

Submitter information

Please provide your name and phone number, and preferred email address for contact if it is different from the one used to send this form:

s 9(2)(g)(i), s 9(2)(a)

In what capacity are you providing feedback?

e.g. on behalf of: your company, the company you work for, an industry organisation, a union, a licensed immigration adviser etc.

9(2)(a)

If you are representing a company or group, what is the name of that group?

Jet Park Hotel Ltd (trading as Jet Park Hotel and Conference Centre) and Jet Park Rotorua Ltd (trading as Jet Park Hotel Rotorua).

Jet Park Hotel Auckland is a 4-star plus property near Auckland Airport with 222 guest rooms, a large, new 250-person multi-storey conference centre. Jet Park Hotel Rotorua has 63 rooms and a 4-star rating. Both have full food and beverage services. Combined with the hotel in Rotorua, there are roughly 210 staff of which 14% are working on a range of work visa types. Both businesses are New Zealand owned and operated.

What industry or industries does that group work in?

Hospitality Industry/ Hotels

In your company or industry, what are the most common occupations for migrant workers?

Chefs (all levels), Food and Beverage Staff (all levels), Front Office Staff (Reception, Night Audit, Hotel Porters, Concierge, Reservations Agent), Housekeeping Team Leader

What visa categories are commonly used by those workers?

i.e. resident visa, Essential Skills work visa, Work-to-Residence work visa (under the Talent or Long Term Skill Shortage List categories), Post-Study work visa (open or employer assisted), open work visa.

Essential Skills Work Visa, Post-Study work visa, Open work visa.

Only answer the following questions if you directly employ migrant workers:

How many migrant workers do you currently employ? (Refer to the visa categories in the question above)

Essential Skills Work Visa- 10 Employees; Other Visas- 20

Have you supported an Essential Skills visa application for any of these workers?

Yes, as above.

Using wage or salary information to help determine skill level and access to Essential Skills migrants

Proposal 1: Introduction of remuneration thresholds to determine skill levels and associated visa conditions for Essential Skills visas

Consider the proposal of aligning the remuneration thresholds for the Essential Skills visa with the remuneration thresholds for the Skilled Migrant Category.

What impacts or implications do you foresee from defining lower-, mid- and higher-skilled Essential Skills migrants in this way?

Give details of the occupations or sectors and wage or salary levels you are thinking of.

ACT 1982

9(2)(b)(ii)



Reinforcing the temporary nature of the Essential Skills visa and managing the settlement expectations of temporary migrants

Proposal 2a: Introduction of a maximum duration for lower-skilled Essential Skills migrants

Consider the option of a three years for a maximum duration for lower-skilled Essential Skills visas.

What impacts or implications do you foresee from the proposed maximum duration for lower-skilled Essential Skills visa holders?

Give details of the occupations and industries you are thinking of.

The hotel industry is already facing issues recruiting suitable entry-level staff. The industry is posed to grow to meet the goal to reach 41 Billion in Tourism Revenue by 2025 (Tourism Industry Aotearoa), it is therefore essential that skilled staff are available.

I do not support the above proposal. Particularly for Food and Beverage Staff (all levels), all chefs, Front Office Staff (e.g. Concierge, Receptionist) and Room Attendants. Since 1 April 2016 our hotel in Auckland has carried vacancies almost monthly for many of these roles, this demonstrates the lack of available staff.

This proposal makes it even more difficult to secure staff because it will become even more costly (advertising costs/ time taken) to support annual work visa applications. The work-force becomes more unstable owing to the long wait for visa processing and the increased risk for them not to be granted.

Further, 3 years is not necessarily sufficient to develop an entry-level hospitality worker to a position where they have the skill-set to hold those management roles in the mid-higher level and earning bracket. This would be the only option to assist an employee to stay longer and if it were employed out of desperation for businesses who cannot find staff; I foresee the potential "dumbing down" of the Hospitality work-force.

At a minimum, I would strongly suggest that any current work visa applicants in the above roles do not have a minimum 3-year period enforceable when they apply for their next work visas. This helps us to retain the talent we have already developed.

Proposal 2b: Introduction of stand down period for lower-skilled Essential Skills migrants

Consider the option for a year-long stand down period following the maximum duration for lower-skilled Essential Skills visas.

What impacts or implications do you foresee from these proposed changes?

Give details of the occupations and industries you are thinking of.

The hotel industry is already facing issues recruiting suitable entry-level staff. The industry is posed to grow to meet the goal to reach 41 Billion in Tourism Revenue by 2025 (TIA), it is therefore essential that skilled staff are available.

