

## ATTACHMENT 1

### Tourism Industry Aotearoa responses to the Stats NZ discussion document 'Towards New Data and Statistics Legislation: Public Discussion Document'

<p><b>Q1. Do you think these proposed outcomes are the right ones for new data and statistics legislation? Please comment on any of these outcomes, and/or list any other outcomes you think should be considered.</b></p>
<p>TIA considers this set of outcomes to be comprehensive and well balanced, with the key touchstones included, including around independence, strategic value, relevant and reliable, confidentiality etc.</p> <p>TIA's <i>Tourism 2025 &amp; Beyond</i> sustainable growth framework has the Vision '<i>Growing a sustainable tourism industry that benefits New Zealanders</i>'. In this framework, 'Knowledge' is a key enabler that establishes the importance of information, including statistics, for informing the industry's sustainable development.</p> <p>Having a current state fit-for-purpose Statistics Act with relevant outcome objectives is essential.</p> <p>We have identified one weakness in the set of outcomes – the lack of an explicit outcome statement along the lines of 'Data will be made available to foster easy and straightforward access by all user groups'. Our current experience is that much more could and should be done to improve ease of access to existing tourism data. Having a clearer outcome objective in the new Statistics Act will create a stronger imperative to progress this area.</p>
<p><b>Q2. How do you think the Treaty of Waitangi should be recognised across the government data system?</b></p>
<p>TIA consider that Māori inclusion within the statistics system is most important to ensure we have a fully integrated and cohesive data system for New Zealand.</p>
<p><b>Q3. How do you think iwi and Māori interests in collecting, managing, and using data should be recognised?</b></p>
<p>The draft Government Tourism Strategy released on 6 November highlights the importance of supporting iwi to develop authentic visitor experiences and to raise awareness of these<sup>1</sup>. Strong demand and supply-side data is important to Māori needs in the tourism industry.</p> <p>TIA would encourage Stats NZ in forming closer relationships with Māori interests in the tourism industry to lift the opportunities for data collections, including to lifting capability and capacity within the statistical system to ensure Māori needs are met.</p>
<p><b>Q4. Do you agree or disagree with the proposed functions, duties, and powers of the Government Statistician listed above? Please comment.</b></p>
<p>TIA agrees with each of the proposed functions. In particular, we see Stats NZ as having an essential role in leading the uptake of administrative data to inform user statistical needs. For instance, in the tourism industry there is a vast quantum of administrative data held by many parties and measures different things. This makes the systematic use of this data very difficult</p>

<sup>1</sup> Aotearoa New Zealand Government Tourism Strategy, MBIE, 2018

and Stats NZ has a clear function to assist in making sense of this data for wider good societal and industry good.

**Q5. Do you think there are any other functions, duties, or powers for leading and coordinating the Official Statistics System the Government Statistician needs to have?**

TIA considers that the Government Statistician has an essential leadership role and this should be explicit in the functions. This would support the Government Statistician undertake the pivotal role in leading an all-of-government approach to official statistics. The Government Statistician should be empowered to set standards and issue directives about producing and publishing official statistics across government agencies.

**Q6. What are your suggestions for ensuring transparency, trust, and integrity in the production of official statistics across government?**

TIA agrees that professional independence is a key foundation of the official statistics systems and the new Stats Act should reinforce this.

In addition, the Act should reinforce that statistics provided by other government agencies are governed by the same independence requirements.

**Q7. Do you think there should be an opportunity for public input when deciding on New Zealand's most important statistics? Please explain.**

TIA considers that public and industry input to define the most important statistics is essential.

Specifically, the tourism industry has a wide range of statistical needs that are not currently being met, and so we would value providing input in to the prioritisation of official statistics. TIA's Tourism Industry Insight Framework sets out in general terms what we would like to see in terms of tourism statistics, and we would certainly be very keen to further articulate our priorities.

**Q8. Do you agree that high-quality statistics produced outside of government should be able to be recognised as reliable and trustworthy? Please explain.**

TIA supports the recognition of statistics produced outside of government as part of the wider statistical system. Increasingly, it is likely that non-government organisations will be a source of more accurate and timely information than government can produce for itself. Clearly, there would be a need for assurance around the independence and integrity of the data, and it may be legitimate that Stats NZ has a role to provide this assurance through its working with the data providers on such things as data standards. We see this approach as desirable, particularly as more administrative data is produced and as industry bodies get more organised in collecting and disseminating data.

**Q9. What do you think about the Government Statistician being able to choose the best data source (administrative data or survey data) and require the data to be provided?**

TIA supports the best data source to support the delivery of quality statistics. This is especially so given the continuing emergence of all sorts of administrative data.

