



SOCIAL POLICY AND PARLIAMENTARY UNIT

Working for the eradication of poverty in NZ

Te Ope Whakaora

Statement of Proposal – Auckland Council Draft Local Approved Products Policy (LAPP) Submission on behalf of The Salvation Army New Zealand Fiji and Tonga Territory

BACKGROUND

1. The Salvation Army is an international Christian and social services organisation that has worked in New Zealand for over one hundred and thirty years. The Army provides a wide-range of practical social, community and faith-based services, particularly for those who are suffering, facing injustice or those who have been forgotten and marginalised by mainstream society.
2. We have over 90 Community Ministry centres and churches (corps) across the nation, serving local families and communities. We are passionately committed to our communities as we aim to fulfil our mission of caring for people, transforming lives and reforming society through God in Christ by the Holy Spirit's power.
3. This submission has been prepared by the Social Policy and Parliamentary Unit of The Salvation Army. This Unit works towards the eradication of poverty by encouraging policies and practices that strengthen the social framework of New Zealand. This submission has also been prepared in partnership with TSA's Addiction Services (Auckland Region). The Salvation Army is regarded internationally as leader in the provision of evidence based addiction treatment services throughout the world. In New Zealand we have over 100 years of experience in providing services to tangata whaiora and their whānua who have experienced harm through their misuse and abuse of alcohol and/or other drugs.
4. The Salvation Army Addiction Services Auckland exists to provide safe, integrated, high quality treatment services to people whose lives have been severely affected by their harmful use of, or dependence on, alcohol and/or other drugs and/or gambling, supporting, challenging and encouraging them as they make positive changes in their lives. To achieve this we offer an effective, evidence-based approach to treatment that partners with people experiencing alcohol, drug and gambling dependence/addiction and that encourages and supports ongoing recovery.
5. In terms of tangata whaiora while alcoholism, drug dependence and gambling addiction can be found across all groups in society, it is often those groups at the lower end of the socio-economic spectrum that suffer most from this disorder. Groups most likely to be in poverty and hardship include women, families, single parents, Maori, Pacific Islands peoples, refugees, people with mental health issues, beneficiaries and people reliant on limited income paid employment.

6. This submission has been approved by Commissioner Robert Donaldson, the Territorial Commander of The Salvation Army's New Zealand, Fiji and Tonga Territory.

RESPONSES DRAFT POLICY

1. *For Auckland – all areas except for the City Centre*

- 1.1 The Salvation Army is generally very supportive of all the draft provisions proposed in this section. Specifically, that for all areas apart from the city centre, licences to retail legal psychoactive substance will not be granted in:
 - a) Areas of high deprivation
 - b) Neighbourhood centres
 - c) Within 500m of a school teaching students year seven and above
 - d) Within 200m of a school teaching students between years one and six inclusive
 - e) Within 500m of the mental health or addiction treatment centre
 - f) Within 500m of an existing psychoactive substances retail licence
 - g) Areas identified as restricted areas on map 1a and 1b.
- 1.2 Moreover, we generally agree with the rationale used for each of these locations, particularly the rationale concerning buffer zones around different types of schools.
- 1.3 As stated above, The Salvation Army supports the inclusion in Point (e) of this section around buffer zones for *mental health and addiction treatment centres*. However, we submit that this definition should be expanded to include other sites or locations that The Salvation Army utilises. We also submit that if this is not possible, then a new definition or section could be included to capture the work of specific sites that engage in harm minimisation and treatment of alcohol and drug issues but that do not fit within the current mental health and addiction treatment centre definition.
 - 1.3.1 We have already proposed in our written and oral submission to the Draft Local Alcohol Plan from the Auckland Council that there are unique locations specific to The Salvation Army that should be included as a “sensitive site” under that policy. Namely, Salvation Army corps (churches) that run Recovery Churches to aid a person’s treatment and rehabilitation, and also some of our key Community Ministry centres delivering social service programmes.
 - 1.3.2 TSA Addictions Service has 8 services/programmes and four treatment centres currently operating in the Auckland metropolitan area. These centres would likely fall within the Addiction Treatment Centre definition in the draft LAPP policy.

- 1.3.3 The Salvation Army runs two Recovery Churches in Auckland: at Manukau and Mt Eden. The Manukau Recovery Church is held weekly at the Manukau Corps of The Salvation Army (16 Bakerfield Place, Manukau). As part of their aftercare, those using this service are also likely to access the other social services and associated programmes operating from this centre throughout the week. It is unclear to us whether this location therefore fits within the definition of being located “within 500m of the mental health or addiction treatment centre” under Point (e) of the draft LAPP. We request further clarification about this please.
- 1.3.4 We acknowledge that the Auckland Council and the Local Boards have already discussed other “sensitive sites”, particularly early childhood centres and places of worship. However, we submit that some of The Salvation Army’s addictions treatment work is unique compared to other treatment centres, comprising aftercare and follow-up support services delivered through our corps (churches) and Community Ministries centres, rather than being localised only to the formal Addiction Services programme delivery site. We provide these services across multiple locations to best serve the vulnerable people requesting our assistance. We propose that these points of difference warrant an extension or change to the “sensitive sites” definitions.

2. For the Auckland City Centre

- 2.1 The Salvation Army supports the provisions in this section for the City Centre. Specifically, that licences to retail legal psychoactive substances will not be granted in:
- a) Areas of residential deprivation
 - b) Within 100m of an existing psychoactive substances retail licence.

In particular, The Salvation Army supports the provision in Point (b) to limit the density of such retail businesses within the City Centre.

3. Review

- 3.1 The Salvation Army supports this two-year review period. However, given the constantly changing nature of psychoactive substances, we recommend a shorter regular review period in the future.

CONCLUSION

The Salvation Army acknowledges that some Local Boards have requested a total ban of the sale of legal psychoactive substances throughout Auckland. We support this request for a total ban.

However, if this approach is not undertaken, then The Salvation Army instead fully supports the tighter regulation and harm minimisation approach proposed in the Auckland Council's Draft Local Approved Products Policy (LAPP).

For further information or discussion, please contact:

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