



Review of Essential Skills in Demand Lists Occupation Nomination Form

All occupation nominations must be submitted using the attached form. The nominated occupation must have an occupation code which can be found from the Australian and New Zealand Standard Classification of Occupations (ANZSCO). You can link to ANZSCO information at www.immigration.govt.nz/anzsco.

Key dates

25 June 2018

Occupation nominations open

23 July 2018

Occupation nominations close at 5pm

Enquiries and nominations

All enquiries and occupation nominations should be directed to:

Email: shortages.review@mbie.govt.nz

Background

The Ministry of Business, Innovation and Employment (the Ministry) maintains the Essential Skills in Demand (ESID) Lists: the Immediate Skill Shortage List (ISSL) and the Long Term Skill Shortage List (LTSSL). Each list performs a particular immigration policy function, and potential migrants use both lists to help understand where opportunities for work lie in New Zealand.

You can check whether an occupation is on a shortage list, or can be classified as skilled under the Skilled Migrant Category, by using the [skill shortage list checker](#). This provides information and the requirements for each of the lists. Information on the review process can be found [here](#).

Please note: An Occupation Nomination process is not used for the Canterbury Skill Shortage List (CSSL), which was created to meet demands for the Canterbury rebuild and economic recovery following the earthquakes. The CSSL is reviewed about three times each year, and follows a different process for review.

Use of ESID lists in immigration

It is **not** necessary for an occupation to be listed on one of the ESID lists in order for a person to obtain a visa to work in that occupation. Employers may bring in migrant workers on temporary work visas under the [Essential Skills](#) work visa policy for occupations not listed on the ISSL or LTSSL, provided they demonstrate that suitable New Zealanders are not available. Other policies that may be used include [Approval in Principle](#), [Talent \(Accredited Employers\) Policy](#), and the [Skilled Migrant Category](#) for residence.

Employers wanting to recruit from overseas are encouraged to visit the Immigration New Zealand website <https://www.immigration.govt.nz/employ-migrants>.

Objectives of the Essential Skills in Demand Lists

The Essential Skills in Demand Lists aim to facilitate the entry of appropriately skilled migrants to fill skill shortages, and to reduce costs and time delays for employers seeking staff. However, this objective must be balanced by the need to ensure that there are no suitably skilled or qualified New Zealand citizens or resident workers available to undertake the work, and that the shortage is genuine.

In general, the government expects that New Zealand industry, employers and the education sector will work together to train or upskill New Zealand workers to fill roles created by turnover and/or by anticipated growth and to pay workers appropriately according to their skills. It views succession planning as part of core business.

However, the government also recognises there are circumstances where the supply of New Zealanders in a particular field may be limited in the short term while New Zealanders are being trained for these roles, or likely to continue to be limited in the longer term while core capacity is developed, or where there are global shortages. An example might be a new technological area where the number of New Zealanders trained in the area is still very

limited, or alternatively in an area of rapid growth where New Zealand based training cannot keep up with demand.

The lists are reviewed every year to ensure they meet the needs of the changing labour market. An occupation may be considered for inclusion on the ISSL or LTSSL provided that:

- the skill level of the occupation is 1, 2 or 3 on the ANZSCO
- the skill shortage is genuine, non-seasonal in nature and industry-wide, e.g. it is not due to difficulties experienced by particular employers in recruiting or retaining New Zealanders because of unattractive working conditions
- there has been a demonstrated attempt to train and attract New Zealanders to available jobs
- terms and conditions in the New Zealand labour market are not undermined, including the training, education and development opportunities of New Zealanders
- the government's education, training, employment and economic development policies are supported
- prevailing and anticipated labour market conditions are taken into account (for example levels of unemployment), and
- there is a significant shortage of suitable New Zealand citizens or resident workers available to undertake the work, and the shortage may reasonably be met by migrants. (this is generally measured as at least 50 work visas per annum, for migrants in that occupation.)

The ESID lists are **not** designed to cater for lower skilled labour shortages or seasonal labour shortages. Nor are they intended to address recruitment and retention problems arising because the industry cannot, or does not, meet the terms and conditions necessary to recruit sufficient numbers of suitably qualified workers from within the New Zealand workforce.

