

Stats NZ Tatauranga Aotearoa
8 Willis Street
Wellington

19 December 2025

RE: Proposed data collection approach and content for the census

Who we are

Community Housing Aotearoa (CHA) is an Incorporated Society and a peak body for the community housing sector. To achieve our Vision of ‘all New Zealanders well-housed’, we have a strategic focus on supporting a responsive housing system underpinned by Te Tiriti o Waitangi and the Right to a Decent Home. We are also mindful of the broader institutional and regulatory context within which our members and other community organisations operate.

Our member organisations provide homes for over 30,000 people nationally across 26,000 homes and our partner members include developers, consultants and local councils. Our member community housing organisations are primarily registered Charities or not for dividend entities that develop, own and/or manage social and affordable housing stock, with a variety of tenure offerings. We have 63 registered Community Housing Provider members.

CHA is a proud Tangata Tiriti organisation and works closely with national Māori housing advocate Te Matapihi, that represents iwi-based and Māori community housing organisations.

In the course of the preparation of this submission we have engaged with and support the submissions of Te Matapihi, Otago University, The Coalition to End Women’s Homelessness, Housing First Auckland, Spectrum Group and Community Research.

Section One: The new admin-data-first census model

- administrative (admin) data
- a new annual sample survey
- tailored solutions developed with partners and communities

Question	Feedback
<p><i>Do you have feedback on the benefits, opportunities, and challenges of the new census approach?</i></p>	<p>Community Housing Aotearoa does not support the admin-data-first census model and is disappointed in the processes that led to this approach. CHA notes the introduction of this changed approach without consultation, the disregard of the expert advisory advice and that this appears to be driven by fiscal concerns instead of improved quality data collection without a proper cost/benefit analysis. We call for an independent review of the approach to ensure that vital data critical to good governance is available to inform decision-making.</p> <p>CHA is particularly concerned on the reliance on administrative data from agencies such as the Ministry of Housing and Urban Development (MHUD) and Ministry of Social Development (MSD) to represent those experiencing homelessness or severe housing deprivation. The best data available is from the census reports on severe housing deprivation which cannot be replaced by administrative data sources.</p> <p>The following are CHA's key concerns regarding the proposed approach:</p> <p>1. Risk of Statistical marginalisation</p> <p>In regard to the proposed move to a 'smaller annual survey and targeted data collection,' Community Housing Aotearoa feels that the proposed sample size of 60,000 households is too small to reliably capture key population groups or detect changes over time. This risks statistical marginalisation of many population groups.</p> <p>This is especially true for the priority communities identified by Stats NZ. These groups are already known to be marginalised and the proposed changes will further disadvantage them.</p> <p>In housing, it is well-documented that the priority communities experience poorer housing outcomes, living in unaffordable, poor-quality homes which don't meet their needs. This is documented in numerous reports including <i>Housing in Aotearoa New Zealand: 2025</i> produced by Stats NZ. That report summarises on-going concerns that:</p>

