



**RISK MONITORING AND REVIEW GOVERNANCE GROUP MEMO:
SELECTION CRITERIA FOR ACCREDITED EMPLOYER RISK MONITORING AND REVIEW**

DATE	19 April 2022
TO	Risk Monitoring and Review Governance Group
MEETING DATE	21st April 2022
PREPARED BY	<p>Privacy of natural persons Risk and Verification Manager, R&V</p> <p>Privacy of natural persons Risk and Verification Manager, R&V</p>
CONSULTED WITH	<p>Privacy of natural persons Team Leader Operational Policy, Op Pol</p> <p>Jeannie Melville, National Manager Immigration Enabling</p> <p>Privacy of natural persons Principal Business Analyst, Insights</p> <p>Privacy of natural persons Intelligence Manager, MBIE Intelligence Unit</p> <p>Privacy of natural persons Principal Business Adviser, V&C</p> <p>Privacy of natural persons Support Manager, Allocation and Support</p> <p>Privacy of natural persons , Manager Joint Targeting and Analytics</p>
ENDORSED BY	Risk and Verification Tasking Group
APPROVED BY	Privacy of natural persons , Acting National Manager, R&V

PURPOSE

This paper seeks agreement from the Risk Monitoring and Review Governance Group (RMRGG) to the proposed development of a model enabling selection of employers for inclusion in the Accredited Employer Risk Monitoring and Review (AERMR) programme. The proposed model will support objectivity and consistency of decision-making in relation to the selection of employers, as well as accountability and auditability.

If the RMRGG agrees to the proposed approach, the Minister of Immigration will be provided with a high-level view of the prioritisation model and the ratio of employers holding high-risk business model accreditation that will likely receive a site visit, as required by the Ministerial Briefing paper *2021-2254 Employer assisted temporary work visa reforms – employer gateway proposals*.

RECOMMENDATIONS

It is recommended the RMRGG:

- a. **Note** the objectives of the Accredited Employer system include incentivising employing New Zealand citizens and only recruiting migrants for genuine shortages, reducing risks around



business models and practices that might enable migrant exploitation and ensuring employers are compliant with immigration, employment and business standards.

Noted

- b. **Note** that in March 2021, the Minister of Immigration noted [2021-2254 *Employer assisted temporary work visa reforms – employer gateway proposals*] that “INZ will develop a risk-based prioritisation process that prioritises the higher risk employers for more robust assessment and more site visits and will provide further advice as implementation progresses on the ratio of employers holding high-risk business model accreditation that will receive a site visit”.

Noted

- c. **Note** that the briefing paper to the Minister indicated that to ensure efficient initial enrolment in the Accredited Employment system, there would be increased support for post-decision risk monitoring and review rather than significant scrutiny at the time of accreditation application.

Noted

- d. **Note** that the briefing paper committed INZ to report back to the Minister of Immigration on the development of the risk-based prioritisation model, and to advise the likely ratio of employers holding high-risk business model accreditation that will receive a site visit, based on that risk model, and that, if agreed by RMRGG, the model proposed in this paper will form the basis for that report back to the Minister.

Noted

- e. **Note** that accreditation fees were modelled on higher risk employer types such as high-volume, triangular and franchisee employers that may require more resource-intensive risk management activity (including site visits), and that forecasts show that 2,700 of the estimated 20,460 employers who will apply for accreditation in the first year will be high-volume, triangular and franchisee employers.

Noted

- f. **Note** that the proposed Accredited Employer Risk Management and Review (AERMR) approach set out in this paper leverages the existing National Prioritisation Process (NPP) and uses a mix of desk-based assessments and site visits to undertake risk monitoring and review.

Noted

- g. **Note** that the AERMR model is developed to align with the Immigration Risk Model utilising intelligence and insights to inform Immigration Risk Management as a learning system.

Noted

- h. **Agree** to the development and implementation of the AERMR model as described in this memo, which utilises three channels:

- i. Referral Targeted,
- ii. System Targeted, and
- iii. System Health.

Agree / Disagree / Discuss



- i. **Agree** that a risk criteria prioritisation matrix be developed in consultation with the Data Science Review Board.

Agree / Disagree / Discuss

- j. **Agree** to the development of the risk prioritisation matrix in two parallel phases, as follows:

- i. Development of a simple prioritisation matrix using a risk criteria model (incorporating fewer data points) for rapid and reliable implementation by no later than July 2022 alongside;
- ii. Development of a more sophisticated prioritisation matrix using a risk evaluation model (incorporating a greater number of data points) which will supersede the preceding risk criteria model to be delivered by the end of 2022.

Agree / Disagree / Discuss

- k. **Agree** to seek commitment of cross-INZ resource to support the development of the AERMR model, including supporting the prioritisation of any necessary enhancements to the ADEPT system as outlined in 41.

Agree / Disagree / Discuss

- l. **Note** the model proposed in this paper would provide AERMR over 15.5% of the employers forecast to apply for accreditation in the first year, which aligns with the fee model for the Employer Assisted Work Visa.

