



BRIEFING

Report back on consultation on proposed changes to immigration settings for international students and final recommendations for change

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|---------------------------------|---------------|-------------------------|------------|
| Date: | 10 July 2018 | Priority: | Medium |
| Security classification: | In Confidence | Tracking number: | 3893 17-18 |

| Action sought | | |
|---|---|--------------|
| | Action sought | Deadline |
| Hon Iain Lees-Galloway Minister of Immigration | Note the summary of feedback received during public consultation. Agree to final proposals to take to Cabinet. | 12 July 2018 |
| Hon Kris Faafoi Associate Minister of Immigration | For your information. | N/A |

| Contact for telephone discussion (if required) | | | | |
|--|-----------------------------|-------------|-----------|-------------|
| Name | Position | Telephone | | 1st contact |
| Siân Roguski | Manager, Immigration Policy | 04 901 3855 | s 9(2)(a) | ✓ |
| Paige Wilburn | Advisor, Immigration Policy | 04 987 3142 | N/A | |

| The following departments/agencies have been consulted |
|---|
| The Ministry of Education, the Treasury, Tertiary Education Commission, Education New Zealand, New Zealand Qualifications Authority, and the Ministry of Foreign Affairs. |

Minister's office to complete:

- | | |
|---|--|
| <input type="checkbox"/> Approved | <input type="checkbox"/> Declined |
| <input type="checkbox"/> Noted | <input type="checkbox"/> Needs change |
| <input type="checkbox"/> Seen | <input type="checkbox"/> Overtaken by Events |
| <input type="checkbox"/> See Minister's Notes | <input type="checkbox"/> Withdrawn |

Comments



BRIEFING

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Purpose

This briefing provides you with a summary of feedback received following public consultation on proposed changes to immigration settings for international students and seeks your agreement to final proposals to take to Cabinet.

Executive summary

In May 2018, Cabinet agreed to undertake public consultation from 2 – 29 June 2018 on proposed changes to post-study work rights and the eligibility of students' partners and their dependent children to work and study in New Zealand.

These proposals were intended to meet policy objectives:

- i. to ensure that post-study pathways for international students are fit-for-purpose and contribute the skills and qualifications New Zealand needs;
- ii. to reduce the likelihood of students being exploited by unscrupulous employers, education providers and agents; and
- iii. to minimise losses of genuine students.

2,061 submissions were received over the consultation period from prospective, current and former international students, international education providers, immigration advisors and employers. The submissions have been analysed and final recommendations have been made for each proposal taking into account the feedback received.

Proposal One: remove employer assisted post-study work visas at all levels

Officials recommend that Proposal One is progressed unchanged. The majority of submitters were supportive of the proposal and considered that the employer-assisted visa was contributing to the exploitation of international students.

Proposal Two: provide a one year post-study open work visa for non-degree Level 7 or below qualifications

Officials recommend that Proposal Two is progressed with changes. The majority of submitters were supportive of Proposal Two, however concerns were raised that Graduate Diplomas were being treated as non-degree qualifications. Submitters raised that students who undertake these qualifications often have completed a degree level qualification to be granted entry into the course, so these qualifications should not be treated differently than degree qualifications.

The proposal to treat these qualifications differently was based on evidence that non-degree level graduates have worse employment outcomes than those at degree levels, which works against policy objective (i).

Based on the feedback, officials consider there are some Graduate Diplomas that merit additional work rights. Officials recommend amending Proposal Two to provide an additional year of post-study work rights for Graduate Diplomas in areas tied to professional and trade registration (i.e. these students would have a total of two years open post-study work rights). This would help to retain international students who have completed qualifications in areas that New Zealand needs, for example teaching or engineering, while ensuring that the pathways for other non-degree level graduates are fit-for-purpose.

Proposal Three: provide a three-year post-study open work visa for degree Level 7 or above qualifications

Officials recommend that Proposal Three is progressed unchanged. Most submitters were supportive of Proposal Three and considered that it would make New Zealand a more attractive study destination for international students undertaking degree level qualifications and above.

Proposal Four: require students completing non-degree Level 7 qualifications to undertake at least two years of study in order to gain eligibility for post-study work rights

Officials recommend that Proposal Four is not progressed. Of the submissions received on Proposal Four, feedback was evenly split between those that support the proposal and those that do not.

Under this proposal Graduate Diplomas would not be entitled to any work rights. The proposal to require at least two years of study to gain post-study work rights was aimed at better aligning work rights with students' investment in New Zealand's export education industry, supporting the achievement of policy objective (i). Some submitters suggested that this proposal will incentivise providers to artificially extend their courses without educational benefit in order to meet immigration requirements.

Officials consider that the policy objectives can be met through other components of the overall package of policy changes and that the risks of the unintended consequences outweigh the possible benefits.

Proposal Five: require international students studying Level 8 or 9 qualifications to be in an area specified on the Long Term Skill Shortage list in order for their partner to be eligible for an open work visa, and in turn the partner's dependent children to be eligible for fee-free compulsory schooling

Officials recommend that Proposal Five is progressed with changes. The majority of submitters on Proposal Five were not supportive of the proposal due to concerns that this proposal would result in a reduction of international students undertaking Masters Degrees at Level 9. Submitters considered these students would be significantly disadvantaged by this proposal as they are often older and accompanied by family. Based on this feedback, officials recommend that this proposal is progressed for qualifications at Level 8, but not Level 9. The change will preserve the link with achieving policy objective (i), while managing risks that policy objective (iii) is not met.

Impact of the changes

Officials have estimated the potential impact the recommended final proposals could have on the number of international students that may not come to New Zealand to study as a result of the changes. In order to do this, officials have used immigration (visa) data on the behaviour of the 2016 cohort of international students, specifically their 'pathways' after study onto work visas. The 2016 cohort has been used as a year delay is required to track their post-study behaviour.

According to this data, from January to December 2016, a total of 36,500 international students finished studying tertiary education. Of these international students, 18,300 had been studying qualifications at Levels 4 to 6 or non-degree Level 7 (including Graduate Diplomas). These are the students that will have their work rights reduced under the changes to post-study work rights.

Of the 18,300, around 13,800 students (about 70 per cent) went onto temporary work visas, including, but not limited to, the open post-study work visa.¹

This results in the estimated potential reduction in international students of between 13,800 and 18,300. The upper end represents the number of affected students who finish study and the lower end represents the number of affected students who finish study and transition onto a work visa.