	<p><i>Housing pressures affect the most vulnerable among us. Inequalities in New Zealand’s housing emerge, with one-parent families, the unemployed, and disabled people often experiencing poorer housing conditions.</i></p> <p><i>Ethnic inequalities are also apparent. Māori and Pacific peoples, in particular, experience poorer housing outcomes, and higher rates of crowding and homelessness.</i></p> <p>The Waitangi Tribunal WAI 2750 stage one report found that the Crown breached the treaty by its failure to adequately consult with Māori over its definition of homelessness in 2009. It further identified that ‘The Crown’s ongoing failures to adequately collect data on homelessness have constituted a breach of the principle of good government.’ Stats NZ and the traditional census responded by engaging with the homeless community at a range of levels for the 2023 census. Moving away from this approach and relying on incomplete admin datasets as the primary source of information risks producing misleading statistics that will obscure the true scale of homelessness in Aotearoa.</p> <p>It is important to have a good understanding of our society including various subgroups and their changes over time to inform good decision making; CHA has reservations this will not be possible with such a small sample size. The admin-data-first approach cannot adequately capture those experiencing homelessness – in particular hidden homeless who are not connected to services. The Coalition for Women’s Ending Homelessness speak to the concerns for gender data based on their recent research using census data. Community Research provides strong evidence of the impact on ethnic communities and Spectrum Group highlights the impact on disabled persons. CHA recommends that the resources set aside for the ‘tailored solutions’ should be put instead into boosting the annual sample size to at least 100,000 persons.</p> <p>2. Considerations for ‘Tailored Solutions’</p> <p>The ‘tailored solutions’ proposed to capture those not visible from administrative data goes against the spirit of co-design. Tailored solutions are proposed as a mitigation strategy, rather than a collaborative effort. From our experience collecting data on homelessness, there are no solutions which will be less expensive and provide as robust data as the census.</p>
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	<p>We also have concerns about how the process of working with the priority communities will be managed to ensure the voices of lived experience are safely engaged and represented. The announcement of the Crown-Māori Statistical Design Forum provides hope that these solutions will be truly co-designed. However, it is unclear about the resources available and the decision-making ability of the Forum to truly influence the statistical products and services required to meet the needs of the communities they are intended to serve.</p> <p>3. Data quality and the line between surveillance and service</p> <p>We are concerned about the quality and accuracy of data collection through administrative sources. Without extensive training and on-going monitoring, the likelihood of poor inputs resulting in incomplete and incorrect data being reported is a concern. Our members report on-going concerns with data collected and provided to them from government agencies for housing placements. They also report the information households are willing to provide to government agencies is often different from what they share with providers.</p> <p>In addition, the admin-data approach risks blurring the line between data collection and service delivery. This convergence may deter many groups from engaging with services. This is already evident with those experiencing homelessness who are often hesitant to seek assistance. The admin-data approach risks undermining trust in confidentiality and privacy across the systems of service delivery. To maintain transparency and protect rights, explicit consent must be a core part in all admin data collection processes.</p> <p>4. Risk of losing Household Composition</p> <p>Grouping individuals into families and families into households using administrative data has been problematic in the past. Moving forward, details such as identifying owner occupier and rental households are also likely to be challenging as the broad administrative data sets (such as the tenancy bond database) only capture part of the population and would diminish our ability to understand the impacts on priority communities of housing system trends over time.</p> <p>This is a core loss of information which will negatively impact the ability of government and community housing organisations to plan for and deliver homes addressing the needs of our diverse population.</p>
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	<p>5. Cost to local/community entities</p> <p>Although moving away from the traditional census to a reliance on administrative data may reduce the cost to Stats NZ, this is likely to result in a transfer of costs onto local councils and community entities. Local councils and groups like the community housing sector will need to seek other ways to collate the data they need to understand their local and specific communities of interest data/ trends/needs.</p> <p>While the cost of the traditional census is significant, the benefit it provides outweighs the cost and provides a base for investment, research, and informed decision-making. For local councils, census data is a primary contributor to meet their many data needs including for housing capacity assessment modelling requirements for central government.</p>
<p><i>We're prioritising working with partners and communities that are likely to be impacted by changing to the new model (including iwi Māori, Pacific peoples, LGBTIQ+, disabled, ethnic communities and transient/homeless populations).</i></p> <p><i>Do you have any suggestions about how Stats NZ could work with communities to design and deliver tailored solutions?</i></p>	<p>The development of tailored solutions appears to be a 'next best alternative' approach to gathering reliable, detailed data previously available through the traditional enumeration approach. We don't think it will be able to adequately fill the gap left, resulting in a significant loss of information about many communities and populations.</p> <p>Community Housing Aotearoa agrees that it is essential for all groups within Aotearoa New Zealand's population to be counted and fairly represented in national data. However, we have identified an important gap in the current proposal. The admin-data-first census model is likely to favour numerically dominant population centres, such as major cities, leaving regional and rural communities underrepresented.</p> <p>This approach will disproportionately affect Māori, of whom about 25% live in rural areas. It is important that data on all populations across the motu is collected consistently, comprehensively and continuously. From what we understand of the new model, we are at risk of losing useful population data for the identified priority populations discussed in the next section and smaller towns.</p> <p>Pacific and other ethnic communities will also be impacted along with LGBTQIA+ and people experiencing homelessness. Compounding this is the inability to see the intersection amongst these groups due to the annual survey size and the population size required to be able to disaggregate the data to see intersecting subgroups.</p>