The Immediate Skill Shortage List

The Immediate Skill Shortage List (ISSL) includes occupations where skilled workers are immediately required, either throughout New Zealand or in certain regions. It facilitates the approval of temporary work visa applications. If an applicant has an offer of employment and meets qualification and work experience requirements for an occupation that is included on the current ISSL, immigration officers will accept that no suitably qualified New Zealand citizens or residents are available.

The ISSL is grouped by the following regions:

- Auckland/Upper North Island
- Waikato/Bay of Plenty
- Central North Island (including Taranaki, Manawatu and Hawkes Bay)
- Wellington (including Wairarapa)
- Canterbury/Upper South Island
- Otago and Southland.

The Long Term Skill Shortage List

The Long Term Skill Shortage List (LTSSL) identifies those skilled occupations where there is an **absolute** (sustained and ongoing) shortage of workers both in New Zealand and globally.

People who gain employment in one of these occupations may be granted a work visa under the LTSSL Work to Residence Visa policy. They may apply for residence after two years provided they have remained working in a LTSSL occupation with a base salary of at least NZ\$45,000 and meet standard policy requirements.

Applicants for residence under the Skilled Migrant Category, who have an offer of employment or work experience in an area of absolute skill shortage on the LTSSL, can gain bonus points for their application for residence.

ESID review process

The process for reviewing the ESID lists is summarised below:

1) Call for Occupation Nominations

The Ministry calls for industry stakeholder proposals for occupations to be reviewed. Occupation Nominations must be made on the attached form and submitted to the Ministry by **5pm on 23 July 2018**.

2) Selection of occupations to be reviewed

The Ministry assesses the Occupation Nomination proposals and selects occupations to be reviewed. The Ministry may also identify occupations that it wishes to review as a result of its own intelligence gathering. As a general rule, occupations identified by industry stakeholders will take precedence, and the Ministry will provide the balance of occupations for review.

3) Publication of Preliminary Indicator Evidence Reports

The Ministry prepares a Preliminary Indicator Evidence Report (PIER) for each occupation selected for the review. The PIER collates relevant statistical data about the occupation and provides a **preliminary view** on the status of the occupation. The PIERs will be published on the Immigration New Zealand website **mid-August 2018**.

4) Call for submissions on occupations selected for review

Submissions will be sought from industry groups and others about the nature and extent of skill shortages in the occupations selected for review. A submission form will be available on the Ministry's website www.immigration.govt.nz by **3 September 2018**. The submission stage will conclude on **8 October 2018**.

5) Wider sector consultation on occupations

The Ministry will undertake any further follow-up with submitters, consultation with government agencies and industry, and additional data analysis that may be required to inform decisions on any changes to the ISSL and LTSSL. The consultation process will conclude **late January 2019**.

6) Decisions made and published

Where there is consensus that an immediate skill shortage exists, the Ministry will recommend that the occupation be added to the ISSL. Where there is a demonstrated absolute (sustained and ongoing) and global long term skill shortage, the Ministry will recommend that the occupation is added to the LTSSL. Occupations may be removed from a list where a shortage no longer exists. There may be cases where the Ministry does not consider changes to the lists to be the most appropriate response to the shortage, and may recommend an alternative solution.

It is expected that final decisions will be published on the Immigration New Zealand website **29 March 2019**.

The Occupation Nomination process

What is an Occupation Nomination for?

The Occupation Nomination process provides an opportunity for industry representatives to request a change to the ESID list status of an occupation.

The completion of an Occupation Nomination Form is the first step in requesting that an occupation be:

- added to one of the ESID lists, or
- removed from one of the ESID lists, or
- moved from one list to the other.

Please note: Occupations will not be considered for review unless an Occupation Nomination Form has been completed and submitted to the Ministry within the specified timeframe.

What initial criteria must be met?

Occupation Nominations will generally only be considered by the Ministry where:

- the occupation has an ANZSCO skill classification at level 1, 2 or 3, and has a specific, recognised qualification requirement, **and**
- the occupation has not been reviewed by the Ministry within the last review period ¹ (or, if it has, the submitter can demonstrate a **significant change** in labour market conditions that warrants a further review), **and**
- the Occupation Nomination has the support of at least one industry body or professional association (for example, an employers' group, trade union, or industry training body).

Information requirements

The Occupation Nomination process requires submitters to make a case for an occupation to be reviewed.

