

**Hon Dr David Clark, Minister of Statistics,
New Zealand Parliament
Wellington**

Via e-mail to: David.Clark@parliament.govt.nz

Dear Minister,

I am writing to you regarding Statistics New Zealand's proposal to only conduct the Household Disability Survey (HDS) during the 2023 Disability Survey and cancel the Disability Survey of Residential Facilities (DSRF). This proposal has created significant levels of concern in the disability community, and hence, at the New Zealand Disability Support Network (NZDSN), we feel compelled to communicate these concerns to you.

First, the proposal frequently talks about the small sample of the DSRF, and how it renders the collected data invalid/not useful on their own. We would like to question this assumption and point out that small sample size does not necessarily have any bearing on the validity/generalisability of the findings. The proposal explains how this sample is randomly selected from the respective population, and assuming that the sample size is equal or larger than the minimum required sample size for extracting statistical data, the size of the sample will not influence the validity of the data; rather, it only indicates that the population is a small population, hence, the sample is small.

Second, the proposal very briefly points out the concerns raised by the disability community during the initial consultation about the 2023 Disability Survey. In their submissions, many members of this community have talked about the importance of the experiences of disabled people living in residential facilities, and the necessity of those experiences to be included in the 2023 Disability Survey. This is consistent with the feedback we have received from our members (disability service and support providers) as well as the wider disability community.

Third, the proposal makes various unsubstantiated claims such as "many of the [DSRF survey] questions are not relevant and may well be inappropriate or insensitive." NZDSN and the disability community find such claims to be condescending and patronising, and effectively taking away disabled people's choice and control. Furthermore, the possibility of causing harm (such as negative emotions) to participants cannot be a justification for not conducting the survey. Statistics New Zealand is expected to be the authority on conducting a survey while eliminating/minimising potential harm to participants. If there is no evidence from previous rounds of DSRF survey to support such claims, we will argue that Statistics New Zealand's proposal is in breach of Articles 29 and 31 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) that seek to "guarantee full participation of people with disabilities in political and public life" and "require state parties to collect appropriate information, statistical and research data, to develop policies required to full implementation of the Convention", respectively.

Fourth, the proposal identifies "the only people who will be excluded from the survey as a result of the cancellation of the DSRF" to be "those receiving a high level of support in aged-care facilities or some residential psychiatric facilities." Instead of conducting the DSRF, the proposal suggests replacing this community with the "administrative data" from the Ministry of Health. On behalf of the disability community,
www.nzdsn.org.nz

community, NZDSN is strongly opposed to this approach for a number of reasons. First, it promotes the long-held practice of the health system to consider disability a health issue. Second, we now have Whaikaha, and we believe Statistics New Zealand should engage with Whaikaha about this matter and other relevant matters for the upcoming 2023 Disability Survey. Third, the proposed approach technically reduces the lived experiences of disabled people to “NUMBERS”. We believe Statistics New Zealand must continue – and even expand – the DSRF to collect data from this vulnerable and forgotten group of disabled people. We would also like to see relevant DSRF data published on their own in order to make the voices of these individuals heard.

Finally, NZDSN believes the proposal does not provide a strong justification for the removal of the DSRF from the 2023 Disability Survey other than the lack of resources which seems to be the major contributing factor behind the proposal. NZDSN recommends that the DSRF be continued and expanded, and a special advisory group comprised of disability experts, those with lived experience, and providers of disability support services be appointed to work alongside Statistics New Zealand for the 2023 Disability Survey to ensure the survey is run in a format that is most conducive to designing evidence-informed policy and practice that eventually improve the health and well-being of disabled people in Aotearoa New Zealand. NZDSN is willing to assist in this process by offering its experience and expertise as well as close ties with the disability community.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'P. Reynolds', with a stylized flourish at the end.

Peter Reynolds
Chief Executive Officer
Kia Tu Tahī Tatou NZDSN
Level 8, 86-90 Lambton Quay
P O Box 4678
Wellington, 6140
New Zealand
Phone 04 473 4678
Mobile 027 534 6472