

Civil Fees Review
Ministry of Justice
DX SX10088
WELLINGTON

2 November 2012

▶ **Submission to the Ministry of Justice regarding the
Civil fees review (Criminal History Check proposals)**

(Submitted on-line)

▶ **About Volunteering New Zealand (VNZ)**

VNZ is an association of over 120 organisations that have a commitment to volunteering, including Volunteer Centres and other national and regional organisations.

Our vision is for a New Zealand that promotes, values and supports effective volunteering for the benefit of individuals and communities – and our mission is to promote, support and advocate for volunteering.

We are the only national organisation in New Zealand that focuses purely on volunteering and volunteer management. As the “voice of volunteering”, we hold the ‘big picture’ and are in a position to liaise and work with organisations across the sector, and to advise government and business sectors on matters related to volunteering. We work to ensure that volunteering occurs within a positive environment where it is encouraged and fostered.

In 2008, 67% of the Community and Voluntary Sector workforce was made up of volunteers; 90% of New Zealand non-profit organisations employ no staff, and rely solely on volunteers¹.

▶ **Submission**

1. We do not agree with the proposed schedule of fees for Criminal History Checks, and cannot see how a fee system will encourage efficiency.
2. VNZ has conducted a brief survey of members about the proposed changes. Results from a small sample are included in this submission.

¹ *The New Zealand Non-profit Sector in Comparative Perspective, 2008*

► Background

4. We appreciate the burden of Criminal History Check (CHCs) to the Ministry in the light of the huge increase in demand for this service. We point out that any increase from the community and voluntary sector is likely because of government contract requirements which give due attention to risk management.
5. Volunteer organisations request CHCs as a means to minimise risk to services. The organisation can thus have confidence in their staff and volunteers. CHCs are also an assurance to the users.
6. We believe the service should be free to community and voluntary sector, especially for organisations, staff and volunteers working with vulnerable people.

► Survey conducted by Volunteering New Zealand

7. Volunteering New Zealand conducted a brief survey of members about the proposed changes. Results from a small sample indicate:
 - An even spread between Ministry of Justice (MoJ) CHCs and Police Vetting
 - Only 12% of VNZ member organisations request 24 or less checks per annum; 30% requested 25-100 checks per annum; and another 30% requested more than 100
 - Online checks were made by 63% of respondents.
8. Comments on the importance of CHCs included:
 - Protection and risk management for the organisation, its property and staff, volunteers and service users
 - CHCs are especially important for vulnerable people (children, young people, elderly and disabled) and for at risk clients
 - Government agencies include CHCs in contract requirements.
9. Comments on the impact of fees were received from 54% of the sample; all were negative:
 - It is an added compliance cost which is unaffordable to organisations.
 - It would add to the burden of fundraising
 - Organisations cannot absorb extra costs, which would add to overheads at the expense of service delivery and support for volunteers
 - Changing criteria for requesting checks would reduce standards and raise the level of risk, to service users and to organisation credibility.

► Additional suggestions

10. Community and voluntary sector organisations would likely have to re-negotiate contracts with government agencies to recoup the cost – in which case it remains a cost to government, if not the MoJ.
11. There is an extraordinary jump in costs for manual requests over 24 per annum. It should be a graduated scale rather than jumping to \$1,850 per annum even if only 30 requests are made.
12. VNZ applauds the proposed service for free electronic requests when there is an exact match. It should still remain free for community and voluntary sector organisations if there is not an exact match.

We look forward to hearing from you in regards to the outcome. If you would like for us to answer any questions or present to any committees about our submission, please contact us.

Yours sincerely



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