Occupation Nominations must **provide evidence** in support of the proposed change in ESID list status,

The Ministry will provide advice to assist groups to meet the required information standards. However, the tight timeframe for the review process means that the Ministry **will not** accept new or revised Occupation Nominations beyond the close-off date.

If the Occupation Nomination is successful, you will be required to provide additional information through the submission process. This information may add to the Occupation Nomination and/or respond to the Preliminary Indicator Evidence Report prepared by the Ministry.

¹ A list of occupations reviewed in the last review period is at the end of this form.

How will Occupation Nominations be assessed?

The Ministry will assess each Occupation Nomination received. Submissions must, in the first instance, meet the three initial criteria listed above.

Where the Occupation Nomination meets the initial criteria, the Ministry will collate relevant statistical data on the occupation, including:

- vacancy rates for the occupation
- estimated jobseekers available
- numbers of visa approvals in the last two years
- number of visa approvals as a percentage of total employed in the occupation, and
- employment growth in the occupation.

The Ministry will decide whether to review an occupation based on an assessment of this data, together with the information/evidence provided through the Occupation Nomination process. Where neither the data analysis nor the evidence provided through the Occupation Nomination is sufficient to support a case for review, the occupation will not be included in the review. Also, there may be cases where the Ministry does not consider changes to the lists to be the most appropriate response to the shortage, and may recommend an alternative solution.

If the Ministry decides not to review an occupation, the submitter will be informed of the decision and the reasons for the decision.

Please note: Acceptance of an Occupation Nomination for review will not automatically lead to changes to the ESID list status of an occupation. This is the first step in the review process. At the submission stage other industry representatives may submit further evidence and the Ministry will consider all submissions alongside analysis of economic, labour market, training, immigration and other relevant data.

Occupation Nomination Form

Please complete this form if you would like to propose an amendment to either the Immediate Skill Shortage List or the Long Term Skill Shortage List.

You may propose the addition or removal of an occupation from one of the lists, or the transfer of an occupation from one list to the other.

You must complete a separate Occupation Nomination Form for each occupation you would like to have considered.

Please answer all questions. Incomplete submissions will not be processed.

Please note the answer fields will auto-extend to accommodate your responses. If you are providing documents, you may attach these separately.

Disclosure

Please note that if this Occupation Nomination is successful, the information provided may be made available to interested parties as part of the review. This is to promote maximum transparency and to encourage the exchange of information between all stakeholders who contribute to the review process. If the Occupation Nomination, or some of its content, is provided to others for the purposes of information sharing and/or consultation, personal contact details will be treated as confidential.

Information held by the Ministry, including the information provided in this form, is official information under the Official Information Act 1982. Accordingly, if a request is made for information under that Act, the Ministry may be required to release this information.

Occupational statistics collected during the course of the review may be used by the Ministry for other research purposes, but individual employers will not be identified.

All enquiries and occupation nominations should be directed to:

Email: shortages.review@mbie.govt.nz

1. Contact information

Who should the Ministry contact if more detail is required about your nomination?

Include name, job title, organisation, phone, email and postal addresses.

Alyson Kana

Senior Policy Analyst

New Zealand Aged Care Association

alyson@nzaca.org.nz

04 473 3159

PO Box 12481

Wellington 6144

The

2. Disclosure

Please confirm that you have read and agree to the terms of the disclosure statement, below.

Disclosure statement:

- The information contained in this Occupation Nomination, or some of its content, may be provided to others for the purpose of information sharing and/or consultation. In this event, personal contact details (individual names, telephone numbers and email addresses) will be treated as confidential.
- The information provided in this form is official information under the Official Information Act 1982 and, accordingly, the Ministry may be required to release this information if a request is made under that Act.
- Occupational statistics collected during the course of the review may be used by the Ministry for other research purposes, but individuals and employers will not be identified.

I have read and agree to the terms of this disclosure statement.

Name: Alyson Kana

3. Initial criteria for Occupation Nomination

An Occupation Nomination must meet three initial criteria in order to be considered by the Ministry of Business, Innovation and Employment:

- the occupation must have an ANZSCO skill level of 1, 2 or 3, and a specific, recognised qualification requirement, **and**
- the occupation must not have been reviewed by the Ministry within the last review period ² (or, if it has, the submitter must demonstrate a **significant change** in labour market conditions that warrants a further review), **and**
- the Occupation Nomination must have the support of at least one industry body or professional association.