Noted

- m. **Note** that 74% of AERMR activities will be desk-based assessments and 26% site visits, with 50% of triangular and franchisee businesses receiving site visits per annum, as per the expectation of the Minister of Immigration.

Noted

- n. **Agree** that the post decision component of the AERMR programme commence after the opening of the migrant gateway scheduled for 4 July 2022 utilising the approach noted in i (a) above.

Agree / Disagree / Discuss

Geoff Scott

General Manager Verification and Compliance
(Chair RMRGG)
Immigration New Zealand

Date: _____



BACKGROUND

The new Accredited Employer work visa system

1. In August 2019, Cabinet agreed to implement a three-step gateway system that employers will need to pass through to hire a migrant worker on an employer-assisted temporary work visa [DEV-19-MIN-0228].
2. The objectives of the Accredited Employer system include:
 - Incentivising employers to employ more New Zealanders to respond to skill and labour shortages over time; and
 - Ensuring that employers only recruit non-New Zealand citizen or residents for genuine shortages, while not displacing New Zealanders from employment opportunities or hindering improvements to wages or working conditions; and
 - Reducing risks around business models and practices that might enable migrant exploitation; and
 - Ensuring that employers are compliant with specific immigration requirements, employment and business standards.
3. There are two types of employer accreditation: Standard accreditation, for employers wanting five or less Accredited Employer Work Visa (AEWV) positions; and high-volume accreditation, for employers wanting more than five AEWV positions. There are additional accreditation requirements for employers who place AEWV holders in triangular employment arrangements, and for franchisee employers.
4. Cabinet additionally agreed that all accredited employers will need to meet three broad standards:
 - The employer must be a genuinely operating a business or other legitimate organisation.
 - The employer and key persons must have no recent history of regulatory non-compliance (including meeting minimum immigration requirements, employment and business standards).
 - The employer must take steps to minimise the risk of exploitation.
5. The first step is the accreditation gateway based on the number of temporary work visa holders an employer intends to support and the type of business model in operation. The second step is the job check which confirms market rate remuneration, that terms and conditions comply with New Zealand employment laws and that relevant labour market tests are performed. The third step is the migrant check to ensure applicants meet the requirements for the AEWV, including that they have the skills and experience advertised for.
6. The AERM model supports Immigration Risk management across the three gateways and is informed by information collected in all three gateways.

