

22 September 2025

s9(2)(a)

Tālofa lava **s9(2)(a)**

**RESPONSE TO AN OFFICIAL INFORMATION ACT REQUEST (REF: DOIA009-2025/26)**

On 26 June 2025, you contacted the Ministry for Pacific Peoples (the Ministry) requesting under the Official Information Act 1982 (OIA), information on advice the Ministry produced on current changes to the Census. On 10 September 2025, you clarified the scope of your request to include second opinion advice, Weekly Report items, Ministerial Briefings, Memos, and Aide Memoires, and Information Requests from the CE's Office. I have outlined your specific request and my response below.

*Talofa lava,*

*Can I please request any advice MPP produced on the [changes to the census](#). I'm looking for formal advice that was provided to Ministerial offices as well as any internal advice that was produced. Thank you in advance – fa'afetai tele lava!*

I have appended to this letter the following documents for advice the Ministry has produced on changes to the census (refer to **Appendix 1**):

- Weekly Report items and second opinion advice
- Aide Memoire: Modernising the Approach to the 2028 Census (AM049-2023/24)
- Modernising the Approach to 2028 Census: Summary and suggested talking points
- The Government Statistician's in-principle decision on the future of census.

Please note, some information has been withheld under:

- Section 9(2)(a) of the OIA to protect the privacy of natural persons; and
- Section 9(2)(f)(iv) to maintain the constitutional conventions for the time being which protect the confidentiality of advice tendered by Ministers of the Crown and officials.

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I am satisfied that there are no public interest considerations that render it desirable to make the information in these documents that are withheld under section 9 of the OIA available.

In line with standard OIA practice, the Ministry proactively publishes some of its responses to OIA requests. As such, this letter may be published on the Ministry for Pacific Peoples' website. Your personal details will be removed, and the Ministry will not publish any information that would identify you or your organisation.

Should you wish to discuss this response with us, please feel free to contact the Ministry at: [oa\\_requests@mpp.govt.nz](mailto:oa_requests@mpp.govt.nz).

If you are dissatisfied with this response, you have the right, under section 28(3) of the OIA, to seek an investigation and review by the Ombudsman. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or freephone 0800 802 602.

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Dr James Greenwell  
**Interim Deputy Secretary**  
**Policy & Insights**

## Appendix 1

## Weekly Report entries to the Minister for Pacific Peoples

| DATE      | Weekly Report Entry   |
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| 2-Feb-24  | <p><b>4.2 Data &amp; Insights Directorate IDI Project Scoped</b></p> <p>An Integrated Data Infrastructure (IDI) research project is being scoped by analysts in the Data &amp; Insights Directorate with support from the Ministry of Health analysts to understand implications for Pacific data underpinned by official statistics and other data sources. Delivery of the project is expected by 30 June 2024 contingent on Stats NZ review processes. The project will expand our evidence base for interpreting information derived from the IDI about Pacific peoples. The project aims to compare administrative and census-based denominators in addition to the ability of those sources to classify ethnicity. Comparisons will relate data quality to the standards specified in the:</p> <ul style="list-style-type: none"> <li>• New Zealand Data and Information Management Principles and Official statistics system principles and protocols for producers of Tier 1 Statistics.</li> <li>• Delivery of the project is expected by 30 June 2024 (contingent on Stats NZ review processes).</li> </ul> <p><i>Maryke Barnard, Operations Manager, Data and Insights</i></p>   |
| 9-Feb-24  | <p><b>3.1 Cross-agency engagement to improve data quality for Pacific peoples</b></p> <p>The Ministry is engaging with strategic partners across the government data ecosystem to raise the quality of data held by government and collaborate on key insights products. The Data and Insights analytical programme will also deliver insights to support those engagements.</p> <ul style="list-style-type: none"> <li>• Work is well advanced on a refreshed Memorandum of Understanding with Statistics New Zealand that includes a focus on collaborating on their agency's census transformation work and understanding implications for Pacific data quality.</li> <li>• The Ministry is in the process of entering into a Memorandum of Understanding with the Ministry of Health to underpin collaborative work on a Pacific health chartbook. The updated chartbook will bring together current information about the health status of Pacific peoples while also highlighting the need to improve data quality.</li> <li>• The Ministry is also collaborating with the Health Quality and Safety Commission on its mortality review function and an avoidable mortality dashboard, providing technical advice and expertise to ensure data for Pacific peoples is interpreted and reported in a robust manner.</li> </ul> <p><i>Dr Corina Grey, Deputy Secretary, Data and Insights</i></p> |
| 1-Mar-24  | <p><b>4.1 Engagement on Stats NZ's proposed Census Transformation Programme</b></p> <p>On 20 February 2024, the Ministry met with Stats NZ to discuss working relationships and Stats NZ's proposal to transform the approach to Census 2028. This approach would replace the traditional population-wide census survey with administrative data collected across a range of government agencies and supplemented by the increased use of smaller population-based surveys. The Ministry is concerned about the potential impact of these proposed changes on the quality of data for Pacific peoples, which is critical for planning, funding, and resource allocation. The Ministry is also seeking more detail on the engagement process for the proposed transformation programme to ensure that Pacific peoples and communities are meaningfully involved, and that agencies and communities understand the potential impact of changes. The Ministry has provided detailed feedback through consultation on Stats NZ's Cabinet paper Modernising the approach to 2028 Census as summarised in the Ministry's Advice section of your Weekly Report.</p> <p><i>Dr Corina Grey, Deputy Secretary, Data and Insights</i></p>  |
| 8 Mar-24  | <p><b>4.1 Cross-agency engagement with Stats NZ on the Ethnicity Standards Review</b></p> <p>In 2019, Stats NZ initiated the Ethnicity Standards Review to enhance the reflection of New Zealand's diverse population. On 1 March 2024, the Ministry attended the first meeting of the expert group and will play a crucial role in connecting Pacific communities with data holders. The expert group comprising the Ministry, other agencies, academics, and community groups will convene every two months until the end of 2024 to finalise recommendations for the updated Ethnicity Standards. The standard is a hierarchical classification of four levels. It provides a benchmark for the Stats NZ census and other agencies that collect ethnicity data. We will continue to keep you updated on this work as it progresses.</p> <p><i>Maryke Barnard, Operations Manager, Data and Insights</i></p>  |
| 15-Mar-24 | <p><b>4.1 Cross-agency engagement with Stats NZ on the Ethnicity Standards Review with the Ministry of Ethnic Communities</b></p> <p>On 6 March 2024, the Ministry met with the Ministry for Ethnic Communities (MEC) to discuss how we can align our contributions to the Stats NZ Ethnicity Standards Review. In 2019, Stats NZ initiated the Ethnicity Standards Review to enhance the reflection of New Zealand's diverse population. Both agencies are members of the expert group tasked with providing recommendations for a revised standard that better reflects New Zealand's diverse population. The Ministry and MEC will share and coordinate our respective data quality work programmes to ensure there is a deep understanding of the implications of the census review programme across government. We will continue to keep you updated on this work as it progresses.</p> <p><i>Maryke Barnard, Operations Manager, Data and Insights</i></p>  |
| 29-Mar-24 | <p><b>3.1 Cross-agency engagement with Stats NZ on modernising the 2028 Census.</b></p> <p>The Ministry continues to contribute to Stats NZ's engagement with government agencies about their plans for Census 2028 and the proposed shift to an 'administrative data-first approach'. On 13 March 2024, the Ministry attended a workshop about the experimental Administrative Population Census to provide feedback on its third iteration. On 25 March 2024, the Ministry attended Stats NZ's workshop, Future Censuses – 2028 and Beyond, for officials working with Pacific data in government agencies. The Ministry's key concerns are the light touch virtual engagement approach, poor quality of ethnicity and other data collected for administrative purposes, the inability to accurately count the population (particularly by region and small area unit) and the current lack of infrastructure across government to ensure standardised collection and reporting of data. The next step will be for the Ministry to provide feedback on Stats NZ's Pacific Data Strategy. We will continue to keep you updated on this work as it progresses.</p> <p><i>Maryke Barnard, Operations Manager, Data and Insights</i></p>  |