<p><i>What approaches, values, or practices could guide how we work with communities to meet their unique information needs?</i></p> <p><i>Is there anything else you think we should consider?</i></p>	<p>To address this gap, CHA recommends that Stats NZ increase the sample size of the annual survey to at least 100,000 to ensure these communities are captured. Doing so will help ensure that robust data reflecting the full diversity of Aotearoa's population and its many centres is available to inform all decisions across many sectors, including housing.</p>
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Section 2: Collecting census information and potential impacts for priority communities

The questions included in this section focus on information about:

- Māori descent
- iwi affiliation
- LGBTIQ+ communities
- ethnicity
- homelessness and housing deprivation
- the disabled population

Question	Feedback
<p><i>Do you have any feedback about how we plan to collect information on Māori descent for the next census?</i></p> <p><i>Do you have suggestions about how Māori descent information could be improved for the next census?</i></p>	<p>We support the points made in the submission by Te Matapihi He Tirohanga Mō Te Iwi Trust which does not support the proposed admin-data-first census model in its current form. We note the concerns and issues they raise about the approach including:</p> <ul style="list-style-type: none"> • Need for an approach which centers Māori, whānau, and data sovereignty. • The risk of reinforcing structural bias by using administrative data. • Emphasising the invisibility of Māori most in need (homelessness, papakāinga, small kaupapa Māori organisations) in administrative data. • Reinforcing that Te Matapihi represents Māori across all of Aotearoa, not just where government systems currently focus.

	<ul style="list-style-type: none"> Asserting that how Māori data is collected, governed, and presented directly shapes future policy, funding and decision-making.
<p><i>Do you have any feedback about how we plan to collect information on iwi affiliation for the next census?</i></p> <p><i>Do you have any suggestions for how we could better represent smaller iwi for the next census?</i></p>	<p>We support the submission of Te Matapihi and also note the important findings of the Waitangi Tribunal's WAI 2750 stage one report.</p> <p>CHA also supports the position of Te Kahui Raraunga working group who represent the Iwi Chairs Forum on the census. b8e45c_5dc3b5ffcd044621b9e90b185b572a92.pdf</p> <p><i>On 3 December, Te Kāhui Raraunga released a communiqué after Hui Raraunga 2025, a wānanga of Māori data experts, iwi leaders, data technicians, academics and Māori data-led organisations discussing changes to the next census and wider Māori data aspirations. The statement affirms that Māori data are taonga and calls for Māori to lead the design, governance, and use of data about Māori, asserting that tino rangatiratanga must apply in digital spaces and that the future of data systems must be built by us, not for us.</i></p>
<p><i>Do you have any feedback about how we plan to collect information on sexual identity, variations of sex characteristics, gender, cisgender and transgender status, and the rainbow/LGBTIQ+ population for the next census?</i></p>	<p>Community Housing Aotearoa knows that housing policy and practices must be guided by robust, comprehensive data, including gender disaggregated data. The introduction of a self-identified gender question in the 2023 Census marked an important step toward ensuring gender-disaggregated data is available. This approach is critical for highlighting the unique experiences of rainbow communities, including transgender women.</p> <p>As noted in the consultation document, the new annual sample survey will not be able to provide the level of detail for this community to be visible or to identify intersections with other data. It can be a decade before this is some ability to look at communities of between 5,000-9,000 people – far too understand issues of importance.</p> <p>Community Housing Aotearoa has concerns about collecting LGBTQIA+ data solely through administrative data. This is because currently there is limited quantity and quality of administrative data of this indicator. For example, there is next to no sexuality data captured, intersex data isn't captured, and</p>