There are caveats to these estimates:

Explanatory note: the 13,800 to 18,300 range reflects the range in number of students who would have reduced work rights under the final proposals

- Officials have not been able to estimate the number of students who chose New Zealand as their study destination based on the ability to take up post-study work rights, but did not take up these rights.
- It is not possible to forecast with certainty the impact of changes on the future behaviour of prospective international students.
- Officials consider migration-motivated students are the most likely to choose another country for their study if that country has more generous post-study pathways. Overall, New Zealand's settings will remain competitive with key competitor markets (on par with Australia, more competitive than the United Kingdom, the United States and Ireland, and less competitive than Canada).

Implementation

Officials recommend that the changes are grand-parented so that current students and post-study work visa holders are not disadvantaged, and that the employer assisted visa is replaced with an open visa from the date of implementation. Officials understand that you would like the changes implemented as part of the November 2018 changes to Immigration Instructions. It is recommended that the grand-parenting of Proposals One through Four is applied from the date of announcement in August 2018, to mitigate the risk of an influx of low quality applications between announcement and implementation.

Subject to your agreement to the above recommendations, officials will provide you with a draft Cabinet paper reflecting your decisions on a final set of changes by Monday, 16 July 2018, with the view to lodge the Cabinet paper for Cabinet Economic Development consideration on 1 August 2018.

¹ Of the 13,800 who went on to work visas, 12,300 were specifically on an open post-study work visa. 4,900 of this group subsequently went on to an employer-assisted post-study work visa.

Recommended action

The Ministry of Business, Innovation and Employment recommends that you:

- a **Note** that 2,061 submissions were received on proposed changes to immigration settings for international students with the following high level feedback:

| | | |
|-----------------------|--|--|
| Proposal One | Remove employer assisted post-study work visas at all levels | 54 per cent supportive 46 per cent not supportive |
| Proposal Two | Provide a one year post-study open work visa for non-degree Level 7 or below qualifications | 72 per cent supportive 28 per cent not supportive |
| Proposal Three | Provide a three year post-study open work visa for degree Level 7 or above qualifications | 86 per cent supportive 14 per cent not supportive |
| Proposal Four | Require students completing non-degree Level 7 qualifications to undertake at least two years of study in order to gain eligibility for post-study work rights | 48 per cent supportive 52 per cent not supportive |
| Proposal Five | Require international students studying Level 8 or 9 qualifications to be in an area specified on the Long Term Skill Shortage list in order for their partner to be eligible for an open work visa, and in turn the partner's dependent children to be eligible for fee-free compulsory schooling | 43 per cent supportive 57 per cent not supportive |

Noted

Proposal One: remove employer assisted post-study work visas at all levels

- b **Note** that submitters were broadly supportive of this proposal and confirmed that employer assisted post-study work visas are contributing to the exploitation of international students.

Noted

- c **Agree** to proceed with Proposal One.

Agree/Disagree

Proposal Two: provide a one year post-study open work visa for non-degree Level 7 or below qualifications

- d **Note** that submitters raised concerns that Proposal Two treats Graduate Diplomas as non-degree qualifications, outlining these qualifications are typically undertaken after a degree level qualification and in areas of value to the New Zealand labour market, e.g. in teaching, engineering and accounting.

Noted

e **Agree to:**

| | | |
|--|---|-----------------------|
| EITHER: Current proposal | Provide a one year post-study open work visa for non-degree Level 7 or below qualifications. | <i>Agree/Disagree</i> |
| OR: Option One (recommended option) | Provide a one year post-study open work visa for non-degree Level 7 or below qualifications, <i>but</i> grant an additional year of post-study work rights for Graduate Diplomas linked to membership or registration with a professional or trade association. | <i>Agree/Disagree</i> |
| OR: Option Two | Provide a one year post-study open work visa for Diplomas and Graduate Certificates at Level 7, but consider Graduate Diplomas at the same level as Bachelor's degrees and make them eligible for a three year post-study open work visas. | <i>Agree/Disagree</i> |

Proposal Three: provide a three year post-study open work visa for degree Level 7 or above qualifications

- f **Note** that the majority of submitters supported this proposal considering it would make New Zealand a more attractive study destination for international students undertaking degree level qualifications and above.

Noted

- g **Agree** to proceed with Proposal Three.

Agree/Disagree

Proposal Four: require students completing non-degree Level 7 qualifications to undertake at least two years of study in order to gain eligibility for post-study work rights

- h **Note** that submitters raised concerns that this proposal would mean that students who undertake Graduate Diplomas at Level 7 would not be entitled to any work rights, as these qualifications take one year of study and that this proposal will incentivise providers to artificially extend their courses without educational benefit to meet immigration requirements.

Noted

i **Agree to:**

| | | |
|--|---|-----------------------|
| EITHER: Current proposal | Require students completing non-degree Level 7 qualifications, including Graduate Diplomas, to undertake at least two years of study in order to gain eligibility for post-study work rights. | <i>Agree/Disagree</i> |
| OR: Option One (recommended option) | Remove this proposal. Only qualifications at Level 6 and below will be required to undertake at least two years of study in order to gain eligibility for post-study work rights. | <i>Agree/Disagree</i> |

Proposal Five: require international students studying Level 8 or 9 qualifications to be in an area specified on the Long Term Skill Shortage list (LTSSL) in order for their partner to be eligible for an open work visa, and in turn the partner's dependent children to be eligible for fee-free compulsory schooling

- j **Note** that submitters raised concerns that this proposal would result in a significant reduction in Masters students at Level 9, as these students are often older and accompanied by family.

Noted

- k **Agree to:**

| | | |
|--|---|-----------------------|
| EITHER: Current proposal | Require international students studying Level 8 or 9 qualifications to be in an area specified on the LTSSL in order for their partner to be eligible for an open work visa, and in turn the partner's dependent children to be eligible for fee-free compulsory schooling | <i>Agree/Disagree</i> |
| OR: Option One (recommended option) | Amend this proposal so it only applies to international students studying at Level 8. The partners of all international students studying at Level 9 will be eligible for an open work visa, and in turn the partners' dependent children to be eligible for fee-free compulsory schooling. | <i>Agree/Disagree</i> |

Implementation

- l **Agree to:**

| | | |
|---|---|-----------------------|
| EITHER: Option One: No grand-parenting | Apply the changes to all current international students and post-study work visa holders (open and employer assisted). | <i>Agree/Disagree</i> |
| OR: Option Two: Grand-parent the proposals | Grand-parent the proposals so the changes do not apply to current international students or post-study work visa holders. | <i>Agree/Disagree</i> |
| OR: Option Three: Grand-parent the proposals and remove employer assisted visas (recommended option) | Grand-parent for all current students and post-study work visa holders and replace the employer assisted visa with open post-study work visa from the date of implementation. | <i>Agree/Disagree</i> |

- m **Agree** that the changes are implemented as part of the November 2018 instructions change.