**Q10. Do you have any suggestions about what the Government Statistician should consider when deciding the best data source needed to produce official statistics?**

TIA's experience with a number of tourism-related administrative data sources is that there needs to be clear explanations of the strengths and weaknesses of the data, and of any characteristics that users should be aware of in using the data.

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**Q11. Do you think public consultation should be required before decisions are made on new or altered content for the Census? Please give reasons.**

TIA considers consultation important to ensure the Census delivers that most useful data.

**Q12. What things do you think are important when deciding to make data open?**

TIA supports the provision of 'open data' in the interests of getting as much data available to support use in research and analysis. For example, the tourism industry would benefit from having better access to employer-employee administrative data to support better understanding of the tourism workforce.

The key requirement relates to ensuring the data is safe to use and assuredly meets privacy and confidentiality standards. Setting and adhering to these standards will be essential.

**Q13. Do you agree or disagree that new data and statistics legislation should clarify that data can be shared across government so that it can be used for research and analysis, with appropriate safeguards and protections? Please give reasons why or why not.**

TIA does not have a particular view on the desirability of 'sharing' data across government although it makes sense for researchers to be able to draw on a variety of data sources. It very much depends on the purpose of sharing, and how and for what purpose the information was obtained in the first place.

As such, TIA sees risks to excessive or inappropriate data sharing and considers that very high standards of privacy and confidentiality care must be adhered to in any data sharing protocols.

**Q14 What protections and safeguards do you think should apply when organisations outside government want to combine their data with government data for research and analysis?**

TIA does not have a particular view, but would imagine protections are equally important when data is shared within and external to government. The safeguards should apply equally to both, but again this may differ due to the reasons why the data was gathered in the first place.

**Q15 Do you agree, or disagree, that new data and statistics legislation should clarify the public interest test considerations for access to government-held data for research and analysis? Please give reasons for your answer.**

TIA agrees that new data and statistics legislation should clarify the public interest test considerations for access to government-held data for research and analysis. Our interest is to support the openness to the provision of data, but with appropriate safeguards in place.

**Q16. Data sensitivity, likelihood of harm, and public expectations are three possible factors to consider when assessing the benefits and risks of research or analysis using government-held data. What other factors do you think should be considered and why?**

Commercial confidentiality and personal privacy must form part of considerations around providing access to government data, in addition to the three points set out in the question.

**Q17 Do you agree or disagree with introducing a risk-management approach to confidentiality settings, balancing benefits against the likelihood and potential impact of identification? Please give reasons why or why not.**

A systematic approach that balances research and analytical benefits to the tourism industry against any likelihood of identification is important. We do feel the risk level should not be a hypothetical level, but based on a pragmatic approach. This is because the more

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<p>confidentialised data becomes, the less useful it tends to be and this can greatly diminish the value of some data sets (e.g. Stats NZ's accommodation data).</p>
<p><b>Q18. Apart from sensitivity of data, what factors do you think should be considered when assessing the potential harm from releasing less-confidentialised data?</b></p>
<p>TIA does not have a particular view on this.</p>
<p><b>Q19 What do you think are the issues, if any, of allowing access to data by international researchers? How might these be addressed?</b></p>
<p>Making data available from the statistical system to international researchers is important, just as it is to New Zealand researchers. As a global industry, tourism works with and partners with global organisations to share knowledge and information.</p> <p>Rules and requirements for accessing data should be able to be common for both international and domestic researchers.</p>
<p><b>Q20 What do you think are the issues, if any, of approving data labs outside of New Zealand? How might these be addressed?</b></p>
<p>No comment</p>
<p><b>Q21. What do you think are the issues, if any, of providing data to reputable international organisations for their ongoing use? How might these be addressed?</b></p>
<p>No comment</p>
<p><b>Q22. What information about access to government-held data for research and analysis do you think should be made publicly available? Please give reasons.</b></p>
<p>No comment</p>
<p><b>Q23. Are there other aspects of data collection, management, and use that you think government agencies should be more transparent about? Please give reasons.</b></p>
<p>No comment</p>
<p><b>Q24. Apart from the two existing broad obligations – to provide information to produce official statistics and to protect confidentiality of information – are there any other obligations you think should be able to be enforced?</b></p>
<p>While likely contained in the first of the points above, the new Act could benefit from making it clearer about the range of administrative data that could and should be drawn upon by Stats NZ in the interest of producing official statistics.</p>
<p><b>Q25. Do you think the two broad types of obligations should be treated with the same level of seriousness? In other words, is failing to provide information as serious as failing to protect confidential information?</b></p>
<p>'Confidential' is a first principle of official statistics production, but equally, failing to provide data can have equally damaging consequences.</p>

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