIC if there is any change to their circumstances which may impact eligibility. The CIIC Tenancy Relationship Manager will send annual reminders to the Tenant/Principal Tenant to comply with this responsibility.

11.1.4 Should a Tenant/Principal Tenant seek to renew their Tenancy Agreement at the end of a term, they will be required to supply updated eligibility information, per section 11.2.1 and 25 of this Policy, before a renewal is approved.

General Tenancy Terms and Management

12.0 Tenancy Agreements

12.1 The Tenant/Principal Tenant must enter into a written Tenancy Agreement with CIIC. In the case of Parliamentary Housing, Parliamentary Services will also be a signatory to the Tenancy Agreement. All Tenants/Principal Tenants are personally responsible in relation to the terms and conditions of the Tenancy Agreement, including but not limited to:

- (a) The safe and careful use of the government house and any fixtures or assets within the property;
- (b) Reasonable maintenance of the government house and grounds;
- (c) Respecting the occupancy numbers for the government house as advised by CIIC;
- (d) Continuing to meet eligibility requirements;
- (e) Not using or permitting the government house to be used for illegal purposes;
- (f) No sub-leasing of a government house;
- (g) Not making any alterations that are not approved by CIIC in writing; and
- (h) Being considerate and respectful of the privacy and quiet enjoyment of neighbours.

12.2 Tenancies are non-transferable except with the written consent of CIIC. For example, transfer may be considered in the following circumstances:

- (a) Death or incapacity of the Tenant/Principal Tenant;
- (b) Relationship changes, such as separation or divorce;
- (c) Domestic violence, protection or safety concerns.

All transfers require entry into a new Tenancy Agreement with CIIC.

12.3 Government housing is provided as the principal place of residence for the Tenant/Principal Tenant and their immediate family.

13.0 Changes to Tenancy Situation

13.1 It is the responsibility of the Tenant/Principal Tenant to bring to the attention of CIIC any significant changes, such as:

- (a) Changes to income or any other eligibility requirements;
- (b) Long or short-term changes to the occupancy of the government house, this includes:
 - (i) Any visitors to the government house who will stay for a period of more than 4 weeks;
 - (ii) If the Tenant/Principal Tenant will be away from the government house for a period of more than 4 weeks.

14.0 Rental Fees

- 14.1 Rental fees payable are in accordance with the Tenancy Agreement.
- 14.2 CIIC shall determine the rental fees by receiving specialist advice from a valuer or real estate agent on market rental rates for the government houses. A standardised rate shall be applied to each government house based on number of bedrooms. CIIC shall set standardised rental fees for each category of housing taking into account the following:
- (a) Social Housing – market rate less an adjustment factor determined by the CIIC Board, taking into account the specialist advice received and affordability for low-income earners.
 - (b) Parliamentary Housing – market rate, taking into account requirements under the Remuneration Tribunal Order or other similar order or regulation.
 - (c) Specialist Public Sector Housing – market rate.
 - (d) Discretionary category – market rate less 20 per cent.
- 14.3 CIIC reserves the right to review the rental fees from time to time, subject to the following:
- (a) Rental fees may not be increased more than once per annum;
 - (b) Any rental fee increase must be made on an evidential basis;
 - (c) The Tenant/Principal Tenant must be given written notice of any rent increase 60 days before the increase comes into effect.

15.0 Overdue Rental Fees

- 15.1 Where a Tenant/Principal Tenant's rent is in arrears, they shall be given written notice by CIIC of the overdue rent amount and the dates that are overdue. The Tenant/Principal Tenant will have a period of 14 days, prescribed by the Tenancy Agreement, to remedy the overdue rent.
- 15.2 Where the Tenant/Principal Tenant's overdue rent is not remedied within 14 days, CIIC may issue notice to terminate the tenancy, with the approval of the CIIC Land and Legal General Manager.

16.0 Bond Payment

- 16.1 CIIC requires bond payments for all government housing as security to cover risk. Bond terms are as follows:
- (a) New tenants are required to make a bond payment equal to four weeks' rent. An existing tenant may be required to make an additional payment to a bond, upon tenancy renewal, to ensure that the bond is equal to four weeks' rent.
 - (b) The bond will be held in the name/s of the Tenant/Principal Tenant who is the signatory to the Tenancy Agreement.
 - (c) The bond must be paid in full before occupying the Government House.