Agree/Disagree

- n **Note** that officials have identified that there is a risk of a spike in low level and low quality applications attempting to come under the more favourable current rules between the announcement of the final changes in August and implementation in November.

Noted

- o **Agree** to grand-parent Proposals One through Four from the date of announcement, to ensure that current students and post-study work visa holders are not disadvantaged, while avoiding an influx of low quality applications.

Agree/Disagree

- p **Note** the following timetable in order to enable an announcement of final decisions at the New Zealand International Education Conference on 9/10 August:

| | |
|---|---|
| Draft Cabinet paper | Monday, 16 July 2018 |
| Ministerial consultation | Thursday, 19 July – Wednesday, 25 July 2018 |
| Cabinet paper lodged for Cabinet Economic Development Committee (DEV) consideration | Thursday, 26 July 2018 |
| DEV consideration | Wednesday, 1 August 2018 |
| Cabinet consideration | Monday, 6 August 2018 |
| Announcement | Thursday, 9 August – Friday, 10 August 2018 |

Agree/Disagree

Siân Roguski
Manager, Immigration Policy
Labour and Immigration Policy, MBIE

..... / /

Hon Iain Lees-Galloway
Minister of Immigration

..... / /

Background

1. On 28 May 2018, Cabinet agreed to release a public consultation document on proposed changes to post-study work rights and the eligibility of students' partners and their dependent children to work and study in New Zealand [CAB-18-MIN-0250 refers].
2. The set of proposed changes in the consultation document were developed in line with the following objectives:
 - i. to ensure that post-study pathways for international students are fit-for-purpose and contribute the skills and qualifications New Zealand needs;
 - ii. to reduce the likelihood of students being exploited by unscrupulous employers, education providers and agents; and
 - iii. to minimise losses of genuine international students.
3. Officials consulted on the following proposals:
 - **Proposal One:** remove employer assisted post-study work visas at all levels;
 - **Proposal Two:** provide a one year post-study open work visa for non-degree Level 7 or below qualifications;
 - **Proposal Three:** provide a three year post-study open work visa for degree Level 7 or above qualifications;
 - **Proposal Four:** require students completing non-degree Level 7 qualifications to undertake at least two years of study in order to gain eligibility for post-study work rights; and
 - **Proposal Five:** require international students studying Level 8 or 9 qualifications to be in an area specified on the Long Term Skill Shortage list in order for their partner to be eligible for an open work visa, and in turn the partner's dependent children to be eligible for fee-free compulsory schooling.
4. These proposals were developed in conjunction with the Ministry of Education, Education New Zealand, New Zealand Qualifications Authority, Tertiary Education Commission and the Ministry of Foreign Affairs and Trade.

Consultation process

5. Public consultation on these proposals was opened on 2 June and closed for submissions on 29 June.
6. 2,061 submissions were received over the consultation period. Of these 1,969 were submitted via SurveyMonkey, alongside 92 written submissions (31 from individuals and 61 from organisations). Officials also attended Education New Zealand Connect Seminars in Auckland, Wellington, Hamilton and New Plymouth and where officials heard from education providers and peak bodies.
7. Just over half of submitters, around 55 per cent, were current students. Of the remaining submissions:
 - 11 per cent were from prospective students;
 - 8 per cent were from education providers (Universities, Private Training Establishments (PTEs) and Institutes of Technology and Polytechnics (ITPs));
 - 8 per cent were from graduates, many of whom were on post-study work visas;

- 3 per cent were from immigration advisors;
 - 2 per cent were from employers of international students; and
 - the remaining 11 per cent were from advocates,
 - student associations, or did not specify.
8. Some submitter's comments were inconsistent with their indications of whether they were supportive or not. Officials took this into account when analysing the submissions.
9. Submitters were most supportive of Proposals Two and Three, with a slight majority in support of Proposal One. There were small majorities not supportive of Proposals Four and Five. Table One below outlines the percentage of submitters that supported and did not support each proposal.

Table One: Percentage of submitters in support of each proposal

| Proposal | Supportive | Not supportive |
|----------------|--------------------|--------------------|
| Proposal One | 54 per cent | 46 per cent |
| Proposal Two | 72 per cent | 28 per cent |
| Proposal Three | 86 per cent | 14 per cent |
| Proposal Four | 48 per cent | 52 per cent |
| Proposal Five | 43 per cent | 57 per cent |

Final recommended changes to immigration settings for international students

Proposal One: remove employer assisted post-study work visas at all levels

Submissions analysis

5. Of the 2,039 responses to Proposal One, there was a slight majority of 54 per cent who supported removing employer assisted work visas, compared to the 46 per cent who did not support the proposal.
6. Of those that supported Proposal One, the main reasons were because:
- it would reduce the exploitation of students;
 - promote choice for students looking for employment;
 - remove dependency on employers and the ability for employers to 'sell' residence.
7. Supportive submitters considered that the proposal would:
- provide them more time and opportunity to find the right job (when coupled with other proposals that retain the existing length of post-study work rights);
 - make the process more transparent for students and employers;
 - reduce Immigration New Zealand (INZ) administration requirements; and
 - help to attract more bona fide students to higher levels of study.
8. Two thirds of graduate submitters supported this proposal. Unions and Student Associations were also very supportive of this change, although some suggested the proposal does not go far enough to combat exploitation.
9. Unsupportive submitters considered the proposal would:
- be negative for business;
 - hinder former students' ability to gain residency;

- not be fair to students; and
 - would reduce the numbers of international students that come to New Zealand to study.
10. The impacts cited by student submitters not supportive of Proposal One included:
- not having the opportunity to get much practical experience after finishing study (for those studying at non-degree Level 7 and below); and
 - feeling like investment in study had been wasted if they weren't able to get the same work rights that they anticipated when they came to New Zealand.
11. Employers raised concerns that Proposal One would create labour shortages and education providers considered this change would lead to a reduction of international student enrolments (when coupled with other proposals limiting total post-study work entitlements).
12. Many submitters, including those in support of the proposal, argued that the focus should be on the education providers and employers who are not meeting education and employment standards rather than the students.

Final recommendations

13. Officials have considered the feedback received and recommend that Proposal One is progressed unchanged.
14. The majority of submitters were supportive of the proposal and confirmed our previous analysis that the employer assisted post-study work visa is contributing to the exploitation of international students. Officials consider the proposal consulted upon best meets your objective to reduce the likelihood of students being exploited by unscrupulous employers, education providers and agents.
15. Officials consider concerns that these proposals do not go far enough to address exploitation and that the focus needs to be on the employers and education providers as valid. However this proposal is intended to be a first step to address migrant exploitation. Work is underway as part of the Migrant Exploitation Inquiry to further address the exploitation of migrants, including international students.
16. Concerns were raised that Proposal One would make it more difficult for international students studying lower level qualifications to transition onto a residence visa which would reduce the numbers of international students who will come to New Zealand. These submissions describe the intended policy impact of the proposal and are in line with policy objective (i).
17. The development and launch of the International Education Strategy alongside these changes is aimed at growing the export education market sustainably and consistent with the Government's policy objectives.