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| 10-May-24 | <p><b>4.2 Cross-agency engagement with Stats NZ on the Census 2028 Transformation Programme</b></p> <p>On 17 April 2024, the Ministry submitted feedback on Stats NZ's Cabinet paper and accompanying Discussion Document, outlining Stats NZ's plan to begin public consultation on modernising the approach to the 2028 Census. On 6 May 2024, we received a response from Stats NZ acknowledging our feedback and work to date to understand the potential impact of changes. Stats NZ has also asked us to contribute to the design of their consultation processes and signalled their intention to stay closely connected throughout the transformation process. Our response to Stats NZ reemphasised our commitment to work together to better understand the quality of Census and administrative datasets and ensure meaningful engagement with Pacific communities. We will also meet with Stats NZ about their recent Report of the Statutory Review of New Zealand's 2023 Census (published on 23 April) to discuss implications for Pacific peoples' data.</p> <p><i>Dr Corina Grey, Deputy Secretary, Data and Insights</i></p>   |
| 31-May-24 | <p><b>3.3 Cross-agency engagement with Stats NZ on the Ministry of Ethnic Communities</b></p> <p>On 10 May 2024, the Ministry met with the Ministry for Ethnic Communities (MEC) to discuss aligning our contributions to the Stats NZ Ethnicity Standards Review. To coordinate our respective data quality work programmes, the Ministry will request MEC's feedback on our survey data quality analysis, and the Ministry will review MEC's outcomes framework currently in development. The Ministry will also join MEC and other population agencies on a combined request for custom Census 2023 and household survey data to share costs and reduce the servicing burden for Stats NZ. We will continue to keep you updated on this work as it progresses.</p> <p><i>Dr Corina Grey, Deputy Secretary, Data and Insights</i></p>  |
| 5-Jul-24  | <p><b>4.2 Cross Agency Engagement with Stats NZ Regarding the Implications of Future Census</b></p> <p>The Ministry has been deliberate in embedding new analytical capabilities to expand its public sector influence to spotlight the implications of Pacific data quality limitations. On 27 June 2024, the Ministry met with Stats NZ counterparts to input into the briefing 'Impacts and Opportunities of Future Census Design Options for Pacific Data'. The primary audience is an independent evaluation panel set up to advise the Government Statistician. The paper will be used to inform the panel about implications of future census proposals and opportunities to address long-standing data needs. It aims to include an:</p> <ul style="list-style-type: none"> <li>• overview of the context of Pacific data</li> <li>• a summary of key messages received during the public consultation; and</li> <li>• an overview of the quality of administrative data, and the ability of census options to support Pacific data needs.</li> </ul> <p>The Ministry has advised Stats NZ that the brevity of the paper will not adequately convey the implications for Pacific data quality especially if panel members lack familiarity with Pacific data quality challenges, and the technical competency to assess complicated methodology options.</p> <p><i>Dr Corina Grey, Deputy Secretary, Policy and Insights</i></p> |
| 19-Jul-24 | <p><b>3.2 Supporting rainbow+ peoples data quality improvement</b></p> <p>On 11 July 2024, the Ministry attended an all-day workshop facilitated by Stats NZ to improve the quality of data about rainbow+ peoples. This is in the context of Stats NZ's decision to redesign Census 2028 to prioritise an administrative data-first approach to collecting population level data about New Zealanders. The workshop was a success in generating ideas for Stats NZ to improve the quality of data about rainbow+ peoples, such as partnering with community organisations and researchers to collect and analyse data about this group. The Ministry provided feedback about the need for earlier engagement with Pacific rainbow+ peoples ensuring that both ethnicity and rainbow+ data is collected more effectively by government agencies. The Ministry will continue to work with Stats NZ and community organisations to ensure better data is available as part of their work programme focused on improving data and insights about Pacific rainbow+ peoples.</p> <p><i>Tuiloma Lina-Jodi Vaine Samu, Director of Pacific Identities &amp; Advisory</i></p>  |
| 2-Aug-24  | <p><b>4.3 Cross-agency Census 2023 data workshop - Reducing data access barriers</b></p> <p>On 25 July 2024, the Ministry attended a cross-agency workshop hosted by Stats NZ to coordinate Census 2023 data requests. The workshop included 8 agencies that require bespoke population statistics based on Census 2023. Ordinarily the release of census data poses a challenge for agencies to access population specific statistics, particularly for Pacific peoples. The process has previously resulted in duplicated effort for Stats NZ. Specific actions from the workshop included: developing a common understanding of how agencies use population statistics, describing data needs beyond the scope of planned Stats NZ releases, and identifying overlapping data requests from agencies. This is the first time agencies have attempted to coordinate data requirements in order to decrease duplication and find cost savings. Besides reducing access barriers for government agencies, there are likely to be efficiencies in the way official statistics are used across government stemming from improved coordination. The Ministry anticipates that the heightened coordination will also support agencies to better account for Pacific data quality issues in their analyses.</p> <p><i>Dr Corina Grey, Deputy Secretary, Policy &amp; Insights</i></p>   |
| 13-Sep-24 | <p><b>4.3 Memorandum of understanding between the Ministry and Stats NZ</b></p> <p>On 11 September 2024, the Ministry signed a Memorandum of Understanding (MOU) with Stats NZ. The MOU will remain in effect until 11 September 2027. The MOU focuses on enhancing the quality of Pacific data produced by government agencies. The main objectives are to work with Stats NZ counterparts to raise awareness of data quality challenges and support cross-agency efforts to improve the collection, analysis and reporting of data for and about Pacific peoples. The MOU also defines roles and responsibilities of the Ministry and Stats NZ. It positions the Ministry as the domain lead for government data about Pacific peoples and acknowledges the roles of Stats NZ as the lead agency for government-held data. Key elements of the MOU include an annual work programme, the establishment of an All-of-Government Pacific Data Advisory Group, and ongoing collaboration between Stats NZ and the Ministry to deliver Pacific data equity across government and the Census 2028 Modernisation Programme proposing to shift to an 'administrative data-first approach'.</p> <p><i>Dr Corina Grey, Deputy Secretary, Policy &amp; Insights</i></p>  |