- (d) No monies can be deducted from the bond payment until the Government House has been vacated.
- (e) Upon vacation of the property, the Tenant/Principal Tenant will be repaid the bond in full, less any deduction for damage or debt relating to the Government House.

17.0 Government House Condition, Repair, Maintenance and Inspection

- 17.1 A government house is provided unfurnished on an 'as is where is' basis unless health and safety considerations require additions or alterations to the property. The exception to this is section, in respect of Parliamentary Housing, is set out at 9.1.7 of this Policy.
- 17.2 CIIC will carry out a pre-occupation inspection report which will be provided to the Tenant/Principal Tenant before the Tenant/Principal Tenant occupies the government house. If the Tenant/Principal Tenant disagrees with any matter in the pre-occupation inspection report, they must bring it to the attention of CIIC prior to occupation. The government house must be returned in the condition it was when the tenancy commenced, with the exception of fair wear and tear.
- 17.3 The Tenant/Principal Tenant is responsible for ensuring that property-related services and expenses such as utilities, cleaning, security, waste disposal and gardening are attended to in a timely and proper fashion.
- 17.4 CIIC is responsible for the repairs and maintenance of the building and related essential fittings for electricity and plumbing systems.
- 17.5 CIIC will carry out inspections of the government house to assess the condition of the government house and any repair or maintenance work that may need to be carried out and attend to such work. Inspections will be carried out at least once every 12 months, but up to once every quarter. Tenants will be given 7 days' notice of the planned inspection. Tenants are required to be present during inspections, and they are required to make themselves and the government house available on the inspection date.
- 17.6 Where any repair or maintenance work is required outside of property inspections, it is the responsibility of the Tenant/Principal Tenant to bring it to the attention of CIIC. The exception to this is Parliamentary Housing, where it is the responsibility of the Tenant/Principal Tenant to bring any repair or maintenance work to the attention of Parliamentary Services, who will inform CIIC (per section 9.1.2 of this Policy).
- 17.7 Where repair or maintenance work is required and reported to CIIC, CIIC will respond to assess the work required within the following timeframe of reporting:
 - (a) Critical – within 12 hours: work that addresses immediate risks to health, safety or the habitability of the home. It must be responded to immediately to prevent harm or further damage. Examples include but are not limited to, major plumbing leaks or

burst pipes, electrical faults posing a safety risk, sewage overflows, roof damage causing water entry, no access to essential utilities.

- (b) Non-critical – 7 days: required to fix faults or deterioration that affect comfort or functionality, but which do not pose immediate risks to health or safety. Examples include but are not limited to, minor plumbing issues, broken fixtures or fittings, faulty light switches or non-urgent electrical repairs.
- (c) Scheduled maintenance and repairs – annually: routine or preventative maintenance carried out at planned intervals, typically to preserve the condition and lifespan of the house. Examples include, roof inspections and gutter cleaning, scheduled painting or property refresh works, upgrades or planned renovations.

18.0 Nuisance and Quiet Enjoyment

18.1 Tenants and their household members, including guests, must not cause a nuisance or disturbance that interferes with the reasonable peace, comfort or privacy of neighbours or the surrounding community. This includes, but is not limited to:

- (a) Excessive noise, shouting or loud music;
- (b) Parties or gatherings that disturb nearby residents;
- (c) Use of the government house or surrounding property in a disruptive or anti-social manner.

18.2 Noise should be kept to a minimum between the hours of 11.00pm and 6.00am and on Sundays, in line with community expectations.

18.3 CIIC may issue written warnings or take further tenancy action, including non-renewal or termination, in cases of repeated or serious nuisance behaviour.

19.0 Complaints and Disputes

19.1 CIIC is committed to maintaining a fair, respectful and responsive housing environment. Tenants, Applicants or members of the public may lodge a complaint about matters such as:

- (a) The condition or management of a government house;
- (b) The conduct of CIIC staff or contractors;
- (c) The behaviour of another government housing tenant or their household members.

