

Child Support - Changing Notice Periods AISA amendment – August 2022



New Zealand Council Of
Christian Social Services

Contact Name:	Nikki Hurst Melanie Wilson Hamish Jarvie Rachel Mackay
Organisation Name:	New Zealand Council of Christian Social Services (NZCCSS)
Ko wai au Who we are:	<p>The New Zealand Council of Christian Social Services (NZCCSS) welcomes the opportunity to provide feedback on the Changing Notice Periods (AISA Amendment) updates to the Child support system.</p> <p>NZCCSS has six foundation members; the Anglican Care Network, Baptist Churches of New Zealand, Catholic Social Services, Presbyterian Support and the Methodist and Salvation Army Churches.</p> <p>Through this membership, NZCCSS represents over 250 organisations providing a range of social support services across Aotearoa. We believe in working to achieve a just and compassionate society for all, through our commitment to our faith and Te Tiriti o Waitangi. Further details on NZCCSS can be found on our website www.nzccss.org.nz.</p>

Tirohanga Whānui | Overview

We broadly agree that waiving the 10 working days' notice period regarding the sharing of information between IRD and MSD allows for proposed child support pass-on's. We tautoko the focus on alleviating the likelihood of debt for parents receiving child support payments. Many of our concerns in this area come not from the delay or removal of delay in information sharing, but instead with the overall restructuring of child support to be classified as income.

Taunakitanga | Recommendations

We raise the following points and recommendations for consideration:

Item One

We support the focus on reducing potential for debt generation for MSD clients inherent in this proposal. We would recommend that the same care is taken to applying this lens to other benefits / supplements / subsidy's that the receiving parent may be receiving, e.g. accommodation supplement, childcare subsidy's, Working for Families, etc...

We would request that provision is made to ensure that where debt inadvertently occurs as a result of this specific process, that a mechanism exists to write it off. Debt generation due to increasing

complexity over which the receiving parent has very little control, needs to be the responsibility of the system, rather than the individual.

Recommendation One:

- a) Surety that debt will not occur as a result of change;
- b) and that this commitment applies across all IR and MSD payments that a family may be eligible for;
- c) and that there is a mechanism for any debt generated by this change to be written off

Item Two

We raise concerns around the potential for lack of surety of consistent payment amounts to receiving parents. We recommend mitigation of the impacts where changes will result in a reduction of payment overall to the receiving parent.

We acknowledge the 10-day notice period will lead to earlier clarity for receiving parents. However, we believe that the proposal could go further. We argue strongly that a commitment to ensuring every receiving family retains certainty of overall income, irrespective of the make-up of that income.

Further, we would advocate for a clause ensuring a blanket commitment to any changes *not* reducing the in-hand amount paid to the receiving parent.

Recommendation Two: A commitment that no family will receive less income as a result of this change

Item Three

We strongly advocate for robust internal practices to ensure deep understanding of these changes across IR and MSD. This would need to cover anyone who would potentially be interacting with receiving or paying parents. There is a strong chance that changes have the potential to cause confusion – a confident, aligned and well-informed IR and MSD workforce will be crucial to mitigate unnecessary anxiety in this group of parents.

We would advise that it is crucial that all of the wider IR and MSD workforce have a deep understanding of this coming change and that clear mechanism's be in place to ensure those impacted are swiftly passed along to those best able to help them.

Recommendation Three: Education of these changes are widely understood

Item Four

Good quality, accessible communication will need to be developed to support whānau to understand these changes. The collateral provided via this consultation is not year clear enough and will require a substantial reworking to become so.

We would recommend working closely with the community, providers, advisors, etc.. across the sector to develop a range of resources able to support communication and understanding.

Recommendation Four: Partner with the sector to develop good information of the change