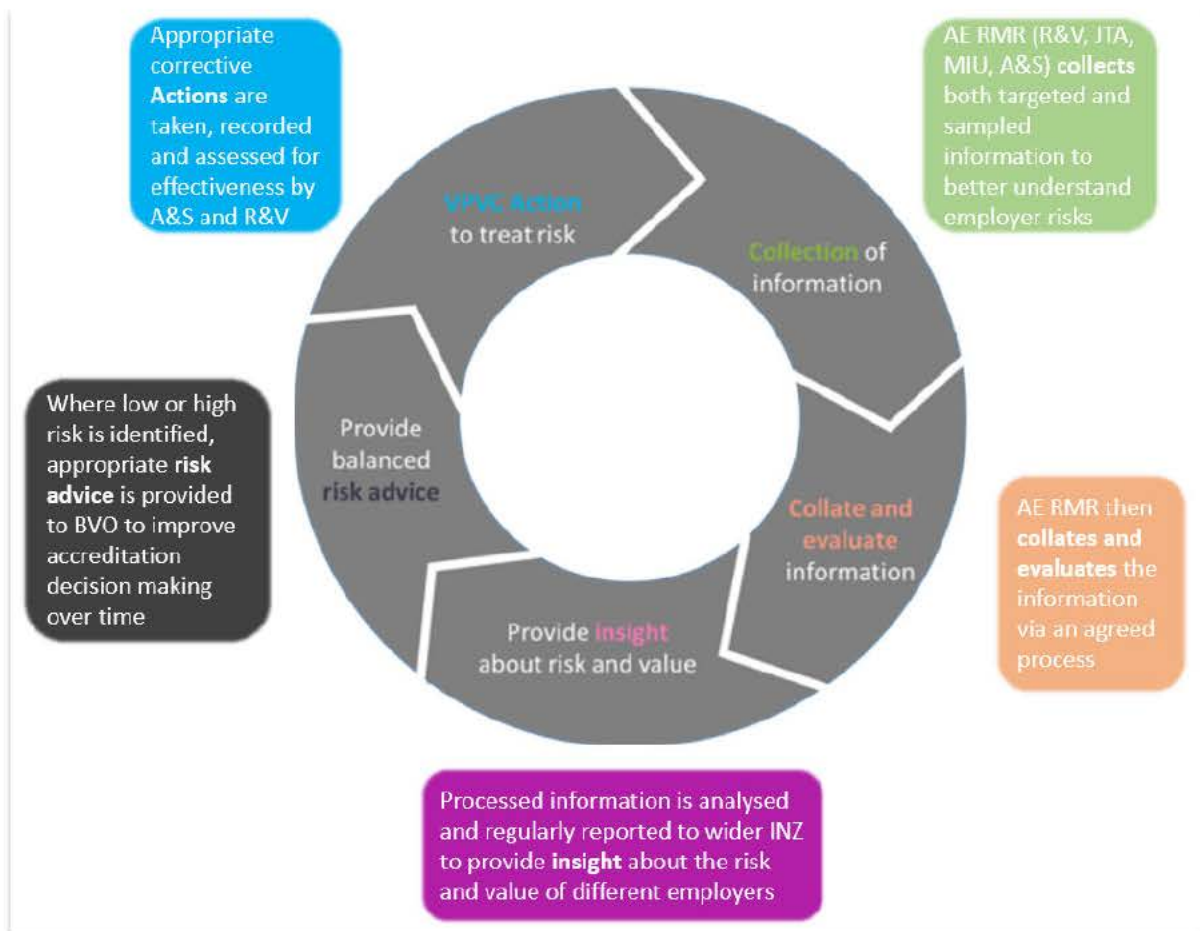
Requirement for risk prioritisation

7. In December 2021, the INZ Immigration Leadership Team agreed to use the final outputs of the Target State Risk Management (TSRM) work as a basis for the immigration risk management design elements in the Target Visa Processing Operating Model. The TSRM uses three INZ-specific focus areas, supported by the Ministry of Business, Innovation and Employment's (MBIE) Risk Management Framework to achieve the target state:
 - a. Immigration Risk Model – align information flows and teams to manage tactical and strategic immigration risks in the Visa Process Value Chain.
 - b. Risk-related governance - operational decision making for immigration risk-related decisions and risk controls.



- c. Risk monitoring – systems and processes to enable effective monitoring of immigration risks in the Visa Processing Value Chain.
8. The AERMR model described in this paper aligns with the Immigration Risk Model utilising intelligence and insights to inform Immigration Risk Management as a learning system. An example of its alignment to IRM process is presented in Figure 1 below. See [Appendix Four](#) for a diagram representing the learning cycle of the AERMR model.

Figure 1 AERMR model alignment with IRM process



9. In March 2021, the Minister of Immigration [2021-2254 *Employer-assisted temporary work visa reforms - employer gateway proposals*] noted that “INZ will develop a risk-based prioritisation process that prioritises the higher risk employers for more robust assessment and more site visits and will provide further advice as implementation progresses on the ratio of employers holding high-risk business model accreditation that will receive a site visit”.
10. The briefing paper also set out that, to ensure the majority of accreditation applications can be processed efficiently without placing an unreasonable compliance burden on employers, the Accredited Employer system would be supported by a greater emphasis on post-decision risk monitoring and review rather than actively checking compliance at the time of application. It further noted that if a breach was found, the employer may face suspension or revocation of accreditation.



11. Pre-decision risk and verification activities (which INZ traditionally deploys during a visa assessment), will be limited in the Accredited Employer gateway, as INZ will not yet have visibility over what information will be submitted in the job check and visa application steps of the process that occur after accreditation has been granted. It is anticipated that in most instances an assessment of compliance with AEWV policy requirements will occur after information has been collated from all three gateways. This streamlined front-end processing approach is anticipated to result in increased timeliness and customer satisfaction.
12. The briefing paper committed INZ to report back to the Minister of Immigration on the development of a risk prioritisation process, and the likely ratio of employers holding high-risk business model accreditation that will receive a site visit, prior to the implementation of the Accredited Employer system in May 2022. The decisions taken by RMRGG in response to this memo will inform the report back to the Minister.

Funding for Accredited Employer Risk Monitoring and Review

13. The briefing paper advised that under March 2021 fee modelling, INZ was funded to conduct a site visit to between a third and a half of high-risk business model employers¹ each year, and that a high proportion of employers would likely be visited at least once every three years. This was confirmed in the Accredited Employer Cost Recovery Impact Statement in January 2022².
14. Accredited employer forecasting undertaken in 2022 estimated 20,460 employers will apply in the first year of the programme, as set out below.

Table 1 Forecast applications

Accreditation type	Annual forecast volume
Standard Accreditation (5 or less migrants)	17,722
High-volume Accreditation (6 or more migrants)	1,738
Triangular Business Model Accreditation	600
Franchisee Accreditation	400
	20,460

¹ Triangular employment models and franchisee employers. See paragraph 29 for more detail on site visit volumes for high-risk employers.

² ADEPT (fees) - Cost Recovery Impact Statement (Jan 22) Rebalance (Final for Min Consultation)



ACCREDITED EMPLOYER RISK MONITORING AND REVIEW MODEL

Model Overview

15. The proposed AERMR model uses two phases to identify and manage Accredited Employer risk, with a strong emphasis in the first 12 months on streamlining front-end processing through undertaking most AERMR activities post-decision while insights and intelligence are collected to inform risk rule development.

Phase One: Pre-decision AERMR. Supporting the emphasis on streamlining front-end processing, only limited conditions will generate pre-decision AERMR processes. In the programme's first year, Immigration officers will be limited to information provided with the Accredited Employer application and any system generated risk advice, as both the job check, and migrant check information is available after accreditation. Pre-decision AERMR will be reliant on referrals from BVO³ and likely occur where:

- The employer is subject to a system warning and the assessing officer seeks Risk and Verification (R&V) assistance to mitigate the identified risk⁴. It is anticipated that officers will manage most of these instances through assessment processes without need for referral to R&V.
- The company or key persons are featured on a stand-down list, and additional R&V support is needed to inform application risk management.

