

13 April 2026

Justice Committee  
Parliament Buildings  
Wellington

## **Koi Tū Centre for Informed Futures submission to the Justice Committee for the Data and Statistics (Census) Amendment Bill**

Koi Tū welcomes the opportunity to submit on the Data and Statistics (Census) Amendment Bill.

Given the importance of the matters at hand, we request the opportunity to make an in-person submission.

1. Koi Tū Centre for Informed Futures is New Zealand's independent, non-partisan institute focused on bridging the gap between complexity, evidence and decision making, with a particular focus on long-term issues that extend beyond political cycles.
2. Our work directly engages with matters affected by the Amendment Bill, including evidence-based decision-making, population dynamics and trust in institutions.<sup>1</sup> We have published in all of these areas, and our work is well regarded nationally and internationally.
3. Ultimately, social cohesion and societal resilience depend on trust in the institutions of government. Underlying both is confidence in the reliability and quality of data which governments use to make choices. The shift seen overseas towards autocracy in previously well-regarded liberal democracies is directly related to the intentional downgrading of data collection and quality, often in the name of efficiency but with deeper motives.
4. At the same time, developments in big data and AI create new opportunities for the government to use data in more sophisticated ways. New Zealand was once seen to be a leader in this area. But these opportunities must be balanced against the risk of drift towards a surveillance society. Social license is critical to the relationship between

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<sup>1</sup> Gluckman, P. (2025). *Wicked problems, policy and politics: Towards more consensual policy-making*. Koi Tū Centre for Informed Futures. <https://informedfutures.org/wp-content/uploads/2025/11/Wicked-problems-policy-and-politics-FINAL-.pdf>; Lala, G., Spoonley, P., & Gluckman, P. (2026). *People, place and prosperity: The case for a population strategy for New Zealand* [Preprint]. Koi Tū Centre for Informed Futures; Gluckman, P. (2024). *Political transparency underpins public trust*. Koi Tū Centre for Informed Futures. <https://informedfutures.org/political-transparency-underpins-public-trust/>

government and citizens in matters of data use, and in our view this issue has not received sufficient attention.

5. As AI becomes more embedded in government processes, the issues extend well beyond privacy. New ethical and governance issues will arise. Stronger structural protections are needed. It is not satisfactory for the Chief Statistician and data-holding agencies to be seen as effectively marking their own homework without independent oversight. This risks damaging public trust in both institutions and democratic decision-making.
6. Many decisions made by central and local government, business, and academia (including our organisation), rely on robust population-level data drawn from the census, nationally representative surveys and linked administrative data sets such as the Integrated Data Infrastructure (IDI). In our view, the amendments are more likely to weaken than strengthen data quality and coverage and therefore risk under-enumerating important parts of New Zealand society at the very time good evidence is most needed.
7. Data, and trust in data, are essential for a strong democracy. High-quality data requires upfront investment, and it is a false economy to undermine them. The higher the data quality, the better-informed decisions can be made, delivering better services and reducing the risk of costly mistakes. Trust in both the data and the institutions that collect and use them depends on transparency and accountability.<sup>2</sup>
8. The census underpins a wide range of decisions by policymakers, businesses and community groups. These include the allocation of public funds, policy development, service delivery for vulnerable populations, and the drawing of electoral boundaries.<sup>3</sup> It is therefore essential that New Zealand has the best possible census data, and that the public has confidence in it.
9. We are conscious of the problems faced by the last two census. To a significant degree, these reflected premature moves toward untrusted digital systems as a cost-saving measure. That experience has already increased cynicism about data-driven approaches and weakened confidence in what was once a public institution held largely above reproach. The Select Committee should carefully consider whether this Bill, in its current form, would further undermine confidence in public statistics and, by extension, democratic institutions.

On this basis, we raise the following points which we would be pleased to expand on in an oral submission.

### **Administrative data does not match the quality of survey-driven census data**

10. New Zealand has traditionally conducted the census as a full field enumeration survey (with certain gaps needing to be filled using administrative data – an issue that has

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<sup>2</sup> Gluckman, P. D., Spoonley, P., Bardsley, A., Poulton, R., Royal, T. A. C., Sridhar, H., & Clyne, D. (2023). *Addressing the challenges to social cohesion*. Kōi Tū Centre for Informed Futures. <http://informedfutures.org/wp-content/uploads/pdf/Addressing-the-challenges-to-social-cohesion.pdf>

<sup>3</sup> Clyne, D. (2023). *Why the census is important to our work*. Kōi Tū Centre for Informed Futures. <https://informedfutures.org/why-the-census-is-important-to-our-work/>

become greater in the last two cycles).<sup>4</sup> Administrative data is useful for research, auditing and understanding service utilisation. However, it is not an adequate substitute for a full census. Even when supplemented by survey data, an administrative-data-first model is inherently less reliable and less comprehensive than a full field enumeration. Limitations include:

- a. Incomplete coverage: Unlike the census, which collects information directly from respondents, administrative data depends on people interacting with government agencies and on that information being accurately recorded. Many people will be captured, but not everyone. Those least likely to be well represented are often those with limited engagement with government or those who hold lower trust in state systems.<sup>5</sup> An administrative-data-first approach therefore risks missing precisely those groups whose needs policymakers most need to understand.
- b. Data and coverage gaps: Stats NZ has already noted that some variables currently collected through surveys cannot be measured well through administrative data alone, including religious affiliation, hours worked and language. Iwi affiliation is also variably collected. Important events that occur outside of New Zealand, such as births, marriages, divorces, qualifications and income earned overseas, may also be poorly captured.<sup>6</sup> These gaps may be especially pronounced for migrant communities. Weak entry and exit data also limits our understanding in several important policy areas.
- c. Limitations of digital self-completion and online collection: Digital self-completion and online collections also have practical quality limitations. It is not always clear who completed a return. Additionally, some respondents may not fully understand what is being asked. Maintaining quality assurance also requires significant resourcing.
- d. Individual-centric data: Traditionally, the census has treated the dwelling as the primary statistical unit, while administrative data is structured around individuals. A dwelling-based approach provides important information about households, family relationships and community structure. At a time of rapidly changing family structures, the census remains one of the best tools for identifying patterns and responding to needs. While administrative data can be used to derive estimates of household living situations, its reliance on individual data and up-to-date addresses means that connections must often be inferred by analysts rather than directly captured by data.

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<sup>4</sup> Stats NZ. (n.d.). *International examples of census survey models & trends*. <https://www.stats.govt.nz/assets/Consultations/Modernising-our-approach-to-the-2028-Census/Supplementary-materials/International-examples-on-census-models.pdf>

<sup>5</sup> Statistics New Zealand. (2014). *Valuing the census*. <https://www.stats.govt.nz/assets/Research/Valuing-the-Census/valuing-the-census.pdf>; See page 35 quote from Ministry of Social Development.

<sup>6</sup> Bycroft, C, Miller, S, Gath, M, Matheson-Dunning, N, Simpson, K, & Das, S (2021). *The quality of administrative data for census variables: Strengths, limitations, and opportunities*. Stats NZ. <https://www.census.govt.nz/assets/Uploads/Research/The-quality-of-administrative-data-for-census-variables-Strengths-limitations-and-opportunities/Download-data/The-quality-of-administrative-data-for-census-variables.pdf>

## **The lack of social license for a de facto population register will affect institutional trust**

11. Many countries that use an administrative-data-first model for their census have a formal population register. Examples include Denmark, Sweden and Finland. In many instances, countries deploy universally used and accepted unique identifiers that link various forms of administrative data (and identity cards).
12. New Zealand already operates, in practice, a de facto population register through the IDI. Anyone who has interacted with a government agency may, in effect, have their data linked through a unique identifier across datasets held by multiple departments.<sup>7</sup>
13. Public understanding of the IDI, its uses and its privacy protections remain limited. Only 22% of people report having a good understanding of what happens to their data once Stats NZ collects it, while a further 50% report limited or no understanding.<sup>8</sup> The proposed legislation does not adequately confront this reality or address in a transparent manner what is, in effect, an increasingly important national data-linkage system.
14. This is a missed opportunity. As governments become more data-driven, the public will need a clearer understanding of how identification works, how privacy is protected, and what safeguards are in place. Most New Zealanders are now familiar with their NHI number. A broader public conversation about identity linkage and data use is now needed.
15. Moving to a more formal and public-facing use of a population-register model before sufficient public understanding will undermine trust in New Zealand's data institutions and may reduce participation. Indeed, 33% of people said they would be more willing to take part in Stats NZ surveys if they knew more about how their data was used. If New Zealand is to move in this direction, that shift must be transparent, publicly understood, and properly governed.

## **New Zealand requires further oversight of the use of administrative data**

16. Further and genuinely independent oversight of administrative data use is needed to maintain public confidence. The issues extend well beyond privacy alone. Ethical questions will continue to evolve as data use and AI expand.
17. For these reasons, the establishment of an independent Government Data-Use Oversight Board should be reconsidered, regardless of whether New Zealand retains a traditional survey census (supported by administrative data) or moves to an administrative-data-first approach. Such a body could provide transparent, accountable, and ethically grounded assurance that government data are being used appropriately. This will become increasingly important as AI plays a larger role in public decision-making.

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<sup>7</sup> ImpactLab. (2025, March 26). *The IDI turns 10: Why the world's watching New Zealand*.

<https://www.impactlab.co.nz/resources/the-idi-turns-10-why-the-worlds-watching-new-zealand>

<sup>8</sup> Statistics New Zealand. (2022, November). *Stats NZ's social licence for data stewardship*.

<https://www.stats.govt.nz/corporate/stats-nzs-social-licence-for-data-stewardship-november-2022/>

## Recommendations

18. We recommend the following:

- a. Retain the traditional census, supported by administrative data: The New Zealand census is not without problems, and we support improvements that address cost, trust and completion rates. However, New Zealand does not yet have a better alternative that preserves the quality, coverage, and legitimacy of a full census. It is premature to make such a change when so much depends on the quality of the resulting data.
- b. Be open to the emergence of a de facto population register: The IDI is a valuable tool for research and policymaking. However, any move toward using it as the core foundation of official population statistics must be accompanied by much greater transparency, clearer public communication, and explicit discussion of how identifiers are used and governed.
- c. Require transparency about how AI and advanced analytics are used in relation to census and administrative data: AI governance should not be treated as a niche or technical issue. The public should know when such tools are used, for what purposes, under what safeguards, and with what accountability.
- d. Strengthen oversight of administrative data use: Given the scale and importance of administrative data in New Zealand, we propose an independent oversight body made up of trusted New Zealanders with a broad remit to ensure that the use of government data is ethical, appropriate, transparent and consistent across agencies. As the collection and use of data continue to expand, such a structure will be increasingly necessary to protect both democratic decision-making and public trust.

We would be happy to expand orally on any of the issues raised.



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