MEMO

DATE	16 June 2022
TO	Stephen Vaughan, Chair of Risk Control Group
PREPARED BY	Privacy of natural persons Team Leader, Business Analytics and Targeting
APPROVED BY	Privacy of natural perso Manager, Business Analytics and Targeting
SUBJECT	**RCG MEMO – ADEPT EDP JOB CHECK RULES**

OVERVIEW

This memo presents the Risk Control Group (RCG) with an overview of the proposed approach to identifying risk pre-decision in the Job Check Gateway for the Accredited Employer Work Visa (AEWV). It asks RCG to agree to the approach for risk rules which is based on the model for identification and management of immigration risk pre-decision approved by the Risk Monitoring and Review Governance Group (RMRGG) on 11 May 2022[1] and the specific risk management approach for the Job Check approved by RMRGG on 13 June 2022[2] (hereafter known as 'the model').

PURPOSE

The Business Analytics and Targeting team (BAT) have worked with stakeholders to identify Triage rules[3] for the Job Check gateway of the AEWV. The rules identified seek to align with the risks that RMRGG agree to manage for Job Checks as part of the initial Employer Accreditation period.

RECOMMENDATIONS

a) **Approve** the seven Triage rules that will trigger on applications for Job Checks as part of the AEWV.

Approved / Declined

b) **Note** rules are subject to the ability to deploy within the Azure Business Rules Engine (AzBRE) Job Check rules application. Development of the rules application will continue until the Job Check gateway goes live.

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[1] Risk & Verification, Onshore (2022), RMRGG Memo – Pre-Decision Immigration Risk Management Approach to the Accreditation Gateway for the Accredited Employer Work Visa

[2] Risk & Verification, Onshore (2022), RMRGG Memo – Pre-Decision Immigration Risk Management Approach to the Job Check Gateway for the Accredited Employer Work Visa

[3] Appendix One

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c) **Note** a further paper will go to RCG on the Migrant Visa gateway and this will be presented when the risk management approach and details of data available are confirmed.

Noted

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Stephen Vaughan
Chief Operating Officer
Chair, Risk Control Group
Immigration New Zealand
16 June 2022

BACKGROUND

1. The AEWV is a three-step gateway system that will be implemented in three stages, corresponding to the three gateways: Employer Accreditation, Job Check, and Migrant Visa. The Job Check gateway will go live on 20 June 2022.

2. RMRGG sets Immigration New Zealand's tolerance to risk. RCG is primarily concerned that modifications to Triage as a key risk control are sound, effective in mitigating risk and are operationally acceptable in the context of INZ's risk tolerance.

3. On 22 September 2021, RCG agreed to the overall approach for transitioning current Triage rules to three gateways for ADEPT and the AEWV.[4]

4. On 11 May 2022, RCG agreed to the Accredited Employer gateway rules.[5]

5. As such, based on the decision from the RMRGG on the model, the BAT team alongside Risk and Verification (R&V) Onshore have identified Triage rules[6] that would currently trigger on the Job Check gateway.

PROPOSED RISK RULES FOR JOB CHECK GATEWAY

6. The model identifies the risk areas intended to be managed initially are *RA9 – Employer*, *RA11 – Labour Market*, and *RA18 – Exploitation*.[7]

7. There are 23 current Triage rules which were previously identified as relating to the Job Check gateway.[8]

8. Based on the risk tolerance set by RMRGG, BAT and R&V Onshore identified seven rules to be deployed for the initial go-live of the Job Check gateway – see Appendix One. The remaining rules will not initially be deployed in the Job Check.

9. The model requires BAT to pare back the Triage rule transition plan for the initial round of Employer Accreditation, Job Check and Migrant Visa applications. Therefore, the majority of rules will only apply to one gateway.[9]

10. The model explicitly states that evidence gathered pre- and post-decision will be used to inform risk rules.[10] As part of the ongoing development of Triage rules for AEWV, BAT will leverage its knowledge and data on work visa risk.[11]

11. Risk advice will provide Immigration Officers with clear guidance on expectations for risk treatment alongside standard operating procedures. Any changes to risk advice

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[4] Business Analytics and Targeting (2021), RCG Memo – ADEPT EDP Rules

[5] Business Analytics and Targeting (2022), RCG Memo – ADEPT EDP Employer Accreditation Rules

[6] Appendix One

[7] For ADEPT Risk Areas, see: Risk & Verification (2021), RCG Memo – Recording of Risk Areas and Specific Risks in ADEPT

[8] This includes twenty existing rules and two rules approved by RCG for AEWV on 22 September 2021.

[9] The BAT transition plan for EDP delivered a full suite of rules to ensure that risks which span multiple gateways were covered in each gateway.

[10] Risk & Verification, Onshore (2022), RMRGG Memo – Pre-Decision Immigration Risk Management Approach to the Accreditation Gateway for the Accredited Employer Work Visa. Pages 7-8.

[11] For example, in consultation with stakeholders, further rules on known industries of concern may be investigated in due course.

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will be drafted by Risk and Verification and be subject to the agreed sign out processes.

OPERATIONAL IMPACT/DATA ANALYSIS

12. The AEWV is a new policy and historical data is not available. Furthermore, the data required to understand the operational impact of these rules on Job Checks is not available due to the migrant-centric nature of Essential Skills work visas.

CONSULTATION

13. Because the RMRGG decision was made on 13 June 2022, and the Job Check gateway opens on 20 June 2022, the proposed recommendations outlined in this memo have not been put to the Triage Stakeholder Group (TSG) and wider subject matter experts.

NEXT STEPS

14. The Azure Business Rules Engine (AzBRE) went live with the Employer Accreditation gateway on 23 May 2022. The Migrant Visa gateway is due to go live on 04 July 2022. Delivery of rules in the three gateways is subject to any constraints with the AzBRE and its integration with ADEPT.[12]

15. There are delays in the confirmation of data elements being available for the remaining migrant work visa gateway. When this is confirmed the BAT team will return to the Risk Control Group to gain approval for the rules to be deployed.

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[12] Business Analytics & Targeting (2022), RCG Memo – ADEPT and Triage Data Integration Gap Analysis. Note that this paper outlines the gaps between ADEPT and AMS for Triage as understood in May 2022. As further products are migrated to ADEPT, the implications of these gaps will change and further gaps may be identified.

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APPENDIX ONE

Triage rules to be deployed for the Job Check gateway:

Maintenance of the law

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