It is forecast that up to 159 employers will be referred for pre-decision AERMR in the first year (5% of AERMR activities).

Phase Two: Post-decision AERMR. Employers are approved accreditation and applications proceed through the job and migrant gateways before being selected for AERMR after a period of time has elapsed⁵. Key benefits from undertaking post-decision AERMR include:

- A robust and holistic risk assessment can be performed through assessing the information and assertions provided through the three gateways and testing compliance with accreditation system requirements after workers are employed.
- Supports efficient application processing at the front-end while retaining BVO's ability to suspend or revoke accreditation where compliance issues are identified.

It is forecast that up to 3,019 employers will be selected for post-decision AERMR in the first year (95% of AERMR activities).

16. *The AERMR Prioritisation Matrix:* The proposed AERMR model will leverage MBIE data assets and data management capabilities to develop a specific selection criteria tool that incorporates insights from

³ Note that Immigration Instructions will likely lead to some employer types, such as Triangular, receiving additional processing and scrutiny from BVO upon application, though will generally not be referred to R&V.

⁴ AMS system employer warnings are likely to comprise most of these occurrences. As of 12 April 2022, 5,514 employers out of 44,111 in AMS (12.5%) had Active (60%) or Expired (40%) AMS warnings associated and had interacted with INZ since January 2019. A significant proportion of employer warnings identify specific risks and provide mitigation advice. It is assumed that approximately 50% of these employers will apply through the Accredited Employer programme of which 5% will then be referred to AERMR. See Appendix Two for more details.

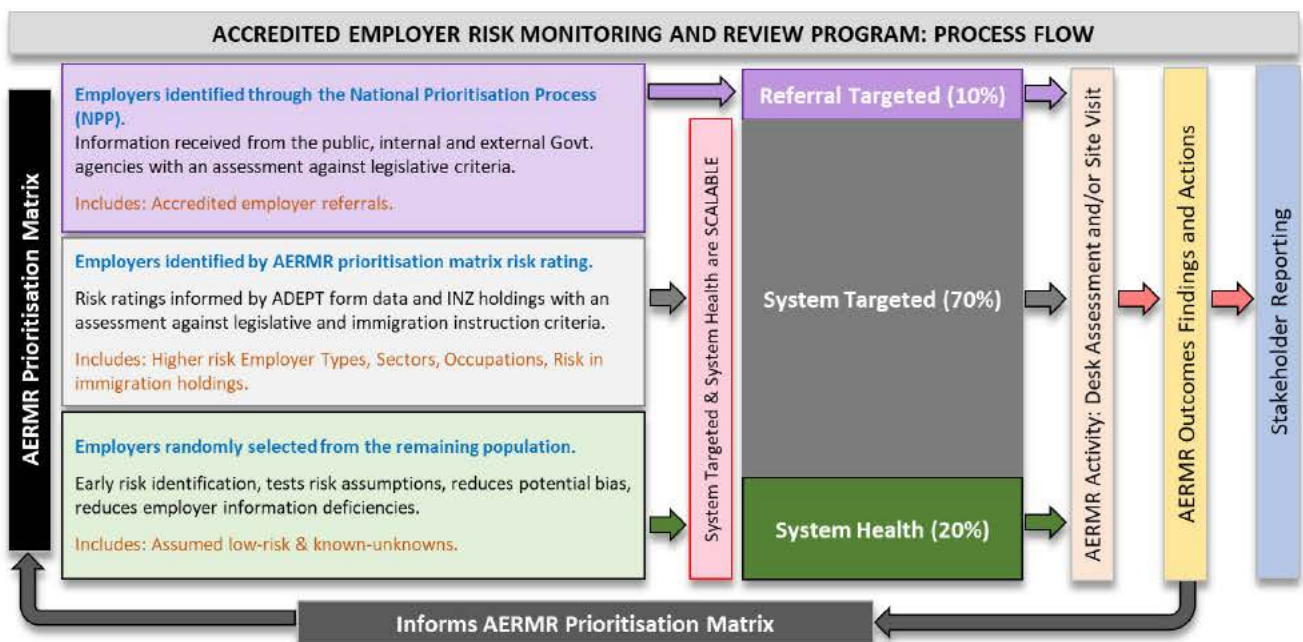
⁵ The optimal range is to be finalised but will ideally be a random (and therefore unpredictable) date which is anticipated to be initially 1 to 4 months after accreditation is granted.



historical INZ data along with ADEPT⁶ information provided by employers and migrants enrolling under the AEVW policy⁷.