Proposals Two: provide a one year post-study open work visa for non-degree Level 7 or below qualifications

Submissions analysis

18. Of the 1,425 respondents to Proposal Two, 72 per cent were supportive and 28 per cent were not in support of the proposal.
19. Many of the current student submitters that supported this proposal noted that this would not impact them as they were studying at a higher level and would therefore be entitled to more generous post-study work rights.
20. Of those that supported Proposal Two, the main reasons were that the proposal:

- supports opportunities for former students to gain some practical, New Zealand-based experience; and
 - provides better options and choices for students.
21. Those not in support of this change considered that the likely impact would be a reduction in students and a negative impact on the labour market, with one submitter noting the *'change provides benefits to degree providers but disadvantages vocational-based education providers'*.
 22. Submitters noted that this proposal will have negative impacts on student numbers and revenues of education providers.
 23. In addition a number of submitters, both supportive and unsupportive, raised concerns with the way Graduate Diplomas are considered non-degree qualifications².
 24. Education providers and students, have submitted that Graduate Diplomas should be treated the same as degree level qualifications given in order for a student to be eligible to enrol in a Graduate Diploma they would have previously completed a degree level qualification. In some cases, however, education providers will grant entry to a Graduate Diploma if the student can demonstrate equivalent practical, professional or educational experience.
 25. As Proposal Four requires students completing qualifications at Level 7 to undertake two years of full time study in order to qualify for post-study work rights and Graduate Diplomas take one year to complete, the combined effect of Proposals Two and Four will mean that international students undertaking Graduate Diplomas would not be entitled to any post-study work rights.
 26. Officials met with education provider stakeholders as part of the consultation process and ITP and PTE representatives were particularly concerned about the impact that Proposals Two and Four would have on their ability to attract international students.

Final recommendations

27. Officials consider there is a case for amending Proposal Two in regards to Graduate Diplomas, given the combined impact of Proposals Two and Four would not align with your policy objectives. There are a number of Graduate Diplomas in areas that would be considered of value to the New Zealand labour market, for example in Early Childhood Teaching or Engineering.
28. Officials have identified a number of alternative approaches that would ensure that international students who have gained the skills and qualifications New Zealand needs would be able to access post-study work rights. Table Two overleaf outlines the alternative approaches for post-study work rights for non-degree Level 7 qualifications.
29. The alternative approaches outlined in Table Two would require the removal of Proposal Four, in order for Graduate Diplomas that take one year of study to be eligible for any post-study work rights. Proposal Four is discussed from paragraph 38 onwards.
30. Officials recommend Option One as it addresses the concerns raised by submitters that some international students studying in areas of value to the New Zealand labour will be lost, while also ensuring the proposals will achieve your policy objectives.

² Graduate Diplomas are for degree graduates to pursue further study at an advanced undergraduate level.

Table Two: Options for post-study work rights for non-degree Level 7 qualifications

| Option | Description | Benefits | Risks | Impact |
|--|--|---|--|---|
| <p>Option One (preferred option): Current Proposal Two with additional post-study work rights for Graduate Diplomas tied to professional registration.</p> | <p>Option One would provide a one year post-study open work visa for all non-degree Level 7 or below qualifications (including Graduate Diplomas).</p> <p>However, international students who undertake a Graduate Diploma to work towards membership or registration with a New Zealand professional or trade association would be eligible for an additional year of open work rights.</p> | <p>This addresses feedback received through the consultation process that some professions that are of value to the New Zealand labour market would be inadvertently captured by this change. For example, teachers and nurses who come to New Zealand with Bachelor Degrees but are required to complete a Graduate Diploma to be able to begin the registration process in New Zealand.</p> <p>This approach is consistent with current instructions which provide an additional year for holders of an employer assisted work visa who are working towards registration or membership.</p> | <p>The risks associated with this option are that ITPs and PTEs that deliver Graduate Diplomas will be significantly financially impacted as the majority of Graduate Diplomas are undertaken in generic subjects, such as business or management.</p> | <p>Based on the cohort of students that finished their study between January and December 2016, approximately 540 students would be eligible for a three year post-study open work visa under this option.</p> <p>The main areas of study at Graduate Diploma level linked to professional bodies are:</p> <ul style="list-style-type: none"> • 198 students in Teaching (with over 100 studying Early Childhood Education); • 134 students in Engineering; and • 154 in Accounting. |
| <p>Option Two: Current Proposal Two, but Graduate Diploma's would be considered to be degree level qualifications and would be entitled to three year open post-study work visas.</p> | <p>This option would remove anyone with a Graduate Diploma from the scope of Proposal Two, therefore international students studying towards a Graduate Diploma would receive a three year post-study open work visa once they have completed their qualification.</p> | <p>This proposal would likely reduce the financial impact of the proposed changes on ITPs and PTEs.</p> <p>It would also provide sufficient post-study work rights for professions that are of value to the New Zealand labour market that require work experience in order to become registered.</p> | <p>This option could undermine the objectives of your proposals to ensure that post-study pathways for international students are fit-for-purpose and contribute the skills and qualifications New Zealand needs.</p> <p>International students who undertake Graduate Diplomas in generic subjects have contributed, in part, to the decline in the average skill level of new residents. Providing three year post-study work rights to these students would provide an incentive for providers to offer increasing numbers of Graduate Diplomas as a pathway to residence.</p> <p>There is also a risk that education providers consider equivalency as sufficient for admission so international students who have not completed degrees may be eligible for the same work rights as degree graduates.</p> | <p>Under this option, based on the cohort of students that finished their study between January and December 2016, around 5,362 students who studied a Graduate Diplomas would be eligible for a three year open post-study work visa.</p> <p>Of these international students, 2,911 are studying business or management qualifications.</p> |

Proposal Three: provide a three year post-study open work visa for degree Level 7 or above qualifications

Submissions analysis

31. Of the 1,320 responses, 86 per cent were supportive of Proposal Three.
32. Of those that supported Proposal Three, the main reasons were that it would:
 - give students a fair chance;
 - provide better opportunities for students;
 - give them more time to find a suitable job;
 - allow them to contribute to the economy;
 - reduce exploitation of students; and
 - increase the attractiveness of New Zealand to international students.
33. Supportive submitters considered the proposal would:
 - increase the likelihood that international students would stay in New Zealand longer to work;
 - increase the number of international students studying at higher levels; and
 - make international students more attractive to employers if they could have a longer working relationship with them.
34. Non-supportive submitters considered this proposal would:
 - not be fair to international students who study and education providers who provide lower level qualifications;
 - have a negative effect on the New Zealand economy, specifically through reduced numbers of international students due to reduced post-study work rights;
 - provide too long a duration of post-study work rights and that this would give international students false hope of gaining residency.

