



New Zealand Council Of
Christian Social Services

Vulnerable Children Bill

New Zealand Council of Christian Social Services (NZCCSS)

Submission to Social Services Select Committee

29 October 2013

1. Introduction

- 1.1 The New Zealand Council of Christian Social Services (NZCCSS) has six foundation members: the Anglican Care Network, Baptist Union of New Zealand, Catholic Social Services, Methodist Church of New Zealand, Presbyterian Support New Zealand Inc. and The Salvation Army. NZCCSS works for a just and compassionate society in Aotearoa New Zealand. We see this as a continuation of the mission of Jesus Christ. In seeking to fulfil this mission, we are committed to giving priority to poor and vulnerable members of our society and to Te Tiriti O Waitangi.
- 1.2 Nationally, NZCCSS membership consists of multiple social service groups working from almost 640 separate organisational sites, which collectively provide over 1,200 social service programmes throughout New Zealand. Our members deliver a wide range of services that cover such areas as child and family services, services for older people, food-bank and emergency services, housing, budgeting, disability, addiction support, community development and employment services. Further details on NZCCSS can be found in Appendix 1.
- 1.3 NZCCSS supports the intent of this Bill but we also have concerns about the extent to which the underlying assumptions, scope, approach and provisions in the Bill will impact on vulnerable children.
- 1.4 Contact details for this submission are Trevor McGlinchey, NZCCSS Executive Officer and Sonia Scott, Policy Advisor, PO Box 12-090, Thorndon, Wellington, Phone 04 473 2627, eo@nzccss.org.nz or sonia.scott@nzccss.org.nz
- 1.5 We request an opportunity to appear before the Select Committee to make further comment on this Bill.

Summary of Key Points:

1. NZCCSS commends the government on the intent of this Bill to improve the well-being of New Zealand's most vulnerable children.
2. NZCCSS supports the establishment of cross-agency collaboration, joint responsibility and accountability for vulnerable children.
3. NZCCSS notes the absence of any reference to the Treaty of Waitangi. This is a serious omission given the Crown obligations to the Treaty of Waitangi and to the protection of tamariki Māori.
4. NZCCSS is concerned about unintended consequences of the Bill on some vulnerable children and their families and whānau, some of whom may perceive they are being singled out, judged and stigmatised rather than supported to make positive changes. The risk of stigmatising families and whānau is the exacerbation of family stress and the potential for increased family violence. There is also a very real risk of exacerbating a culture of avoidance where mothers avoid necessary contact with health and social service providers.
5. NZCCSS is concerned the focus of the bill is largely reporting, monitoring, policing, and is focussed on individuals rather than the social context and structural inequalities, which make it very difficult to parent well. [inadequate family income to provide basic necessities, poor quality homes, limited transport options, difficulty accessing medical and dental services].
6. NZCCSS recommends to the committee a UK report by Professor Eileen Munro *The Munro Review of Child Protection: A Child –Centred System*. The report concludes UK child protection legislation is “too focused on compliance and procedures and consequently has lost its focussed on the needs and experience of individual children”. NZCCSS would be concerned if this Bill followed the same approach criticised in Professor Munro's report.
7. We recommend:
 - a) The extension of well-being measures to **all** children in New Zealand [Clause 6].
 - b) The inclusion of a specific reference to the Treaty of Waitangi.
 - c) The inclusion of wording in the Child Youth and Family Act 1989 [Clause 6 *Welfare and Interests of Child or Young Person Paramount*] to strengthen the focus of the Bill on the interests of the child.
 - d) The Bill to give effect to the obligations under the UN Convention on the Rights of the Child (UNCROC) [Clause 6].
 - e) The inclusion of child poverty eradication targets as discussed in working paper 5 of the Expert Advisory Group on Solutions to Child Poverty [Clause 6].
 - f) The inclusion of additional reporting provisions to enable public scrutiny of changes to ministers priorities for vulnerable children [Clause 7].
 - g) The inclusion of relevant non-government organisations and the Office of the Children's Commissioner in the preparation of vulnerable children plans [clause 8].
 - h) Funding of training required to implement child protection policies [Clauses 14-20].