If you are **not** preparing the Occupation Nomination on behalf of an industry body or professional association, a letter of support from an appropriate industry or professional body must be forwarded with this form.

Nomination details

3a) State the occupation name and ANZSCO 6 digit occupation code.

Ensure that the occupation appears on the Australian and New Zealand Standard Classification of Occupations (ANZSCO). If you cannot find a code for the occupation please contact Statistics New Zealand. The link to ANZSCO is www.immigration.govt.nz/anzsco

254412 Registered Nurse (Aged Care)

3b) Do you want to:

- add this occupation to a list (please state ISSL or LTSSL) -
- remove this occupation from a list
- move this occupation from one list to another (e.g. from the ISSL to the LTSSL)

Note: *It is not normally necessary to make a submission to add an occupation to the ISSL if it is already on the LTSSL. If an applicant produces an offer of employment in an occupation that is included on the current LTSSL, immigration officers will accept that no suitably qualified New Zealand citizens or residents are available, as if the occupation is on the ISSL.*

² A list of occupations reviewed in the last review period is attached to this form.

ESID review history

3c) Is the occupation currently on the Immediate Skill Shortage List or the Long Term Skill Shortage List? (This can be checked at <http://skillshortages.immigration.govt.nz/>).

- ISSL
- LTSSL
- Neither

3d) Was the occupation reviewed by the Ministry in 2017?

Refer to list of occupations at the end of this form.

- Yes
- No. Go to 3f

3e) Please describe why you consider that a further review of this occupation is necessary.

Ensure that your explanation clearly states how the current labour market conditions for the occupation differ from those at the last review (e.g. change in demand for labour as a result of a particular strategy or project). Why is the change significant?

Please note: Occupation Nominations will not be considered again where there is no significant change in labour market conditions for the occupation specified, or where explanations are generic, rather than specific.

The change of registered nurses (aged care) from the Long Term Skill Shortage List to the Immediate Skill Shortage List has had a significant impact on the ability of providers in the aged residential care (ARC) industry to be able to recruit and retain staff.

Our members have reported that it has become increasingly difficult to employ registered nurses (RNs) over the last 12 months, both those who are New Zealand citizen and resident RNs and those with international nursing qualifications. In a survey to our members to inform this submission (July 2018), 65% of respondents reported they had experienced an increase in the degree of difficulty in trying to recruit New Zealand citizen and resident RNs, and 38% of respondents noted it has become more difficult to recruit internationally qualified nurses (IQNs) on visas since the change from the Long Terms Skill Shortage List (LTSSL) to the Immediate Skill Shortage List (ISSL).

The July 2018 survey highlighted ARC providers have experienced an increase in difficulty of retaining New Zealand citizen and resident RNs. Since February 2017, 36% of respondent ARC providers have experienced an increase in the departures of New Zealand citizen and resident RNs.

The 2017 NZACA Member Survey showed the annual turnover rate for RNs working in the ARC industry was 37.8%. This was considerably higher than the across the industry annual turnover rate of 26.1%.

Recent changes to immigration policies and the change of RNs (aged care) from the LTSSL to the ISSL has created feelings of insecurity and undervaluation of the role. The ARC industry in New Zealand relies heavily on those with IQNs to be able to provide the highest quality care to our most vulnerable older people. There are not enough New Zealanders willing and able to work in the ARC industry to enable us to provide this level of care. The survey of our members showed 17% of RNs currently working in ARC are IQNs and working in New Zealand on a temporary visa. Our members rely on being able to recruit and retain IQNs but the change in policies have left these migrant workers with insecurity, as they are unsure whether they will be able to remain in New Zealand long term, and being undervalued, as they contribute to our industry and society without being recognised.

The settlement of the pay equity claims for care and support worker in the ARC industry in July 2017 has compounded the difficulties around recruiting and retaining RNs in our industry. Under the Care and Support Workers (Pay Equity) Settlement Act (2017) care and support workers are currently paid between \$19.80 and \$24.50 per hour. This is set to increase to \$27.00 by 2021. The 2017 NZACA Member Survey showed RNs standard hourly pay rates were not too dissimilar to their care and support worker colleagues. Pay rates for RNs working in ARC range from a lower quartile of \$26.45 to an upper quartile of \$29.85 with a median of \$28.00. The RN role carries a higher level of responsibility than care and support workers, including their supervision. RNs are also more qualified and a regulated workforce in comparison to care and support workers.