17. As the methodology behind the prioritisation matrix will be supported by RMRGG-agreed risk criteria informed by both intelligence and evidence, the AERMR will allow risk activities to pivot to organisational requirements and identify risk efficiently and effectively. It will provide an adaptable, scalable, objective and transparent means to identify risk. Data monitoring and analysis capability will assist with informing tactical, operational, and strategic priorities.
18. The prioritisation matrix will sit at the front of the AERMR process flow and provide data and insights for all accredited employers. AERMR activity will be generated through three channels: Referral Targeted, System Targeted and System Health. AERMR activity will consist of desk-based assessments and / or site visits. The outcomes from that activity will inform any further actions including referrals for suspension or revocation of accreditation and provide a feedback loop into the AERMR prioritisation matrix. The AERMR model additionally supports timely reporting to stakeholders. Figure 2 sets out AERMR model process flows.

Figure 2 AERMR Model Process Flows



19. It is envisaged that selection of candidates for the AERMR model will become more automated over time, reducing AERMR resourcing requirements. The MBIE Data Science Review Board will be consulted with further development of the AERMR prioritisation matrix.
20. It is currently proposed that Allocation and Support (A&S) manage the prioritisation matrix, and task AERMR activities to R&V to undertake.

⁶ The Advanced Digital Employer-led Processing and Targeting Programme is delivering a new visa processing system (known internally as ADEPT) on which the AEVW policy will be implemented.

⁷ Refer to paragraphs 33-42 (pages 12-14) for additional information on the prioritisation matrix.



Three channels for accredited employer inclusion in the Accredited Employer Risk Monitoring and Review model

21. As described in paragraphs 9 and 10, 2021-2254 *Employer-assisted temporary work visa reforms - employer gateway proposals* noted that risk prioritisation activities would include performing checks before and after decisions are made at the accreditation gateway, however, the expectation on commencement of the Accredited Employer system is that these would primarily be applied post-decision. Accordingly, 95% of AERMR is focussed on post-decision checks.
22. It is recommended that the AERMR selection process is populated through three allocation channels:
- *Referral Targeted*: Employers identified through information received into the NPP.
 - *System Targeted*: Employers identified based on ratings applied through the AERMR prioritisation matrix.
 - *System Health*: Employers randomly selected from the remaining Accredited Employer system population.

Figure 3 Three channels for AERMR Selection



23. *Referral Targeted* allocations will be provided by NPP after a prioritisation assessment and allocated by Allocation and Support (A&S). The NPP receives information from the public, internal and external government agencies and other sources which is then assessed in relation to legislative criteria⁸, sectoral focus and political and reputation risk, to determine the associated level of risk or harm. MBIE referrals to NPP include INZ R&V Teams and the MBIE Intelligence Unit.
24. Analysis by the NPP and A&S teams suggest, based on historical interactions, that the AERMR model may receive around 300 referrals for accredited employers through this channel.
25. Referral targeted allocations will be subject to a deconfliction process to mitigate the likelihood of negatively impacting any current or future Compliance, Investigation and Labour Inspectorate activity.
26. *System Targeted* allocations will be dependent on the AERMR prioritisation matrix to inform the selection criteria. Accredited employers will be assessed through the matrix and prioritised based on

⁸ The NPP assesses potential breaches of the Immigration Act, 2009 and the Crimes Act, 1961.



the highest risk rating for allocation. This cohort will also be subject to a deconfliction process, as per Referral Targeted

27. **System Health** allocations will be a randomly selected sample from the remaining Accredited Employer system population after the removal of the system targeted allocation. System health will support a balanced and objective allocation model, which will also test “low risk” assumptions.
28. The settings proposed for the AERMR model have been developed to align with the resource allocation in the AEWV fee model. The model is scalable to organisation requirements⁹. Additional management and A&S resources required to operationalise the model are captured separately in the AEWV fee model and provided in [Appendix Two](#).
29. Based on the proposed settings, 15.5% of accredited employers will be subject to AERMR activities (consisting of 74% desk-based assessments and 26% site visits)¹⁰. All triangular business model and franchisee employers will be subject to AERMR activities along with 28% of high-volume and 8% of standard accreditation employers. 50% of triangular and franchisee businesses receiving site visits per annum, as per the expectation of the Minister of Immigration.
30. Estimates for the split of applications through each allocation channel and the share of resourcing required to undertake the associated AERMR activities is summarised below¹¹:

Table 2 Activities and Resourcing by Allocation Channel

AERMR programme Activities and Resourcing: Timing by Allocation Channel					
Timing by Allocation Channel	Activities	% Activities	Hours	% of Hrs	FTE
Pre-Decision (5%)	15	0.5%	321	1.0%	0.2
Post-Decision (95%)	285	9.0%	6096	19.1%	4.12
Referral targeted Total	300	9.4%	6417	20.2%	4.34
Pre-Decision (5%)	112	3.5%	1084	3.4%	0.7
Post-Decision (95%)	2122	66.8%	20603	64.7%	13.93
System targeted Total	2234	70.3%	21687	68.1%	14.67
Pre-Decision (5%)	32	1.0%	187	0.6%	0.1
Post-Decision (95%)	612	19.3%	3545	11.1%	2.40
System health Total	644	20.3%	3731	11.7%	2.52
Total	3178	100%	31836	100%	21.53
Timing Summary	Activities	% Activities	Hours	% of Hrs	FTE
Pre-Decision (5%)	159	5.0%	1592	5.0%	1.1
Post-Decision (95%)	3019	95.0%	30244	95.0%	20.45
Total	3178	100%	31836	100%	21.53