- i) 'state agencies' are transparent when assessing whether a provider needs to comply with all or some of the safety check requirements [Clause 31] as set out in the service contract.
- j) The inclusion of a review process where the provider believes the 1 or more of the safety check requirements are not proportionate to the risk presented by the activities set out in the contract [Clause 31].
- k) The Bill provides for the specific monitoring of additional costs associated with undertaking requirements set out in clause 31.
- l) Child Harm Prevention Orders sit alongside appropriate resourcing of intensive support to address underlying behaviour of those subject to the order [Clauses 48-99].
- m) A transparent process that informs a subsequent mother/parent about what specific changes need to be made [Clauses 104 - 107].
- n) Provision of appropriate services and resources to support the mother/parent in their efforts to make changes. [Clauses 104-107]
- o) The remove of a subsequent child should only be the very last resort and only after intensive support has been made available [Clauses 104-107].
- p) The Bill strengthens the states support of all mothers/parents by putting sufficient resources and services into all families to minimise situations where mothers/parents expose their children to harm [Clause 104-107].
- q) The Bill makes provisions to adequately fund family group conferences and to monitor the extent to which FCG plans are funded [Clauses 108 - 114].
- r) The removal for the word 'extraordinary' from clause 123 (2) (a) and the inclusion of wording that would specifically enable financial assistance for sports, social and cultural activities.
- s) The inclusion of a transitional support person to help manage these complex relationships between special guardians and natural parents to help foster positive links and to create a positive environment for a child to grow[Clauses 116-118].
- t) Amend Clause 132 to enable the Chief Executive to provide financial assistance to young people leaving care to become and remain independent.
- u) Young people leaving care are prioritised for affordable and decent state housing.
- v) Young people receive free access to medical and dental services for the first year after leaving state care.
- w) Young people are assisted (through travel expenses/accommodation) to engage with a support person who will take an interest in the future development of the person.
- x) The inclusion of an opt-out provision to the KiwiSaver Act 2006 as the current rate for contribution is likely too high at 3% for some young people and could lead to further hardship [Clause 140].

Section One

2 General Comments

Firstly, the New Zealand Council of Christian Social Services (NZCCSS) acknowledges the government's commitment *to protect and improve the well-being of vulnerable children*. NZCCSS shares this commitment. Many of our social service providers have a long history of working alongside children and families/whānau living in vulnerable circumstances. This submission draws on their extensive knowledge and experience of what interventions help struggling families and what exacerbates their problems. We therefore welcome the opportunity to feed into the select committee process, with the hope that we influence the final draft of the bill to ensure the bill achieves its overarching intent to improve the well-being of vulnerable children.

2.1 Faith in Humanity

The Bill is underpinned by assumptions about 'good' parents and 'bad' parents. Children are assumed to be vulnerable because of poor parental choices and behaviour. 'Bad' parents must therefore be controlled and monitored and have their children removed and put into the care of the state.

In contrast, NZCCSS approach is based on an intrinsic belief in love and redemption; people do grow, mature, develop and change, with appropriate social service support, and in an environment based on trust, respect, and partnership. These principles are at the heart of the work we do with vulnerable families/whānau in communities.

2.3 Partnership with Families/Whānau

The focus of the Bill is largely reporting, monitoring, policing, and is focussed on individuals rather than the social context in which children develop. Another underlying assumption of the bill is that if the state reports, monitors and police 'bad parents' more, children will be less vulnerable.

However, in contrast to this assumption, what we see in communities is that families and whānau respond best when they feel respected, supported, and included in communities. It is therefore of significant concern to NZCCSS that this bill seeks to single out, judge and stigmatise 'bad' parents. The risk of stigmatising families and whānau is the exacerbation of family stress and the potential for increased family violence. There is also a very real risk of exacerbating a culture of avoidance where people avoid necessary contact with health and social service providers. These are high stakes for our already vulnerable children.

Our members report that parents are more likely to effectively address underlying issues, learn new skill, and change behaviour when they feel in control of their lives and perceive a 'partnership' with services providers in an environment of trust and respect. [Grassroots Voices: the Voices of New Zealand Families and Communities, February 2009]. Increased reporting, monitoring and policing is unlikely to improve well-being outcomes for vulnerable children.

