

## **Accessibility for New Zealanders Bill Social Services and Community Committee**

### **The Salvation Army Submission – 07 November 2022**

#### **Summary:**

1. Overall, The Salvation Army appreciates the intentions of this Bill to address and improve accessibility issues for disabled people in New Zealand. It is positive that there is an appetite and drive for change from our Parliamentarians in this area. This follows from the momentum of establishing the Ministry of Disabled People in July 2022. However, The Salvation Army is disappointed that this actual Bill is too limited in scope with its primary focus on establishing this Accessibility Committee. We had expected and hoped for more with this Bill, especially after it had been promised for so long by this government. In the end, this Bill can be a good building block or starting point to meaningful change in this space. But more is urgently needed than what is contained in this current Bill.

#### **Background of The Salvation Army:**

2. The mission of The Salvation Army Te Ope Whakaora is to care for people, transform lives, and reform society by God's power. The Salvation Army is a Christian church and social services organisation that has worked in New Zealand for over one hundred and thirty years. It provides a wide range of practical social, community, and faith-based services, particularly for those who are suffering, facing injustice, or who have been forgotten and marginalised by mainstream society.
3. The Salvation Army's combined services provide support to around 140,000 people annually. These services included providing around 88,000 food parcels to more than 33,000 families, providing some 4,600 people with short-or long-term housing, and over 4,000 families and individuals supported with social work or counselling. The Salvation Army also provides almost 20,000 addiction services and counselling sessions through Bridge (Alcohol and other drugs) and Oasis (gambling). Bridge and Oasis support over 2,000 Tangata Whaiora and their whanau annually across the country.
4. This submission has been prepared by the Social Policy and Parliamentary Unit (SPPU) of The Salvation Army. The SPPU works towards the eradication of poverty by advocating for policies and practices that strengthen the social framework of New Zealand. This submission has been approved by Commissioner Mark Campbell, Territorial Commander of The Salvation Army's Aotearoa New Zealand Fiji Tonga, and Samoa Territory.

#### **The Salvation Army's Position and Journey:**

5. The Salvation Army in New Zealand is currently on our own journey of ensuring there is greater accessibility for disabled people in both our churches and social services. By no means are we experts in this space. But we are working with internal Salvationist experts

and informed people to support us in this journey. Creating accessible environments for disabled persons worshipping in our churches through to those accessing our diverse social services is critical for us to meet our mission to care for people, transforming lives and reforming society by God’s power.

6. One starting point for our position and journey regarding accessibility is The Salvation Army international position statement on Persons with Disabilities.<sup>i</sup> This statement affirms that:
  - a. ***All people are made in the image of God and are of equal intrinsic value. Thus, The Salvation Army celebrates difference and seeks to treat all people with dignity and respect. Many people around the world experience discrimination due to disabilities. The reality ranges from stigma or negative attitudes to deeply engrained and systemic exclusion. The Salvation Army’s response is to go beyond minimum national legal requirements and to make it possible for persons with disabilities to be fully included and to flourish. We know less of who God is and how God appears in the world when people with disabilities are excluded. Inclusion is beneficial for everyone. Diversity within our communities and congregations strengthens us and shapes our mission and ministry. The aim of all Salvationist practice is to ensure that we are a church that makes the embodied gospel accessible for all.***<sup>ii</sup>
  
7. This international position statement has provided the impetus in our local work in increasing accessibility for disabled persons to The Salvation Army. This statement offers both a Biblical/theological and a practical set of measures and principles to guide our work here. Still, we acknowledge openly and internally that greater work and commitment is needed.
  
8. Accessing robust data can be a challenge in this space. Therefore, we rely heavily on government reporting on hardship. Below is a table reproduced from the Ministry of Social Development’s October 2022 report *Child Poverty in New Zealand*.<sup>iii</sup> This table is focussed more on child poverty and hardship, showing for example that 21 per cent of disabled children are living in some form of hardship, with 10 per cent living in severe hardship. But it gives great insight into the sheer numbers of children in disabled homes facing hardship. This evidence frames our own Salvation Army approaches to improving accessibility. But more data like this is needed to help the Ministry of Disabled People and the Accessibility Committee (if this current Bill passes) frame strong responses to these gaps.

