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New Zealand

27 September 2022

Tatauranga Aotearoa – Stats NZ

8 Willis Street, Wellington Central

Wellington

Tēnā koe Stats NZ,

This is a submission from Whaikaha – Ministry of Disabled People (Whaikaha) and the Office for Disability Issues, now in Whaikaha. We encourage Stats NZ to publish disaggregated data from the 2023 Census by impairment status in the NZ.Stat tool in a cross-cutting manner, as it does for gender, ethnicity, and age. We also encourage Stats NZ to partner with disabled people in this kaupapa and can help Stats NZ connect with our community partners.

**Disaggregating 2023 Census Data on Disabled People in NZ.Stat**

Stats NZ intends to identify disabled populations in the 2023 Census by including the Washington Group Short Set of Questions on Functioning (WGSS). The proposed NZ.Stat tables to follow the 2023 Census indicate that Stats NZ intends only to publish data on disabled people identified by region. This is disappointing as Stats NZ already gathers the data required to disaggregate all 2023 Census data by impairment status. Regional breakdowns are only one of many analytically useful products Stats NZ could produce for disabled populations and the broad range of agencies that support them.

Whaikaha believes this approach does not align with a range of key strategic commitments and risks missing a significant opportunity to add demonstrably to the pool of data available on disabled populations.

Whaikaha encourages Stats NZ to seize the opportunity provided by the 2023 Census to disaggregate its data by impairment status in a cross-cutting manner, as it does for gender, ethnicity, and age. Whaikaha would also encourage Stats NZ to connect with the cross-government Disability Data and Evidence Working Group and partner with disabled people in this kaupapa, as disabled people have a keen interest in disability data.

Below is a summary of the major strategic commitments relating to disability data and the value of Census 2023 data in the broader disability data context.

**2022 Governmental Priorities & Strategic Context**

The New Zealand Government has prioritised disabled populations and has a range of strategic commitments relevant to disabled people:

* Whaikaha was established on 1 July , 2022 to give disabled populations a strong voice and to steward strategic disability policy across government
* Disabled people are a key equity population in the Pae Ora (Health Futures) Act, now serving as the bedrock legislation for the health system
* Accessibility for New Zealanders Bill will focus additional attention and resources on promoting accessibility for disabled people across Aotearoa.

Each of these developments is significant and speaks to a strong direction from the Government that disabled people should be prioritised as a key equity group alongside Māori and Pacific populations. High-quality disability data is critical to inform and support efforts to prioritise disabled people. As steward for all data in Aotearoa (including disability data), Stats NZ should do what it can to support this strategic direction.

The New Zealand Government also has at least two major threads of strategic commitments to disabled populations:

* United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). Article 31 of the UNCRPD explicitly expresses a commitment to collect and make available disaggregated disability data to inform cross-government policy. The importance of disability data is mirrored in the New Zealand Disability Strategy 2019-2023, where promoting and collecting disability data is a cross-cutting action for all government agencies, including Stats NZ.
* Te Tiriti o Waitangi entitles Māori, including tāngata whaikaha Māori, to equitable rights and outcomes in Aotearoa. In December 2021, the Waitangi Tribunal found that the Government cannot credibly claim to be ensuring equity for or active protection of tāngata whaikaha Māori, if it is not able to see these populations in its datasets. Agencies, including Stats NZ, cannot meet their obligations under Te Tiriti o Waitangi without disaggregated disability data.

The Census is a key data source for monitoring the New Zealand Disability Strategy. **Appendix One** includes a table connecting Census data to 5 of the 8 outcome areas in the Strategy. **Appendix Two** includes examples of Census tables that we would like to use to report on specific outcome areas, and that service providers could use to assist their planning and accommodation for the needs of disabled people.