Final recommendations

35. Officials recommend that Proposal Three is progressed unchanged.
36. Submissions received confirm this proposal will have the intended impact of sending a strong signal that New Zealand values migrants with high level qualifications for residence.
37. Submissions have confirmed that Proposal Three is in line with your objective to ensure that post-study pathways for international students are fit-for-purpose and contribute the skills and qualifications New Zealand needs. The proposal will encourage international students to undertake degree level qualifications and above and also provide a pathway to residency for international students with the skills New Zealand wants.

Proposal Four: require students completing non-degree Level 7 qualifications to undertake at least two years of study in order to gain eligibility for post-study work rights

Submissions analysis

38. Of the 1,253 who responded to this proposal, there was a fairly even split between those that support the proposal (48 per cent) and those that don't (52 per cent).

39. Key themes in the feedback of those supportive of this proposal were that it would:
- lead to better prepared students;
 - promote genuine students focused on education not residency; and
 - be of benefit to the New Zealand economy.
40. Some submitters were supportive of the proposal only if Graduate Diplomas at Level 7 were to be treated the same as a Bachelor degree. Many submitters who were in support of Proposal Four noted that there would be no impact on them.
41. The majority of submissions by education providers were not in support of this change, with two thirds of the submissions attributed to PTEs. Many noted that Graduate Diplomas required the student to hold a Bachelor Degree or equivalent and that an additional year of study is not required, or desirable. Some submitters suggested this proposal would incentivise education providers to artificially extend the duration of their courses.
42. Many student submitters also noted that they already had bachelor degrees from outside New Zealand and did not need to study for more than one year.
43. The impacts for those who do not support this proposal included a likely reduction in students, particularly at PTEs and ITPs, where some noted this would have a significant financial impact.

Final recommendation

44. Officials recommend that this proposal is not progressed.
45. Under Proposal Four students who undertake Graduate Diplomas at Level 7 would not be entitled to any post-study work rights. As discussed from paragraph 26 above this is not in line with your objective to ensure post-study pathways contribute to the skills and qualifications New Zealand needs, while minimising losses of genuine students to the export education market. Submitters have overwhelmingly argued that this proposal will have significant impacts on their ability to attract international students.
46. In addition submissions have suggested that this proposal may not have the intended effect of improving the level of skill of graduates. Rather some submitters have suggested that this proposal will incentivise providers to artificially extend their courses without educational benefit in order to meet immigration requirements.

Proposal Five: require international students studying Level 8 or 9 qualifications to be in an area specified on the Long Term Skill Shortage list (LTSSL) in order for their partner to be eligible for an open work visa, and in turn the partner's dependent children to be eligible for fee-free compulsory schooling

Submissions analysis

47. Of the 1,133 submitters who responded to Proposal Five, 57 per cent did not support it, while 43 per cent were supportive.
48. Key themes in the feedback of those that supported the proposal were that:
- linking the requirements to skill shortage lists would alleviate skill shortages; and
 - the proposal would benefit the economy (through a positive impact on the labour market).
49. While many of the respondents supportive of the proposal noted that there would be no personal impact on them, the identified likely impact would be reductions of students with families enrolling in qualifications at Levels 8 and 9 in areas not specified on the LTSSL.

50. Non-supportive submitters considered this proposal would:
- have a detrimental impact on families;
 - mean that quality candidates would choose not to come as they would be separated from their families; and
 - mean New Zealand would miss out on experienced and qualified people.
51. Some current student submitters stated they would leave New Zealand if this was applied to them. Submitters also considered that these changes will limit New Zealand's ability to attract high quality postgraduate students to New Zealand.
52. Some education providers considered that they would be significantly affected, with one estimating a 50 per cent decrease of postgraduate students and another 80 per cent decrease, in both cases leading to reduced revenue and job revenue.
53. Universities New Zealand raised concerns that international students undertaking Masters Degrees at Level 9 would be significantly disadvantaged by this proposal as these students are often older and accompanied by family. In addition their partners often support them to study and so concerns were raised that there would be a reduction in Masters students.

Final recommendations

54. Officials consider there is a case for amending Proposal Five in regard to Masters Degrees at Level 9. Officials recommend this proposal is progressed for qualifications at Level 8 and recommend making no change for qualifications at Level 9.
55. The majority of qualifications being undertaken by international students with partners are at Level 8 and are not in areas specified on the LTSSL. The most common qualifications are Postgraduate Certificates and Diplomas at Level 8 in Business or Management.
56. The recommended change to Proposal Five will ensure that New Zealand gets the skills it needs by incentivising international students studying at Level 8 to study in areas specified on the LTSSL, while minimising losses of genuine international students at higher levels by allowing them to bring their partner and their partners' dependent children.

Impacts of the final changes

Impact on international student numbers

57. Officials have estimated the potential impact the recommended final proposals could have on the number of international students that may not come to New Zealand to study as a result of the changes. In order to do this, officials have used immigration (visa) data on the behaviour of the 2016 cohort of international students, specifically 'pathways' after study onto work visas. The 2016 cohort has been used as a year delay as a year delay is required to track their post-study behaviour. Note these estimates differ from those presented in the May Cabinet paper as MBIE has refined the data by classifying all students by their exact level of study and qualification completed, rather than only using institution as a proxy.
58. According to this data, from January to December 2016, a total of 36,500 international students finished studying tertiary education. Of these international students, 18,300 had been studying qualifications at Levels 4 to 6 or non-degree Level 7 (including Graduate Diplomas). These are the students that will have their work rights reduced under the changes to post-study work rights.

59. Of the 18,300, around 13,800 students (about 70 per cent) went onto temporary work visas, including, but not limited to, the open post-study work visa.³
60. The potential reduction in international students based on previous behaviour is estimated to be between 13,800 and 18,300. This upper end represents the number of affected students who finish study and the lower end represents the number of affected students who finish study and transition onto a work visa. Explanatory note: the 13,800 to 18,300 range reflects the range in number of students who would have reduced work rights under the final proposals
61. This range represents MBIE officials' best estimates and has some caveats attached:
- Officials have not been able to estimate the number of students who chose New Zealand as their study destination based on the ability to take up post-study work rights, but did not take up these rights. In order to estimate this, officials have used total student visa applications between January and December 2017. A total of 60,000 student applications were approved and 20,000 of those students were intending to study at the levels affected by the changes (i.e. Levels 4 to 6 and non-degree level 7, including Graduate Diplomas). This compares to education data which confirms enrolments of 27,800 international students at Levels 4 to 7 non-degree, plus an additional unknown portion at un-government funded PTEs.
 - It is not possible to forecast with certainty the impact of changes on the future behaviour of prospective international students. The impact analysis is limited by the fact that students could come to study anyway and then transition on to another work visa (such as an Essential Skills visa) or decide to study a qualification at a higher level. In addition there may be students who follow a pathway from lower levels, including secondary school, into tertiary education who are not captured by the estimates.
 - Officials consider migration-motivated students are the most likely to choose another country for their study if that country has more generous post-study pathways. Overall, New Zealand's settings will remain competitive with key competitor markets (on par with Australia, more competitive than the United Kingdom, the United States and Ireland, and less competitive than Canada).