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| 11-Oct-24 | <p><b>4.4 Summary of the latest release from Census 2023</b></p> <p>On 3 October 2024, Stats NZ released a selection of individual and dwellings data from Census 2023. The data primarily include usually resident population counts disaggregated by Pacific ethnic group, age, gender, and geographic area, including regions, territorial authorities, and health boundaries. Between Census 2018 and 2023:</p> <ul style="list-style-type: none"> <li>• There was an average population increase of 18% among different Pacific groups (Samoan, Tongan, Cook Islands Māori, Niuean, Fijian, Tokelauan).</li> <li>• At least half of Pacific peoples from all populations live in the Auckland region, except for the Tokelauan population (27% in Auckland and 48% in Wellington).</li> <li>• In Auckland, more than half of the Pacific population lives in four of the 21 Auckland Local Boards. In eight of these Boards, Pacific peoples comprise 25% to 70% of the total population under 15 years.</li> <li>• More than half the total population under 15 years in the Manurewa, Ōtara-Papatoetoe, and Māngere Ōtāhuhu Local Boards are Pacific peoples. This has implications for the allocation of targeted education resources.</li> </ul> <p>The release also included social attributes like languages spoken and individual home ownership which have not yet been disaggregated by ethnicity. Samoan is the third most widely spoken language (110,541 speakers) after English and Māori. Auckland continues to have the lowest rate of home ownership (59%) compared with all other regions. There are some challenges interpreting the results for Pacific peoples. The release is based on people counted on census night, supplemented with administrative data sources and previous censuses, which have known inaccuracies, particularly for Pacific peoples. Census 2023 also has documented complications related to the dwelling register, which may negatively impact the reliability of statistics. A precise estimate of the population undercount may not be available until early 2025. The Ministry continues to work with Stats NZ and other government agencies to improve the quality of data and insights for Pacific peoples.</p> <p><i>Dr Corina Grey, Deputy Secretary, Policy &amp; Insights</i></p> |
| 25-Oct-24 | <p><b>4.2 Update on Stats NZ Ethnicity Standard Review</b></p> <p>On 4 October 2024, Stats NZ agreed to commission new analyses and revise timeframes for the Ethnicity Standard Review, based on advice about significant evidence gaps, led by the Ministry, Health NZ, the Ministry of Health and the University of Waikato. The public consultation process to revise the Standard (originally scheduled for November 2024) has been tentatively rescheduled to take place after July 2025. Stats NZ has indicated that further investigation on the use of ethnicity data and implications of proposed changes will be required. This will also involve consulting with agencies accountable for ethnicity data collection, such as Health NZ, the Ministry of Health and Ministry of Education. The purpose of the Standard is to enable government agencies to group and organise ethnicity data meaningfully and systematically. The objective of the Review is to improve consistency in the collection and use of ethnicity data across the Government Data System. This work is also a prerequisite for the proposed Census 2028 model, which relies entirely on administrative data for population enumeration. <span style="background-color: black; color: red;">s9(2)(f)(iv)</span></p> <p>Therefore, understanding agencies' ability to implement the standard will provide crucial evidence before the standard can be changed.</p> <p><i>Dr Corina Grey, Deputy Secretary, Policy &amp; Insights</i></p>   |
| 24-Jan-25 | <p><b>4.2 Ongoing work programme with Stats NZ</b></p> <p>The Ministry signed a Memorandum of Understanding (MoU) for three years with Stats NZ on 11 September 2024, which you were briefed about. The agreement recognises the Ministry's role as the Crown's domain lead for Pacific peoples' data across the government data system. The MoU links directly to the Ministry's Performance Improvement Review 2024, which highlighted the need to improve data quality across government and led to the subsequent establishment of a combined Policy and Insights Directorate within the Ministry. The objective of the MoU is to work with Stats NZ to raise awareness of data quality challenges and support cross-agency efforts to improve the collection, analysis and reporting of data for and about Pacific peoples. The Ministry has a significant programme of ongoing work with Stats NZ focusing on 3 areas:</p> <ul style="list-style-type: none"> <li>• the establishment of an All-of-Government Pacific Data Quality Advisory Group</li> <li>• provision of technical advice and data analysis to inform Census Modernisation planning</li> <li>• analysis using data from the Integrated Data Infrastructure to inform the Ethnicity Standard Classification review.</li> </ul> <p>As the new Minister of Statistics, this will enable ongoing collaboration and the Ministry will continue to update you on the findings from our analytical projects and advice around community engagement processes through the Weekly Report. The Ministry will update you in the next Weekly Report about our agency feedback on the Cabinet Paper: Modernising the Census by taking an Administrative Data-First Approach. We will also update you on how our feedback was used by Stats NZ for the related Cabinet Paper: Realising Social Investment Through Better Use of Data.</p> <p><i>Dr Corina Grey, Deputy Secretary, Policy &amp; Insights</i></p>   |

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| 31-Jan-25 | <p><b>4.1 Modernising the approach to census data collection</b></p> <p>Stats NZ is currently seeking agency feedback on its draft Cabinet paper - Modernising the census by taking an administrative data-first approach: Approval of policy decisions. Overall, the Ministry supports census modernisation, particularly when it addresses well-documented data quality gaps. There are long-standing data quality issues relating to Pacific peoples, including an undercount of the Pacific population in official statistics. Updating the approach to the census is an opportunity to address these issues. However, Stats NZ has not provided an estimate of full costs to the government, which will need to develop essential data infrastructure and processes by 2028. The data currently collected by government agencies does not include critical population demographics required for evidence-based decision-making, and it is unclear how these gaps will be managed in the approach to census modernisation. Any significant change or reduction in data access creates specific risks for the Ministry and other government agencies, including misallocation of resources, inequity of service delivery and inability to evaluate programme impacts. The Ministry has provided detailed feedback on the Cabinet paper to Stats NZ, including that:</p> <ul style="list-style-type: none"> <li>• any changes should bring the quality of data for Pacific peoples up to standard</li> <li>• a cost-benefit analysis of the proposed approach compared to the traditional census would assist with outlining the trade-offs and their potential impacts for government</li> <li>• agencies that collect government data will need to consider the cost implications of the proposals, which should include implications for service planning, funding and for developing new data infrastructure by 2028 or 2030</li> <li>• the Ministry would welcome further information from Stats NZ on the outcomes of public consultation and any proposals for an all-of-government approach.</li> </ul> <p>The Ministry will continue to work with Stats NZ on the census work programme. Officials are available to discuss the feedback with you or provide more detail if required.<br/><i>Dr Corina Grey, Deputy Secretary, Policy &amp; Insights</i></p>   |
| 7-Feb-25  | <p><b>4.2 Engagements with Stats NZ on Integrated Data Infrastructure and Social Investment</b></p> <p>On 31 January 2025, Stats NZ held a workshop for government analysts to identify challenges related to social investment analysis using the Integrated Data Infrastructure (IDI). The Ministry's feedback focused on the proposed approach of using the IDI as the benchmark for social investment, and the limitations of using the IDI for describing unmet need and outcomes for Pacific peoples. There is also a direct link to proposed Next Census plans, which will disrupt the ability to monitor data quality and trends in outcomes for populations using the IDI. Stats NZ has advised that the IDI is currently unable to provide many basic social attribute indicators at the quality needed for social investment (e.g., New Zealand Deprivation Index data, disability, Severe Housing Deprivation, combined information on people, dwellings and location data, languages spoken, religious affiliation, education qualifications, and family and household data) and the evaluation of government services for Pacific peoples. The Ministry is working with Stats NZ to ensure that official statistics related to Pacific peoples are of high quality. The Ministry's Memorandum of Understanding with Stats NZ recognises the Ministry as the Crown's domain lead for Pacific peoples data across the government data system. Stats NZ has recently invited the Ministry to participate in its Regulatory Impact Statement Panel related to the Next Census proposal. Other members of the Panel include the Ministry of Health and Social Investment Agency. Membership on this Panel addresses the Performance Improvement Review recommendation for the Ministry to influence the collection and use of data related to Pacific peoples.<br/><i>Dr Corina Grey, Deputy Secretary, Policy &amp; Insights</i></p>  |
| 21-Feb-25 | <p><b>1.2 Key focus areas for improving data for Pacific peoples across government</b></p> <p>At your officials meeting on 10 February 2025, you requested information on key areas in your Statistics portfolio to improve data for Pacific peoples. You have previously been briefed on the lower quality of data for Pacific peoples compared to other population groups, including a long-standing undercount of Pacific peoples in official statistics. There are opportunities in your Statistics portfolio to improve the quality of ethnicity data by clarifying roles and responsibilities for data quality standards. Why a focus on improving the quality of ethnicity data is important Government agencies need timely, high-quality data to develop effective policies and programmes and take a social investment approach. A lot of the data collected and used by agencies is available in Stats NZ's Integrated Data Infrastructure (IDI). The IDI is also central to Stats NZ's Next Census proposal. However, a major issue with the IDI is the inconsistent collection, recording and reporting of ethnicity data across different government datasets. As ethnicity has consistently been shown to be a strong marker of need (independent of other variables, including socioeconomic deprivation and rurality), this issue poses a significant barrier to the effective implementation of a social investment approach across government. There are existing levers that Stats NZ and the Government Statistician could use to address the quality of ethnicity data in the IDI, including: Mandating and regularly monitoring the implementation of data standards across government, including the Ethnicity Standard Classification. The Standard Classification sets out how all agencies should collect, record and report ethnicity data. However, implementation of this Classification is highly variable across government.</p> <ul style="list-style-type: none"> <li>• Updating data quality frameworks such as the Principles and Protocols For Producers of Tier 1 Statistics, and supporting government agencies to implement them.</li> <li>• Supporting the coordination of IDI resources across government.</li> </ul> <p>The Ministry has a Memorandum of Understanding (MoU) with Stats NZ and a joint programme of work to improve data quality for Pacific peoples, including:</p> <ul style="list-style-type: none"> <li>• Establishing an all-of-government Pacific data quality advisory group.</li> <li>• Contributing to Stats NZ's Ethnicity Standard Classification Review.</li> <li>• Supporting Stats NZ on its Regulatory Impact Statement Panel to resolve gaps in the Data and Statistics Act 2022.</li> </ul> <p>There are other opportunities to strengthen work between the Ministry, Stats NZ and other agencies responsible for the collection and reporting of data for Pacific peoples:</p> <ul style="list-style-type: none"> <li>• Previously, a meeting between Stats NZ, Health and Ministry officials was raised as an opportunity to discuss issues related to Stats NZ's previous Cabinet paper on the Next Census proposal. This meeting would be useful, as concerns raised by the Ministry of Health and Ministry for Pacific Peoples have not been resolved.</li> <li>• The Ministry can work with your Stats NZ officials to ensure that its upcoming Cabinet paper for Next Census addresses the issues raised here and in our agency feedback to date.</li> </ul> <p><i>Dr Corina Grey, Deputy Secretary, Policy &amp; Insights</i></p> |