Shortages of available RNs will have an impact on the industry in the short, medium and long-term. Members who responded to our July 2018 survey noted that due to their inability to fill vacant positions and bureau staff being hard to get they are having to fill available shifts with the staff they currently employ. This, however, can only be a short-term solution as it will increase burnout and sickness of current staff, therefore further compounding the issue.

The DHB/NZNO multi employer collective agreement (MECA) that is currently under negotiation for RNs employed in DHB environments is going to further compound the RN employment issues facing the ARC industry. The proposed DHB/NZNO MECA includes 500 new positions for RNs across the current DHB workforce. RNs to fill these positions are likely to come from our industry as a significant number of RNs already leave their positions in ARC to take up one in a DHB hospital. The July 2018 survey reported 58% of respondents were affected by New Zealand citizen and resident RNs leaving their care facilities to take up positions in DHB hospitals, and 36% were affected by IQNs moving to positions in DHB hospitals.

In conclusion, over the last 12 months the pool of RNs available to work in the ARC industry has reduced due to immigration policy changes and the moving of this workforce to the ISSL. If the pool of RNs available to work in ARC does not increase this will have significant impacts on the industry and the vulnerable older people they care for.

Industry support

3f) Please provide details of the industry body or professional association(s) that support this Occupation Nomination.

Industry bodies and professional associations include employer groups, trade unions and industry training groups.

New Zealand Aged Care Association - employer group

The New Zealand Aged Care Association (NZACA) is the peak body for the ARC industry in New Zealand. We represent 93% of the 39,000 beds in the country's ARC industry. Our members range from the very small stand-alone care homes to the large co-located sites that include care services and retirement villages. Our members' services include rest home, hospital, dementia and psychogeriatric care, as well as short-term respite care and a small number of YPD (young persons with disabilities) beds.

You must attach a letter/s of support if you are NOT representing an industry body or a professional association.

3g) Please provide details of key stakeholders in this industry who may also have views about this occupation.

For example, government agencies, training organisations, unions, industry bodies, registration bodies and employer groups. Please provide the name and email address of each contact person.

Associated industry groups:

Retirement Villages Association

New Zealand Home and Community Health Association

Care Association of New Zealand (CANZ)

Training organisation:

College of Nurses

Employer groups:

Bupa

CHT

Oceania Healthcare

Radius Care

Ryman Healthcare Group

Summerset Care Ltd

Unions:

E tū

New Zealand Nurses Organisation

Government departments/agencies:
Nursing Council of New Zealand
Ministry of Health

Skills and qualifications

3h) What are the qualification and work experience requirements for the occupation in shortage? (i.e. what qualifications and experience are required to work in the occupation? Please note any applicable registration requirements).

e.g. Bachelor of Engineering (NZQF Level 7) and a minimum of three years' relevant post-qualification work experience

Bachelor of Nursing degree and registration with the Nursing Council of New Zealand.

To become a registered nurse, New Zealand nursing graduates require:

- a. A bachelor's degree in nursing approved by the Nursing Council of New Zealand; or
 - b. a graduate nursing qualification at Level 7 on the New Zealand Qualifications Framework approved by the Nursing Council of New Zealand; or
 - c. a postgraduate nursing qualification at Level 8 on the New Zealand Qualifications Framework approved by the Nursing Council of New Zealand; and
 - d. a pass in an assessment of Nursing Council Competencies for Registered Nurses by an approved provider;
- and
- e. a pass in an Examination for Registered Nurses set by the Nursing Council of New Zealand.

Registered nurses from overseas

To become registered in New Zealand, registered nurses from outside New Zealand must:

- a. Current registration with an overseas regulatory authority; and
- b. successful completion of a nursing programme that is, in the Nursing Council's opinion, equivalent to or as satisfactory as a bachelor's degree programme in nursing at Level 7 on the New Zealand Qualifications Framework; or
- c. successful completion of a graduate pre-registration nursing programme that is, in the Nursing Council's opinion, equivalent to or as satisfactory as an approved New Zealand graduate nursing programme at Level 7 on the New Zealand Qualifications Framework that leads to registration in the registered nurse scope of practice; or
- d. successful completion of a postgraduate pre-registration nursing programme that is, in the Nursing Council's opinion, equivalent to or as satisfactory as an approved New Zealand postgraduate nursing programme at Level 8 on the New Zealand Qualifications Framework that leads to registration in the registered nurse scope of practice; and
- e. two years' post-registration nursing practice as a registered nurse of at least 2,500 hours within the five years immediately preceding the date of the application; and
- f. at the direction of the Nursing Council, successful completion of a Nursing Council approved competence assessment programme.

