



New Zealand Council Of
Christian Social Services

The New Zealand Council of Christian Social Services
Submission to the Social Services and Community Select Committee on the
Child Poverty Reduction Bill

3 April 2018
New Zealand Council of Christian Social Services
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www.nzccss.org.nz

Introduction

New Zealand Council of Christian Social Services (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: (a) giving priority to the poor and vulnerable members of our; society and (b) Te Tiriti O Waitangi.

(NZCCSS) has six foundation members; the Anglican Care Network, Baptist Churches of New Zealand, Catholic Social Services, Presbyterian Support New Zealand and the Methodist and Salvation Army Churches.

Nationally the range and scope of our six members is extensive and comprises 213 separate provider sites, delivering a range of 37 types of services via 1024 specific programmes, located in 55 towns and cities throughout New Zealand. Further details on NZCCSS can be found on our website www.nzccss.org.nz

Within this range of services, NZCCSS social workers and social care workers deliver services to all age groups from new born and antenatal, children and young people, and older people (65+), through to those at the final stages of their biological lives.

Consultation process

The preparation of this submission draws on the extensive experience of our member agencies and follows consultation with the NZCCSS Child and Family Policy Group and the Impacts of Poverty and Exclusion Policy Group, comprised of Chief Executive Officers and practitioners, who meet regularly to inform NZCCSS of their current experience of working with children and families in communities. NZCCSS also consulted with Māori social workers who shared their extensive experience working within a Kaupapa Māori Framework in their communities.

NZCCSS contact details

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We request an opportunity to appear before the Select Committee to make further comment on this Bill.

Executive Summary and Key Recommendations

The New Zealand Council of Christian Social Services (NZCCSS) commends the government on this Bill. The setting of measures and targets in legislation to reduce child poverty is a vital step towards improving the lives of hundreds of thousands of children in New Zealand. It is also an important way to ensure child poverty becomes the central focus of government policy today and in the future.

NZCCSS members firmly believe New Zealand has enough resources to support living standards at a level which supports every child and their family/whānau to access the necessities of life. Governments across the political spectrum must take on board this moral responsibility to ensure all children have opportunities to grow and flourish, and to fully participate in their communities.

It is important to the success of this Bill, that there is a strong and sustainable NGO sector to implement strategies to reduce child poverty. As captured in the Bill, achieving a reduction in child poverty will take the sustained involvement of government and all-of society. Although the Bill is silent on NGO involvement, it is critical the NGO social service/community sector is involved in the development and implementation of child-poverty reduction strategies.

Key points and recommendations

- i. NZCCSS notes the absence of a reference to the Te Tiriti O Waitangi Policy. This is a serious omission given the Crown's obligation to the Te Tiriti O Waitangi and to the protection of tamariki Māori who remain disproportionately represented in child poverty statistics.
- ii. NZCCSS also notes the absence of a reference to the United Nations Sustainable Development Goals, specifically the goal "*halving poverty rates for all ages by 2030, based on national measures*". The Policy Intent of the Bill clearly supports this goal. References to both the United Nations Convention on the Rights of the Child (UNCROC) and the United Nations Convention on the Rights of Person with Disability (UNCRPD) are also omitted from this Bill.
- iii. NZCCSS supports the focus of this Bill to capture the complexity of a definition of poverty by including a range of measures (income-related measures, severe hardship measure and a poverty persistence measure, yet to be defined).
- iv. NZCCSS believes the policy framework provided for in this Bill must ensure the inclusion of specific targets to measure poverty reduction among tamariki Māori, Pacific children and children with disabilities as identified by the EAG Report 2012.
- v. To achieve the ambitious and necessary child poverty targets it is critical the wider public understand the fiscal trade-offs that will be required to support poverty reduction strategies. NZCCSS believes consideration should be given to a national public awareness initiative to educate all New Zealanders on the full impacts of poverty over the life span of a child, and why alleviating child poverty benefits everyone in our communities and New Zealand as a whole.