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| 4-April-25 | <p><b>1.2 Ministry representation on the Stats NZ Regulatory Impact Statement Panel</b></p> <p>Between 17 February and 13 March the Ministry was represented on the independent Regulatory Impact Statement (RIS) panel for Stats NZ to assess the quality of advice supporting the upcoming Cabinet paper for the Next Census programme. A consensus was not achieved but the majority of panellists concluded that the interim RIS partially meets the quality assurance criteria. The panel noted the interim RIS does not yet contain any monetised costs, and that the absence of quantified costs, risks, and wider benefits make it hard to assess the difference between options under consideration for the next census. The panel anticipates that more complete information in the final RIS should make these choices clearer. The Ministry's conclusions on the panel were consistent with advice previously provided by the Ministry on Next Census Cabinet papers. The Ministry panellist was also concerned that the impact analysis did not consider advice received from experts, anticipate the need for a contingency plan (in the absence of a thorough analysis of options) or examine the reliability of population statistics under the preferred option. Additional feedback provided by the Ministry highlights the need for more detailed information about implications for the quality of population statistics, specifically for Pacific peoples. The Ministry will continue to keep you updated on the feedback we share with Stats NZ regarding the Next Census work programme.</p> <p><i>Dr Corina Grey, Deputy Secretary, Policy &amp; Insights</i></p> |
| 20-Jun-25  | <p><b>1.5 Chief Executives' Meeting: Strengthening Collaboration Between Stats NZ and the Ministry</b></p> <p>Following recent briefings on Pacific data in the IDI and Toloa Scholarships monitoring, the Government Statistician and Secretary for Pacific Peoples met on 12 June 2025 to discuss improving Pacific data quality and cross-agency coordination. The meeting reaffirmed a strong partnership between agencies with complementary expertise. Discussions focused on enhancing Pacific data in the IDI, aligning with statistical standards and Social Investment goals based on evidence of need, and leveraging the Government Chief Data Steward to address systemic data gaps. The Ministry also highlighted opportunities to make new data sources—such as Toloa Scholarships and Whānau Ora Services—available to IDI researchers. Concerns were raised about the Next Census and Ethnicity Standard Review, particularly risks to Pacific data integrity and public trust. Officials agreed to continue momentum through monthly talanoa sessions, with the Ministry reaffirming its leadership in Pacific data governance. Next steps include defining joint actions and timelines, with regular updates to you through the weekly report.</p> <p><i>Dr James Greenwell, Interim Deputy Secretary, Policy &amp; Insights</i></p>   |
| 18-Jul-25  | <p><b>2.1 Media responses</b></p> <p>This week the Ministry responded to questions from Pacific Media Network regarding the government's approach to ensuring accurate data is collected on Pacific communities along with Stats NZ. It is anticipated that the changes to Census will continue to be a key topic of concern for Pacific communities, academics and media. The Ministry also confirmed to the Post that there are currently no restructures underway, in response to questions that were put to a number of agencies. Information was provided to your office on both issues.</p> <p><i>Jaimee Burke, Director Communications, Corporate &amp; Support Service</i></p>  |
| 18-Jul-25  | <p><b>3.2 Co-presentation with Health Entities at New Zealand Population Conference 2025</b></p> <p>On 11 July 2025, the Ministry co-presented with Health NZ and the Ministry of Health on collaborative efforts to improve standards for ethnicity data analysis. The presentation focused on the challenges of selecting appropriate population denominators and comparator groups, and the need to support good practice in an environment where population statistics are undergoing Significant transformation. The Ministry's value-add lies in our technical leadership, cross-agency coordination, and commitment to advancing high-quality data practices that inform health Service design and evaluation to meet Pacific peoples' needs. The Ministry's work to improve standards is particularly timely given the broader changes outlined in the keynote addresses, which focused on the shift from traditional census enumeration to the use of administrative data. Demographers are interested to identify ways to maintain the integrity of population statistics and reduce risks to data continuity, granularity, and public trust. The Ministry intends to play a key role in advancing a pathway toward census-quality population statistics for Pacific peoples by 2030.</p> <p><i>Dr James Greenwell, Interim Deputy Secretary, Policy &amp; Insights</i></p>   |
| 25-July-25 | <p><b>1.2 Summary of Pacific Data Quality Analysis in Government Household Surveys</b></p> <p>In 2024, the Ministry reviewed six household surveys used for government planning and funding. The Ministry found consistent limitations in Pacific data quality, including small sample sizes, under-representation, barriers to participation, and a lack of Pacific-specific benchmarks. These issues are especially relevant to the Next Census, which may rely on household surveys instead of full-field enumeration for social attribute information. Design choices currently reduce the reliability household surveys for Pacific populations. The Ministry recommended three actions:</p> <ul style="list-style-type: none"> <li>• increase Pacific sample sizes and response rates</li> <li>• apply established data quality frameworks</li> <li>• coordinate surveys as a government-wide programme.</li> </ul> <p>The Ministry continues to engage across agencies on the findings it has presented at multiple conferences and plans to publish shortly. This work positions the Ministry to influence survey design and support the Next Census in delivering inclusive and reliable data. A summary of findings will be released in the coming months to support the Stats NZ Chief Methodologist in improving survey methods.</p> <p><i>Dr James Greenwell, Interim Deputy Secretary, Policy &amp; Insights</i></p>  |