Impact of the changes by qualification level institution type, region and subject area

62. Officials have also broken down the potential impacts by qualification level, institution type, region of study and then subject area. These figures are based on the cohort of students who finished their study between January and December 2016 who then transitioned on to a work visa, including, but not limited to, a post-study work visa (the same group as used in the estimate in paragraph 60 above).
63. The shaded figures are the number of students who would have their work rights reduced under the proposed changes (subject to your agreement to the recommended approach regarding Proposals Two and Four).

³ Of the 13,800 who went on to work visas, 12,300 were specifically on an open post-study work visa. 4,900 of this group subsequently went on to an employer-assisted post-study work visa.

Table Three: Students who finished studying between January and December 2016 by level and institution type

| Institution type | Qualification Level | | | | | Grand Total |
|--|---------------------|--------------|--------------------|------------------------------|----------------------|---------------|
| | Levels 1-3 | Levels 4-6 | Level 7 non-degree | Graduate Diplomas at Level 7 | Degree Level 7 to 10 | |
| Institutes of Technology and Polytechnics (ITPs) | 833 | 1,886 | 7 | 3,486 | 1,060 | 7,272 |
| Private Training Establishments | 5,956 | 6,401 | 3,591 | 995 | 601 | 17,544 |
| Universities | 3,117 | 990 | 6 | 875 | 6,209 | 11,197 |
| Not recorded | 415 | 11 | 5 | 6 | 18 | 455 |
| Grand Total | 10,321 | 9,288 | 3,609 | 5,362 | 7,888 | 36,468 |
| Total affected by the change | 18,259 | | | | | |

*note that the shaded cells represent those students who are affected by the changes

64. Table Three above shows that 60 per cent of the potential loss of students will be from PTEs and 30 per cent will be from ITPs. Based on this cohort of students, most of the of the potential loss of students will be in Auckland (65 per cent), followed by 9 per cent in Canterbury, 6 per cent in Wellington and then 6 per cent in the Bay of Plenty. Annex One provides further detail on the impact by region.

65. The subject areas most affected by the changes are as follows:

- Level 4 – 6: Business and Cookery
- Level 7 non-degree: Business and IT
- Graduate Diplomas: Business and Management

66. The majority of courses at the levels affected are in business or management. Further detail on the subject areas most affected by the proposed changes has been provided in Annex One.

Impacts on education providers

Impacts on Institutes of Technology and Polytechnics (ITPs)

67. As noted in the May Cabinet paper, a number of ITPs have used growth in international student numbers to support their profitability [3410 17-18 refers]. During consultation a number of ITPs have provided an estimate of the impact the changes will have on their business.

68. Each ITP has individually assessed the expected impact of the proposed changes compared to 2017 actual student data. While the methodology used by each ITP has not been verified, ITPs are the most equipped to understand their enrolment patterns, international demographics, and international strategies and how these changes will alter enrolments.

69. Using information supplied by ITPs, TEC has completed impact modelling to provide the range of potential impacts depending on how accurate the analysis by the ITPs is. TEC estimate that the overall ITP sector revenue impact will be in the vicinity of s 9(2)(b)(i)

70. The Minister of Education has asked education officials to develop an overview of the education sector impacts, including modelling the impact on ITPs. MBIE will work closely with education agencies on a report to Ministers with this information.

Impact on Private Training Establishments (PTEs)

71. PTE students make up 60 per cent of the international students affected by the changes. Officials have used the average tuition revenue per student at PTEs of \$6,285 to calculate the potential lost fee revenue to the PTE sector. Based on the estimated reduction of students of 13,800 and 18,300 students, officials estimate the lost fee revenue would be from \$52 million to \$69 million.

Explanatory note: the 13,800 to 18,300 range reflects the range in number of students who would have reduced work rights under the final proposals.

Economic impact

72. A number of providers have commented on the economic impact of the proposed changes. To do this they have used methodology that seeks to estimate the loss to the economy of, for example, the spending of international student arising from the changes.
73. Education New Zealand (ENZ) commissions reports on a two yearly basis on the economic impact of international education, the most recent of which was published in October 2016, with the 2018 report currently being finalised.⁴
74. In this reporting the economic value of the sector is derived using a methodology previously agreed by ENZ, Treasury, and Statistics New Zealand that draws on tuition fee revenue directly reported to the Ministry of Education by providers together with expenditure information from a large scale survey of international students (>8,000) covering non-tuition related living costs and income earned in New Zealand. A number of standard economic multipliers are then used to calculate additional impacts on the New Zealand economy (including upstream and downstream suppliers and employment).
75. There are differing views on the validity of the different estimates and methodologies underpinning them. For example, following announcements of the changes ANZ reported they were of the view that the number of students that would be impacted and the associated economic impact of the proposed policy changes were overestimated by both providers and officials.⁵ This compares to the ITPs and PTEs who reported they were of the view that the impact was underestimated.

Implementation

76. In addition to seeking your agreement to final changes, officials also wish to seek your agreement to an approach for grand-parenting and a date of implementation.

Options for grand-parenting the proposals

77. You have indicated that you want final proposals to be grand-parented so that existing students are not disadvantaged. Officials have identified two possible options for grand-parenting the proposals alongside the option of no grand-parenting for completeness. The options are as follows:

- **Option One:** apply the changes to all current international students and post-study work visa holders (open and employer assisted).

⁴ Infometrics and National Research Bureau (2016) *The Economic Impact of International Education in New Zealand 2015/16 for Education New Zealand*.

⁵ Walls, Jason. (June 12, 2018). *ANZ say the Government has overestimated how many students its new work rights policy will affect by up to 6000 people per year*. Retrieved from URL <https://www.interest.co.nz/news/94241/anz-say-government-has-overestimated-how-many-students-its-new-work-rights-policy-will> on 10 July 2018

- **Option Two:** grand-parent the proposals so the changes do not apply to current international students or post-study work visa holders.
- **Option Three (*preferred option*):** grand-parent for all current students and post-study work visa holders and replace the employer assisted visa with an open visa from the date of implementation.