2.4 The Best Protective Factor is Supporting Parental Bonding

There are many factors that contribute to a child's vulnerability: a child's complex needs due to a disability, living in a cold damp home, inadequate nutrition, and restrictions on means of transport, limited access to medical and oral services, inadequate clothing, and ability to join in community and school events are just some of the factors identified in research [EAG, 2012]. However, social services providers also see children's vulnerability moderated by protective factors, particularly those where there is a strong parent-child bond, and connectedness with wider family/whānau, community (marae, schools, community groups, parishes).

What we see in communities is supported by substantive evidence that children have the best outcomes when parents are supported to address underlying issues (mental health, alcohol/drug addiction, poor parenting skills). And it is from here that parents make changes to their behaviour, and this in turn strengthens their parental bond with their children, creating resilience. What we also know is this process is long-term and intensive and requires significant resources that are not necessarily reflected in contractual agreements which are generally short-term. However, the long-term benefits of supporting protective factors to build resilient and strong children far outweigh the cost to the state. The monitoring framework which is at the core of this Bill runs counter to effective practice in working with these families.

2.5 The Child Harm Protection Bill

The use of the term 'vulnerable' is misleading as the bill is primarily about child harm protection measures. If the bill intends to address vulnerability it would need to extend its scope to include child poverty, which represents the highest vulnerability risk to New Zealand children. The Committee will be aware of the report by the Expert Advisory Group on Solutions to Child Poverty that identified 270,000 New Zealand children living in poverty. Maori, Pasifika children and children with disabilities were identified as 'disproportionately represented in poor households [August 2012]. An effective bill would therefore need to include measures to "improving their social and economic well-being" (f) specifically targeted at Maori, Pasifika children and children with disabilities. If the select committee does not recommend the inclusion of child poverty, it should rename the bill The Child Harm Protection Bill so that it does not mislead the public on the limited scope of what it can deliver.

2.6 Acknowledging Poverty and Abuse Research

Any type of harm is damaging to a child's development. However, ignoring the complexities of adult behaviour behind child abuse and structural inequalities in which child harm occurs is also harmful.

CYPS data on substantiated child protection notification provides an insight into types of harm undertaken primarily by adults to our vulnerable children:

2012/13 there 21,778 cases of substantiated abuse and of these:

- 12,072 (55.4 per cent) were emotional abuse findings
- 5,104 (23.4 per cent) were neglect findings
- 3,190 (14.6 per cent) were physical abuse findings
- 1,412 (6.5 per cent) were sexual abuse findings.

Without negating the impact of these different categories of harm on children, it is nevertheless significant that **emotional and neglect abuse** is proportionately higher than physical and sexual. And when we link this to substantive research over twenty five years that identifies a clear **link between poverty and abuse** (particularly emotional and neglect) we are presented with a whole new story on child harm [*Child Abuse: What Role does Poverty Play. Child Abuse: An Analysis of Child Youth and Family Data.* CPAG, 2013].

This Bill does not address structural inequality as a determinant of a child's vulnerability. As noted above 'bad parenting' is the focus of the Bill and a punitive approach is taken rather than addressing underlying inequalities of income, housing, health and transport.

It is astounding then that this Bill excludes any specific reference to child poverty, although as has been noted above clause 6 (f) refers to *improving their social and economic well-being*. However, there is no indication on how this might be funded and actioned by the state.

If we wilfully ignore child poverty and the structural inequality that sits underneath child poverty, we ignore the largest group of vulnerable children living in New Zealand (270,000 children largely Māori, Pacifica and children with disabilities). This will diminish the effectiveness of this bill to improve the well-being of vulnerable children, and correspondingly its credibility.

But of greater importance is the damage this wilful neglect of 270, 000 vulnerable children has on our collective humanity.

The following comments from a NZCCSS service provider help to illustrate that despite extraordinary stresses on struggling families humanity still shines through.