- vi. NZCCSS agrees a consistent definition of key terms in the Bill is critical to enable the accurate reporting of child poverty alleviation data over time and recommends consultation with a broad range of stakeholders including the NGO sector in this process.
- vii. NZCCSS understands the technical challenge for the delay in defining 'persistent poverty' but strongly supports interim action to mitigate the impacts of poverty on this group of children.
- viii. NZCCSS shares concerns raised by the Child Poverty Action Group on the time lag in data collected and analysed by Household Economic Survey and the need for the sample size to increase to provide a valid representation of population groups in the Government's statistician annual report.
- ix. NZCCSS recommends the inclusion into the annual report of NGO data to provide a broader a community-services perspective on the impact of child poverty initiatives.
- x. NZCCSS supports calls to include data on children with disabilities and parents/carers with disabilities and that this data is included in the Government statistician's annual report.
- xi. NZCCSS supports the re-naming of the Vulnerable Children's Act.
- xii. NZCCSS supports the scope of the government strategy on well-being and looks forward to consulting with Oranga Tamariki on how this Bill will be translated into policy, action plans and specific allocations of public expenditure, and how children outside of the threshold for statutory care, will access services to support their well-being.
- xiii. NZCCSS recommends the strategy is re-named the *child and family/whānau well-being strategy* to reflect Kaupapa Māori worldview and a preventative health model which views a child as part of their family/whānau and community context.
- xiv. NZCCSS supports an updated National Child and Nutrition Survey to understand the current diet of children living in low-income households so that appropriate policy interventions can be identified. The last survey was undertaken in 2002.
- xv. NZCCSS recommends the inclusion of housing legislation (and Housing Minister) is included in part 1 (5) interpretations, given the cost and availability of housing are critical factors associated with child at risk of poverty and harm.

Ko te ahurei o te tamaiti arahia ō tātou māhi
“Let the uniqueness of the child guide our work”
Whakataukī Proverb

Section A: General Comments

The New Zealand Council of Christian Social Services (NZCCSS) commends the Government on this Bill, and on taking up the challenge set in 2012 by the Expert Advisory Group (EAG) on [Solution to Child Poverty in New Zealand: evidence for action](#). It is heartening that six years after the report was released, child poverty has been for the first time, officially named in legislation, and a policy framework (measures, targets, reporting and strategy) is proposed to support this (and future) government’s work to improve the lives of thousands of children raised in poverty in this land of abundant resources.

Measuring the Impacts of poverty

NZCCSS supports the focus of this Bill to capture the complexity of a definition of poverty by including a range of measures (income-related measures, severe hardship measure and a poverty persistence measure (yet to be defined)).

NZCCSS members have a long history of working alongside children and families/whānau living in vulnerable communities, and of seeing first-hand the impacts of poverty. These impacts are however more evident for children living in households where multiple stressors are co-existing (poverty/debt/addiction/family violence/mental health/illness). Members also see the impact of a more tangible part of child poverty – material hardship - inadequate food and nutrition, poor quality and often transient housing, and missing out on basic material items such as a separate bed, warm clothes, shoes.

Restoring dignity and mana

A hidden impact of poverty reported by members is the loss of hope, dignity, social isolation and stigmatisation within families/whānau, where low income and material hardship is entrenched across generations. Policy initiatives to reduce child poverty must give consider to how dignity and mana of individuals and whānau can be restored, if we are to support people and whānau to independence.

Naming income and wealth inequality

That New Zealand has reached the point where a child poverty Bill is needed is not accidental, but rather it is underpinned by 30 years of restructuring since the mid-1980s, which left behind many people and communities, some of which have never fully recovered. An integral part of this story is also the corresponding rise in income and wealth inequality, significant benefit cuts to social welfare payments during the 1990s, and the replacement of a universal family payment to a targeted Family Support payment [Child Poverty Action Group. (2017). Further fraying of the welfare safety net].

All of these factors, alongside a range of social determinants of poverty – poor quality and high cost housing, low-skilled, low-wage and temporary work, cost barriers to health, (including oral health), food insecurity, poor educational attainment - have accumulated

in an unacceptable rate of child poverty in New Zealand, which 30 years later are complex to unravel and will require dedicated time and resourcing.

On the ground, members describe the challenges of working in families/whānau where there is multi-generational poverty, employment and training opportunities are limited, household debt high and capabilities held by earlier generations lost. Members tell us \$65 extra through the Families Package will have benefit but limited. Much is needed to raise household income to a level to cover necessities the majority of children take for granted.

“\$60 could help but then something comes up a tangi or car repair and then the pressures on to go to a money lender”.

“Low income whānau tend to have more children in a household to care for, including children and teens of other whānau. \$60 will not go far”.