Measuring outcomes for disabled people is challenging, as disability is a diverse and complex concept and disabled populations do not reliably identify themselves as disabled. Disability is being measured using the WGSS in several surveys across Aotearoa, including the Household Labour Force Survey and the General Social Survey. However, sample sizes are small, and results cannot be broken down to compare outcomes for equity sub-groups, such as tāngata whaikaha Māori, tagata sa’ilimalo, disabled women, disabled young people, disabled rainbow people, or disabled rural people. These are well-known data gaps that have been raised both by the Waitangi Tribunal and in preparations for New Zealand’s 2022 UNCRPD examination in Geneva.

The 2023 Census represents a unique opportunity to mitigate these data gaps as it is the only survey in Aotearoa that has a sample size large enough to produce data disaggregated by equity sub-groups of the disabled population.

Whaikaha would be happy to meet with and assist Stats NZ to partner with the disabled community to inform this process.

This letter has been reviewed and approved by Brian Coffey, Director, Office for Disability Issues and Mark Jacobs, Interim DCE Policy and Partnerships.

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**Appendix One: High-Level NZ.Stat Disability Data Use Cases**

Whaikaha and the Office for Disability Issues expect that we, together with government colleagues and those in research institutes across the motu, can access publicly available tables from the 2023 Census to bolster reporting on 4 out of 8 outcome areas of the New Zealand Disability Strategy (2019-2023) to answer the question:

*Is New Zealand a non-disabling society – a place where disabled people have an equal opportunity to achieve their goals and aspirations?*

We will also be looking at differences in outcomes among sub-populations such as tāngata whaikaha Māori, tagata sa’ilimalo, disabled women, disabled young and older people, rainbow disabled people and rural disabled people.

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| **NZ Disability Strategy** | **Data sources for reporting on outcomes** |
| Outcome 1: Education | Ministry of Education Administrative Data, Disability Survey, NZCER, Household Labour Force Survey, Youth 2000, General Social Survey, **Census 2023,** Disability Survey 2023, Te Kupenga 2028 |
| Outcome 2: Employment and Economic Security | Household Labour Force Survey, General Social Survey, Public Service Census, Household Economic Survey, **Census 2023**, Disability Survey 2023, Te Kupenga 2028 |
| Outcome 3: Health and Wellbeing | New Zealand Health Survey, Ministry of Health Administrative Data, Disability Support Services Data, General Social Survey, Household Labour Force Survey, **Census 2023** Disability Survey 2023, Te Kupenga 2028 |
| Outcome 4: Rights Protection and Justice | New Zealand Crime and Victims Survey, Kiwis Count, Household Labour Force Survey, Human Rights Commission, Oranga Tamariki |
| Outcome 5: Accessibility | General Social Survey, Access 2020, Kiwis Count, **Census 2023**, Disability Survey 2023, Te Kupenga 2028 |
| Outcome 6: Attitudes | General Social Survey, Household Labour Force Survey, Access 2020, Human Rights Commission, Disability Survey 2023, Te Kupenga 2028 |
| Outcome 7: Choice and Control | General Social Survey, Disability Survey 2023, Te Kupenga 2028 |
| Outcome 8: Leadership | Household Labour Force Survey, Public Service Census, Ministry of Social Development data on leadership and disability, **Census 2023** |

**Appendix Two: Specific tables that would be useful by outcomes**

The table below includes some examples of Census tables that we would like to use to report on specific outcome areas, and that service providers could use to assist their planning and accommodation for the needs of disabled people.   
This list is not exhaustive.