**Table B.6**  
**DEP-17 6+/17 material hardship rates (%) for children by disability status,**  
**average of HES 2019-20 and 2020-21**

	Disabled children	Non-disabled children	Children in disabled household	Children in non-disabled household
<b>Numbers in hardship</b>	25,000	90,000	73,000	56,000
<b>% in hardship</b>	21	10	21	7
<b>Numbers in severe hardship</b>	12,000	38,000	34,000	21,000
<b>% in severe hardship</b>	10	4	10	3
<b>Total numbers</b>	120,000	905,000	345,000	800,000
<b>Total %</b>	12	88	30	70

Note for table: A disabled household is one with at least one disabled person.

## Specific Responses to the Bill:

9. We support the general intentions, rationale and evidence presented to progress this piece of legislation. These are not in question for us.
10. Additionally, the establishment of the Accessibility Committee in this Bill is hopefully a helpful resource to address the accessibility for disabled people. But the focus of this Bill just on this committee and associated methodology and framework is short-sighted and unhelpful in the long term.
  - a. The Committee itself looks, on the face of it, to be a helpful resource with its membership and framework. But establishing yet another ministerial advisory Committee adds another level of government bureaucracy that seems counter-productive to the noble intentions of addressing the barriers to accessibility. Having multiple levels of both advisory groups (such as that proposed in this Bill), and frontline social services can themselves be barriers to access as those using our services must navigate through these often-complex bureaucratic systems.
  - b. Furthermore, the fact that this Committee and the framework described in this Bill chooses to “not take a prescriptive approach through regulation”<sup>iv</sup> means, in our view, that the Committee does not have meaningful ‘teeth’ or measures or powers that can help affectively address accessibility barriers. The process, framework and governance-focussed approach of this Bill does make *some* sense.
  - c. But given the major gaps in accessibility, we submit a more rigid set of powers, rules, processes, and principles may have been more valuable in this situation. We note the significant reach and influence of the Americans with Disabilities Act (ADA) 1990 that in many ways provides comprehensive and far-reaching influence in numerous areas of life including public accommodations, employment, transportation, state and local government services, and telecommunications.<sup>v</sup> This kind of ADA legislation cuts across multiple facets of life and holds all accountable to accessibility and disability issues. We would have preferred greater exploration of something like this ADA approach rather than the current framework, bureaucratic, awareness and Committee-centric approach of this Bill.
  - d. Also, there are other major building blocks *already* operating in this sector that provide a strong framework to address accessibility issues. This of course includes the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). In 2010, the New Zealand government began articulating how it would meet the obligations set out in Article 33 of the UNCRPD which requires the government to establish a framework to promote, protect and monitor implementation of the Convention.<sup>vi</sup> There has been a review programme since 2010 for the government on the UNCRPD. There are other hugely helpful frameworks and tools such as the New Zealand Disability Strategy 2016-2026, and the AccessAble work. In short, we submit that a robust framework is *already* in existence and operation in New Zealand. This existing framework needs to be effectively built on rather than become cluttered by more or additional levels of bureaucracy.
  - e. If the Bill passes in its current form with this Committee-focussed approach, we submit that we support the current provisions related to the establishment of the Committee. But we affirm that a stronger, prescriptive approach is needed for this

Committee that should be set out in the legislation. More is urgently needed in this space, and we do not believe this current Bill is sufficient to drive for real change here.

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<sup>i</sup> Available at <https://www.salvationarmy.org/isjc/ips>

<sup>ii</sup> Ibid, page 2.

<sup>iii</sup> Available at chrome-

extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.msd.govt.nz/documents/about-msd-and-our-work/publications-resources/research/child-poverty-in-nz/2022-child-poverty-report.pdf

<sup>iv</sup> [https://www.parliament.nz/en/pb/bills-and-laws/bills-proposed-laws/document/BILL\\_125643/accessibility-for-new-zealanders-bill](https://www.parliament.nz/en/pb/bills-and-laws/bills-proposed-laws/document/BILL_125643/accessibility-for-new-zealanders-bill), page 3.

<sup>v</sup> <https://adata.org/learn-about-ada>

<sup>vi</sup> <https://www.odi.govt.nz/united-nations-convention-on-the-rights-of-persons-with-disabilities/nzs-monitoring-framework/>