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Tēnā koe Ms Craig,

**Submission on the *Proposed data collection approach and content for the census***

Trust Democracy is a non-partisan, non-profit incorporated society established in 2019 to strengthen public discourse, education and research about democracy in Aotearoa New Zealand. Its officers are all volunteers. Our purpose is to foster democratic innovation for a fair, just and inclusive society.

Over the last two years, Trust Democracy has participated in a Statistics NZ stakeholder group that meets quarterly. Amongst other things, there have been presentations and discussions about the administrative data-first approach to future Censuses.

Trust Democracy previously responded to Stats NZ's 2024 consultation on 'Modernising our approach to the 2028 Census'. In that submission, we noted that:

- The 'Our World' section 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.
- Levels of public trust in the New Zealand government fluctuate and the global trend in trust in government is declining. 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.
- We have 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.

Since that June 2024 submission, we note that levels of public trust in government within New Zealand have further declined as noted in a 2025 Auditor General's report.<sup>1</sup> As we said in our 2024 submission, the long-term sustainability of the Census and public data collection regardless of an enumerated or administrative data-first approach cannot be assured unless this is addressed. To our knowledge, Stats NZ has not undertaken, or begun planning, research on public trust in the collection of information and data by government agencies.

### **Stats NZ's current consultation on the proposed data collection approach and content for the census**

Trust Democracy is convinced that the proposed approach to the census is a major mistake that will cause significant harm to New Zealand. The proposal to rely primarily on administrative data is a route that has not been adopted by any other country without a population register (the backbone for a national identity card system). We believe that the decision to move away from a traditional survey-based census should be reversed as soon as possible.

Adopting an administrative-data-first approach will have two major effects:

1. It will degrade the quality of data collected by Stats NZ and made available to researchers and policy makers, both inside and outside of government.
2. It will worsen the surveillance risks posed by the Integrated Data Infrastructure; we have no confidence in the 'safeguards' around its use or that building strong enough safeguards is even possible.

Fundamentally, the proposal by Stats NZ will shift New Zealand from having a place-based census to one based on individual people. This is a profound change, which will significantly undermine the capacity of the state to make decisions about allocation of resources to areas and populations of greatest need, as well as affecting constitutional issues such as revisions to electorate boundaries.

Moving from the traditional census involves shifting from a snapshot of data gathered at one time, to administrative data gathered over much longer — and variable — time frames, which in turn means that the data held by Stats NZ will both be out of date and refer to different dates for different people.

It also involves moving from a precisely specified set of data, of a known quality, to a broader range of specifications with variable quality collected for different purposes using different instruments. This cannot have a positive impact on the quality of the census, or the data held by Stats NZ. In turn this will damage the accuracy of predictions based on that data and needed for policy making and resource allocation.

Stats NZ will no longer be able to aggregate family and household data, since the shift from a location-based frame to an individual-based frame means that administrative data cannot accurately provide precise data about who is living in a place together at a particular moment in time. This is a major change and means that the longitudinal continuity with previous censuses will be broken.

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<sup>1</sup> Office of the Auditor-General, 2025, 'Part 1: A challenging operating environment and a decline in public trust' from Observations from our work in central government, <https://oag.parliament.nz/2025/central-government/part1.htm>

The function of Stats NZ is not to be the ‘backend’ for the short-term approach of the current government towards ‘social investment’. It is to ensure that high-quality, impartial, and objective official statistics are produced relating to New Zealand to inform the public and inform decision making.<sup>2</sup>

We note that the March 2024 Cabinet Committee paper on the shift to an administrative-data-first approach to the Census did not even seek Cabinet consent for this change.<sup>3</sup> Instead the decision of the Minister for Statistics, who had no independent source of advice to challenge the proposals being made by Stats NZ officials, was presented as a *fait accompli*; Cabinet members were simply asked to ‘note’ the Minister of Statistics’ decision. This is a very peculiar way for a parliamentary democracy to make such a major decision — indeed you could say it was fundamentally undemocratic for a decision with such serious ramifications both for government capacity and capability and civil liberties to be made in such a way.