Equity across population groups

The EAG identified 3 groups of children disproportionately at risk of poverty: Tamariki Māori, Pasifika children and children with disabilities (or living with parents with a disability). NZCCSS believes the policy framework provided for in this Bill must ensure the inclusion of specific targets to measure poverty reduction among these 3 groups to track improvements to the lives of these children. Identifying population groups at risk enables meaningful and culturally appropriate initiatives to be identified and implemented.

Sustained ‘All of society’ support

To achieve the ambitious and necessary child poverty targets it is critical the wider public understand the fiscal trade-offs required to support poverty reduction strategies. NZCCSS believes consideration should be given to a national public awareness initiative to educate all New Zealanders on the full impacts of poverty over the life span of a child, and why alleviating child poverty benefits everyone in our communities. This initiative would likely encourage sustained public support for poverty reduction policies and expenditure, specifically those targeted at specific cohorts of children (Māori/Pacific/children with disabilities) as set out in the EAG report.

Section B: Legislation

1. Scope of Bill

New Zealand’s partnership Treaty with Māori

NZCCSS notes the absence of a reference to the Te Tiriti O Waitangi Policy. This is a serious omission given the Crown’s obligation to the Te Tiriti O Waitangi and to the protection of tamariki Māori who remain disproportionately represented in child poverty statistics. NZCCSS however commends the inclusion of requirements in the Bill to consult with Māori.

Equity across all children

It is widely agreed that Māori have experience poverty since colonisation. Government data gives support to this position [*Measuring and Monitoring Material Hardship for NZ Children MSD research and analysis used in advice for the budget 2015 Child Poverty Package*], and substantive research undertaken by the EAG's analysis in 2012 reached a similar conclusion "*Māori children are proportionally more likely than pakeha children to be exposed to the impacts and effects of poverty than the average child. The rates of severe and persistent poverty among Māori children are at least double the rate for Pakeha children*" [The EAG Working paper. Reducing Child Poverty in Māori Whānau].

Cultural identity and its connection to poverty

The importance of Māori identity and connectedness is also a critical dimension of poverty among Māori whānau. NZCCSS consultation with iwi social workers tells us Māori living in poverty are more likely to be disengaged from their Māori identity, that is who they are and where they come from, and that this frequently leads to poor mental health and ability to achieve well-being and independence.

A Treaty Based Response

As previously noted this Bill does not reference Te Tiriti O Waitangi. Given the inequitable number of tamariki Māori living in poverty, this means setting targets for the reduction of child poverty for Māori which recognise and respond to this inequity.

While outside of the direct purview of this Bill, but still influenced by the poverty reductions settings within it, a range of responses targeting Māori whānau should be developed and implemented. These will need to include both immediate and more long-term initiatives.

Immediate initiative could include:

- Reintroduction of marae and Māori community-focussed employment and skills development initiatives
- Further development and roll-out of kaupapa Māori health, including mental health, and addictions programmes.
- Further development and roll-out of kaupapa Māori disability support programmes
- Increased funding of Whanau Ora
- Greater support for social services organisations that provide a high level of support to Māori whānau

Longer term initiatives will require:

- Housing support programmes which turn around the rapidly declining rate of Māori home ownership
- Greater focus on Māori achievement and success at all levels of education
- Increasing access to apprenticeships and skills development programmes via programmes developed for/by and demonstrating success in achieving qualifications and employment

NZCCSS Recommendation: The Bill needs to i) include a reference to the Te Tiriti O Waitangi ii) Policy measures developed to reduce child poverty must have regard to the principles of Te Tiriti O Waitangi and to the importance of cultural identity iii) provide for targets to be set specifically for tamariki Māori.

International Treaties.

NZCCSS notes the absence of a reference to the United Nations Sustainable Development Goals (UNSDG), specifically the goal “halving poverty rates for all ages by 2030, based on national measures”. The Policy Intent of the Bill clearly supports this goal, but the Bill is silent on this requirement.

NZCCSS notes the absence of a reference to both the United Nations Convention on the Rights of the Child (UNCROC) and the United Nation Convention on the Rights of Person with Disability (UNCRPD).

UNSDG, UNCROC and UNCRPD are important international commitments New Zealand has signed up to and need to be honoured.

NZCCSS Recommendation: Policy measures to reduce child poverty must have regard to the requirements of UNSDG, UNCROC and UNCRPD.

2. Government Statistician

NZCCSS notes the expanded role of the Chief Statistician to define key terms in Bill set out below (pg 4-6).

