

18 June 2024

Stats NZ Tatauranga Aotearoa
PO Box 2922
Wellington 6011

Submit online at www.stats.govt.nz/future-census

Kia ora

Re: Submission on Stats NZ's 'Modernising our approach to the 2028 Census' discussion document

1. The commentary in this submission is tendered on behalf of the Trust Democracy (TD), which was established as a non-profit incorporated society in 2019 to strengthen public discourse, education and research about democracy in Aotearoa New Zealand.
2. We acknowledge the relationship that has been developing through regular meetings with senior Stats NZ staff during 2024.
3. This submission has been developed by 3 members with diverse experience and expertise. All have taken part in past censuses. All 3 have experience of managing or using Government data and information. The submission has been reviewed by the TD committee.
4. Rather than responding to the questions posed in the discussion document, this submission focuses on issues with the consultation process and with contextual matters relating to the key issue of trust and confidence.
5. TD has concerns about the way the discussion document structures this public consultation. We believe the issues are too complex for traditional survey rating and aggregative methods, which do not provide for the public deliberation required to work through value trade-offs and uncertainty. This deficiency raises questions about the legitimacy of subsequent decisions and limits any positive impacts that might accrue regarding trust and confidence. As discussed at the meetings referred to in paragraph 2, we would be happy to discuss public-deliberation-based approaches with Stats NZ in the future.
6. TD is concerned that the discussion document's framing is overly simplistic, binary and lacks balance. Especially at the beginning of the document (see pages 2-3), contemporary enumerated censuses are characterised as a 'burden' both in financial and time terms whereas administrative-data approaches are described as efficient, modern and more sustainable. It is claimed that with a data-first approach, 'targeted' surveys can be used to fill in data gaps, and these may even be 'community-led'. Privacy issues seem easily manageable. Such a framing makes it sound as if changing to a data-first approach has no downsides. This is clearly not the case and the discussion document should have outlined the pros, cons and costs of the various

approaches to the 2028 Census, including ways of strengthening the traditional, fully enumerated approach, if it wanted to promote public deliberation.

7. The discussion document uses the digitisation of government as a reason to value censuses. This statement needs to be tempered. Work by New Zealand's Citizens Advice Bureau has found that the digital-first or digital-only approach to public service delivery has limited public access and caused harm with respect to inclusion and wellbeing for a significant number of New Zealanders.¹
8. We acknowledge that Stats NZ actively surveys New Zealanders to understand their awareness of, and confidence in, Stats NZ and their willingness to complete Stats NZ's surveys.² High response rates are needed to achieve correspondingly valuable data and results. Levels of public trust in the New Zealand government fluctuate and the global trend in trust in government is declining.
9. The 'Our World' section (page 5) needs to not only acknowledge but also describe what is known about why a declining number of people are prepared to participate in censuses. Without this, it is hard to evaluate whether even an administrative-data-first approach will work in the long-run. Can we be certain that the people who are refusing to participate in censuses are providing accurate data when engaging with other government processes and services, if they engage at all? As a result of systemic biases reflected in data, there is a risk of a data-first approach working against currently disadvantaged groups.
10. While TD accepts Stats NZ's acknowledgement that "without the use of admin data, we [Stats NZ] would be unable to produce robust and reliable population estimates", the trust issue still needs to be addressed. While Stats NZ has a role to play in this, it is a whole-of-government problem for politicians, political parties, public servants, the news media and others. Without trust and confidence in government, the admin data and survey data collected will not ensure the long-term sustainability of the Census, public data collection and services, and government policy, programmes and decision-making generally.
11. TD has concerns about a reliance on an administrative-data-first approach to the census. While Stats NZ, as a professional statistics and data agency, should have the capability to provide high-quality research and data services, TD is concerned about the capacity of the public service as a whole, especially in the context of the current Government's cost-saving exercises, which likely affect agency (including Stats NZ) capability and capacity, including funding and maintaining fit-for-purpose data technology systems and the ability to interact effectively across all ethnicities. Stats NZ may need to pivot back to a more fully enumerated census in the future if the quality of administrative data declines.

¹ Citizens Advice Bureau New Zealand, 2020, Face to Face with Digital Exclusion: A CAB Spotlight Report into the Impacts of Digital Public Services on Inclusion and Wellbeing.
https://inclusioncampaign.cab.org.nz/assets/Documents/Face-to-Face-with-Digital-Exclusion-/FINAL_CABNZ-report_Face-to-face-with-Digital-Exclusion.pdf

² See, for example, Stats NZ's social licence for data stewardship, August 2021.
<https://www.stats.govt.nz/assets/Uploads/Corporate/Stats-NZs-social-licence-for-data-stewardship-Aug21/Stats-NZ-Social-Licence-Report-Aug21.pdf>

12. Stats NZ depends on public trust and confidence to do its work. Against this imperative, recent stories about the use of personal data for electoral purposes³ raise serious questions about government agencies partnering with community organisations for censuses and government service delivery. Similar concerns were raised in the 2021 survey cited in paragraph 9. Stats NZ should continue to survey public trust and confidence and consider extending this by commissioning and publicising regular independent assessments of its data collection processes and services by university researchers or non-profit civil society organisations to support public trust.
13. Given the issues raised in this submission and publicly by people such as Len Cook⁴ and Kate Prickett *et al*,⁵ TD suggests that a second round of consultation be conducted. This should be structured to enable a broad range of stakeholders to assess and weigh the pros, cons and costs of different approaches for conducting our future censuses.
14. Please do not hesitate to contact me if you would like to discuss any of these points.

Ngā mihi, nā

A handwritten signature in black ink, appearing to read "Simon Wright", with a long horizontal flourish underneath.

Simon Wright
Chair

³ See, for example, Brett Kelly, S., Inside the Te Pāti Māori privacy breach allegations, 13/06/2024, <https://newsroom.co.nz/2024/06/13/inside-the-te-pati-maori-privacy-breach-allegations/>

⁴ Cook, L (2024), Can We Have the Population Statistics We Need Without a Regular Census? Policy Quarterly, <https://ojs.victoria.ac.nz/pq/article/view/9484/8393>

⁵ Prickett K, Kukutai T, Carr PA (2024), Risking our future Census data, The Press, 18 June.