*"The most children in vulnerable circumstances we see are those where family appears to be constantly in a state of chaos and stress. Everyday life is a struggle. Mum has 3-4 children and is on a benefit. It's not enough to cover rent and feed the family and they rely on food parcels up to twice a week to cover the basics. Accessing assistance is a problem (getting to Work and Income, doctors etc.) because they have no car and can't afford the bus fare or the bus timetable makes it difficult to get in and back home in time for kids after school. There are mounting debts. Parent and child/children have health problems, sometimes serious. There have been family violence/abuse within family issues, which have led to re-location, and loss of family support. It becomes difficult to make supportive connections with neighbours and often a loss of confidence to make new links. The problems indeed can seem insurmountable **but one thing that is nearly always present is that the kid's parents do love them and are doing the best they can**".*

[NZCCSS Analysis of White Paper, 2012]

Section Two

The following section provides comments on the legislative provision set out in the Bill and includes recommendations for consideration by the Social Service Select Committee.

3 Part One - Cross-Agency Measure (Clause 3 – 13)

NZCCSS supports the joint governance and accountability provisions set out Sub Part 1 of the bill and believe these provisions will go some way to address long-standing issues around agency silos and the coordination and delivery of services to vulnerable children.

3.1 Interpretation of Children's Agencies and Children's Ministers (Clause 5)

NZCCSS notes that 'State Agencies' are not specifically identified in the Bill while acknowledging other documentation identifies the Ministries of Social Development, Health, Education, and Justice as lead agencies.

NZCCSS recommends to the Committee the inclusion of Te Puni Kokiri, the Ministry of Pacific Island Affairs and the Office For Disabilities Issues, as accountable ministries for the preparation of a vulnerable children's plan. This recommendation is based on:

- a) the Crown obligations to the Treaty of Waitangi and the protection of Māori children.
- b) the disproportionate number of Māori , Pacifica and children with disabilities living in poverty and or at risk of harm.

3.2 Improving the Well-being of Vulnerable Children (Clause 6, 7, 8)

NZCCSS supports the Bill's focus on '*improving the well-being of vulnerable children*' in relation to the setting of government priorities and the preparation of the vulnerable children's plan.

Improving the wellbeing of vulnerable children means promoting the best interests of vulnerable children (having regard to the whole of their lives), including (without limitation) taking measures aimed at—

- a) protecting them from abuse and neglect:***
- b) improving their physical and mental health and their cultural and emotional well-being:***
- c) improving their education and training and their participation in recreation and cultural activities:***
- d) strengthening their connection to their families, whānau, hapū, and iwi, or other culturally recognised family group:***
- e) increasing their participation in decision making about them, and their contribution to society:***
- f) improving their social and economic well-being.***

NZCCSS however suggest Clause 6 **Welfare and Interests of Child or Young Person Paramount** in the Child Youth and Family Act 1989 is included in the definition of '*best interests of vulnerable children*', as the wording in the clause makes for a stronger statement about the interests of the child being paramount.

“In all matters relating to the administration or application of this Act (other than part 4 and 5 and sections 351 to 360), the welfare and interests of the child or young people shall be first and paramount consideration, having regard to the principles set out in sections 5 and 13.”.

3.3 Extend Well-Being Measures to ALL Children

The NZCCSS supports the focus and meaning given in the Bill to ‘well-being of vulnerable children. The NZCCSS recommends the extension of well-being measures to **all** children in New Zealand and proposes the following amendments [(a), (f) and additional meaning (g) and (h)]:

1. (a) reword to read ‘protecting them from abuse and neglect by supporting parents, investing in public awareness of child development and building policy, practice and attitudes that enable children to thrive’.
2. (f) improving their social and economic well-being, including efforts to ensure that families are receiving their full entitlements under the Social Security Act 1964 with full transparency about the take-up of benefits, and extend In-Work tax Credit (\$80) to parents who are not in work to help ensure every child has their basic necessities met.
3. (g) upholding their rights under the UN Convention on the Rights of the Child.
4. (h) the inclusion of child poverty eradication targets as discussed in working paper 5 of the Expert Advisory Group on Solutions to Child Poverty.

