

# Data and Statistics (Census) Amendment Bill



New Zealand Council Of  
Christian Social Services

**April 2026**

## Tirohanga Whānui | Overview

The New Zealand Council of Christian Social Services (NZCCSS) welcomes the opportunity to provide feedback on the Data and Statistics (Census) Amendment Bill. While we value the level of consultation that has been conducted in this process, we strongly believe that the concerns regarding the quality of data and targeted approaches for groups who may be underrepresented have not sufficiently been addressed and as a result strongly oppose the move to an administrative data led census. Additionally, while there have been previous consultations regarding how quality and underrepresented groups may be addressed, the outcomes of the latest consultation in December, has not yet been made public, with no report yet released at the time of this submission (15<sup>th</sup> April 2026).

## Taunakitanga | Recommendations

We raise the following points and recommendations for consideration:

### Item One:

Despite multiple consultation processes there is still inadequate solutions for addressing cohorts who are at risk of being underrepresented in the data collection with the new census approach.

The official advice from the expert advisory panel convened by Stats NZ does not support the move away from a traditional census, highlighting that there are significant gaps in administrative data which will likely result in underrepresentation of minority groups in the data collected (Stats NZ, 2025). This includes LGTBIQ+ communities, housing insecure individuals, disabled people, iwi Māori, Pacific and other minority population groups.

**Recommendation One:** We recommend that the move away from the traditional census not progress until tailored approaches to ensure these cohorts are not underrepresented in the data have been designed, consulted on and piloted.

### Item Two:

Research indicates that people are less likely to apply for supports they don't deem they are eligible for (MSD, 2022). As policy changes can impact eligibility for these supports there is a risk that future policy change will impact the administrative data that is collected. For example, with recent changes to Emergency Housing Special Needs Grants (SNGs) many of our member organisations reported an increase in visible homelessness and people attempting to make appointments for Emergency Housing with Work and Income being advised they would not be eligible. If no appointment is made, these enquiries are not reflected in the figures regarding need for housing support. In short, this means policy changes would have the ability to shift the appearance of need for support services as a result of administrative data representing access to services rather than assessment of an individual's situation. The census has been able to provide a valuable sense-check of the context people are living in, that is not based on policy changes such as tightened eligibility criteria. We have concerns regarding how this might impact funding for services and identification of where supports are required.

**Recommendation Two:** Work is needed to address how administrative data is collected and how to improve collection to ensure it reflects need, not just changes in eligibility.

**Item Three:**

The move to an administrative data led census is likely to significantly impact the value of the data which is produced by the census both to the government but also to organisations who use this data.

While the 2023 census cost \$319.6 million, the estimated value from this significantly outweighed the cost at \$2.8 billion (Jack & Bowlby, 2024). While it is difficult to determine how the move away from the traditional census will impact this value, it is believed that it will have a negative impact given the loss of granular data that allows for regional assessment of need for support services and programmes.

**Recommendation Three:** We recommend that any new census approach is initially run concurrently to the traditional census. While this would be a significant cost it, this would ensure a more seamless transition, allowing assessment of tailored solutions while addressing any concerns regarding the quality of data and economic value.

**Item Four:**

We continue to have concerns regarding the reliance on administrative data to the extent proposed. The use and linkage of administrative data by Stats NZ does not require informed consent and there are concerns regarding data sovereignty (Greaves et al, June 2025). The use of this information without consent risks individuals losing trust in agencies collecting this data. The proposal in December included mention of working with social service providers to provide additional data, a process which risks individuals losing trust in and reducing engagement with these services.

**Recommendation Four:** Significant work is needed to ensure that data collection and use align with the principles of Māori data Sovereignty and work is needed to promote trust in these processes.

## Ngā Tohutoro | References

Greaves, L., Tarapa-Dewes, E. P., West, K. & Renfrew, L. (June 2025). *Scrapping the national census raises data sovereignty and surveillance fears for Māori*. The Conversation.

<https://theconversation.com/scrapping-the-national-census-raises-data-sovereignty-and-surveillance-fears-for-maori-259274>

Jack, M. & Bowlby, G. (2024). Report of the Statutory Review of New Zealand's 2023 Census. Wellington, New Zealand ISBN 978-1-99-104973-

5. <https://www.stats.govt.nz/assets/Reports/Report-of-the-Statutory-Review-of-New-Zealands-2023-Census/report-of-the-statutory-review-of-new-zealands-2023-census.pdf>

Ministry of Social Development (MSD). (2022). Summary of key findings from the 2022 New Zealand Income Support Survey. <https://www.msd.govt.nz/documents/about-msd-and-our-work/work-programmes/income-support-survey/summary-of-key-findings-from-the-2022-new-zealand-income-support-survey.pdf>

Stats NZ. (2025). *Response to the Future Census Independent Evaluation Panel report: Evaluation of New Zealand's future census options for 2028 and beyond*.

<https://www.stats.govt.nz/assets/Reports/Evaluation-of-New-Zealands-future-census-options-for-2028-and-beyond/Response-to-the-Future-Census-Independent-Evaluation-Panel-Report-Evaluation-of-New-Zealands-future-census-options-for-2028-and-beyond.pdf>

## **Ko wai tātou | Who we are**

NZCCSS has six foundation members; the Anglican Care Network, Baptist Churches of New Zealand, Catholic Social Services, Presbyterian Support and the Methodist and Salvation Army Churches.

Through this membership, NZCCSS represents over 100 organisations providing a range of social support services across Aotearoa. Our mission is to call forth a just and compassionate society for Aotearoa, through our commitment to our faith and Te Tiriti o Waitangi.

Further details on NZCCSS can be found on our website - [www.nzccss.org.nz](http://www.nzccss.org.nz).

## **Ingoa whakapā | Contact Name**

**Alicia Sudden** [ceo@nzccss.org.nz](mailto:ceo@nzccss.org.nz)

Katie Schraders