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| 8-Aug-25 | <p><b>1.2 Summary of Pacific Data Quality Analysis in Government Household Surveys</b></p> <p>In 2024, the Ministry reviewed six household surveys used for government planning and funding. The Ministry found consistent limitations in Pacific data quality, including small sample sizes, under-representation, barriers to participation, and a lack of Pacific-specific benchmarks. These issues are especially relevant to the Next Census, which may rely on household surveys instead of full-field enumeration for social attribute information. Design choices currently reduce the reliability household surveys for Pacific populations. The Ministry recommended three actions:</p> <ul style="list-style-type: none"> <li>• increase Pacific sample sizes and response rates</li> <li>• apply established data quality frameworks</li> <li>• coordinate surveys as a government-wide programme.</li> </ul> <p>The Ministry continues to engage across agencies on the findings it has presented at multiple conferences and plans to publish shortly. This work positions the Ministry to influence survey design and support the Next Census in delivering inclusive and reliable data. A summary of findings will be released in the coming months to support the Stats NZ Chief Methodologist in improving survey methods.</p> <p><i>Dr James Greenwell, Interim Deputy Secretary, Policy &amp; Insights</i></p> |
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**Second opinion advice on changes to the census**

| Modernising and transforming the 2028 Census: Public consultation document |   |
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| <b>Agency</b>  | Stats NZ  |
| <b>Date feedback provided</b>  | 17 April  |
| <b>Type of paper</b>   | Cabinet policy paper  |
| <b>Cabinet Committee</b>   | Cabinet Economic Policy Committee   |
| <b>Summary of paper</b>  | <p>Last month, the Cabinet Expenditure and Regulatory Review Committee (EXP) endorsed plans to transform and modernise the 2028 Census. In response to a request from Cabinet, this paper seeks approval for the online discussion document which forms the basis of the public consultation component of the census transformation process currently underway.</p> <p>Public consultation is expected to commence on 8 May for a period of six weeks via online submissions and a light-touch social media programme. The online submissions will be based on the discussion document that outlines the intention to move away from a full enumeration survey to an administrative data-first approach.</p> <p>Following the public consultation, Stats NZ design work, and analysis by an evaluation panel, a high-level model for the 2028 Census will be identified and presented to Cabinet later this year.</p> <p>The Ministry has previously highlighted the impact of the proposed engagement approach and recommended changes:</p> <ul style="list-style-type: none"> <li>• Administrative data are largely based on who can access services and are therefore known to undercount Pacific peoples. The proposed changes by Stats NZ would likely result in further deterioration of the quality of data on Pacific peoples, households and populations.</li> <li>• In addition to the six-week online discussion document, further consideration is required to ensure appropriate consultation with Pacific peoples and communities.</li> </ul> |
| <b>Feedback provided</b>   | <p>Feedback from the Ministry centred on the following issues that we believe are either missing or not covered sufficiently in the Cabinet paper and/or public consultation discussion document:</p> <ol style="list-style-type: none"> <li>1. Awareness of the likely negative impact on the quality of data available for population planning, policy advice and decision-making.</li> <li>2. Highlighting risks and implications of the changes for enumerating the population and particularly ensuring Pacific peoples are counted.</li> <li>3. Analysis or discussion of how the technical challenges (e.g. quality control and assurance, consistency and standardisation of definitions across diverse admin datasets) that have previously been identified by Stats NZ will be overcome.</li> <li>4. Information about the financial implications across government (not just Stats NZ) of the proposed changes is currently incomplete.</li> <li>5. Implications of the current plans for limited agency and public engagement.</li> </ol>   |

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| <b>Ministry position</b>                       | The Ministry for Pacific Peoples supports evidence-based opportunities to improve data equity, accuracy and reduce costs. We are committed to supporting and working closely with Stats NZ in ensuring official statistics are of high quality and in engaging Pacific peoples, communities and organisations in this consultation process. |
| <b>Feedback incorporated into final report</b> | TBC   |

s9(2)(f)(iv)

**Modernising the approach to 2028 Census**

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| <b>Agency</b>                 | Stats NZ  |
| <b>Date feedback provided</b> | 27 February 2024  |
| <b>Type of paper</b>          | Cabinet policy paper  |
| <b>Cabinet Committee</b>      | Cabinet Economic Policy Committee   |
| <b>Summary of paper</b>       | <p>Stats NZ is engaging with other government agencies about plans to transform Census 2028 to an 'administrative data-first' approach. This will replace the traditional population-wide census survey with administrative data and supplemented by population-based surveys.</p> <p>Administrative data are largely based on who can access services and are therefore known to undercount Pacific peoples. The proposed changes by Stats NZ would likely result in further deterioration of the quality of data on Pacific peoples, households and populations.</p> <p>One of the key drivers of the proposed changes is cost savings. The delivery cost for Census 2023 was an estimated \$317 million. By not holding a regular census, Stats NZ would save money as an organisation, but there would not necessarily be cost savings across government, as compliance costs for routinely collected data and supplemental surveys would</p> |

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|   | <p>likely be transferred to other agencies. There is good evidence that the census provides value for money (approximately \$2.2 billion, or around \$4 of benefit for each dollar spent, according to a 2021 report).</p> <p>Stats NZ is proposing a three-pronged engagement approach:</p> <ol style="list-style-type: none"> <li>1. Targeted engagement (already underway) with key stakeholders and partners.</li> <li>2. Online public consultation (via discussion document) over four weeks in April 2024.</li> <li>3. A light-touch social media public engagement programme.</li> </ol>  |
| <p><b>Feedback provided</b></p>                       | <p>Feedback from the Ministry centred on the following issues:</p> <ol style="list-style-type: none"> <li>1. Highlighting the impact of the proposed changes on data equity for Pacific peoples (as the proposed changes are likely to result in a degradation of the quality of data the government holds on Pacific peoples and communities).</li> <li>2. Clarification on the costs of the proposed transformation. Currently, the paper is focused on cost savings for Stats NZ, but the costs of the transformation will likely transfer the burden of data compliance and costs to other government agencies.</li> <li>3. Including evidence from independent reviews of the census and experience internationally.</li> <li>4. Seeking assurance from Stats NZ that there would be strong data governance and oversight to ensure data quality standards are met and maintained.</li> <li>5. Ensuring there is a robust and meaningful engagement with Pacific data experts, organisations and communities.</li> </ol> |
| <p><b>Ministry position</b></p>                       | <p>The Ministry would like to be strongly engaged in this programme as it has important and significant implications for the quality, accuracy and use of data on Pacific peoples and populations in New Zealand.</p>   |
| <p><b>Feedback incorporated into final report</b></p> | <p>TBC</p>  |

s9(2)(f)(iv)

s9(2)(f)(iv)

Released under the Official Information Act 1982

## aide memoire

### Advice/information

**Date:** 15 March 2024

**Security Level:** In Confidence

**For:** Hon Dr Shane Reti  
**Minister for Pacific Peoples**

**Ref:** AM049-2023/24

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### MODERNISING THE APPROACH TO THE 2028 CENSUS

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#### **Purpose**

This aide memoire responds to your request on 12 March 2024 to provide a summary of the Ministry's advice for Statistics New Zealand's (Stats NZ) Cabinet paper *Modernising the approach to the 2028 Census*.

This advice includes a brief description of Stats NZ's proposed changes to an administrative data-first census, as outlined in the Cabinet paper, and issues the Ministry has raised in response.

Further detailed information on these issues is outlined in **Appendix 1**.

Talking points have been included in **Appendix 2** for your reference.

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#### **Background**

New Zealand's census provides an official national count of people, dwellings, and detailed social, cultural, and economic information. The census provides the fundamental base for New Zealand population statistics, social investment initiatives and funding formulae across government.

The census is an authoritative, and in some cases the only, comprehensive source of information on Pacific peoples' characteristics and circumstances.