19.2 The complaints procedure is as follows:

- (a) All complaints must be submitted in writing via email to the CIIC Tenancy Relationship Manager. The complaint should include the complainant's name, contact details, a clear description of the issue and any relevant supporting information or evidence.
- (b) CIIC will acknowledge receipt of the complaint within 3 working days.
- (c) CIIC will assess the complaint and may seek further information from relevant parties. A written email response outlining the outcome or next steps will be provided within 10 working days.

- (d) If the complainant is not satisfied with the outcome they may request an internal review by the CIIC Land and Legal General Manager, who will provide a further response within 10 working days.
- (e) If the complainant remains unsatisfied, they may refer the matter to the Cook Islands Ombudsman Office or seek legal advice.

19.3 CIIC will maintain a confidential complaints register to record:

- (a) The date of the complaint;
- (b) Nature of the complaint;
- (c) Actions taken; and
- (d) Outcome and resolution status.

19.4 Reporting on the complaints register to the CIIC Board will occur bimonthly and annually according to the MEL Plan.

20.0 Breach of Tenancy Agreement

20.1 Where the Tenant/Principal Tenant breaches the Tenancy Agreement, CIIC will notify the Tenant in writing. The Tenant will then have a period of time, specified in the Tenancy Agreement, to remedy the breach. Where the breach is not remedied within that period of time, CIIC may issue notice to terminate the Tenancy, with the approval of the CIIC CEO.

21.0 Tenancy Termination

21.1 Where a Tenant/Principal Tenant wishes to terminate the Tenancy Agreement, they will give three months' written notice to CIIC.

21.2 With the approval of the CIIC CEO, CIIC may terminate the Tenancy Agreement under any of the following circumstances, unless stipulated in the Tenancy Agreement, if the Tenant/Principal Tenant:

- (a) Breaches any of the obligations under the Tenancy Agreement;
- (b) Ceases to meet any of the eligibility criteria; and
- (c) Is deemed absent from the property for a term of more than four weeks, without explanation to CIIC.

21.3 When a tenancy is terminated due to ineligibility, the Tenant/Principal Tenant and all other occupants must vacate the government house within the following time:

- (a) In the case of Social Housing, within 90 days of the tenancy termination;
- (b) In the case of Parliamentary Housing, within 90 days of the tenancy termination; and
- (c) In the case of Specialist Public Sector Housing, within 30 days of the tenancy termination.

The tenant must continue to meet all obligations under their tenancy agreement and this Policy until they have vacated the government house.

- 21.4 CIIC is not obligated to provide another government house following tenancy termination. The Tenant/Principal Tenant whose tenancy has been terminated may submit an application and, if eligible, will be added to the government housing waitlist.

22.0 Government Housing Application

- 22.1 Those wishing to apply for a government house must complete an application form available from CIIC or the CIIC website. There will be a separate application form for each housing category. Applications for Social Housing, Specialist Public Sector Housing and the Discretionary Category are submitted to the CIIC Tenancy Relationship Manager. Parliamentary Housing applications are submitted to Parliamentary Services.
- 22.2 Applications will not be considered complete or assessed unless all supporting documents are provided.
- 22.3 Complete applications will be assessed by the CIIC Tenancy Relationship Manager and Applicants will be screened to confirm eligibility.
- 22.4 Once eligibility is confirmed, Applicants will be placed on the government housing waitlist. CIIC will maintain a waitlist for Social Housing, Public Sector Specialist Housing and the Discretionary Category. Parliamentary Services will maintain a waitlist for Parliamentary Housing.

23.0 Government Housing Waitlist

- 23.1 The government housing waitlist comprises eligible Applicants. It contains the following information:
- (a) Application and eligibility information;
 - (b) Category of housing the Applicant qualifies for;
 - (c) Date of application.
- 23.2 Applicants will be registered on the waitlist in chronological order according to the date a complete and eligible application is received by CIIC, including any supporting documentation required.
- 23.3 It is the obligation of the Applicant to advise CIIC if there is a change to their circumstances or eligibility.
- 23.4 CIIC will review the waitlist, including eligibility, when a government house becomes available and allocate a government house according to the priority criteria of the relevant housing category and a 'first come first served basis'.