- *base financial year*
- *child’s household*
- *equivalised (in relation to household income)*
- *household*
- *household income*
- *housing costs (in relation to equivalised disposable household income)*
- *income*
- *material hardship*
- *persistent poverty*
- *severe material hardship*

Defining an adequate household income for our poorest in society

NZCCSS agrees a consistent definition of these terms is critical to enable the accurate reporting of child poverty alleviation data over time. How each of the key terms are defined is also critical as these will set the standard by which the household income and living standards of the poorest members of our society will be set. NZCCSS would support the involvement of a broad range of stakeholders across NGOs, government, and academia during the consultation process.

3. Child Poverty Measures

Primary measures (sec 10 to 13) incorporate measures for:

- a. Low income before housing costs (below 50% of median income, moving line)*
- b. Low income after housing costs (50% median income, fixed line)*

- c. *Material hardship (based on EU's standard threshold i.e going without things such as healthy food, warm clothes, or delaying going to the doctor)*
- d. *A persistent poverty measure (for low income, material hardship or both. The data is not currently available for this measure). Part 2, clauses 10 to 13.*

Supplementary measures

- a) *Low income before housing costs (60% of median, moving line)*
- b) *Low income after housing costs (60% of median, moving line)*
- c) *Low income after housing costs (50% of median, moving line)*
- d) *Low income after housing costs (40% of median, moving line)*
- e) *Severe material hardship*
- f) *Both low income and material hardship (using 60% AHC moving line and the material hardship measure from the primary list.*

NZCCSS supports the Bill's intention to capture the complexity of a definition of poverty by including a range of measures (income-related measures, severe hardship measure and a poverty persistence measure, to be defined).

NZCCSS notes the inclusion of a 50% measure aligns with the OECD's measure used for its international comparisons, and with the United Nations Sustainable Development Goal to reduce poverty (as noted above). From this viewpoint NZCCSS supports this measure.

Why the 60% measure after housing is a more realistic measure

However, NZCCSS believes an income set at a 60% of median household disposable income after housing costs, is more realistic from a family's perspective on what would be considered a 'reasonable' level of income to protect them from the worst impacts of poverty, and to enable them to live with dignity and participate fully in society.

The research undertaken to support the calculation of the Living Wage in 2013 (currently being updated) was based on finding the "*income necessary to provide workers and their families with the basic necessities of life*" that enable workers to "*live with dignity and to participate as active citizens in society.*"

The researchers used a combination of focus groups with lower income families looking at what they estimated they would need to have the necessities and to be able to participate in society, along with reviewing the research and statistical information on living costs in Aotearoa New Zealand. The result of that research was to arrive at an annual household after-tax income of \$53,976 or 76.78% of the median household income after tax. As the researchers pointed out, this lands around halfway between the 60% of median household income poverty line and the median income. (***Report of an investigation into defining a living wage for New Zealand***, P.King & C. Waldegrave, December 2012 https://www.livingwage.org.nz/reports_and_research). An update of the living wage is due to be released in April 2018 and this will help give an up-to-date benchmark against which any poverty measures can be assessed.

What this research clearly demonstrates is that using a measure of poverty lower than the 60% of household median is too low to provide an income into a household that can enable them to meet their basic needs and participate in society.

The 60% median measures (both before and after housing costs) provide the most meaningful measure of the true level of poverty and families living on less than this

income for a sustained period will almost certainly face material hardship as well. Prime Minister Jacinda Ardern used this measure as the headline for her personal commitment to reducing poverty during the 2017 General Election campaign (<https://www.radionz.co.nz/news/political/338701/labour-would-lift-100-000-children-out-of-poverty-by-2020-ardern>) and this commitment is supported by the evidence.

Measuring people in the deepest hardship

People on the lowest incomes as measured by the 40% median income are those most in need and in deepest hardship. The number of people in this category has not reduced but actually *increased* over the past 10 years, even as some modest improvements in the higher poverty measures have occurred. This is because those on the lowest incomes are overwhelmingly from households relying on government transfers, mainly welfare benefits.

It is clear that government income support levels will have to be significantly raised and benchmarked against the movements in wages if a significant decrease in poverty for the lowest income earners is to be achieved and sustained. Policy changes such as the Government’s Families Package are forecast to deliver more income into lower income households. While this is a significant first step towards reducing poverty in the lowest income households, further, bolder action will be required.

Children in benefit dependent households

The largest gap remains the exclusion of children in benefit dependent households from the In-Work Tax Credit. Changing this payment to a Child Tax Credit would bring additional income that would significantly reduce poverty in the lowest income families.

