



## **Policing (Cost Recovery) Amendment Bill Law and Order Select Committee**

### **The Salvation Army New Zealand Fiji and Tonga Territory Submission**

#### **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.<sup>1</sup>
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 been informed by feedback from other parts of the wider Salvation Army. This includes our social programmes such as HomeCare, Education and Employment, and Community Ministries. Our Human Resources Department has also provided information for this submission.
4. This submission has been approved by Commissioner Robert Donaldson, Territorial Commander of The Salvation Army's New Zealand, Fiji and Tonga Territory.

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<sup>1</sup> <http://www.salvationarmy.org.nz/our-community/mission/>

## THE SALVATION ARMY PERSPECTIVE

5. The Salvation Army **supports** some aspects of this Bill, specifically what constitutes a 'demand service' as per the new section 79B. However, we are **opposed** to other parts of the Bill. This will be discussed further below.
  
6. The Salvation Army believes that we have a strong professional and working relationship with the New Zealand Police and other justice sector agencies. For example, Salvation Army Community Ministry centres frequently work with Police and the Department of Corrections to have those serving community-based court appointed sentences serve in our food banks to prepare and provide food parcels. Also, Salvation Army services generally support the Police through offering advice, and the provision of specialised social services and food parcels for people referred to us by the Police.
  - In the year ending 30 June 2014, we provided **14,017 hours** of community service or diversion work for those serving a community based sentence at our 63 Community Ministry centres across New Zealand.
  - If we assigned \$60.00 per hour cost (to include staff costs, overheads and supervision of these people), that would amount to **\$841,020** worth of work from us.
  - We do not charge the Police or Courts for any of this work. Neither do we receive any remuneration from the Police or Courts. Again, this is part of the working relationship The Salvation Army has with the Police and other Justice Sector government agencies.
  
7. The Salvation Army is a significant user of Police vetting services. There are some key elements regarding our use of these vetting services;
  - There is currently no cost to The Salvation Army to conduct or renew a Police check.
  - It is mandatory for all Salvation Army staff and volunteers working with vulnerable people to have a Police check conducted before employment.
  - Our Education and Employment social programme is moving to conducting Police vetting for all 80 staff members on an annual basis. This vetting is mandatory for all education service providers.
  - Our HomeCare social programme, which provides quality care and support for people in their own homes, has offered some useful data detailing their recent experience with Police vetting services. This information acts as a brief case study of engagement with Police vetting;

	2012	2013	2014
<b>New Support Workers</b>	212	186	255
<b>Review of Police Checks</b>	Nil	Nil	Approx. 400 (HomeCare began their three-yearly renewal process in August 2014 and it will end in July 2015)
<b>Total Police Checks Completed (in calendar year)</b>	322	317	796

- The increase in total Police checks from 2013 to 2014 is due to HomeCare starting the three-yearly review of staff Police checks.
- HomeCare estimate that in the future, they will conduct approximately 600 Police checks annually. This is likely to be about 300 new pre-employment checks for incoming staff, and about 200-300 renewals for staff approaching their third anniversary since their initial Police check.
- This is just one of the many social services The Salvation Army provides. All of our social services will have similar experiences with conducting and renewing Police checks.

## SPECIFIC RESPONSES TO AMENDMENTS

### 8. Stated policy objectives

- The Salvation Army supports the stated policy objectives of this Bill.
- We acknowledge that the overall Vote Police budget has been under some real stress over the last four years. Therefore, cost-recovery measures for specific services can be beneficial to the Police as long as they do not limit the core functions of the Police as enshrined in the Policing Act 2008.

### 9. New section 79B

- The Salvation Army agrees with the definition of a demand service as per new section 79B(2).
- However, we **oppose** the inclusion of Police vetting services within the demand service definition under new section 79B(3).
  - The Salvation Army submits that other Policing services, such as providing security services for private and commercial events, might be better suited to fit within a demand service as defined by this Bill because they are generating commercial revenue and profit for these organisations or companies. We emphasise that there is also a plethora of private security companies available for this kind of work. Cost-recovery in these situations might be more beneficial for the Police so long as core policing services are not affected and the Police do not become a quasi-security service for commercial enterprises.
  - The Salvation Army, along with many other non-governmental organisations, social service providers, charities or Churches, are major users of Police vetting services. These Police checks are a critical component in the work these organisations undertake with vulnerable and marginalised people and families, all with aim of improving the public and social good of New Zealand. Adding a cost to conduct or renew a Police check would likely impose significant financial burdens to a social services sector that is already under immense economic pressure.
  - Using our examples above, if a cost was imposed for Police vetting, we would need to pay for approximately **700** Police checks per year for just **two** of our social programmes. This does not include Police vetting needs for our Community Ministry and Early Childhood Education Centres, and our Alcohol, Drug and Gambling Addiction Services, for example. Again, that would add stress to already tight budgets for these programmes.

### 10. New section 79C

- We agree with the criteria listed in this section.

### 11. New section 79D

- The Salvation Army welcomes this provision regarding consultation.

## 12. New section 79G

- The Salvation Army submits that organisations within the social services sector that are providing services for the social and public good of New Zealand should be permanently exempt from being charged for using Police vetting services.
- Additionally, if other Police services are added to the definition of demand services if this Bill passes, we submit that the Minister should exercise their discretion in granting fee exemptions or waivers in favour of those not-for-profit organisations providing services for the social and public good of New Zealand.

## 13. Final Comments

- The Salvation Army does not wish to comment on the other aspects of this Bill not already discussed specifically above.
- The Salvation Army is acutely aware of the various arguments surrounding the passage of this Bill. While we do not necessarily support a full user-pays type of system that this Bill creates the framework for, we acknowledge the huge budgetary pressures being placed on the Police and wider Justice Sector. We contend that vital additional financial resource for the Police is better addressed through increasing the Vote Police Budget appropriations, rather than creating a framework for cost-recovering through the so-called demand services. Our submission is based on our commitment to working for the social and public good of our nation. We also support our nation having an adequately resourced Police force that also works for the wider social and public good. But we submit that cost-recovery should not be imposed on organisations who are themselves under great financial and budgetary stresses

## CONCLUSION

For further information or discussion, please contact:

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