<p><i>Do you have suggestions about how LGBTIQIA+ information could be improved to better reflect your community or lived experience?</i></p>	<p>overall data is recorded inconsistently across different admin databases.</p> <p>There is a need, too, for the tailored solutions for different data points (e.g., LGBTIQIA+ data and homelessness data) to overlap. This is because it is important that we capture intersectionality and have all relevant variables to be made available for decision-making, public awareness and academic research.</p> <p>Community Housing Aotearoa supports the detailed submission from The Coalition to End Women's Homelessness and Otago University on this topic.</p>
<p><i>Do you have any feedback about how we plan to collect information on ethnicity for the next census?</i></p> <p><i>Do you have suggestions about how ethnicity information could be improved to better reflect your community or lived experience?</i></p>	<p>CHA has similar concerns on ethnicity data to those expressed in the prior questions regarding the collection of information. We have supported the growth of Pacific-led housing delivery for several years and directly know the importance of having detailed data available for small population groups.</p> <p>Prior work by Stats NZ in the <i>Pacific housing: People, place and wellbeing in Aotearoa New Zealand</i> provided great insights which we believe will not be replicable from the new annual survey approach. Given the even smaller numbers in other ethnic communities the ability to tailor responses to their needs will be lost.</p> <p>We share the concerns and recommendations in the submission from Community Research regarding ethnic communities. They provide detailed and compelling analysis of the impacts of the admin-data approach will have on the ability to have clear data on ethnic communities.</p>
<p><i>Do you have any feedback about how we could measure housing deprivation and homelessness for the next census?</i></p> <p><i>Do you have any suggestions for how we</i></p>	<p>Community Housing Aotearoa is concerned about the proposed approach of using administrative data from agencies such as the Ministry of Housing and Urban Development to measure homelessness. We can acknowledge how admin data can be helpful in addition to a traditional enumeration census, but it cannot replace it.</p> <p>CHA uses census homelessness data to inform our work, and without this data the community housing sector will have to</p>

<p><i>could better reach or represent people experiencing housing deprivation/homelessness?</i></p>	<p>find it ourselves. For example, we are part of the National Homelessness Data Project which does six-monthly surveys to inform our understanding of trends in homelessness. This involves contact with frontline providers to collect and report on outreach, engagement and support activities. However, the sector are not data experts, and it is very labour intensive, making the way the traditional census collects homelessness data key for our sector.</p> <p>While we acknowledge the intent to improve efficiency, we believe this method raises significant challenges that need careful consideration to maintain trust and accuracy.</p> <ul style="list-style-type: none"> • Many people experiencing homelessness do not engage with HUD, MSD or similar agencies. Relying solely on administrative data risks undercounting and misrepresenting this population. • Furthermore, linking statistical data collection to services may create concerns that information could influence eligibility for housing or benefits. This perception could discourage people from seeking support. <p>Consent and Ethical Standards: People experiencing homelessness have not provided explicit consent for their service data to be used for census purposes. Ensuring transparency and consent is essential to uphold ethical principles. Using personal data without consent could unintentionally reinforce stigma and deter people from accessing help.</p> <p>To ensure accurate and appropriate data collection, CHA and homeless serving organisations engaged extensively with Stats NZ to prepare for and implement targeted outreach for the 2023 Census to better reach those experiencing homelessness. The new approach cannot provide a better, cost-effective way to achieve the same results.</p> <p>Looking ahead, CHA recommends a collaborative approach grounded in community engagement and local knowledge. Community-led methods, developed alongside Māori and advocacy groups, should prioritise cultural appropriateness and mana-enhancing practices. Data collection with individuals experiencing housing deprivation/homelessness should be voluntary and transparent, with clear consent processes. This includes working closely with providers and</p>
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	<p>agencies in the homelessness sector and involve individuals with lived experience in the processes.</p> <p>In addition, supplementing survey data with point-in-time street counts and partnering with service providers can help reach more of those who fall outside formal systems. However, these approaches are not as reliable as the census. Street counts are labour and time intensive, often relying on volunteers and producing data of variable quality. The prospect of organising such counts across the country on a consistent basis is daunting and likely to result in significant gaps. It also shifts responsibilities from central government to local authorities and communities.</p>
<p><i>Do you have any feedback about how we plan to collect information about the disabled population in the next census?</i></p> <p><i>Do you have any suggestions for how information about the disabled population could be improved to better reflect your community or lived experience?</i></p>	<p>We are concerned about the proposed plan as it will not provide sufficient detail to understand the disabled population. The discussion document acknowledges that existing admin data isn't of suitable quality or consistency to meet information needs. As expressed earlier, the new annual census survey lacks sufficient size to prevent the marginalisation of disabled people. We urge Stats NZ to engage with Disabled Persons Organisations as stated in the submission from Spectrum Group and the rest of their recommendations.</p> <p>To safeguard quality and equity, we support retaining the Washington Group Short Set of Questions on Functioning (WGSS) annually, embedding a periodic Household Disability Survey-style module, codesigning methods with disabled communities and publishing transparent data-quality audits.</p> <p>These steps will uphold New Zealand's obligations under UNCRPD Article 31 and ensure disability data remain fit for purpose in policy and service design.</p> <p>The recently released New Zealand Disability Strategy 2026-2030 provides specific, measurable goals and actions for across education, employment, health, housing and justice. Focusing specifically on the housing goals and actions, we don't believe the proposed admin data approach will enable measurement of progress toward the goals.</p> <p>Many indicators including unmet modification needs, housing suitability, instability and affordability stress are only captured through direct engagement with disabled people. This</p>