We noted above that no other country (that does not have a population register) has adopted the approach taken by the New Zealand government. The United Kingdom has this year explicitly rejected an administrative-data-first approach, which had been advocated for since 2014, following significant concerns from expert statisticians and users of UK statistics. The Chair of the UK Statistics Authority, Sir Robert Chote, said that, “The National Statistician’s recommendation is to commission a mandatory questionnaire-based census in 2031 – building on the success and lessons of the last census in 2021”.<sup>4</sup>

The Financial Times reported that, “There is now a recognition within the ONS that it needs to devote more resources to keeping its traditional surveys running”.<sup>5</sup> The Guardian reported that a group of more than 60 leading statisticians told the UK government that:<sup>6</sup>

“An increased reliance on administrative data risks an increasingly fragmented and inaccurate data landscape. There is currently no mechanism for administrative data owners to be held accountable for the quality of their data. Data owners do not necessarily see their contribution to the national data infrastructure as a priority. Even with a variable as basic as sex, we have seen various administrative sources moving away from collecting accurate data, due to the pressure of internal or external lobbying.”

The same statisticians also noted that:

“Administrative data cannot fulfil these functions of census data. Census completion, while not 100%, remains very high and has the advantage of being a legal requirement.

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<sup>2</sup> See section 3 of the Data and Statistics Act 2022.

<sup>3</sup> *Cabinet papers – Modernising and transforming the 2028 Census: Public consultation on an administrative data-first approach for census*, Statistics NZ, 08/05/2024, accessed on 16/12/2025. <https://www.stats.govt.nz/corporate/cabinet-papers-modernising-and-transforming-the-2028-census-public-consultation-on-an-administrative-data-first-approach-for-census/>

<sup>4</sup> *Recommendation from the UK Statistics Authority on the future of population and migration statistics in England and Wales*, UK Statistics Authority, 17/06/2025. <https://uksa.statisticsauthority.gov.uk/publication/recommendation-from-the-uk-statistics-authority-on-the-future-of-population-and-migration-statistics-in-england-and-wales/>

<sup>5</sup> *UK should hold traditional census in 2031, statistics authority says*, Financial Times, 03/06/2025. <https://www.ft.com/content/7d429dbc-5939-4706-96c4-175cac7953f7>

<sup>6</sup> *Plans to replace 2031 census in England and Wales set to be abandoned after backlash*, The Guardian, 17/06/2025. <https://www.theguardian.com/uk-news/2025/jun/17/plans-to-replace-2031-census-in-england-and-wales-set-to-be-abandoned-after-backlash>

Administrative data sources, to various degrees, will disproportionately omit hard-to-reach populations which are not registered with service providers and will additionally suffer from item non-response and non-consent to data-sharing, both of which may disproportionately affect particular population groups.”

Damningly, they said that the proposals in the UK — similar to those being promoted by Stats NZ — were “wishful thinking” about replacing a known quantity with “an untested patchwork of administrative data and surveys”.

Despite attending the quarterly stakeholder meetings with Stats NZ, and listening to its presentations on its preferred approach, Trust Democracy’s concerns about an administrative-data-first approach have not been assuaged. Indeed, the more research we have done on this topic, the graver our concerns have become.

High quality statistics are the bedrock of government and commerce in all countries. Indeed, they are the basis for a democracy in which people can deliberate and make informed choices. New Zealand is rushing headlong into an untested approach to censuses which has not been tried anywhere in the world, and which will cause a major fracture from our historical datasets. We are supportive of using administrative data in between enumerated censuses, but if New Zealand is to embark on a shift to relying primarily on administrative data, it should continue running enumerated censuses simultaneously, until the results show that the administrative data can provide a reliable replacement. Even then, there should be much deeper public deliberation on what it means to shift from a location-based frame for the data to a person-based frame, and the likelihood that this shift will inevitably be predicated on creating European-style population registers and identity cards.

We are concerned that Stats NZ, by pushing an administrative-data-first approach, is straying well beyond its statutory functions and laying the foundations for identity cards in New Zealand, when this has not been proposed by any government.

Finally, as the reports from the United Kingdom show, robust and reliable data collection must be adequately funded.<sup>7</sup> In contrast we have seen major cuts in recent years in funding of Stats NZ and other agencies who would be relied upon to provide accurate data in an administrative data-first approach. This will inevitably have an impact on quality and breadth of collection. We remain concerned that an administrative-data-first approach is driven by cost-cutting and hubris.

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<sup>7</sup> *Georgia Gould MP to Sir Robert Chote – Recommendation on the Future of Population and Migration Statistics*, UK Statistics Authority, 15/07/2025.

<https://uksa.statisticsauthority.gov.uk/correspondence/georgia-gould-mp-to-sir-robert-chote-recommendation-on-the-future-of-population-and-migration-statistics/>