3.4 Public Scrutiny of Priorities

The NZCCSS supports clause 7 which provides for Ministers to set priorities for vulnerable children but notes there are no reporting provisions to require public scrutiny of any changes to these priorities. A further reporting provision is needed to report on whether appropriate public investment is being made to support measures in clause 6.

To address these issues NZCCSS recommends an amendment to the clause at (3) and an additional provision (4):

- (3) An instrument recording priorities set or changed under this section is neither a legislative instrument nor a disallowable instrument for the purposes of the Legislation Act 2012, and does not have to be presented to the House of Representatives under section 41 of that Act, **but will be made publicly available.**
- (4) Progress against priorities will be measured and reported on for the purposes of accountability and to ensure that appropriate investment is made to ensure progress.

3.5 Inclusion of NGOs and the Office of the Children’s Commissioner in VCPs

While Clause 7 sets out requirements for the preparation of vulnerable children plan, NZCCSS notes there is no reference to consultation with Non-Government Organisations who play a significant role in the delivery of services to our most vulnerable children. The NZCCSS also notes the absence of any reference to the Office of the Children’s Commissioner who has a statutory role to monitor services provided under the CYPF Act, to advocate for children and to raise awareness of and monitor the application of UNCROC in New Zealand.

To address this exclusion, NZCCSS recommends an addition to Clause 8 (1) (a) to read:

- (a) develop a draft vulnerable children’s plan **in consultation with the relevant non-government organisations and the Office of the Children’s Commissioner.**

4. Subpart 2 - Child Protection Polices (Clause 14 -20)

4.1 Workplace Capability

The requirement for child protection policies raise no specific issues to our social service agencies working with children the majority already have in place policies in relation to identifying and reporting child abuse. However, NZCCSS notes this requirement will extend to a diverse children's workforce where child protection policies have not been previously required, and that there will likely be increases to compliance cost issues in an environment of already limited funding. For some agencies, this will mean staff training to enable them to accurately identify and report abuse.

NZCCSS recommends issues around workforce capability are considered by the committee and that consideration is given to fund training required to implement Clause 14-20.

5. Subpart 3 – Children's Worker Safety (Clause 21 – 43)

5.1 Service Delivery Contracts (Clause 31)

NZCCSS supports the Bill's endeavour to set out a three tier safety check with regulatory provision to exempt 1 or more of the safety check requirements.

NZCCSS recommends that state agencies are transparent when assessing whether a provider needs to comply with all or some of the safety check requirements (Clause 31) as set out in the service contract.

NZCCSS also recommends the inclusion of a review process where the provider believes the 1 or more of the safety check requirements are not proportionate to the risk presented by the activities set out in the contract.

5.2 Additional Cost to Providers

NZCCSS is aware that any new safety checks will impose significant additional costs on police and those providers may potentially have to pay for the checks to be conducted. NZCCSS is also aware that provisions in clause 39 (approving of screening services) would enable the Police to contract safety checks to a private agency.

NZCCSS recommends that in light of expected new costs to providers the bill provides for the specific monitoring of additional costs associated with undertaking requirements set out in clause 31.

6. PART 2 - Child Harm Prevention Order (Clause 44 -99)

NZCCSS acknowledge that a Child Harm Prevention Order (CHPO) has potential to increase the safety of children from a relatively small number of high-risk adults. However, there are clear human rights issues raised when criteria set out in (clause 48 (4) extend to persons 'believed' on reasonable grounds of committing a qualifying offence without having being convicted. Whilst these orders are likely to apply to a small number of people, it is critical that the Bill of Rights implication are taken into account when including (4) (b) in the criteria for application for a CHPO to address the likelihood that innocent people could be subject to CHPOs.

The reality of CHPOs is that people will be labelled a child abuser (prosecuted or not) and that this label will stick for the person's entire life, with no hope of redemption.

NZCCSS providers believe people can and do change with intensive support and supervision. However, the Bill makes no mention of how people subject to a CHPO will be supported to address their offending. Placing restrictions on the movements of a high risk adult is not sufficient to reduce their risk of harming children.

NZCCSS recommends: CHPOs sit alongside appropriate resourcing of intensive support to address underlying behaviour of those subject the order.