4. Case for review

You are required to make a case for an occupation to be reviewed.

Please outline why you think the occupation should be reviewed. List the **key points** and provide any relevant supporting evidence (additional material may be attached).

If the Occupation Nomination is successful, you may be required to provide additional information to support your case and/or to respond to the PIER prepared by the Ministry, through the submission process.

Proposal

4a) **ISSL only** - Does your proposal relate to the whole of New Zealand or only some regions?

Please tick all that apply.

Certain regions only:

- Auckland/Upper North Island
- Waikato/Bay of Plenty
- Central North Island (including Taranaki, Manawatu and Hawkes Bay)
- Wellington (including Wairarapa)
- Canterbury/Upper South Island
- Otago and Southland

Or:

- All of New Zealand**

4b) Give reasons for your proposal:

Describe the nature of the issue – list the key points. For example, please provide details of any change in demand for this occupation, the availability of New Zealanders to fill positions, and training available (both on the job and through education providers).

Why is there a shortage or no longer a shortage?

There is a genuine shortage of RNs available to work in the New Zealand ARC industry.

NZ trained RNs are not applying for vacant advertised positions.

Current immigration policies and visa settings add to the difficulty of recruiting IQNs.

The current annual turnover rate of RNs working in ARC is very high.

ARC providers cannot recruit young New Zealanders willing to learn and available to do the job with the right training

Graduate nurses and those on the Nurse Entry to Practice Programme (NETP) require support that many ARC facilities aren't able to give due to size and environment within which they operate.

New Zealand has an ageing population and an increasing number of older people requiring hospital care. This is going to increase the number of RNs needed to work in our industry in the short, medium and long-term.

The Occupation Nomination is unlikely to succeed if no supporting evidence is provided.

4c) Please detail your supporting evidence below. (supporting material may be attached).

Evidence is required to demonstrate that the issues outlined above can be substantiated. Evidence may be gathered in a range of ways, for example through industry surveys, feedback collated from industry bodies or employers, and data collated from administrative records. In each case it will be important to demonstrate that the 'issue' has some breadth i.e. that it relates to an occupation as a whole, rather than to one or two employers, or a small group.

ARC providers are increasingly finding it difficult to recruit and retain RNs as the pool of available workers does not meet demand and is unlikely to in the future as the number of older people requiring ARC increases.

New Zealand citizen and resident RNs are simply not applying for advertised employment opportunities available in the ARC industry. Our July 2018 survey of members received comments that noted that RNs who are New Zealand citizens or residents are not applying for jobs in ARC. The only people applying for the opportunities are IQNs:

"In the past 12 months [we] have advertised twice for a registered nurse. Both times we did not have any NZ citizen or resident RNs apply. All were overseas applicants."

"We have no New Zealand trained RNs applying for roles that we are advertising over the last 12 months. The only NZ trained RN recruited was through word of mouth."

"No NZ citizens applied for the position."

"No NZers apply to work in aged care. Despite advertising a position after NZ programmes have graduated. No New grads apply to work in our industry."

Although IQNs are applying for the advertised roles in ARC facilities it is still difficult to employ these people due to immigration settings around visas and this has increased over the last 12 months. Thirty-eight percent of respondents to our July 2018 survey noted it has become more difficult to recruit IQN RNs on visas since the change of RN (aged care) from the LTSSL to the ISSL in 2017.

The current visa requirements on IQNs that ARC providers are able to make an employment offer to has made it harder for the IQN to accept the employment offer. The visa application process is taking longer, "It is taking a long time for RNs and or their partners to gain a work or residence visa. More visas are being declined and retaining RNs is being made more difficult for employers ". The lack of flexibility in visas is also a factor in an ARC providers ability to employ IQNs "International RNs are the dominant appliers [to job advertisements]. All want full time work for their visa requirements. Lack of flexibility due to visa requirements," "the process for converting a temporary visa to a work visa has been more tedious and time-consuming."