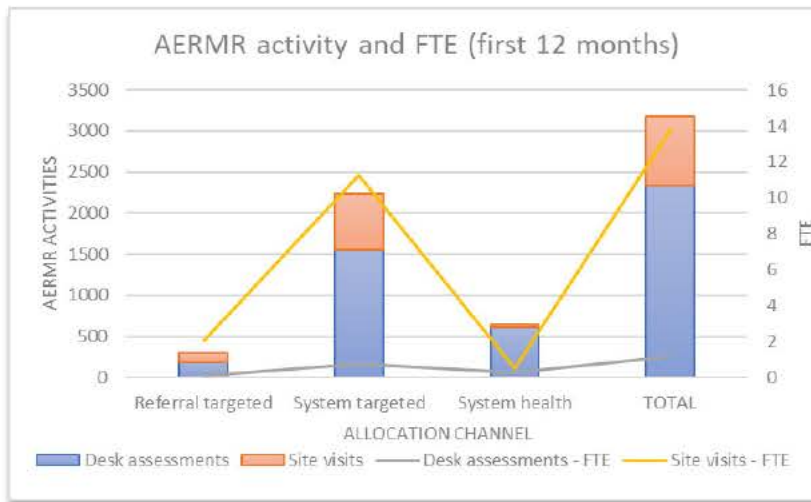
⁹ For further detail around FTE calculations see [Appendix Two](#): AE RMR Allocation, Activity and Resourcing model assumptions

¹⁰ Forecast volumes are based on policy settings anticipated in 2021 which were validated in January 2022 [ADEPT (fees) - Cost Recovery Impact Statement (Jan 22) Rebalance (Final for Min Consultation)]. These do not account for the potential impact of the 2021 Resident Visa, work visa extensions onshore or the change in median wage settings to instructions which may reduce the overall number of accreditation applications. In the event forecast volumes change, consideration will be given to resource implications.

¹¹ Allocation, activity and resourcing model assumptions are included in [Appendix Two](#). See [Appendix Three](#) for the complete AE RMR allocation, activity and resourcing model.



Chart 1 AERMR activities and resourcing by allocation channel



31. Estimates for the split of AERMR activities by employer accreditation type and the share of resourcing required to undertake the associated AERMR activities is summarised below:

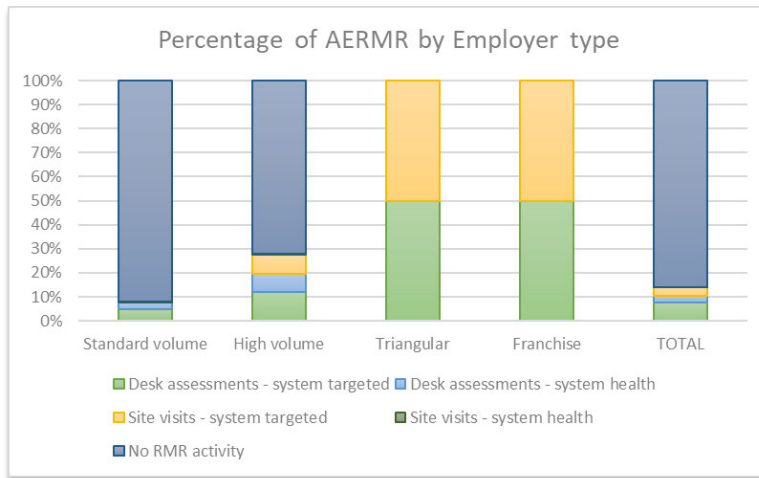
Table 3 Activities and Resourcing by Accreditation Type

AERMR programme Activities and Resourcing by Accreditation Type				
Accreditation Type and Activities	Activities	Activity %	% of Accred	
			Type Employers	FTE
Desk Assessments	180	60%	60%	0.93
Site Visits	120	40%	40%	3.41
NPP Referral (unknown Accred Type)	300	100%	100%	4.34
Desk Assessments	1322	95%	7.5%	3.44
Site Visits	70	5%	0.4%	1.08
Standard Volume Accreditation	1391	100%	8%	4.52
Desk Assessments	341	70%	19.6%	1.23
Site Visits	146	30%	8.4%	2.36
High Volume Accreditation	487	100%	28%	3.59
Desk Assessments	300	50%	50%	0.78
Site Visits	300	50%	50%	4.67
Triangular Business Model	600	100%	100%	5.45
Desk Assessments	200	50%	50%	0.52
Site Visits	200	50%	50%	3.11
Franchisee Accreditation	400	100%	100%	3.63
Total	3178		15.5%	21.53

Accreditation Type and Activities	Activities	Activity %	% of Accred	
			Type Employers	FTE
AERMR Desk Assessments	2342	74%	11.4%	6.90
AERMR Site Visits	836	26%	4.1%	14.63
Total	3178	100%	15.5%	21.53



Chart 2 AERMR activities by employer type



Accredited Employer Risk Monitoring and Review programme timeline

32. Employers can apply for accreditation from 22 May 2022, and for a job check from 20 June 2022 and migrants can be invited to apply from 4 July 2022. As described in paragraph 11, a robust and holistic assessment of compliance with AEWV policy is usually enabled only after information has been collated from all three gateways, and for this reason it is recommended that the Accredited Employer RMR programme commence after the opening of the migrant gateway.