7. PART 3 – Amendments to Acts

Subpart 1 - Amendment to the Children, Young Persons and Their Families Act 1989

Subsequent Children

7.1 Subsequent Children : Funding to Address Underlying Issues (Clause 104 – 107)

NZCCSS acknowledges the need to ensure 'subsequent children' as defined in clause 104 (3) are safe in the care of their parents. However, the decision to remove a subsequent child must be accompanied by appropriate support and resources to address underlying issues (mental health, drug/alcohol addiction, family violence/lack of parenting skills), and by effective engagement with families struggling to care for their children. NZCCSS is aware of a body of practice data which shows it is the skill of practitioners in engaging with the families that is the most important and much more significant than the creation of a series of monitoring checks such as those identified in the bill.

NZCCSS also points to the need for mothers of a subsequent child born to have real hope they might keep their child if they make agreed changes to their lives. Any approach to subsequent children must be underpinned by a belief in hope and redemption; people can and do change with appropriate support.

NZCCSS recommends:

1. A transparent process that informs the mother/parent about what specific changes need to be made.
2. Provision of appropriate services and resources to support the mother/parent in their efforts to make changes.
3. The remove of a subsequent child should only be the very last resort and only after intensive support has been made available.

7.2 Social Worker Assessments

NZCCSS believes the skills, competency and considered judgment of the assessing social worker will be critical to the effectiveness of new provisions for the removal of subsequent children, particularly when assessing a mother who has already had successive children removed from her care. In such cases, NZCCSS is concerned there is a risk the assessing social worker will

apply a higher risk threshold despite a mother's effort to change, and risk that less experienced social workers could be risk averse in their assessment and as a consequence make an assessment and recommendation that is not proportionate to the risk.

7.3 Fear of Accessing Medical Services

NZCCSS raises the issue of mothers not presenting at medical and midwifery services due to fear the subsequent child will be removed. This situation is already happening and the proposed bill provides no certainty about how this risk might be minimised.

NZCCSS recommends the bill strengthens the states support of all mothers/parents by putting sufficient resources and services into all families to minimise situations where mothers/parents expose their children to harm.

7.4 Family Group Conferences (Clauses 108 – 113)

NZCCSS supports the bill's focus of Family Group Conferences (FCG) in developing plans about the services and assistance required to support a vulnerable child. However, we are concerned the bill makes no reference to the cost implications in the delivery of FCG plans or in the attendance of family members at conferences.

A further concern expressed is around the implementation of FCG plans and a quiet trend in referrals to NGOs who deliver specific services free of charge. It is imperative that the state retains its responsibility for its vulnerable citizens.

NZCCSS recommends the Bill makes provisions to adequately fund family group conferences and to monitor the extent to which FCG plans are funded.

7.5 Permanent Caregiver (removal of service orders) (Clause 132)

NZCCSS has concerns about removal of service orders from permanent caregivers and new provision under clause 132 that suggest financial assistance will be harder for permanent caregivers to access.

NZCCSS believes strongly the state has a responsibility to ensure permanent caregivers receive sufficient financial assistance to support vulnerable children in their care. Flexibility in the provision of financial support to permanent caregivers is critical to achieve this.

Our social service providers tell us children who have experienced troubled and disruptive lives need opportunities to participate in sports and other social, cultural, school activities, and in some cases, to continue links with family/whānau. These activities sit alongside a child's need for specific health, counselling, and educational needs.

It is these opportunities to build strong social connection and learn new skills that enable a child to grow, develop and build resilience. However, these activities cost money and are often out of the financial reach of permanent caregivers.

The wording in clause 132 (2) sets out conditions under which the Chief Executive must provide financial assistance to permanent caregivers [(2) (a)–(e)]. The wording here implies a tightening of financial assistance to permanent caregiver. NZCCSS would not support this move,

believing it would be counteractive to the intent of the bill: to improve the well-being of vulnerable children

(2) (a) implies a tightening of financial assistance ‘**needs arising from care and protection needs or the extraordinary health, education, developmental needs of the child young person**’. If the government is serious about addressing child vulnerability it must provide necessary financial assistance to permanent caregivers to enable them to care for their children.