78. The options have been assessed against the following objectives:

- ensure that post-study pathways for international students are fit-for-purpose and contribute to the skills and qualifications New Zealand needs;
- reduce the likelihood of students being exploited; and
- fairness to current international students and post-study work visa holders.

79. Table Four below outlines the impact of each grand-parenting option on current international students and post-study work visa holders as well as assessing how each option aligns with the above objectives.

80. Based on the analysis, officials recommend Option Three. This option best meets your objectives for post-study work rights and is the most fair to current international students and post-study work visa holders.

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Table Four: Impact of grand-parenting options

| Option | Impact on current students | Impact on post-study work rights visa holders | Alignment with objectives |
|--|---|--|--|
| <p>Option One: No grand-parenting. Apply the changes to all current international students and post-study work visa holders (open and employer assisted)</p> | <p>Current students studying at Level 4-6 would have their post-study visa duration reduce by two years.</p> <p>Students studying at Level 7 degree and above would be better off as they would be entitled to a three year open work visa.</p> | <p>Open post-study visa holders who studied at Level 4 to 6 and non-degree Level 7 would lose their entitlement to the two year employer assisted visa.</p> <p>Open post-study visa holders who studied at degree Level 7 and above would be eligible for another two year open work visa. Employer assisted work visa holders would retain their visa, but could apply to remove the employer assisted condition.</p> | <p>Applying the changes immediately to international students who undertake lower level qualifications would ensure that the realignment of the pathways to residence in favour of skills and qualifications New Zealand needs would start flowing through immediately.</p> <p>Allowing all current students and post-study visa holders to transition off the employer assisted visa will best support the Governments objective to reduce the likelihood of exploitation.</p> <p>Not grand-parenting would create significant disruptions for current students and post-study work visa holders who are or have studied at Level 4 to 6 and non-degree Level 7 as they would lose their entitlement to two years of post-study work rights. Current students and post-study work visa holders also enrolled on the basis on the current settings and it would be unfair to change their entitlements after the fact.</p> |
| <p>Option Two: Grand-parent the proposals so the changes do not apply to current international students or post-study work visa holders</p> | <p>There would be no change in entitlement for current students.</p> | <p>Open post-study visa holders would be entitled to the two year employer assisted visa.</p> <p>Employer assisted work visa holders would retain their visa.</p> | <p>Not applying the proposed changes to the current group of students would allow another cohort of students not aligned with the Government's priorities to flow through.</p> <p>Preserving the employer assisted visa, and requiring open post-study visa holder to move onto an employer assisted visa, would maintain the exploitation risk.</p> <p>Grand-parenting would be fair for students and post-study visa holders. They would be entitled to what they were entitled to when they commenced studying.</p> |
| <p>Option Three (preferred option): Grand-parent for all current students and post-study work visa holders and replace the employer assisted visa with an open visa from the date of implementation</p> | <p>Current students would be better off as they would all be eligible for a three year open post-study visa once they finished studying.</p> | <p>All post-study work visa holders would be better off. Open post-study visa holders would be eligible for another two year open work visa. Employer assisted work visa holders would retain their visa, but could apply to remove the employer assisted component.</p> | <p>Not applying the proposed changes to the current group of students would allow another cohort of students not aligned with the Government's priorities to flow through.</p> <p>Allowing all current students and post-study work visa holders to transition off the employer assisted visa will best support the Governments objective to reduce the likelihood of exploitation.</p> <p>Grand-parenting would be the most fair for students and post-study visa holders. They would be entitled to the same duration of post-study visa as they were entitled to when they started studying, but they would be better off with an open post-study work visa.</p> |

Options for implementing the proposals

81. There are two scheduled changes to immigration instructions and the final agreed policy changes can be implemented in line with one of: November 2018 and March 2019.
82. You have indicated that you would like the changes to be progressed in November. There are some risks associated with announcing the final changes in August at the New Zealand International Education Conference and Expo, but then not implementing the changes until November.
83. A three month window between announcement and instructions changes will likely result in a spike of student visa applications in low level courses in order for students to take advantage of the preferable post-study work rights under the current settings.
84. This spike can be significant, as was experienced when the New Zealand Qualifications Authority changed the English language requirements for international students. In 2015 the changes were intended to come into force in September 2015, but instead they were not progressed until October 2015. In that one month window Immigration New Zealand received an increase of approximately 1,500 additional student visa applications, of which the majority were low level and low quality applications. The approval rate for these applications reached a low of 27 per cent.
85. In order to mitigate this risk, officials recommend that grand-parenting of Proposals One through Four only applies to international students and post-study work visa holders as of the date of announcement, rather than the date of implementation. This would meet your objective of ensuring that existing students are not disadvantaged while avoiding an influx of applications from students studying from Levels 4 to non-degree Level 7 attempting to come under the more favourable current rules, which would provide them with a guaranteed two additional years of open post-study work rights.

Next steps

86. Following your agreement to a final set of proposals, officials will provide you with a draft Cabinet paper reflecting these decisions on Monday 16 July 2018. Once you have agreed to a final draft of the Cabinet paper, officials recommend you undertake Ministerial consultation from Thursday 19 July to Wednesday 25 July.
87. Following Ministerial consultation, the final Cabinet paper will be lodged for Cabinet Economic Development Committee (DEV) on Thursday 26 July for DEV consideration on Wednesday 1 August.
88. Subject to Cabinet confirmation on Monday 6 August, officials understand you and the Minister of Education will be attending the New Zealand International Education Conference on 9/10 August with the intention of announcing the final International Education Strategy and the changes to immigration settings for international students.

Annexes

Annex One: Impact of post-study work rights changes by subject and region

Annex One: Impact of post-study work rights changes by subject and region

The below tables outline which regions will be most affected by the changes.