24.0 Allocation of Government Housing

24.1 Before a government house is offered to an Applicant on the government housing waitlist, the Applicant will be required by CIIC to provide updated information confirming their eligibility for the relevant housing category.

24.2 Applicants will be allocated accommodation according to family size/number of occupants as follows:

Family Size	Number of Bedrooms
Single person	1
Couple, no dependents	1
Couple or single with one dependent	2
Shared accommodation (two individuals not in a relationship or two couples), no dependents	2
Couple with two dependents of same gender	2 or 3
Couple with two dependents of different genders	3
Couple or single with more than two dependents	3

24.3 Applicants will be made one offer of accommodation. If it is declined, they will be removed from the waitlist. They may apply again, and if eligible, will be added to the waitlist in chronological order. The exception to this is where they provide a valid reason for decline, including:

- (a) Does not have the number of bedrooms the Applicant is eligible for; or
- (b) Does not meet any special needs the Applicant or a member of their family has (for example a person who is less able-bodied). In some cases, the CIIC Board may exercise their discretion to make alterations to the Government House to accommodate the needs of the Applicant or their family member.

25.0 Renewal of Tenancy Agreement

25.1 CIIC will advise the Tenant/Principal Tenant of the end of their tenancy term 28 days before the end of the term. Thereafter the Tenant/Principal Tenant must advise CIIC in writing, within seven days, if they wish to renew their Tenancy Agreement.

25.2 Where a Tenant/Principal Tenant requests renewal of their Tenancy Agreement, they are required to provide updated information to establish their eligibility in accordance with the requirements of this Policy).

25.3 A new written Tenancy Agreement will be completed between the Tenant/Principal and CIIC.

26.0 Forms, Tools and Templates

26.1 To support the effective implementation and administration of this Policy, CIIC will develop, maintain and update the necessary forms, templates and operational tools. These will include:

- (a) Application forms for each category of government housing;
- (b) Tenancy Agreement templates;
- (c) Government housing database;
- (d) Pre-occupation inspection report and inspection and maintenance reports;
- (e) Complaints register;
- (f) Government housing waitlist.

26.2 CIIC shall also support Parliamentary Services to develop the forms, templates and operational tools necessary needed to implement this Policy.

Collaboration with Other Government Agencies and Non-Governmental Organisations

27.0 Parliamentary Services

- 27.1 In respect of Parliamentary Housing, a close working relationship will be maintained between CIIC and Parliamentary Services in relation to the provision and management of Parliamentary Housing.
- 27.2 Parliamentary Services shall be responsible for collection of rent from the Tenant/Principal Tenant, where applicable, and payment of rent to CIIC in relation to Parliamentary Housing.
- 27.3 Parliamentary Services shall be responsible for all engagement with the Tenant/Primary Tenant and application, waitlist and allocation processes.
- 27.4 CIIC shall be responsible for all other management activities in relation to this Policy.

28.0 Ministry of Internal Affairs

- 28.1 Where CIIC identifies that a Tenant/Principal Tenant or their immediate family in occupation of a government house, requires support that may be provided by INTAFF, CIIC shall do the following:
 - (a) Seek the consent of the Tenant/Principal Tenant and/or their immediate family member to contact INTAFF in relation to their situation;
 - (b) If consent is obtained, contact INTAFF, to make a referral in relation to the Tenant/Principal Tenant and/or their immediate family member.

29.0 Other Government Agency or Non-Governmental Organisation

- 29.1 Where CIIC identifies that a Tenant/Principal Tenant or their immediate family in occupation of a government house, requires support that may be provided by another Government Agency or Non-Governmental Organisation (NGO), CIIC shall do the following:
 - (a) Seek the consent of the Tenant/Principal Tenant and/or their immediate family member to contact the Government Agency or NGO in relation to their situation;
 - (b) If consent is obtained, contact the Government Agency or NGO, to make a referral in relation to the Tenant/Principal Tenant and/or their immediate family member.