NZCCSS recommends: the removal for the word ‘extraordinary’ from clause 123 (2) (a) and the inclusion of wording that would specifically enable financial assistance for sports, social and cultural activities.

7.6 Special Guardians (children leaving the state care) (Clause 116 -126)

NZCCSS acknowledges the complex problem the bill seeks to address around the relationship between natural parents who have a child removed and appointed guardians. However, NZCCSS is concerned the provisions are at variance with what we know from good practice, particularly around the fostering of parental bonds in complex families.

The wider context of appointments of special guardianship rights over a child is one fraught with high emotion and a sense of vulnerability for all involved. It is therefore a decision that requires much skill and support.

NZCCSS recommend the inclusion of a transitional support person to help manage these complex relationships between special guardians and natural parents to help foster positive links and to create a positive environment in which a child can grow and develop.

7.7 Achieving Independence (Clauses 131 - 136)

NZCCSS strongly supports the inclusion of specific provisions for children leaving state care to independence.

It is a national travesty that young people leaving care have been left without any adequate support once they reached their 17th birthday.

Our social service providers tell us young people transitioning out of care must have access to sufficient financial resources to enable them to meet their basic needs (housing, food, transport, clothing, medical costs), and to learn life skills many take for granted (accessing a passport or other means of official identification, opening a bank account, using the internet to search for on-line jobs). And above all else these young people need someone on their side who care deeply in their development.

It is therefore disappointing to read that clause 131 preclude financial assistance to this group of vulnerable people unless for ‘exceptional circumstances’. The state can and must play a role in supporting fully these young people who are at the margins of life at too early an age.

NZCCSS recommends:

- Amend clause 31 to enable the Chief Executive to provide financial assistance to young people leaving care to become and remain independent.
- Young people leaving care are prioritised for affordable and decent state housing.

- Young people receive free access to medical and dental services for the first year after leaving state care.
- Young people are assisted (through travel expenses/accommodation) to engage with a support person who will take an interest in the future development of the person.

8. Amendments to Kiwisaver Act 2006 (Clauses 138- 141)

The NZCCSS supports this provision. However, an opt-out provision should be considered as the current rate for contribution is likely too high at 3% for some young people and could lead to further hardship.

NZCCSS recommends:

- Amend Clause 141 to include an opt-out clause.

Appendix I – Overview of NZCCSS

The New Zealand Council of Christian Social Services (NZCCSS) has six foundation members: the Anglican Care Network, Baptist Union of New Zealand, Catholic Social Services, Methodist Church of New Zealand, Presbyterian Support New Zealand Inc and the Salvation Army.

Collectively, these six members are responsible for around 640 social service delivery sites in their networks throughout New Zealand. Our members deliver a wide range of services that cover such areas as child and family services, services for older people, food-bank and emergency services, housing, budgeting, disability, addiction support, community development and employment services.

This size and diversity in services are amongst the many reasons for NZCCSS to celebrate its membership and the work that they do to meet people's needs throughout New Zealand.

NZCCSS Mission and Role

NZCCSS works for a just and compassionate society in Aotearoa New Zealand. We see this as a continuation of the mission of Jesus Christ. In seeking to fulfil this mission, we are committed to:

- giving priority to poor and vulnerable members of our society
- Te Tiriti O Waitangi

The key roles of NZCCSS are to represent the common interests and vision of our members at the national level; to supply information and networking opportunities to support members provide quality services; and to develop, critique and advocate for policies that will assist poor, vulnerable and disadvantaged members of society.

A national Council, made up of two representatives from each denomination, governs NZCCSS. A small Secretariat team carries out the day-to-day work of the Council. This includes gathering and distributing information, research on social policy issues, and building relationships with government officials and others working in the community sector.

A Policy Group oversees the policy and research work that NZCCSS does in three key areas: child and family, housing and poverty and services for older people. Each Policy Group is made up of at least two council representatives plus social services managers, academics or others with particular expertise in that area. This means that the work that NZCCSS does is well informed by what is happening in our members' communities.

www.nzccss.org.nz or www.justiceandcompassion.org.nz