Census 2018 was the first to take a 'digital first' online approach to save costs. Unfortunately, response rates declined significantly, particularly for Māori and Pacific peoples. This subsequently impacted the quality of data available for Pacific populations throughout New Zealand.

As part of the unplanned Census 2018 mitigation process, responses were supplemented by administrative data from the Integrated Data Infrastructure (IDI). Census 2023 similarly used a combined approach with the planned use of administrative data to supplement full enumeration. Unlike census data collected by Stats NZ, administrative data are collected by other government agencies in a non-standardised way for statutory and accounting purposes and not for the purposes of enumerating the population and understanding population dynamics.<sup>1</sup>

As the first significant trial using administrative data for population statistics, Census 2018 was able to increase coverage of the population but could not plug information gaps critical for investments in Pacific communities (e.g., occupation, household characteristics, smoking, employment hours, languages spoken). Subsequently, overall Census 2018 data quality for social

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<sup>1</sup> Stats NZ (2022), Aotearoa New Zealand: Long term insights briefing about the role of data in wellbeing and economic advantage.

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attributes and small-area population counts of Pacific peoples has been well documented as unreliable.<sup>2</sup>

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**Proposed census transformation process**

Stats NZ is starting to engage government agencies about plans to transform Census 2028 to an 'administrative data-first' approach. The transformation aims to replace the traditional population-wide census survey with administrative data, supplemented with population-based surveys. The proposed shift represents the greatest transformation in official statistics since the census was established in 1851.

Larger household surveys conducted by Stats NZ and other agencies will be required (up to 3 times larger) to supplement social attribute gaps anticipated for Census 2028. Current surveys are small and costly to run. Due to inadequate samples, they are often not representative of specific areas or allow analysis of diverse Pacific ethnic groups. Sample frame designs also rely on census data to calculate whom and where to survey.

A key driver of the proposed transformation is cost savings. The delivery cost for Census 2023 was estimated at \$326 million. In theory, Census 2028 may result in lower costs for Stats NZ by not holding a regular census survey. However, Stats NZ has not provided an estimate of full costs to the government, which will need to develop unprecedented data infrastructure by 2028. New compliance costs for routinely collected data and supplemental surveys likely to be transferred to other agencies are also unknown. There is good evidence that the census provides value for money (approximately \$2.2 billion, or a return on investment of around \$4 for every dollar spent).<sup>3</sup>

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**Proposed engagement approach**

Stats NZ is proposing a three-pronged engagement approach:

- targeted engagement (already underway) with key stakeholders
- online public consultation over six weeks, starting in April 2024
- a light-touch social media public engagement programme.

Stats NZ has stated that its targeted engagement will include key communities who are under-represented in administrative data sets, such as Pacific peoples. Stats NZ acknowledges that public buy-in and support will also be critical for delivering a new census approach. However, an independent review of Census 2018 indicates that online public consultation and 'light-touch' approaches are not effective ways to engage with Pacific peoples on such an important issue.

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**Risks/key issues**

*Potential degradation of data quality and impact on decision-making, resource allocation and policy development.*

- The proposed approach is likely to impact data quality because data in the IDI are deficit-focused and based on interactions with the Crown, often under trying circumstances. This is further complicated by the lack of a
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<sup>2</sup> Ministry for Pacific Peoples (2022), Long-Term Insights Briefing 2022; Improving Pacific Data Equity.

<sup>3</sup> Bakker, C (2021). Value of the New Zealand Census: August 2021. Retrieved from [www.stats.govt.nz](http://www.stats.govt.nz) 26/2/2024

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data quality standard for administrative census and the Data and Statistics Act 2022 not specifying what a census needs to include.

- There will also be significant disruption for users of official statistics such as policymakers, budget holders and agencies regarding funding formulae, policy target measures and indicators, electoral boundary calculations and other fundamental considerations. The shift to administrative data may also restrict any changes to public services if they are tied to population statistics. For the Ministry, this could impact how our programmes are funded and administered.
- We are seeking assurance from Stats NZ that there will be strong data governance and oversight to ensure data quality standards are met.

*Financial implications are unclear*

- The paper is focused on cost savings for Stats NZ, but costs of the transformation will likely transfer the burden of data compliance costs to other government agencies.

*The proposed approach does not reflect international best practice and gold standard approaches*

- Robust evidence from independent reviews of the census and experience internationally is lacking. We need to ensure that the proposed approach is benchmarked against best international practice.

*There is limited scope for engagement and census implementation*

- As proposed, an administrative census will require probabilistic models which have a greater complexity and 'black box' aspect for the public and other government stakeholders (public trust may suffer). The existence of the IDI as a precursor to Census 2028 has not been well communicated to the public. We have recommended to Stats NZ the importance of robust and meaningful engagement with Pacific data experts and communities.
- The public consultation process will conclude in June 2025, which leaves less than three years to implement Census 2028. Typically, the full intercensal period of five years is required for census implementation.

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#### **Next steps**

Officials are available to meet with you to discuss this in further detail. We will provide further updates on any developments via the Weekly Report.

The Ministry is currently negotiating a refreshed Memorandum of Understanding (MOU) with Stats NZ. The Ministry's Data and Insights directorate is also undertaking related work, including:

- preparing analytical reports assessing data quality and coverage for Pacific peoples from the government's household survey programme
- conducting IDI analysis to understand Pacific data implications from census transformation.

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**Ministry contact:** Dr Corina Grey, Deputy Secretary Data & Insights, s9(2)(a)

## Appendix 1 – Shifting to an administrative data-first approach

The Ministry has specific concerns about the proposed shift toward an administrative data-first approach. There is considerable risk in moving to a new system before it is soundly proven and the Ministry has provided feedback to Stats NZ, raising the following concerns:

**(a) A shift towards an administrative data-first approach would result in a degradation in the quality of population data overall, as well as further deterioration in the quality of data on Pacific peoples**

Administrative data are largely based on who can access services (and this is disproportionately weighted towards welfare, health, education, taxation, and justice processes). The likelihood of being included in these datasets differs by socioeconomic status, ethnicity, and gender.<sup>4</sup>

Limitations with population data derived from administrative records include:

- Data may be missing for part of the population (e.g., people not working or receiving a benefit or superannuation and not enrolled with a GP). Conversely it may also include people who have left the country.
- Data may be of poor quality because it is not important to the agency collecting it.
- Data may simply not be available (e.g., languages spoken, family and household attributes and smoking are not usually collected by government agencies and would be difficult to reconstruct without census yet are critical to understanding populations and the services needed to respond effectively).
- It is difficult to capture events that occur overseas and recently arrived migrants who have no personal history in administrative data (e.g., highest qualifications).
- Data may not be consistently collected or recorded across different administrative sources. Analyses conducted by the Ministry and other agencies have found that the collection of ethnicities across different administrative sources is highly variable and particularly problematic when people have multiple ethnicities.

In New Zealand, administrative data are known to undercount Pacific peoples.<sup>5</sup> A recent analysis by the Ministry of several government population surveys (like the supplementary surveys proposed in the Cabinet Paper) also demonstrate significant under-representation of Pacific peoples, resulting in limited and imprecise data on Pacific peoples, households and communities.

**(b) Stats NZ's statements that the proposed census transformation will cut costs and reduce compliance burden do not have a robust evidence base**

According to the Cabinet paper, the expense of the Census (estimated at \$326 million for Census 2023) is one of the main challenges facing Stats NZ. Stats NZ states that the proposed census transformation will 'provide better value for New Zealanders.' However, the paper is focused solely on cost savings for Stats NZ, not for the government as a whole.

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<sup>4</sup> Bedford, R., A. Reid, B. Milne, D. Cormack, I. Cope, L. Cook, T. Kukutai and T. Lumley (2020). "Final report of the 2018 Census External Data Quality Panel."