As noted in 3e above, the turnover rates for RNs in the ARC industry is higher than the overall industry (37.8% vs 26.1%). This is largely due to the high number of RNs leaving employment in the ARC industry for that in a DHB hospital. Fifty-eight percent of respondents to the July 2018 survey have experienced departures in the last year due to New Zealand citizen and resident RNs moving to

DHB hospitals. Thirty-six percent have also had RNs on temporary working visas leave to work at DHB hospitals over the last 12 months.

The ARC industry is being used as a stepping stone for RNs, particularly IQNs who gain experience in the New Zealand health system for a year or two before moving to a position in a DHB hospital setting. "We are used as a stepping stone - it use to be to get to get to Australia, now its to get to the DHB. Wages have a lot to do with this." The pay rates DHB hospitals are able to offer RNs are an incentive to obtaining employment there. ARC cannot compete with the pay rates received by RNs working for DHBs are our funding is capped by legislation.

It has been suggested that providers of ARC should look to employ new graduate nurses or those on the NETP programme. This may be possible in larger care facilities but not for the majority. Many ARC facilities do not have the environment necessary to support graduate RNs. RNs in ARC often work in solo postions in smaller homes where they are responsible for caregivers. This is not an environment a new RNs should be working in. Therefore, although ARC provider would welcome employing graduate RNs in most instances this is not practical.

ARC providers are continuously employing New Zealand citizen and resident RNs and IQNs, training and developing the employee only for them to move on and the provider to be left to start the process again. "We spend time training and developing our nurses and then they leave to move to another region/to the DHB/overseas."

Providers in the ARC need certainty in their ability to recruit and retain registered nurses. They need policy settings that are encouraging and inviting to RNs to enable them to do this. Not settings where RNs are left with insecurity and vulnerability in their ability to remain employed and in New Zealand. New Zealand has an ageing population that is going to need more care and support then ever before. ARC employers provide the quality of care that our older New Zealanders need currently but to be able to continue to do this they need to be able to recruit and retain the right nurses.

Occupations will not be reviewed unless the Ministry is assured that there will be a reasonable evidence base to support the review process.

4d) Are you aware of, or will you be able to collate, evidence and provide it within the timeframe for submissions (by **8 October 2018**)?

Yes – please detail below

No

Please provide full details of:

- a) *the proposed process* - A suvery has already been completed to support this submssion. However, should further information be required we will be able to survey our membership within the timeframes specified on the following page.
- b) *the timeframes over which you will be collecting evidence* - as above.
- c) *the nature of the information you are seeking* - as above.

Next steps

The Ministry will assess all Occupation Nominations received within the set timeframe (i.e. by **5pm on 23 July 2018**). Results of the assessment process will be communicated to your key contact person listed above in August 2018.

Where an occupation has been accepted for review, the Ministry will advise your contact person of the outcome and prepare a Preliminary Indicator Evidence Report (PIER), which will be published on its website in August 2018.

Where an Occupation Nomination does not meet the required standard, the Ministry will write to the contact person explaining the reasons for the decision.

The formal submission process is expected to begin on **3 September 2018**. You will be required to make a full submission in support of the case that you have put forward and/or in response to the PIER report.

The Ministry would like to thank you for contributing to this review.

OCCUPATIONS REVIEWED BY THE MINISTRY IN 2017

- Accountant
- Anaesthetist
- Cardiac Physiologist
- Cardiologist
- Carpenter
- Chemical Engineer
- Dental Technician
- Dentist
- Fibrous Plasterer
- Forest Scientist
- Hair or Beauty Salon Manager
- Hairdresser
- Joiner
- Materials Engineer
- Medical Laboratory Technician (Phlebotomy and Histology Technicians)
- Metal Casting Trades Worker (Foundry Moulder)
- Midwife
- Motor Mechanic (General)
- Motorcycle Mechanic
- Ophthalmologist
- Other Sports Coach or Instructor
- Panelbeater/ Collision Repair Technician
- Pathologist
- Petroleum Engineer
- Pharmacy Technician
- Poultry Farmer
- Registered Nurse (Aged Care)
- Registered Nurse (Mental Health)
- Renal Medicine Specialist
- Resident Medical Officer
- Roof Plumber
- Roof Tiler
- Solid Plasterer
- Vehicle Painter/ Automotive Refinish Technician