| Region | Qualification Level | | | | | Grand Total |
|-------------------------------------|---------------------|---------------|--------------------|------------------------------|----------------------|---------------|
| | Levels 1-3 | Levels 4-6 | Level 7 non-degree | Graduate Diplomas at Level 7 | Degree Level 7 to 10 | |
| Auckland | 6,471 | 5,942 | 3,002 | 3,022 | 4,330 | 22,767 |
| Bay of Plenty | 248 | 484 | 154 | 508 | 47 | 1,441 |
| Canterbury | 720 | 879 | 399 | 397 | 834 | 3,229 |
| Christchurch | 4 | 1 | 1 | 1 | - | 7 |
| Cromwell | 1 | - | - | - | - | 1 |
| Dunedin | 1 | - | - | - | 2 | 3 |
| Gisborne | - | 1 | - | - | 1 | 2 |
| Hamilton | 7 | - | - | - | 1 | 8 |
| Hawkes Bay | 80 | 120 | 22 | 77 | 33 | 332 |
| Invercargill | - | - | - | - | 1 | 1 |
| Manawatu-Wanganui | 209 | 105 | - | 96 | 444 | 854 |
| Manukau | 1 | - | - | - | - | 1 |
| Mt Maunganui | 1 | - | - | - | - | 1 |
| Nelson-Marlborough | 124 | 56 | - | 128 | 25 | 333 |
| Northland | 28 | 20 | - | 12 | 19 | 79 |
| Otago | 1,062 | 271 | 6 | 139 | 592 | 2,070 |
| Palmerston North | 1 | - | - | - | - | 1 |
| Porirua | - | 1 | - | - | - | 1 |
| Queenstown | 3 | - | - | - | - | 3 |
| Rotorua | - | 1 | - | - | - | 1 |
| Southland | 32 | 81 | - | 232 | 53 | 398 |
| Takapuna | 1 | - | - | - | - | 1 |
| Taranaki | 8 | 109 | - | 55 | 32 | 204 |
| Taupo | 18 | 7 | - | - | - | 25 |
| Te Puke | - | - | 1 | - | - | 1 |
| Waikato | 368 | 344 | 1 | 359 | 684 | 1,756 |
| Wellington | 583 | 866 | 23 | 335 | 787 | 2,594 |
| West Coast | 3 | - | - | 1 | - | 4 |
| Not recorded | 347 | - | - | - | 3 | 350 |
| Grand Total | 10,321 | 9,288 | 3,609 | 5,362 | 7,888 | 36,468 |
| Total affected by the change | | 18,259 | | | | |

Note: These figures are based on the cohort of students that finished their study between January and December 2016

The below tables outline which qualifications will be most affected by the changes. Officials have identified the qualifications at each level affected where more than 50 students completed the qualification. These figures are based on the cohort of students that finished their study between January and December 2016.

Qualifications at Level 4-6

| Qualification title | Number of students |
|---|--------------------|
| National Diploma in Business (Level 6) | 922 |
| Certificate of Proficiency | 599 |
| New Zealand Diploma in Business (Level 6) | 555 |
| Diploma in International Cookery and Patisserie | 475 |
| Diploma in Professional Cookery Level 5 | 334 |
| Diploma in International Culinary Arts | 291 |
| Diploma in Professional Cookery (Level 5) | 229 |
| CTC Wings - Cadet programme (Level 5) | 228 |
| Diploma in Culinary Arts (Level 5) | 224 |
| Certificate in Proficiency | 214 |
| Diploma in Professional Cookery | 207 |
| National Diploma in Hospitality (Management) (Level 5) | 192 |
| National Diploma in Business (Level 5) | 179 |
| International Diploma in Food Preparation and Cookery Supervision (Advanced) (Level 5) | 169 |
| Diploma in Applied Hospitality Management (Level 6) | 122 |
| Diploma of Business Management (Advanced) (Level 6) | 120 |
| General English (Level 4) | 109 |
| Diploma in Applied Technology | 99 |
| Hairdressing: Salon Support and Emerging Stylist (Level 4) | 93 |
| New Zealand Diploma in Cookery (Advanced) (Level 5) | 90 |
| NZ Diploma in Business | 89 |
| National Diploma in Business Level 6 | 85 |
| National Diploma in Hospitality Management (Level 5) | 84 |
| New Zealand Diploma in Cookery (Advanced) Level 5 | 76 |
| Diploma in Computing (Level 6) | 74 |
| General English + IELTS Preparation (Level 4) | 70 |
| National Diploma in Business(level 6) | 70 |
| New Zealand Diploma in Cookery (Advanced) (Level 5) with strands in Cookery and Patisserie (Level 5) | 69 |
| English Language Training Scheme | 69 |
| NSIA Diploma in Hospitality Management (Level 5) | 66 |
| Diploma in Healthcare Management (Level 6) | 58 |
| Diploma in Information Technology (Level 6) | 58 |
| New Zealand Diploma in Engineering (Level 6)(with strands in Electrical Engineering and Electronic Engineering) | 55 |
| International Diploma in Cookery | 54 |
| Diploma of Business Management (Advanced) Level 6 | 53 |
| NZIM Diploma in Management (Advanced) (Level 6) | 51 |
| Certificate in Diversional Therapy and Community Health (level 4) | 50 |

Level 7 non-degree qualifications

| Qualification title | Number of students |
|---|--------------------|
| Diploma in Business (Level 7) | 788 |
| Diploma in Business Management (Level 7) | 366 |
| Diploma in Health Services Management Level 7 | 256 |
| Diploma in Management (Healthcare) (Level 7) | 136 |
| Diploma in Business (Level 7) (with strands in Management, Healthcare Management, and Project Management) | 127 |
| Diploma in Computing (level 7) | 119 |
| Diploma in Business Management (with Specialisations) (Level 7) | 114 |
| Diploma in Information Technology (Support and Operations) (Level 7) | 109 |
| Diploma in Business (L7) | 101 |
| Cornell Diploma in Business Studies (Level 7) | 87 |
| Diploma in Computing (with strands in Software Development & Computer Networking) (Level 7) | 81 |
| Diploma in Information Technology (Multi Media) (Level 7) | 60 |
| Diploma in Electronics and Telecommunications Level 7 | 58 |
| Diploma in Health Services Management (Level 7) | 57 |
| Diploma in Computer Systems Support (Advanced) (level 7) | 53 |
| Diploma in Management (level 7) | 52 |

Graduate Diplomas at Level 7

| Qualification title | Number of students |
|--|--------------------|
| Graduate Diploma in Applied Management | 338 |
| Graduate Diploma in Information Technology | 265 |
| Graduate Diploma in Hotel Management | 174 |
| Graduate Diploma in Computing | 129 |
| Graduate Diploma in Operations and Production Management | 125 |
| Graduate Diploma in Teaching (Early Childhood Education) | 110 |
| Graduate Diploma in Sales and Marketing | 104 |
| Graduate Diploma in Hospitality Management | 98 |
| Graduate Diploma in Applied Business Studies | 94 |
| Graduate Diploma in Business | 92 |
| Graduate Diploma in Information Technology (Level 7) | 88 |
| Graduate Diploma in Accounting | 78 |
| Graduate Diploma in Management | 71 |
| Graduate Diploma in Project Management | 71 |
| Graduate Diploma in Addiction, Alcohol and Drug Studies | 67 |
| Graduate Diploma in Business (level 7) | 62 |
| Graduate Diploma in International Business Innovation | 53 |
| Graduate Diploma in Construction Project Management | 50 |