<sup>5</sup> Jack, M., and C. Graziadei (2019). "Report of the independent review of New Zealand's 2018 Census."

The proposed transformation will likely transfer the burden of data compliance and costs to other government agencies, most of which are not currently structured or equipped with the expertise to deal with these changes. The proposed changes would therefore likely lead to an increase, rather than a decrease, in costs associated with collection of population data.

In addition, health, education, welfare, and transport budgets are allocated using population-based funding formulas derived from census data. These budgets run into tens of billions of dollars annually. The impact of poor-quality population statistics on major public spending could be much larger than the cost of running the census.

A 2021 report commissioned by Stats NZ estimated the total benefit of the Census at approximately \$2.2 billion (or around \$4 of benefit for each dollar spent).<sup>6</sup> A similar valuation approach for the Australian census estimates a \$6 benefit per dollar spent. When all benefits are included, the value of a census might be up to 10 times its cost. Benefits of this magnitude should not allow quality and timeliness to be put at risk for short-term cost savings in our new fiscally demanding environment.

**(c) Evidence from independent reviews of the census and experience internationally are crucial to understanding the implications of the proposed transformation programme**

Several independent reviews have been conducted over recent years, including after the 2018 Census and more recently the 2023 Census. Findings from these reviews, and robust analysis of international experience with traditional and administrative data censuses, are crucial to understanding the potential implications of the proposed census transformation programme.

Research conducted by the Ministry has found that, other than a well-run census, the most successful population enumeration approaches overseas are found in Scandinavian countries. Those countries have compulsory population registers with high levels of public acceptability.<sup>7</sup>

Canada and Australia are still conducting traditional censuses but have moved to online data collection as the primary mechanism, with extensive support for those unable to complete electronic questionnaires. Like New Zealand, they can also supplement their full enumeration census with administrative data. In 2021, the response rates for the Australian and Canadian Censuses were 96.1 and 98.0 percent, respectively. Meanwhile, the New Zealand response rate for Census 2018 was 83.3% and just 65.2% for Pacific peoples.

France has moved to a rolling census. Instead of trying to enumerate the whole population in one go, a survey covers around 13% of the population each year as part of a 5-yearly cycle, and these data are pooled across years to give a census-equivalent picture of the French population. This system has been criticised for potentially missing people in certain places, and the multi-year design makes the interpretation of the statistics more complex for users.

Like Stats NZ, the Office for National Statistics in the UK is also transforming the population and migration statistics system for England and Wales in preparation for Census 2031 using administrative data. It is currently under consultation, where over sixty leading experts in population studies have voiced concerns about potential degradation in the quality of data.

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<sup>6</sup> Bakker, C (2021). Value of the New Zealand Census: August 2021. Retrieved from [www.stats.govt.nz](http://www.stats.govt.nz) 26/2/2024

<sup>7</sup> Bycroft, C (2015). Census transformation in New Zealand: Using administrative data without a population register. *Statistical Journal of the IAOS* 31(3): 401-411.

## Appendix 2 – Talking Points for the Statistics New Zealand (Stats NZ) 2028 Census paper

### Suggested talking points

- The census plays a central role in New Zealand's data landscape, including economic decision-making.
- I acknowledge that through these proposed changes, Stats NZ aims to reduce costs, improve efficiency, be responsive to data needs and deliver better value and outcomes for New Zealanders. I fully support cost containment, reduction in the compliance burden, and the provision of value to the public.
- I welcome the opportunity to discuss the proposed changes – we need to ensure the new system will match the value and coverage of the existing census and bring about necessary improvements.
- As Minister for Pacific Peoples, I have the following comments and questions regarding the proposed approach for Pacific peoples:
  - The quality of data for Pacific peoples is already lower than for most other population groups, with a long-standing, well-documented undercount of Pacific peoples in official statistics.
  - Building awareness in communities takes time and it is important that any changes made to the current system bring the quality of data for Pacific peoples up to standard.
  - My data experts advise that the proposed reforms would further degrade data quality for Pacific peoples. I would like to see a robust analysis of the likely impacts of the proposed changes on the quality of data available across government.
  - The current paper focuses on costs incurred by Stats NZ for delivering a full-enumeration census, not the costs that would subsequently be borne by other government agencies. I would like to see further analysis of the costs involved in the proposed transformation to ensure that the compliance burden is manageable and can be carried in our current fiscal climate.
  - My officials have advised there is evidence that the census, while expensive, provides a return on investment of \$4 for every \$1 spent (the total benefit of census estimated at \$2.2 billion according to a 2021 report commissioned by Stats NZ).
  - The engagement approach must also include meaningful engagement and consultation with the Ministry for Pacific Peoples, Pacific data experts and Pacific communities. I would like assurance that Stats NZ will work closely with my Ministry to achieve this.
- A well-run census should give Government the ability to monitor trends over time for Pacific peoples, make inter-census comparisons, and help us to track progress on our targets.
- I would like to see Stats NZ and the Ministry for Pacific Peoples work together to resolve the issues and gaps I have outlined and will ask my officials to stand by to support Stats NZ with this process.

## Modernising the approach to 2028 Census: Summary and suggested talking points

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### Suggested talking points

- The Census plays a central role in New Zealand's data landscape, including for economic decision-making.
- I acknowledge that through these proposed changes, Stats NZ aims to reduce costs, improve efficiency, be responsive to data needs and deliver better value and outcomes for New Zealanders. I fully support cost containment, reduction in the compliance burden, and the provision of value to the public.
- The opportunity to discuss the proposed changes today is welcome – as a Cabinet, we need to know that the new system will match the value and coverage provided by the existing census and bring about necessary improvements.
- As Minister for Pacific Peoples, I have the following queries regarding the proposed approach for Pacific peoples:
  1. The quality of data for Pacific peoples is already lower than for most other population groups. There is a long-standing, well-documented undercount of Pacific peoples in official statistics. It will be important that any changes address bringing the quality of data for Pacific peoples up to standard.
  2. My data experts advise that there is a risk that the proposed reforms would further degrade data quality for Pacific peoples. What assurances can Stats NZ give in this regard?
  3. I would like to see further analysis of the costs involved in the proposed transformation. Advice I have been given suggests that the Census, while expensive, provides a return on investment of \$4 for every \$1 spent (estimated at \$2.2 billion according to a 2021 report commissioned by Stats NZ).
  4. The engagement approach must include meaningful engagement and consultation with the Ministry for Pacific Peoples, Pacific data experts and Pacific communities. I would like assurance that there are plans to do this.
- A well-run census should give Government the ability to monitor trends over time for Pacific peoples, make inter-census comparisons, and compare the experience of different ethnic groups.
- I would like to see Stats NZ and the Ministry for Pacific Peoples work together to resolve the issues and gaps I have outlined, and will ask my officials to stand by to support Stats NZ with this process.

## Background

The census provides an official count of people and dwellings and detailed social, cultural and economic information about the population. Government agencies use census information to allocate funding.

The 2018 Census was the first to take a 'digital first' approach. Unfortunately, response rates suffered, particularly for Māori and Pacific peoples. This subsequently impacted the quality of data available for Pacific populations throughout New Zealand.

As part of the Census 2018 mitigation process, responses were supplemented by administrative data from the Integrated Data Infrastructure (IDI). These data are collected in a non-standardised way by agencies for statutory and accounting purposes and not for the purposes of enumerating the population and understanding population dynamics.

This supplementation increased coverage of the population for the 2018 Census but could not plug gaps for specific data critical for Pacific communities (e.g. occupation, household characteristics, smoking, employment hours, languages spoken). Subsequently, overall quality is poor for the social attributes and small-area population counts of Pacific peoples.