Income inequality is not included in the suite of measures for child poverty, yet changes in the fixed line (CV) poverty measures suggest that inequality between the mid-incomes (mainly wage earners) and those on the lowest incomes (mainly reliant on government transfers) has increased.

This can be explained by the fact that wages have increased more for lower to middle income earners than levels of income support from government.

We note that another important measure included in the SDGs (Inequality Goal #10.1) is a measure of income inequality that measures the proportion of total income that goes to the lowest 40% of income earners. The SDG goal is for this to increase but the trend for New Zealand over the past decades has been for the share of the lowest 40% to decrease, meaning increasing inequality (*Household Incomes in New Zealand: Trends in indicators of inequality and hardship 1982 to 2016, MSD, July 2017, p.92*).

Selected Income Poverty Measures from the Child Poverty Bill

Most recent data	2007	2016	Ten-year Target	Number 2016	Population 2016
50% AHC CV	16%	14%		155,000	1,078,000
60% AHC CV	22%	20%	10%	220,000	
50% BHC	13%	13%	5%	140,000	
60% BHC	20%	20%		215,000	

60% AHC	22%	27%		290,000	
40% AHC	11%	13%		140,000	

(Source: Household Incomes in New Zealand: Trends in indicators of inequality and hardship 1982 to 2016, MSD, July 2017, p.156. Ten Year Target percentages are from Prime Minister’s media release 31 January 2018 “Historic commitment to reduce child poverty”)

Income poverty figures before housing costs are improving but if after housing costs are included, poverty is increasing. This is the result of the worsening housing crisis forcing up rents and housing costs and reduced access to public housing with income-related rent subsidies.

The fixed line after housing costs poverty measure is also dropping, which says that lower incomes are rising in real terms for the lowest income households. But their incomes are not rising as much as those immediately above them in the lower-middle incomes, so they are being left further behind in relative terms.

What can be concluded from the set of measures is that the “easiest” targets have been made primary ones, yet the secondary ones capture important information about the inequality in income distribution for lower income families. The reality of poverty is that the relative measures indicate how close families are to a level of income that enables them to meet their basic needs and participate in society.

Defining persistent poverty

The latest Child Health Monitor (2017) revealed over 7% of New Zealand children are living in severe poverty (based on data from 2008). This translate as 80,000 New Zealand children are experiencing both material hardship and living in a low-income household. Research tells us children who live in poor households in their first five years of life are more likely to grow up with poor health and fewer opportunities (e.g. leaving school early, unemployed in later life). Our members see the impact of this poverty and the damage it does to a child’s development, and to the sense of dignity and mana. While NZCCSS understands the technical challenge for the delay of this definition to 2025, actions to mitigate this most damaging level of poverty, must not wait until a definition is determined. Interim action must begin with urgency.

4. Reports

NZCCSS supports requirements in the Bill for the Government’s Statistician to report annually on child poverty against measures used set out in the Bill. It is critical that good resourcing is available for timely data to allow the effective monitoring of the measures and targets.

NZCCSS hopes the Government’s Statistician draws on a broad range of data, alongside the Household Economic Survey (HES). NZCCSS shares concerns raised by the Child Poverty Action Group on the time lag in data collected and analysed by HES and the need for the sample size to increase to provide valid representations of population groups to incorporate into the Government Statistician’s annual report.

NZCCSS recommends the inclusion into the annual report NGO data to provide a broader community-services perspective on the impact of child poverty policy initiatives. This

anonymized data might include data on food parcels, emergency housing, budgeting advice, family counselling, and other supports sought by families/whānau from NGO services. Monitoring changes over time would provide snapshots of community and family/whānau resilience.

NZCCSS supports calls to include data on children with disabilities and parents/carers with disabilities. The EAG report clearly identified children with disabilities as being over-represented in child poverty data. Disabled children are more likely to live in sole parent and low-income households. The Bill needs to make provision to ensure this data is included in the Statistician's Report.

Name change for Vulnerable Children Act 2014

The Vulnerable Children Act 2014 is to be renamed the Children's Act 2014 (Part 3, clause 41 and 42).

NZCCSS supports the re-naming of the Vulnerable Children's Act 2014 to the Children's Act to address what is stigmatising language to describe the children at the heart of the work undertaken by Oranga Tamariki. The amended name of the Act enables Oranga Tamariki to facilitate high aspirations for all children and young people to grow and flourish including children in their care.