	<p>highlights a risk that an admin-based census could risk undercounting disabled people, particularly for tāngata whaikaha Māori, disabled young people, and those in unstable or non-standard housing arrangements.</p> <p>We urge Stats NZ to follow the Future Census Independent Evaluation Panel’s recommendation to increase the frequency of the Household Disability Survey. We believe running these every 5 years will provide the detailed information required to meet our data needs.</p> <p>It is also important to ensure the accessibility of the annual survey itself (formatting, language used and support options available). The survey should ensure the inclusion of capturing learning disabilities in data.</p>
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Section 3: Proposed changes to census content

- the topics collected information on using admin data and the new annual sample survey
- updates to existing variables
- new variables.

The nine variables in this section are:

- quality of life indicators
- income amount by income source
- floor area
- age of dwelling
- information about dwelling coldness
- cigarette smoking behaviour
- access to telecommunication systems
- main means of travel to work and workplace address
- number of rooms.

Question	Feedback
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<p><i>Do you need information about life satisfaction to be collected through the census? (yes or no)</i></p> <p><i>What would you use this data for?</i></p> <p><i>Do you have any feedback about this data being collected?</i></p>	<p>CHA will use this data to inform our work. Data on the life satisfaction of the communities that intersect with our kaupapa is important for us to advocate for housing solutions that enhance quality of life across diverse communities. Having this data broken down by regions, population groups, genders, incomes and household composition will help CHA and our members to direct our housing delivery and advocacy efforts. This data also allows for comparisons with other renters and homeowners, providing important insights about how our housing system is operating.</p> <p>CHA strongly supports the addition of this question in the census. This is because it is important to know the broader life satisfaction of Aotearoa's individuals and communities, for any sector whose decisions have an impact on life satisfaction outcomes. For the housing sector, CHA feels this is important because in combination with other data sets, this information contextualises disparities across different communities, and where housing may play a part in improving life satisfaction.</p> <p>CHA supports the Coalition to End Women's Homelessness submission that outlines that for Māori, quality-of-life measures should also reflect cultural connection to place and community, including whether people are living as ahi kā (connected to and living on ancestral whenua) or as taura here / māta waka (living outside their ancestral rohe). These distinctions shape wellbeing and access to support but are not visible in administrative data. Tools such as Te Kupenga demonstrate that culturally grounded measures of connection and belonging can be collected in ways that uphold mana and improve data quality.</p>
<p><i>Do you need information about sense of purpose? yes</i></p> <p><i>What would you use this data for that can't be met with life satisfaction information?</i></p>	<p>While life satisfaction reflects overall wellbeing, a question on sense of purpose would directly capture whether individuals feel their lives have meaning and direction. For the housing sector, this data is relevant and would be helpful because housing stability and security often influence a person's ability to pursue goals and maintain a sense of purpose/community etc. Understanding this relationship helps CHA and its members identify what's working and what can be done to better improve life satisfaction across the motu.</p>