## Proposed Census Transformation Process

Stats NZ is engaging with other government agencies about plans to transform Census 2028 to an 'administrative data-first' approach. This will replace the traditional population-wide census survey with administrative data and supplemented by population-based surveys.

Administrative data are largely based on who can access services and are therefore known to undercount Pacific peoples. The proposed changes by Stats NZ would likely result in further deterioration of the quality of data on Pacific peoples' households and populations.

Current household surveys do not adequately sample Pacific peoples to ensure representativeness for specific areas or allow analysis of diverse Pacific ethnic groups. Government surveys also use census statistics to calculate whom and where to survey. It is unclear how the survey sampling frames would be defined in the absence of a census.

One of the key drivers of the proposed changes is cost savings. The delivery cost for Census 2023 was an estimated \$317 million. By not holding a regular census, Stats NZ would save money as an organisation, but there would not necessarily be cost savings across government, as compliance costs for routinely collected data and supplemental surveys would likely be transferred to other agencies. There is good evidence that the census provides value for money (approximately \$2.2 billion, or around \$4 of benefit for each dollar spent, according to a 2021 report).<sup>1</sup>

## Proposed Engagement Approach

Stats NZ is proposing a three-pronged engagement approach:

1. Targeted engagement (already underway) with key stakeholders and partners.
2. Online public consultation (via discussion document) over four weeks in April 2024.
3. A light-touch online public engagement programme.

Stats NZ has stated that its targeted engagement will include key communities (e.g. Pacific peoples) who are under-represented in administrative data sets. However, it is unclear how meaningful engagement with Pacific peoples and communities will be conducted, given that online public consultation and 'light-touch' online approaches are not appropriate ways to engage with Pacific peoples on such an important issue.

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<sup>1</sup> Bakker, C (2021). Value of the New Zealand Census: August 2021. Retrieved from [www.stats.govt.nz](http://www.stats.govt.nz) 26/2/2024

# The Government Statistician's in-principle decision on the future of census

## Background

1. On 7 November 2024, the Minister of Statistics informed the Minister for Pacific Peoples of the Government Statistician's in-principle decision about the future of the census. Option B – the delivery of a census in 2030 using administrative data supplemented with annual attribute surveys – will replace the standard whole-of-population census in 2028 (Option A).
2. The Minister for Pacific Peoples commissioned the Ministry for Pacific Peoples (the Ministry) to identify impacts of the preferred approach, including the government's ability to obtain accurate data on New Zealand's growing and changing population, including Pacific peoples.
3. As the Government's advisor on Pacific Peoples, the Ministry relies on accurate and timely population statistics to draw data and insights together from its own initiatives, connections with Pacific communities, and across government.

## Based on the information provided, the Ministry's preference is Option A

4. When Stats NZ sought feedback on the options in April this year, the Ministry outlined concerns regarding an administrative data-first approach to census. The Ministry continues to engage with Stats NZ to understand the costs of this change (especially those costs that will now be borne by other agencies), whether the timeframes are achievable, and how representative surveys will be of the population (and particularly for Pacific peoples). We will provide further information as this becomes available.
5. Option B delays the next census by two years, requires legislative amendment, separates the collection of population characteristics data from data used to count the population (i.e. enumeration), and relies on other government agencies to collect census data.
6. Stats NZ has not shared analysis underpinning the selection of Option B or the positions of organisations and experts consulted (including the Independent Evaluation Panel). Without visibility of the analysis, the Ministry continues to support Option A.

## A move away from a whole-of-population census risks reducing our understanding of New Zealand's population

7. The census and government household surveys, which use census data to select participants, are an authoritative source of information about the population (including Pacific peoples) and their circumstances. A well-run census enables Government to count the population (including Pacific ethnic groups), monitor trends over time, administer social investments, and help track progress on targets.

8. Current census data collection is standardised, monitored, and designed to support an understanding of population dynamics. Government agencies collect data in standard and non-standard ways for statutory and accounting purposes. Administrative data is not gathered to understand population dynamics and is not currently fit for that purpose.
9. We anticipate that the loss of whole-of-population census data (the highest quality source of ethnicity data) will significantly reduce the ability of government to understand Pacific populations in New Zealand.

**Questions for Stats NZ:**

What analyses have been conducted to show that Option B will maintain or improve:

- Our current understanding of population demographics, including ethnicity?
- Government's ability to monitor trends, administer social investments and track progress on targets?

**Administrative data is not collected for census purposes and is not currently set up to understand the characteristics of New Zealand's population**

10. Option B will require that government agencies other than Stats NZ collect data for census purposes. There is currently no equivalent census standard for administrative data that would enable the consistent collection and reporting of population statistics.
11. Administrative data is dependent on people's ability to make contact with specific agencies and access their services. Access to services is seldom universal, and therefore some groups may be overrepresented in data sources, and other groups underrepresented or rendered invisible.
12. Understanding household composition and family type is crucial to understand the changing dynamics of New Zealand's population and how to appropriately orient services. Pacific peoples have distinct family characteristics and public service needs relative to the total population that are not registered in administrative data.
13. Some variables that are essential to understanding New Zealand's population are either incomplete or not available in administrative data. These variables include ethnicity (particularly for those with multiple ethnicities), disability status, gender, sexuality, area-based deprivation, languages spoken, family structure and housing characteristics. These data gaps will not be overcome by supplementation with household survey data.

**Questions for Stats NZ**

- What levers will Stats NZ use to implement classifications and standards with other agencies to ensure administrative data is consistent and of high-quality?
- In the absence of a population register to organise administrative data, how will Stats NZ ensure Pacific people's data from a range of agencies can be linked together correctly?



### **The proposed change to census risks reducing public trust in Government**

14. Option B is likely to result in an expansion of the scope and amount of data collected by government agencies. Administrative data related to Pacific peoples tend to be deficit-focused and based on interactions with the Crown under trying circumstances.
15. The Ministry is also concerned that these changes may result in people being required to provide more information than is necessary to access public services.

#### **Questions for Stats NZ**

- In past Cabinet papers Stats NZ has highlighted falling trust in government as an issue: what is Stats NZ's current thinking on these matters including consent implications?
- How will Stats NZ ensure high response rates for the attribute survey, given documented community engagement difficulties and falling response rates for the census?

### **Analysis of demand on agencies and financial implications of the proposed change have not been shared**

16. The proposed change could result in substantial compliance costs for government agencies, which are not currently structured or equipped as census collectors. As agencies must assume accountabilities for census data collection (under the Data and Statistics Act 2022), significant investment to ensure cross-agency data standards compliance will be required. Agency collection of detailed ethnicity, disability and iwi affiliation data will likely lead to significant cost increases.
17. Evidence for promised cost savings (relative to conventional census costs and value) has not been shared. Savings may be short-term and limited to Stats NZ. The trade-off between maintenance of current capacity and cost savings is unclear. Timeframes for Option B, for example, indicate that information most needed to inform the new Social Investment approach may be relinquished in favour of realising long-term savings for Stats NZ.

#### **Questions for Stats NZ**

- Will Stats NZ's planned agency engagements (and implied legislative amendment) specify other agencies' data collection, pace and scale of change, implied costs, risks and planned mitigation requirements?
- How will Stats NZ fund ongoing data compliance and enforcement of data quality standards to ensure the government has access to high quality population statistics?

### **The Ministry continues to engage with Stats NZ to lift the quality of data for Pacific peoples across government**

18. In September the Ministry signed a Memorandum of Understanding with Stats NZ. The two agencies agreed to raise awareness of data quality challenges related to the census and to support cross-agency collection, analysis and reporting of data about Pacific peoples. A key element is the establishment of an All-of-Government Pacific Data Advisory Group, which the two agencies are jointly progressing.