5. Government strategy for improving well-being of all children and those with greater needs

NZCCSS supports and commends the intention of clause 6 of the Bill

- a) *improving the well-being of all children; and*
- b) *improving, as a particular focus, the well-being of children with greater needs; and*
- c) *reducing child poverty and mitigating impacts of child poverty and of socio-economic disadvantage experienced by children.*
- d) Improving the well-being of the core populations of interest to the department (namely children with early risk factors for future statutory involvement, those who the department works with, and care-experienced children, as specified in section 9 (1).

Whilst NZCCSS has no information on how Oranga Tamariki will apply the well-being strategy to the scope of its work with children, we believe emphasis needs to be on measures of income and material hardship and not predictive modelling to identify children with the greatest need.

Engagement strategy with the NGO sector

The development of a child strategy covering both the general child population and those with 'greater needs' will be a challenge. Currently there is no information on how this strategy will be implemented, which must include an engagement plan with the community-based NGO sector. The capacity of the public sector is not sufficient on its own to develop an over-arching strategy for children. It is disappointing the Bill makes no reference to the NGO social service/community sector given the vital work undertaken by this sector. NZCCSS strongly believes it is critical to the success of this Bill that there is a strong and sustainable NGO sector to implement strategies to reduce child poverty.

Scope of the Strategy

This Bill is ambitious in that the scope of strategy covers both the well-being of the general child population and those with the 'greatest need', sitting within the Oranga Tamariki agency. The overall approach of the Bill is in line with NZCCSS' support for proportionate universalism and its combination of targeted interventions for those with the greatest needs, in addition to the provision of a broad range of universal services targeted at all children and families/whānau (Marmot, M. 2010). The two are equally critical.

However, more policy detail is needed on how Oranga Tamariki will maintain a focus on the well-being of 'all children', whilst working with a targeted group of children under the statutory responsibility of the Chief Executive. NZCCSS is concerned to ensure children outside of the threshold for statutory care have access to necessary services and supports to support their well-being.

NZCCSS looks forward to consulting with Oranga Tamariki on how this Bill will be translated into policy, action plans and specific allocations of public expenditure.

Whole of child and whānau approach

Our members consistently tell us addressing income poverty, working alongside the child and family/whānau to address other co-existing stressors (i.e (debt/addiction/family violence/mental health/illness), restoring the dignity and positive self-identity (cultural connectedness) of the whole family, is the most effective action to improve the wellbeing of children and their families/whānau. This represents a whole of child/whānau approach, seeing the child in its wider context of family/whānau and community not simply as an individual outside the context of its own family/whānau.

It is critical that Clause 6 gives full attention to the Kaupapa Māori worldview and acknowledges the inter-relationship between child and whānau. NZCCSS strongly recommends the strategy is re-named the child and family/whānau well-being strategy.

Definition of 'well-being' in the Bill.

A definition of 'well-being' needs to be included in the Bill to give clarity to the Government's (well-being) strategy. As above, any definition must include a Kaupapa Māori definition and draw from Kaupapa Māori research and data (i.e Te Kupenga 2013).

NZCCSS is aware that The Treasury has released a draft Well-Being Framework which is likely to underpin this Bill. NZCCSS believes a broad range of indicators are needed alongside international indexes and indicators.

Inclusion of a National Child and Nutrition Survey

NZCCSS would support the inclusion of a [National Child and Nutrition Survey](#) and reporting process. We know good nutrition is critical for child development and good health and we also know food is the first thing to go when a family/whānau is struggling on a low income. The last National Children's Nutrition Survey was undertaken by the Ministry of Health in 2002. It is critical that all children living in low income households have access to diets rich in essential micronutrients and vitamins to support their health

and development. More data is needed to understand the current diet of children living in low-income households so that appropriate policy interventions can be identified.

Children's agencies

Finally, NZCCSS supports requirements to ensure 'children's agencies' as identified by the Bill (see below) work together to improve the well-being of children and 'particular groups of children' (*Part 3, clause 45, inserting new section 4*).

Part 1 (5).

Oranga Tamariki Act 1989

Education Act 1989

New Zealand Public Health and Disability Act 2000

Policing Act 2008

Sentencing Act 2002

Social Security Act 1964

Given that the cost of housing is a driver of poverty, it is critical that housing legislation (and Housing Minister) is included in this section of the Bill.

Aroha tētahi ki tētahi – Let us Look after each other