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| **NZ Disability Strategy** | **A range of Census tables we would like to see disaggregated by disability** |
| Outcome 1: Education | Birthplace (broad geographic areas) by highest qualification by age and sex, for the census usually resident population count aged 15 years and over, 2006, 2013, and 2018 Censuses (RC, TA, SA2, DHB)  Study participation and ethnic group (grouped total responses) by age group and sex, for the census usually resident population count aged 15 years and over, 2006, 2013, and 2018 Censuses (RC, TA, SA2, DHB)  Highest secondary school qualification and ethnic group (grouped total responses) by age group and sex, for the census usually resident population count aged 15 years and over, 2006, 2013, and 2018 Censuses (RC, TA, SA2, DHB)  Highest qualification and occupation (ANZSCO major group) by sex, for the employed census usually resident population count aged 15 years and over, 2006, 2013, and 2018 Censuses (RC, TA, SA2, DHB)  Main means of travel to education by age group and sex, for the census usually resident population count attending, studying, or enrolled in education, 2018 Census (RC, TA, SA2, DHB) |
| Outcome 2: Employment and Economic Security | Hours worked in employment per week and status in employment by age group and sex, for the employed census usually resident population count aged 15 years and over, 2006, 2013, and 2018 Censuses (RC, TA, DHB)  Main means of travel to work and workplace address by age group and sex, for the employed census usually resident population count aged 15 years and over, 2018 Census (RC, TA, SA2)  Birthplace (broad geographic areas) and work and labour force status by age and sex, for the census usually resident population count aged 15 years and over, 2006, 2013, and 2018 Censuses (RC, TA, SA2, DH)  Individual home ownership and total personal income (grouped) by age group and sex, for the usually resident population count aged 15 years and over, 2006, 2013, and 2018 Censuses (RC, TA, SA2, DHB)  Occupation (major group) and industry (division) by age group and sex, for the employed census usually resident population count aged 15 years and over, 2006, 2013, and 2018 Censuses (RC, TA, DHB)  Sources of personal income and work and labour force status by age group and sex, for the census usually resident population count aged 15 years and over, 2006, 2013, and 2018 Censuses (RC, TA, DHB)  Total personal income and occupation (major group) by age group and sex, for the employed census usually resident population count aged 15 years and over, 2013 and 2018 Censuses (RC, TA, SA2, DHB)  Total family income (grouped) by family type, for families in occupied private dwellings, 2013 and 2018 Censuses (RC, TA, DHB, SA2)  Unpaid activities (total responses) by age group and sex, for the census usually resident population count aged 15 years and over, 2006, 2013, and 2018 Censuses (RC, TA, SA2, DHB) |
| Outcome 3: Health and Wellbeing | Dwelling dampness indicator and dwelling mould indicator by total household income (grouped), for households in occupied private dwellings, 2018 Census (RC, TA, SA2, DHB)  Access to basic amenities (total responses) by tenure of household, for households in occupied private dwellings, 2018 Census (RC, TA, SA2, DHB)  Access to telecommunication systems (total responses) by total household income (grouped), for households in occupied private dwellings, 2013 and 2018 Censuses (RC, TA, DHB, SA2)  Main types of heating used (total responses) by tenure of household, for households in occupied private dwellings, 2018 Census (RC, TA, SA2, DHB)  Number of motor vehicles by tenure of household, for households in occupied private dwellings, 2006, 2013, and 2018 Censuses (RC, TA, DHB, SA2)  Extended family type, for extended families in occupied private dwellings, 2006, 2013, and 2018 Censuses (RC, TA, DHB, SA2)  Cigarette smoking behaviour and ethnic group (grouped total responses) by age group and sex, for the census usually resident population count aged 15 years and over, 2006, 2013, and 2018 Censuses (RC, TA, SA2, DHB)  Māori descent indicator by age group and sex, for the census usually resident population count, 2006, 2013, and 2018 Censuses (RC, TA, SA2, DHB, urban rural indicator)  Legally registered relationship status and partnership status in current relationship by age and sex, for the census usually resident population count aged 15 years and over, 2006, 2013, and 2018 Censuses (RC, TA, SA2, DHB) |
| Outcome 5: Accessibility | Census night population count and change, by regional council areas 2006, 2013, and 2018 Censuses  Census night population count and change by territorial authority and Auckland local board areas 2006, 2013, and 2018 Censuses  Census night population count and change by age and sex 2006, 2013, and 2018 Censuses |
| Outcome 8: Leadership | Similar tables to Outcome 2 |