



NEW ZEALAND FEDERATION OF
FAMILY BUDGETING SERVICES (INC.)
TE RŌPŪ PENAPENA PŪTEA
WHĀNAU O AOTEAROA

P O Box 24382
Wellington
Ph:(04) 471-1420
Fax:(04) 471-1490
enquiries@familybudgeting.org.nz
www.familybudgeting.org.nz

07 August 2008

Nathan Clark
Preventing and Minimising Gambling Harm Submissions
Ministry of Health
PO Box 5013
Wellington

SUBMISSION: Preventing and Minimising Gambling Harm 2010 - 2016

Background

The Federation is a collective of community organisations that share a common code of ethics, philosophy, and commitment to delivering free, high-quality budgeting advice to families/whanau and individuals in Aotearoa-New Zealand. The Federation has been incorporated since 1979 and has provided free budgeting advice as a collective for almost 50 years.

Snapshot

The Federation comprises a total of 149 members in various categories nation-wide. Member services provide budget advice from Kaitaia to Invercargill and, including the West Coast, Great Barrier, and Waiheke Islands, provide coverage to most towns and cities in New Zealand. As of 30 July 2008, Federation personnel included 670 certificated budget advisers, 224 service coordinators and staff, 597 other volunteers, 17 Federation tutors and 193 trainee advisers. In the 12 months to 30 July 2008, Federation services fielded over 293,000 enquiries, worked with more than 29,000 client families, and delivered almost 500 community education programmes.

It is from this depth of community knowledge and experience in the consumer finance sector that the Federation makes the following submission.

Client Endorsement of a NZFFBS Inc Budget Adviser

"I believe her inspiration gave me strength to end a long, devastating battle with gambling addiction. W.I.N.Z case managers, W.I.N.Z budget adviser, Gambling addiction counsellors, social workers, family doctor, family members, and friends were unable to achieve the results of this extremely talented lady." (*Name Withheld*, 2006)

Introduction

1. Thank you for providing the community with the opportunity of providing feedback on the Consultation Document. The Federation, on the whole, endorses the proposed approach in the plans.
2. The Federation notes a number of gaps in service coverage in the service plan and has also included these below.
3. The Federation does not believe that the plan adequately addresses the area of tertiary prevention.
4. The Federation acknowledges the Ministry of Health's proactive use of research to underpin and improve its service delivery and wishes to offer its assistance in this area.
5. The Federation supports the 20:80 weighting for the levy calculations and offers its reasoning below.

Submission

1. Are there things you particularly endorse about the proposed approach in the service plan?

The Federation endorses the community-wide approach being taken by the Ministry of Health and believes this emphasis should continue throughout 2010-16. The Federation believes that there are a number of factors both impacting and influencing gambling addiction and gambling harm.

From the Federation's point of view, the financial devastation experienced by the problem gambler, and the financial fallout experienced by those close to the gambler is a consequence of gambling that the Federation is well placed to deal with. Similarly, there are other organisations that are affected by and can have effect on the problem gambler's life. These organisations should be identified, categorised, and included in all future consultation.

The Federation endorses both the maintenance and development of effective interventions as stated in the strategic plan. The maintenance of existing interventions is paramount and, again, the Federation urges the Ministry of Health to consider *all* secondary and tertiary interventions that are already available in the community before developing and duplicating those services.

The Federation acknowledges the Ministry's proactive use of research to underpin and improve its service delivery and urges it to work alongside the community in this regard and utilise the already existing capacity the community sector can offer.

2. What changes do you suggest to the proposed approach in the service plan?

The Federation notes with disappointment that there is still no planned community education intervention strategy in the strategic plan.

Objective 6 of the strategic plan states that "People have the life skills and the resilience to make healthy choices that prevent and minimise gambling harm". The Federation notes that under a similar Objective in the previous strategic plan the Action section stated that the Ministry will, "develop and implement relevant life skills programmes, such as coping with financial gains or losses, budgeting and using credit."

The Federation has been developing such programmes for over 30 years and is the largest network delivering budgeting and financial literacy education in New Zealand. We regret that the Ministry has not previously approached the Federation to consider a contract for service delivery of financial life skills for those affected by gambling. It is with deeper regret we note that the Ministry has now removed this objective from the 2010-16 strategic plan.

