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

SUBMISSION: Preventing and Minimising Gambling Harm 2007 - 2010

Submitting: on behalf of a group of organisations
Sectors represented: Consumer, Maori, Education, Family/Whanau, Non-government organisation, Provider
Do you wish to receive a copy of the summary of submissions: YES

Background

The Federation is a collective of community organisations that share a common code of ethics, philosophy, and commitment to delivering quality, free budgeting advice to families/whanau and individuals. The current membership comprises 139 budget services throughout New Zealand that employ over 1300 predominantly volunteer staff and represent more than 30,000 clients a annually.

Snapshot

The Federation comprises 146 members in various categories nation-wide; member services provide budget advice from Kaitaia to Invercargill, including the West Coast, Great Barrier, and Waiheke Islands. In the year to 30 July 2006, the Federation personnel included 706 certificated budget advisers, 173 service coordinators and staff, 307 other volunteers, 36 Federation tutors, and 104 community educators. During this time, Federation services fielded 244,825 enquiries, worked with 30,748 client families, and delivered almost 700 education programmes in the community.

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 service plan Consultation Document. The Federation, on the whole, endorses the proposed approach in the service plan.
2. The Federation, on behalf of its membership, offers the changes included below to the service plan.
3. The Federation notes a number of gaps in service coverage in the service plan and has also included these below.
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 in the strategic plan and believes this emphasis should continue throughout 2007-10. The Federation believes 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 often those close to the gambler is a consequence 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/tertiary interventions that are already available in the community before developing and duplicating those services.

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.

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

The Federation notes with disappointment that there is absolutely no mention of community education intervention in the 2007-10 service plan. Objective 5 of the strategic plan is to "assist the development of people's life skills and resilience in relation to preventing or minimising gambling harm". Further, it states under the Action section of this Objective 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 single largest body delivering budgeting and financial literacy education in New Zealand. It is with regret that the Ministry has not yet approached the Federation to consider a contract for service delivery of financial life skills for those affected by gambling. The Federation urges the Ministry to consider the duplication in resources that would be created if it implemented its own skills programmes. The Federation asks the Ministry to consider all of the opportunities available in the community and invites the Ministry's training department to discuss this opportunity with us. Further, the Federation urges the Ministry to include this Objective in the service plan.

The Federation also notes with disappointment that there is little mention of achievement of Objective 3 of the strategic plan. The Federation is more than willing to work with the Ministry and associated organisations to enhance its capacity to define and address gambling harm in our community.

In fact, the Federation would also note that it has already begun the process of implementing a reciprocal training and referral arrangement with the Problem Gambling Foundation, which is one its members. This work has occurred through the Federation's own initiatives and it has not ever been approached by the Ministry itself to consider the enhancement of capacity even though the Federation's client group falls entirely into the 'priority populations' apparently targeted in the Funding Principles in section 1.4. The Federation is interested to if other organisations with 'priority population' clients have been approached by the Ministry or if this work is yet

to commence. If this work is yet to commence then the Federation urges the Ministry to include this Objective in the service plan.

3. Does the service plan provide adequate service coverage to meet the needs of the population in the areas of primary, secondary and tertiary prevention?

The Federation does not believe the service plan provides adequate service coverage. As outlined in 2. 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 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 'Psychological interventions and support' section of 1.62 Intervention Services (secondary and tertiary prevention). 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 gambling addicts 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.

4. Does the service plan adequately address research and workforce development?

The Federation notes that there is no provision for socioeconomic research funding in either the 2007/08 or 2009/10 years of the service plan. Also, there is only provision for \$600,000 of the total \$6,750,000 of research spend over these three years. The Federation believes that socioeconomic research is fundamental to understanding the interrelated determinants to and impacts of gambling addiction. The Federation believes that it has a viable research programme offering that the Ministry should investigate before finalising the research spend over these three years. The Federation's proposed research programme is reliant on long term data and would like to see an increased socioeconomic research spend over these years and beyond.

The Federation has an opportunity, through its Clients' Voices research programme to gather both qualitative and quantitative raw data on its clients. With over 10,000 clients per annum that are roughly 40% Maori, 8% Pacific Island, and 1% Asian, predominantly from lower income and higher poverty backgrounds, and grouped in lower socioeconomic areas, the Federation is well placed to gather data from a large 'at risk' New Zealand population.

This data will provide a depth of individual and/or family/whanau personal financial analysis that is currently unavailable through any other research programme. Gambling, along with its socioeconomic determinants and impacts, will be one of the features of our research programme. When a client presents to a budget service with an obvious gambling addiction the client will usually be referred to an appropriate intervention service. During, and after, intervention it is appropriate for the client to be referred back to the budget service. It is at this point when we will be able to gather the necessary social and economic indicators that will help to measure the prior intervention. As a secondary data set we will also be able to gather data across our general client group that will provide socioeconomic information about gambling in general. This data set would fall within both the 'help services' theme and the 'gambler characteristics and behaviour' theme of the Ministry's epidemiological framework. The Federation invites the Ministry's research department to discuss this opportunity with us further.

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 gambling addicts 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 organisation 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 2007-1010: Consultation Document.

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

The Federation also wishes to receive feedback from the Ministry on the following points:

- Will secondary and tertiary gambling intervention services in the community be identified, categorised, and included in all further consultation processes?
- Why is there absolutely no mention of community education intervention in the 2007-10 service plan? Will the Ministry be implementing a life skills programme to achieve its strategic plan objectives and will the Ministry take up the Federation's invitation to the Ministry's training department to discuss an opportunity to contract out the delivery of life skills training to the Federation?
- Why is there little mention of achievement of community capacity enhancement in the 2007-10 service plan. Will the Ministry be implementing a capacity enhancement programme to achieve its strategic plan objectives and, again, will the Federation be contacted and supported in this regard?
- Will family budgeting be specifically included as a specialist intervention under the 'Psychological interventions and support' section and will Federation budget services be supported in this regard?
- Will the Ministry take up the Federation's invitation to the Ministry's research department to discuss an opportunity for developing its research programme?

The New Zealand Federation of Family Budgeting Services Inc looks forward to the Ministry of Health's response.

Yours sincerely

Jarrod Rendle
Information & Policy Officer
NZFFBS Inc.