

Committee Secretariat  
Justice Committee  
(submitted through the online portal)

15 April 2026

**RE: Data and Statistics (Census) Amendment Bill**

**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 103 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.

**Introduction**

Community Housing Aotearoa (CHA) uses Stats NZ census 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 key trends over time. This enables us to advocate for equitable housing solutions and ensure that decisions are grounded in robust data. Our members likewise utilise census data to inform their local housing provision decisions.

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.

CHA supports the position of the former NZ Government Statistician Len Cook as outlined in ‘*Why a properly resourced independent expert review of census proposals is vital before legislation is amended.*’ We are concerned about the negative impacts on data quality, coverage, and comparability over time and with international peers resulting from the proposed changes.

## Key Points

CHA is concerned about the reliance on administrative data in the proposed approach and its impact on our ability to understand housing trends and outcomes. We know that administrative data sourced from agencies such as the Ministry of Housing and Urban Development (MHUD) and the Ministry of Social Development (MSD) cannot replace the census to understand the scale and characteristics of those experiencing homelessness or severe housing deprivation. Whilst we acknowledge how admin data can be helpful in addition to a traditional enumeration census, we do not believe it can replace the census.

As outlined in this Bill's background Departmental Disclosure Statement document, "The benefits of this Bill depend on the quality of government data." Our members report ongoing concerns about the data collected and provided by government agencies for housing purposes. Many people experiencing homelessness do not engage with HUD, MSD or similar agencies. Relying solely on administrative data risks undercounting and misrepresenting this population. Members report that the information individuals and families are willing to provide to government agencies is often different from what they share with providers.

Should the Bill proceed to implement an administrative data-led approach, we have several other concerns about the proposed changes to data collection.

Firstly, CHA is concerned about the proposed sample size of 60,000 households in the Census Attribute Survey (CAS). This sample size is too small to reliably capture key population groups or detect changes in trends over time. This risks statistical marginalisation of many population groups. This concern is not simply for those experiencing the greatest needs, it impacts the ability to understand trends in home ownership as well as homelessness.

Secondly, the loss of this robust census information will negatively impact the ability of government and community housing organisations to plan for and deliver homes meeting the needs of our diverse population. Local councils and developers, as well as 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, which will likely be costly.

Thirdly, moving away from the traditional 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, and its impacts on population groups, i.e., Māori, Pacific Peoples, Women and Gender Minorities, Youth, LGBTQIA+, those living with disabilities and more.

Community Housing Aotearoa and our members have identified key information we will need to effectively plan and deliver housing services under the new proposal:

1. Wellbeing data to be collected through the Census Attribute Survey (CAS)

- Information about life satisfaction is to be collected through the CAS. CHA strongly supports adding this question to the CAS.
  - Information about the sense of purpose. 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.
  - Information about self-rated general health. In our sector, it is important to capture self-rated health data because physical and mental health outcomes are linked to housing conditions.
  - Information about the income amount by income source. We routinely use income by source to assess the effectiveness of housing policies and subsidies. For example, this information provides key insights into households' rent burden, including whether they receive the Accommodation Supplement.
2. Data on Dwellings to be collected through the Census Attribute Survey (CAS)
- Information about the floor area of a dwelling. This data is important for our sector to understand trends in house size as measured by floor area. Dwelling 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, as well as broader environmental and economic concerns. This is data we routinely analyse and reference to support our members' work and inform policy and practice.
  - Information about the age of a dwelling. 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. Given our poor record as a nation in terms of short- and long-term repairs and maintenance of our residential housing stock, age is also a strong indicator of our housing safety, functionality and performance. Each of these have significant value as we plan for our future.
  - Information about the number of rooms. 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 for calculations of utilisation, showing spare rooms and overcrowding, which are used in housing needs assessments for local authorities.
  - Information about dwellings being colder than people would like in winter. Having this data will help identify communities that are disproportionately affected by what they perceive to be colder homes.

- We strongly support aligning census questions on cold homes and hot homes. These issues are closely related, and many dwellings that are cold in winter are also prone to overheating in summer—particularly older, poorly constructed homes and those in which occupants cannot afford adequate heating or cooling. Because the census is already the leading national source of information on cold homes, it is the most appropriate place to collect national, comparable data on hot homes as well.
  - We have heard directly from residents of social housing about overheating concerns. In addition, partner organisations such as the Green Building Council, He Kāinga Oranga, and others have expressed concerns about this issue and are engaging in research and developing solutions for builders.
  - We hear from research partners that they are increasingly focused on the relationship between overheating and mental health, especially the impacts on sleep quality and anxiety. This is a particular concern for Community Housing Aotearoa, because social housing tenants are disproportionately affected by poverty and have high rates of underlying health or potential mental health issues. Overheating compounds these.
  - Social housing is fundamentally a location-based good. To plan effectively, advocate for appropriate provision, and understand health and well-being impacts at a local level, we need underlying data at small-area geographic resolution.
  - Only the census provides information at a sufficiently fine spatial scale to support this work. Without census-level data, it is very difficult to assess where overheating is most acute or to target policy and investment.
3. Additional data to be collected through the Census Attribute Survey (CAS)
- Information about the main means of travel to work and the workplace address. CHA utilises this data to understand workplace vs residency information. It is critical information to support regional planning providing clear information on the geographic extent of housing and employment market areas.
  - Information about electronic cigarette (vape) use. 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 the use rates of potential health hazards is helpful for improving wellbeing.

**We wish to make the following recommendations**

Community Housing Aotearoa calls for an independent review of the admin-first data-collection approach, with the goal of ensuring that vital data, critical to good governance, will not be lost under the proposed new approach outlined in this Bill. If this call for an independent review is not

actioned, we wish to make the following recommendations to minimise the negative impacts of the admin data approach:

1. Increase the Census Attribute Survey (CAS) sample size to a minimum of 100,000 respondents.
  - CHA recommends that the resources set aside for the ‘tailored solutions’ be instead used to boost the CAS annual sample size to enable robust analysis of population groups, and the reliable identification of trends over time.
2. 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.
  - 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.
3. Include a CAS question on homes being warmer than occupants would like in summer.
  - CHA recommends that Stats NZ include a question on whether dwellings are warmer than people would like in 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.
4. We urge Stats NZ to follow the Future Census Independent Evaluation Panel’s recommendation to increase the frequency of the Household Disability Survey.
5. It is also important to ensure the accessibility of the CAS survey itself (formatting, language, and support options).

We thank you for the opportunity to submit on this consultation and request the opportunity to present at the hearings on this Bill.

Ngā mihi



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Community Housing Aotearoa – Ngā Whānau o Aotearoa