<p><i>Do you need information about self-rated general health?</i> Yes</p> <p><i>What would you use self-rated general health data for that can't be met with life satisfaction information?</i></p>	<p>Health as a key determinant of overall life satisfaction is also a unique topic. CHA feels that both questions would provide distinctive and unique data insights. For our sector it is important to capture self-rated health data because physical and mental health outcomes are linked to one's housing situation. Including self-rated health data allows CHA and its members to best understand the relationship between health and housing and what our sector can do to best support health outcomes. This could not be done as well with just a life satisfaction question alone; the two questions provide a more comprehensive understanding.</p>
<p><i>If it is not possible to have all these quality-of-life measures, which would be most useful and why?</i></p>	<p>CHA encourages the implementation of all the quality-of-life measures as they all provide unique insights. However, if only one was to be implemented, we feel life satisfaction would be the most useful. This is because, if framed appropriately, it may be able to capture a holistic sense of wellbeing, including health and sense of purpose.</p>
<p><i>Do you need information about income amount by income source?</i> Yes</p> <p><i>What would you use this data for?</i></p> <p><i>Do you have any feedback about this data being collected?</i></p>	<p>We strongly support collecting the amount of income by source.</p> <p>We routinely utilise income amount by source to understand the effectiveness of housing policies and subsidies. For example, this information provides key insights such as understanding the rent burden for households including and excluding the Accommodation Supplement they receive. It also helps to understand the economic circumstances of Super Annuation recipients who have income from work compared to those with investment income due to differences in wealth. This is key to understanding demand for smaller, more affordable rental and ownership homes and the ability for retirees to afford those homes.</p>
<p><i>Do you need information about the floor area of a dwelling?</i> Yes</p> <p><i>What would you use this data for?</i></p>	<p>We strongly support collecting the floor area of dwellings.</p> <p>This data is important for our sector to understand trends in house size as measured by floor area. Overall sizes have increased over time even as household sizes have decreased. As larger homes cost more to build and operate, there are direct implications for affordability along with broader environmental and economic</p>

<p><i>Do you have any feedback about this data being collected?</i></p>	<p>concerns. This is data we routinely analyze and reference to support the work of our members and inform policy and practice.</p> <p>The floor area/layout of a dwelling is also helpful data to collect to help Aotearoa's housing sector reflect on its housing design journey and whether dwelling layouts reflect unique cultural considerations needed in our housing stock.</p>
<p><i>Do you need information about the age of a dwelling? Yes</i></p> <p><i>What would you use this data for?</i></p> <p><i>Do you have any feedback about this data being collected?</i></p>	<p>We strongly support collecting the age of dwellings.</p> <p>CHA and our members routinely use this data to better understand the makeup of Aotearoa's housing stock. In our consulting work, it is a key data point included in Housing Need Assessment reports for local authorities. The age of dwellings provides insights regarding housing amenities, quality and materials likely to be included in the dwelling. It also provides a clear picture of the overall housing stock by age, showing the impact of different policies to encourage new supply across local authority areas.</p>
<p><i>Do you need information about dwellings being colder than people would like in winter? Yes</i></p> <p><i>What would you use this data for?</i></p> <p><i>Do you have any feedback about this data being collected?</i></p>	<p>We strongly support collecting data on whether dwellings are colder than people would like in winter.</p> <p>CHA's vision is 'all New Zealanders well-housed.' Measuring whether the home meets warmth expectations is an important indicator of housing adequacy. This information is crucial to have for the housing sector in understanding Aotearoa's housing stock and therefore to enable where CHA's members can tailor the composition of their services to work towards all New Zealanders being well-housed.</p> <p>This data will inform targeted interventions by our members and others. It can help Aotearoa's housing policy designers at a local and central level. Having this data will help identify communities who are disproportionately affected by what they perceive to be colder homes.</p> <p>CHA recommends that Stats NZ includes a question on dwellings being warmer than people would like in the summer. Recent research from summer 2023/2024 showed 70% of people in a limited study reported their homes were warmer than they wanted (BRANZ, 2025). It would be helpful to have national data to support better building across the motu.</p>

