



PIE Submission

Empowering families: Increasing certainty and preventing debt in the Working for Families scheme

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Thank you for the opportunity extended to myself and to NGOS to comment on [this document](#).

I am experienced policy analyst with a particular interest in Working for families WFF over many years. I append the last decade of articles and interviews to this submission.

I do not necessarily speak for other NGOs, but you may find they resonate with much of this submission. Unfortunately, many of us find that the last rounds of consultations with MSD and IR over many years have been very discouraging and excessively time-consuming. They have absorbed a large amount of painstaking unpaid work with little feedback or any sign improvement in the policies. Our views have been presented in good faith but volunteers doing the very hard work of patching up the frayed social fabric have run out of energy and patience.

The last major review of Working for Families under Labour was quietly shelved along with all our various submissions since the WEAG report.

- St John, S (2023) [So this is the best we can expect from the Working for Families \(WFF\) review?](#) 14th August 2023
- St John, S (2023) [What are we to make of welfare and Working For Families reform now?](#) Daily Blog 10th August, 2023

Other reviews proved equally pointless: eg

- St John, S (2024) [Review of crippling debts to government now delayed to the Never Never.](#) Daily Blog 24th June 2024

And among other demands on our time, there was the critical but failed review of the purpose and principles of the Social Security Act

- **St John, S. (2022) [Social security purposes and principles are cold comfort for too many](#) NZ Herald 25th July 2022**

I note the extensive analysis on all aspects of WFF and previous consultations as provided in various OIAs. The latest one I have received, 19th Sept 2024 is 184 pages long and does not appear on the official IR OIA site:

The extensive consultations from advocacy groups concerned with Child poverty received a brief summary:

Insights from engagement

34 The engagement process as part of the review has now concluded. A separate report summarising key findings has been prepared for Ministers, but the following provides a summary from the process. The majority of feedback was from advocacy groups concerned with child poverty and broader social policy issues.

- The majority of survey respondents were of the view that WFF does not currently pay enough to support families. Through targeted engagement, many stakeholders, including a number of academics and those representing groups that advocate for children, emphasized the importance of broader social policy concerns. From these groups, we heard that:
 - The objective of income adequacy and reducing child poverty is important and that the payments need to keep up with the cost of living to provide adequate support.
 - The IWTC should be paid to all families and not just those who are off a benefit and in paid work. These stakeholders argued that the payment was discriminatory or unfair, particularly given children were unable to choose whether their parents were working. They also emphasised the need to value other contributions people make, such as caring for children or voluntary work.

I provide the following brief comments on the current document for consultation

- The title: **Empowering families: Increasing certainty and preventing debt in the Working for Families scheme** promises more than it can possibly deliver. Families are not empowered and will not be under the scope of this consultation.
- It does not start from first principles of asking what the purpose of WFF should be and therefore takes as the starting point the status quo. Paid work is prioritised over the needs of children. The deficiencies of WFF are embedded and tinkering with the issues under consultation here will make a marginal difference only.
- The recent minimal increases to the threshold and the rise in the abatement rate to 27.5% are backward steps. They follow other backward steps that have increased the IWTC and frozen thresholds.
- Jeremy Beckham's submission on the shortening of the period of assessment is endorsed in full. This very detailed assessment will not be further repeated here but must be given prominence in the IR review.
- CPAG submitted years ago on the IR transformation project that real time assessment for WFF will not work. Our submission was ignored: See [Making Tax Simpler Better Administration of Social Policy: Working for families \(WFF\)](#). We also note the recent negative experience of 3 monthly assessment for Family Boost.

- The problem is the design of WFF itself as we have said on so many occasions. [It requires a multiparty approach](#) for reforms to be long-term and acceptable. At front of mind must be that we are failing to support our poorest children.
- [CPAG's submission to Labour's WFF review](#) spells out what needs to be done. If adopted significantly more children and their families will be empowered to live free from the toxic stress of poverty.

To conclude: it must be accepted that WFF is seriously flawed and does not work in many respects. It is in need of major reform; to simplify, to prevent poverty and to actually encourage work effort.

The MSD is asked to review all the submissions the NGO sector has made over the period of WFF reviews since the WEAG report. Tinkering is time consuming and takes the gaze off the real problems of flawed design

Appendix. Further Contributions from Susan St John that talk about the IWTC and WFF reform in 2015-2025

Susan St John

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- St John, S (2025) [There is a truckload of trouble coming as the budget looms and the signals are ominous](#) Daily Blog 2nd April 2025
- Susan St John, Radio NZ interview with Susan Edmunds [My entire years wages, mum, 47k debt for working for families](#) 20th Jan and [We can barely make ends meet as it is': Mum facing \\$47k Working for Families debt](#) Star News 21st January 2025 November
- Interview with Thomas Coughlan [Thousands fewer families getting support as unemployment rises](#) NZ Herald, 19th November 2024
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- [Bryan Bryce Podcast with Susan St John on Working for Families](#), Head to Head, [Audio only](#) substack Bryan Bruce series, August 19th, 2024
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- [What impact did the Coalition government budgets have on the reduction of child poverty?](#) Waatea interview 4th June 2024..

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