I do not support the above proposal. Particularly for Food and Beverage Staff (all levels), chefs (all levels), Front Office Staff (e.g. Concierge, Receptionist) and Room Attendants. Should we support an Essentials Skills Visa for 3 consecutive years we will be as a matter of course training and developing that employee. This proposal results in that skilled, willing employee being lost to our business after 3 years and is therefore a disincentive to use migrant labour at all. This is also especially given the cost of securing staff for 3 years as outlined in the previous section.

Alternatively, if labour shortages are so exaggerated we may have no other choice but to hire migrant workers for short-term stints to "stop-gap" shortages. I believe that this however has the effect of weakening the skill set of our labour force, it increases turn-over, reduces the pool of talent from which to develop future leaders with and in turn this threatens the quality of service levels and therefore guest experience and the potential for maximum revenue.

It makes the issue of recruiting those roles mentioned above even more difficult. As an example, our properties have held vacancies for chefs, F&B Staff, Room Attendants almost monthly since 1 April 2016.

It would be desirable to see this proposal waived entirely. One option could be that an employer who invests in supporting and training a staff member on a work permit and who shows a commitment to working in Hospitality and has stayed with that same employer of the 3-year term could have the requirement waived of a stand-down period and the minimum salary threshold.

At a minimum, I would also strongly suggest that the stand-down period not apply to any staff on work permits who are already working in the above positions in the hotel industry.

Proposal 3: Require the partners of lower-skilled Essential Skills visa holders to meet the requirements for a visa in their own right

Consider the proposal to require the partners of lower-skilled Essential Skills visa holders to meet the requirements for a visa in their own right.

What impacts or implications do you foresee from these proposed changes?

Give details of the occupations and industries you are thinking of.

In our Auckland hotel, there may be 4 Room Attendants who would be forced to apply for a work permit in their own right. Since these staff would be categorised in a skill level 4-5 position I believe that it would make it near impossible for them to obtain a work permit.

In the Housekeeping Department, the hotel employs a majority of NZ Citizens/Residents but the turn-over rate is much higher for these staff than those that we have employed previously under the partner visa, who have gone onto obtaining residency and are still loyal employees of ours. An example of this is; in the year since 1 April 2016 our requirement for Room Attendants increased owing to the expansion of the hotel of a multi-storey conference centre and 60 more rooms to form a Housekeeping Department totalling 52 staff. Of the 26 room attendants who were employed since this date and who have now left their employment 21 of these were NZ Citizens or Residents. 8 of these staff abandoned their employment and/or had performance or attendance issues, 3 went to study, 3 to a better job, and 7 resigned owing to family or other commitments. Further under the above proposal we face the potential loss of 4 staff who are currently on a work permit under this category, are well trained and would stay.

It is desirable for the hotel to obtain a lower turn-over rate of staff; the above proposal makes this goal even more challenging as the likelihood of the pool of good NZ Residents/Citizens pool increasing is low (lower unemployment rate, more tourism/hospitality businesses opening to meet the demands of this growing industry).

Our suggestion is that the proposal for partners of lower skilled Essential Skill Visa holders be allowed to work in restricted industries where a need for workers is shown e.g. Hotels without obtaining a visa in their own right.

Proposal 4: Require the children of lower-skilled Essential Skills visa holders to meet the requirements for a visa in their own right

Consider the proposal to require the children of lower-skilled Essential Skills visa holders to meet the requirements for a visa in their own right.

What impacts or implications do you foresee from these proposed changes?

Give details of the occupations and industries you are thinking of.

The implications for attracting lower skilled workers (and thereby increasing the pool of talent required) to the Hospitality industry is diminished because these workers will not be able to afford the expenses related to international student fees and other such costs. Further, for those staff who are already in NZ on a work permit and who are facing renewal of this, may end up leaving for the same reasons.

Reinforce that Essential Skills visas should only be granted for the period for which the employment is offered

Proposal 5: Make it explicit how the 'period of employment' condition applies to seasonal work

Consider the option to reinforce that Essential Skills visas for seasonal work are only for the length of the season and that the offer of employment must match the length of the season.

What impacts or implications do you foresee from these options?

Give details of the occupations or sectors you think are likely to be affected.

Our hotels in Auckland and Rotorua are not currently reliant on the employment of seasonal workers. However, one of the effects that this proposal could have is that hotels in those areas may find it restrictive to growing their business during shoulder seasons because they may not have staff available.

Consider the list of seasonal occupations being considered.

Are there any seasonal occupations that should be added or removed from this list? Why?

This is not applicable to our hotels currently.

Consider the list of seasonal occupations being considered.

If you employ seasonal staff, or represent a sector with seasonal staff:

- What are the occupations of the seasonal staff within the sector that you are commenting on?
- For each of the occupations that you have identified, what is the typical period that you require seasonal staff to cover (e.g the peak of the season)?

This is not applicable to our hotels currently.