Policy Monitoring and Review

30.0 Monitoring of Policy Implementation

- 30.1 Monitoring of this policy shall be carried out in accordance with the Monitoring, Evaluation and Learning (MEL) Plan annexed at **Appendix A**.
- 30.2 The MEL Plan outlines the indicators, methods, responsibilities and reporting mechanisms required to ensure the effective implementation and continuous improvement of this Policy.
- 30.3 CIIC shall:
- (a) Coordinate regular monitoring of housing allocations, tenancy compliance, maintenance and collection of rental fees;
 - (b) Ensure timely and accurate data collection to inform decision-making;
 - (c) Maintain up to date records of government housing stock, tenancy agreements and waitlists; and
 - (d) Provide internal bi-monthly reports to the CIIC Board.

31.0 Policy Review

- 31.1 This Policy shall be formally reviewed every three years, or sooner if required due to significant changes in housing stock, housing demand, rental market factors, legislation or Government priorities. The review process will include:
- (a) An assessment of the effectiveness and impact of this Policy based on MEL data;
 - (b) Identification of gaps, challenges and opportunities for improvement; and
 - (c) Recommendations for amendments or Policy reform where needed.
- 31.2 An initial implementation review shall be conducted one year after the policy has been endorsed by Cabinet.
- 31.3 The CIIC Land and Legal General Manager shall lead the Policy review process, with support from the CIIC Tenancy Relationship Manager and other relevant staff.

32.0 Continuous Improvement and Learning

- 32.1 CIIC commits to a learning-oriented approach to housing management. Lessons drawn from the MEL Plan, ongoing monitoring, tenant feedback, and cross agency collaboration shall be used to:
- (a) Improve internal systems and procedures;
 - (b) Strengthen policy implementation and accountability; and
 - (c) Inform future housing strategies, programmes and resource planning.

Policy Sign-off and Ownership Details	
Document name	
Version number	
Policy category	
Public facing	
Approval date	
Approved by	
Effective from	
Date for review	[1 year for implementation review and then 3 years recommended]
Consulted with General Manger/Division	
Author	
Policy Owner	
Document location	
Compliance measures	

Revision History			
Version	Date	Revision description/summary of changes	Author

APPENDIX A



Government Housing Management Policy Monitoring, Evaluation and Learning (MEL) Plan

Purpose of the MEL Plan

This MEL plan provides a structured approach to track how well the policy is being implemented and the impact of the Government Housing Management Policy (the Policy) in accordance with Policy objectives. This MEL plan aims to:

- Measure outcomes and impact of the Policy
- Support learning and improvement of the Policy and the government housing management processes.

Objectives of the MEL Plan

1. **Monitoring:** track implementation of the Policy and measure outputs against targets.
2. **Evaluation:** assess the effectiveness, efficiency and impact of the policy.
3. **Learning:** use insights to improve current and future housing management strategies.

Roles and Responsibilities

Actor	MEL Role
CIIC Board	Receives and considers monitoring and evaluation reports, makes policy recommendations based on evidence from data and monitoring and evaluation reports
CIIC CEO	Receives and considers monitoring and evaluation reports
Land and Legal General Manager	Policy Owner, overseas Policy implementation, MEL plan and reporting
Tenancy Relationship Manager	Day to day Policy implementation, monitoring and reporting, oversees inspections
Asset Management General Manager	Oversees maintenance and repair work, provision of data for monitoring and reporting
Policy Developer	Preparation of the Policy Evaluation Report

Data Collection

The following disaggregated data should be collected throughout the government housing processes, such as application and renewal:

- Age of principal tenant and household members
- Gender of principle tenant
- Marital or family status
- Number of dependents
- Employment status
- Ability status of Tenant and household members
- Home island (Pa Enea)

Key Policy Outcomes to Monitor/Measure

The CIIC Land and Legal Division shall be responsible to prepare quarterly and annual monitoring reports, for consideration by the CIIC CEO and the CIIC Board:

- Quarterly report:
 - Equitable access to government housing in accordance with the Policy
 - Effectiveness of the Policy
 - Written tenancy agreements in place
 - Complaints
- Annual report:
 - Equitable access to government housing
 - Allocation of housing in accordance with allocation in the Policy
 - Allocation of housing based on eligibility
 - Efficient housing allocation and turnover
 - Compliance with tenancy terms
 - Property maintenance and repair
 - Written tenancy agreements in place

Outcome	Indicator	Data Source	MEL Frequency
1.0 Improved equitable access to government housing	1.1 Percentage of houses allocated to each category of housing (Social, Parliamentary, Specialist, Discretionary)	Government housing database (Smartsheet)	Quarterly and annually
2.0 Improved effectiveness of the Policy	2.1 Variation between actual number/percentage of houses allocated to each category of housing and number/percentage of houses to be allocated according to this Policy	Government housing database (Smartsheet)	Quarterly and annually
	2.2 Percentage of tenants meeting the eligibility requirements for each category of housing	Application and eligibility data	Annually
3.0 Improved prioritisation of Pa Enea applications	3.1 Percentage of Pa Enea applicants who have been moved	Application data Government housing database (Smartsheet)	Annually

	from the waitlist to a government house		
4.0 Improved efficient housing allocation and turnover	4.1 Average time that houses are vacant before being re-tenanted	Asset Management maintenance and repair logs Government housing database (Smartsheet)	Annually
	4.2 Average time that applicants are on the waitlist before allocation	Application data Waitlist	Annually
5.0 Property maintenance and repair	5.1 Percentage of maintenance requests addressed within: • 12 hours for critical • 7 days for non-critical • Annual maintenance	Asset Management maintenance and repair logs Government housing database (Smartsheet) Inspection reports	Annually
	5.2 Expenditure on government housing maintenance and repairs	Asset Management maintenance and repair logs	Quarterly and annually
6.0 Increase in written tenancy agreements in place	6.1 Percentage of tenancies with current tenancy agreements	Tenancy agreements Government housing database (Smartsheet)	Quarterly and annually
7.0 Improvement in complaints management	7.1 Number of complaints received	Complaints register	Quarterly and annually

Evaluation of Policy Impact

The Policy should be evaluated one year after endorsement by Cabinet and every 3 years thereafter, to be aligned with Policy review per section 30.

Prior to the Policy review, the CIIC Policy Developer shall prepare an evaluation report for the CIIC CEO and CIIC Board, which includes:

- Monitoring reports for the previous 3-year period (or 1-year period in the case of the first review).
- Comments on the following evaluative questions, based on data from the monitoring reports:
 - How effective was the Policy at increasing equitable access to government housing?
 - How effective was the eligibility criteria for the reduction of the waitlist?

- How effective was the prioritisation of Pa Enua applicants at moving them from the waitlist to government houses?
- What are the types of complaints being received on the complaints register?
- How effective is the Policy in ensuring that property maintenance and repair issues are being dealt with in a timely manner?
- Has the Policy led to government housing stock being used to its full potential and for its intended purpose?

Evaluation methods include:

- **Quantitative:** statistical analysis of government housing data from monitoring and evaluation reports
- **Quantitative:** analysis of the complaints register, engagement with CIIC Land and Legal Division as to experience of managing government housing under the Policy
- **Comparative:** comparison with previous evaluation report (or pre-Policy data, where available, for first evaluation).

Evaluation reports and CIIC Board recommendations should be made publicly available via the CIIC website.

Learning

<i>Learning Activity</i>	<i>Purpose</i>	<i>Lead</i>	<i>Frequency</i>
Review of monitoring reports	Review monitoring data and adjust practice where Policy objectives are not being met	Land and Legal Division	Quarterly and annually
Implementation review	Review monitoring and evaluation data and make policy recommendations based on evidence for improvement	Preparation of evaluation report – Policy Developer Review and recommendations – CIIC Board	One year after Policy endorsement by Cabinet
Review of evaluation reports/Policy review	Review monitoring and evaluation data and make policy recommendations based on evidence for improvement	Preparation of evaluation report – Policy Developer Review and recommendations – CIIC Board	Every 3 years