The Ministry's own data collection shows that, "research... on barriers to help-seeking for problem gamblers found that help-seeking primarily occurs following a crisis event, with financial problems the primary motivation for seeking help" (p.4). As Federation services exist for people seeking help with financial problems it is disappointing that the Ministry refuses to acknowledge the participation of these services as part of its overall strategy.

The Federation also notes with deep regret that the community sector has effectively been removed from the Ministry's strategic plan. The closest objective to this is now Objective 4, where the Ministry considers analysis of Government annual reports and surveys to be of more value than working collaboratively with the sector that works every day with problem gamblers.

It would appear that the Ministry has chosen a national media campaign over working with the community sector as the most effective strategy for raising awareness in the community.

Along with mental health clients, problem gambling clients continue to exact a drain on the resources of budget services due to the complexity of their cases and longevity of the intervention. The Ministry continues to disregard this work and provides little opportunity for budget services to voice their opinion on this matter. It would appear that the rephrasing of the Ministry's objectives has further marginalised this aspect of what should be an overall and comprehensive intervention strategy.

3. Does the service plan adequately address the areas of primary, secondary and tertiary prevention?

The Federation does not believe the service plan provides adequate service coverage. As outlined above there is no provision for life skills development and there is also no provision for the enhancement of community capacity to address gambling harm. Without the inclusion of these provisions the Federation does not believe the Ministry can meet the targets it has set for itself in the strategic plan.

The Federation would like to see the inclusion of family budgeting as a specialist intervention and supported under the 'Psychosocial interventions and support' section. The Federation believes its members service delivery falls squarely under the 'assessment' and 'aftercare' functions of specialist intervention providers. Federation budget advisers are guaranteed to have a minimum level of training and this training could be extended to include the assessment and action of potential problem gamblers who often present to budget services due to external determinants; in particular debt crises.

The aftercare function is a service that Federation budget advisers already offer to the community and this provision could be easily extended to include aftercare of problem gamblers with the support of the Ministry.

Further, the Federation believes that budgeting services should become an integral partner with Ministry-funded service providers. Budgeting services are extremely well placed both to identify and refer potential problem gamblers who present for budget advice and also as an aftercare service to deal with the financial issues that inevitably problem gamblers and their families.

5. Of the two options outlined in the levy calculations, do you support the 20:80 weighting or the 10:90 weighting? Why?

The Federation supports the 20:80 weighting for levy calculations for the following three years and beyond. The Federation understands from practical experience that the presentation factor is a poor indicator of gambling harm. Federation budget advisers see many clients every year suffering from the effects of gambling who would not necessarily be considered 'problem gamblers' and would, therefore, be unlikely to present themselves as such. The Federation also notes that many people with minor gambling addictions are helped through budget advice every year that are not counted in the presenting weighting.

The Federation believes that there is a correlation between increased expenditure on gambling and increased gambling addiction. It considers, therefore, that an increased weighting of expenditure is necessary to increase the funds available to public education, intervention, and research organisations in correlation with the increase in potential gambling addiction. It would, then, be fair that as gambling intervention and education helps to decrease the prevalence of all gambling in society that the funds available to the organisations offering these services would decrease over time also.

Call to Action

The New Zealand Federation of Family Budgeting Services Inc thanks the Ministry for offering it the opportunity to make this submission on the Ministry's Preventing and Minimising Gambling Harm 2010-2016: Consultation Document.

The Federation asks the Ministry to carefully consider all of the points raised in this submission and incorporate the changes offered, where it finds appropriate, into its service and strategic plan.

Federation member budget services look forward to receiving a response from the Ministry as to what, if any, part of the problem gambling intervention these services play. With around 30,000 clients per annum of whom 40% are Maori, 8% Pacific Island and 1% are Asian, who come from predominantly lower income and lower socioeconomic areas the Federation is well placed to become a strategic partner with the Ministry to help prevent and minimise gambling harm in Aotearoa-New Zealand.

Yours sincerely

Jarrod Rendle
Information & Policy Officer
NZFFBS Inc.