<p>Main means of travel to work and workplace address</p> <p><i>What would you use this data for?</i></p> <p><i>Do you have any feedback about this data being collected?</i></p>	<p>We strongly support collecting data on travel to work and workplace address.</p> <p>CHA utilises this data to understand workplace vs residency information. Many New Zealand housing markets cross local council boundaries and understanding housing, employment and commuting patterns is valuable information for an integrated planning system. We currently use this data in housing needs assessments to understand who lives where, where they work and the connect, or disconnect, between these important life pillars.</p>
<p>Number of rooms</p> <p><i>What do you currently use number of rooms data for?</i></p> <p><i>Do the types of rooms we count meet your needs?</i></p> <p><i>What additional types of rooms would you like included in the <u>count of number of rooms</u>?</i></p> <p><i>Would adding additional types of rooms, such as bathrooms and toilets, impact your use of the count of number of rooms?</i></p> <p><i>Do you have any feedback about this data being collected?</i></p>	<p>We currently use the number of rooms data to understand occupancy and crowding in dwellings. The separate reporting of the number of bedrooms is critical to understanding this. This forms the basis of calculations of utilisation showing spare rooms and over-crowding used in housing needs assessments for local authorities.</p> <p>In general, yes but with the changes to housing typology and increasing density, counting the number of bathrooms and toilets would be helpful.</p> <p>The addition requested would not impact our use of the count of number of rooms if bedrooms continue to be reported separately.</p> <p>We support the continued collection of the number of rooms and the separate reporting of the number of bedrooms. We also request adding bathrooms and toilets.</p>
<p><i>Do you need information about electronic cigarette (vape) use? Yes</i></p>	<p>This data would provide CHA and the wider housing sector with more awareness of electronic cigarette usage in communities. Housing and health are linked and knowledge of usage rates of potential hazards to health is helpful to improve wellbeing.</p>

) <i>What would you use this data for?</i>	It would be helpful to identify who are the biggest users of vapes in different communities so our sector can work towards tailored support. Without a robust database, it is much more difficult for our sector to respond to this emerging need.
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Section 4: Meeting broader information needs

- what information matters most to your community
- how it could be collected in the future
- how we can best deliver it.

Question	Feedback
<i>Are there particular data needs, gaps, or opportunities you think Stats NZ should consider?</i>	<p>CHA feels it is imperative to capture non-numerically dominant groups. Rural and regional communities are at risk of being overlooked in the admin-first-based-census. Similar concerns are held about all other sub-groups, particularly Māori. These groups' inclusion in data is essential for equitable policy and service delivery across Aotearoa.</p> <p>Refer to our submission points in sections 1 and 2 for full details.</p>
<i>Are there ways that you use Stats NZ data that you want to tell us about?</i>	<p>Community Housing Aotearoa uses Stats NZ data to inform evidence-based housing policy and programme design. We rely on this data to understand housing outcomes for sub-groups and to identify trends over time. This enables us to advocate for equitable housing solutions and ensure that decisions are grounded in robust data.</p> <p>Community Housing Solutions, CHA's consultancy service, uses Stats NZ census datasets critical for preparing Housing Needs Assessments that reflect the realities of diverse communities across Aotearoa. To deliver insights, we rely on the ability to segment across household composition, age, ethnicity, disability status and other variables. This provides the ability to identify specific groups whose needs are not being met in the local housing market. This ability will be severely impacted under the proposed changes.</p>

In conclusion, Community Housing Aotearoa is disappointed by the introduction of these changes without prior consultation, the disregard of the expert advisory advice and a lack of a cost/benefit analysis.

We also offer our support to Stats NZ to mitigate the potential impacts on priority communities of the changes ahead. We thank Stats NZ for the opportunity to submit on this consultation.

Ngā mihi

A handwritten signature in black ink, appearing to read 'Paul Gilberd', written in a cursive style.

Paul Gilberd

Chief Executive

Community Housing Aotearoa – Ngā Wharerau o Aotearoa