PRIORITISATION MATRIX

33. As discussed in paragraph 16, it is proposed that the AERMR model will leverage insights from historical INZ data along with information provided by employers in the accredited employer and job check gateways and applicants in the migrant gateway.

34. The prioritisation matrix will sit at the front of the AERMR process flow and be informed by data and insights. See [Appendix Four](#) for a diagram representing the learning cycle of the AERMR model.

35. The prioritisation matrix is currently in development stage. Discussions have been undertaken with key stakeholders including the ADEPT programme team, data scientists and NPP and A&S system developers and users.

36. Two prioritisation matrix models are currently being explored:

- a. *Risk criteria model:* This is a relatively simple model which can, with high confidence, be delivered by no later than July 2022. After accreditation through the three gateways, relevant information obtained from the application processes will be collated in the prioritisation matrix. Accredited employers identified under RMRGG-supported risk criteria along with risk weightings, will be ranked based on the corresponding risk rating. Selected risk criteria will be informed by MBIE intelligence and evidence and will be largely reliant on relevant data fields collected through the application forms.

Positive attributes associated with the risk criteria model include its simplicity of design and implementation. Negative attributes include potential overreliance on a limited set of risk criteria



and the consequent inability to identify more nuanced indicators of risk including through a lack of computational capability.

Maintenance of the law
[Redacted]

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

b. *Risk evaluation model*: This model incorporates insights from historical INZ data along with information provided by employers and migrants enrolling under the AEWV policy. Similarly informed by both intelligence and evidence, the risk evaluation model will enable risk activities to pivot to organisational requirements and identify risk efficiently and effectively. It will provide an adaptable, scalable, objective and transparent means to identify risk. Data monitoring and analysis capability will assist with informing tactical, operational, and strategic priorities.

The risk evaluation model will enable computation of key data points from historical INZ employer and worker information and accredited employer application. It will incorporate all the risk criteria model assessment points and in addition could include:

- Maintenance of the law
[Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

Positive attributes associated with the risk evaluation model include the broad and diverse range of risk criteria available for assessment and an increased ability to pivot to support organisational requirements. The risk evaluation model enables a far more nuanced risk approach and an improved opportunity to identify cumulative impacts on immigration system integrity. Negative attributes include the complexity of design and implementation and likely need for increased on-going resourcing and support.

37. [Appendix One](#) provides further detail of the potential risk assessment points the risk evaluation model could leverage to inform risk identification.
38. While a comparison of the Risk Criteria Model and the Risk Evaluation Model shows that that latter presents a more sophisticated model utilising a greater set of data points, the simplicity of the design and ease of implementation of the Risk Criteria Model increases the likelihood of successful implementation by July 2022. Design, testing and delivery of the Risk Evaluation Model would be challenging to achieve by July 2022.



Maintenance of the law

39. It is recommended that the risk criteria and risk evaluation models are developed in parallel, with staggered delivery timeframes. The simpler risk criteria model would be initiated from July 2022, with the risk evaluation model superseding this once robust consultation, quality control and testing have been completed.
40. Cross-INZ resource would be required to support the successful development and implementation of a prioritisation matrix and enhancement to the ADEPT system may be necessary. Development of a Risk Monitoring and Review process for AEWV is in scope of the ADEPT project.
41. Resources will be required to develop, test and deliver the model including the risk criteria and risk evaluation models to underpin AERM. The following roles and groups have been identified to support this development noting there will be varying degrees of input and involvement required:
- R&V Business Analyst(s)
 - P&S Data analyst
 - MIU NPP Evaluator
 - R&V Risk and Verification Manager(s)
 - A&S Support Manager
 - R&V Information Analyst
 - R&V Senior Verification Officer(s)
 - MIU Intelligence Analyst
 - OTI Technical Business Analyst
42. It is recommended that the risk prioritisation matrix be developed in consultation with the Data Science Review Board.



**APPENDIX ONE – ACCREDITED EMPLOYER RISK MONITORING AND REVIEW: PRIORITISATION
MATRIX**

Maintenance of the law

Maintenance of the law



APPENDIX TWO – ALLOCATION, ACTIVITY AND RESOURCING MODEL ASSUMPTIONS

Calculations to assist with determining the allocation of Accredited Employer RMR activities and resourcing requirements have been based on the following assumptions:

1. Accredited Employer system enrolment volumes in the first twelve months of the programme will be 20,460 as described in the January 2022 CRIS.¹²
2. NPP referrals (n=300) will only relate to Accredited Employer system participants and accordingly these activities will be coded to the respective accreditation type when determined. Rather than estimate the accreditation type, the model has treated this as a separate line (effectively increasing the number of enrolments to 20,760). There were two drivers for the approach, firstly there was limited intelligence to assess which accreditation type might be most relevant and secondly, the primary function of the model is to assist with articulating the selection criteria rather than finalise resourcing estimates. Accordingly, the accuracy of allocation split is of less relevance currently.
3. AERMR activity allocation percentages have been assigned with consideration of the advice provided to the Minister of Immigration¹³ and after consultation with stakeholders within Verification and Compliance (V&C), R&V and Operational Policy.
4. The Accredited Employer work visa fee model provides resourcing for 39 FTE for V&C branch:

Table 6 V&C resourcing within AEWV Fee Model

Allocation	Quantity	Type
Accredited Employer Gateway	27.7	FTE
Job and Migrant Gateways	2.6	FTE
Supporting Functions		
R&V Management	3	FTE
A&S Management and Analysis	6	FTE
Total	39.3	FTE

5. The settings proposed indicate 27 FTE Verification Officers are required to undertake AERMR and verification activity across all three gateways and is scalable to resourcing requirements.
6. FTE calculations have been based on the below assumptions informed through consultation with the INZ Workforce Planning Team.

Table 7 Workforce planning assumptions

FTE Calculations	250 days/year
	32.5 hours/week
	6.5 hours/day
	1625 hours/year
Workforce Behaviours rate	91%
Final FTE Calculation	1479 hours/year

¹² ADEPT (fees) - Cost Recovery Impact Statement (Jan 22) Rebalance (Final for Min Consultation)

¹³ 2021-2254 Employer-assisted temporary work visa reforms - employer gateway proposals



7. AERMR activities have been informed through consultation with R&V Teams and align with the AEWV fee model developed by Immigration Enablement. Resource requirements have been calculated based on accreditation type – standard accreditation and higher risk accreditation (high-volume, triangular and franchisee) – and timing of AERMR activities (pre-decision and post-decision).

Table 8 Desk-based Assessment & Site Visit Resourcing

RMR Resource	Pre-Decision	Post-Decision
Standard Accreditation: Desk Assessment	1.02	4 Hours
Standard Accreditation: Site Assessment	23	23 Hours
Higher Risk: Desk Assessment	1.02	8 Hours
Higher Risk: Site Assessment	42	42 Hours

8. Once the Immigration Instructions for EAWV are finalised and standard operating procedures for AERMR are developed, a review of the assumptions for desk-based assessments and site visits will be undertaken.
9. There are 44,111 employer entities in AMS, however only 20,460 (less than 50%) are forecast to apply for accreditation. From this, it is estimated that 50% (2,757) of the 5,514 employers with active or expired (or both) warnings, and which have interacted with INZ since January 2019, will apply for accreditation. 90% of employer warnings are generic “information warning” category, comprising all levels of risk from high to insignificant. It is estimated that around 5% of “hits” (138) will require escalation to R&V, with the remainder able to be managed via BVO’s own staff, including Technical Advisors and Practice Leads. This assumption will need to be reviewed after AEWV is operationalised.



APPENDIX THREE – ACCREDITED EMPLOYER RISK MONITORING AND REVIEW: COMPLETE ALLOCATION, ACTIVITY AND RESOURCING MODEL¹⁴

AERMR: Referral Targeted				RMR Process Type		Hours				FTE		
Risk Criteria	Apps	RMR	Apps %	Desk % #	Site % #	Desk Hrs	Site Hrs	Total Hrs	% of Hrs	Desk FTE	Site FTE	Total FTE
NPP Referral %		100%		60%	40%							
NPP Referral #	300	300	9.4%	180	120	1377	5040	6417	20.2%	0.93	3.41	4.34
Total	300	300	9.4%	180	120	1377	5040	6417	20.2%	0.93	3.41	4.34
Referral Targeted % of total allocation				100%								
AERMR: System Targeted				RMR Process Type		Hours				FTE		
Employer Risk Criteria	Apps	RMR	Apps %	Desk % #	Site % #	Desk Hrs	Site Hrs	Total Hrs	% of Hrs	Desk FTE	Site FTE	Total FTE
Standard Volume (5-) %		5%		95%	5%							
Standard Volume (5-) #	17722	886	27.9%	842	44	3242	1019	4261	13.4%	2.19	0.69	2.88
High Volume (6+) %		20%		60%	40%							
High Volume (6+) #	1738	348	10.9%	209	139	803	3198	4001	12.6%	0.54	2.16	2.71
Triangular %		100%		50%	50%							
Triangular #	600	600	18.9%	300	300	1155	6900	8055	25.3%	0.78	4.67	5.45
Franchisee %		100%		50%	50%							
Franchisee #	400	400	12.6%	200	200	770	4600	5370	16.9%	0.52	3.11	3.63
Total	20460	2234	70.3%	1550	683	5970	15717	21687	68.1%	4.04	10.63	14.67
System Targeted % of total allocation				11%								
AERMR: System Health				RMR Process Type		Hours				FTE		
Employer Risk Criteria	Apps	RMR	Apps %	Desk % #	Site % #	Desk Hrs	Site Hrs	Total Hrs	% of Hrs	Desk FTE	Site FTE	Total FTE
Standard Volume (5-) %		3%		95%	5%							
Standard Volume (5-) #	16836	505	15.9%	480	25	1848	581	2429	7.6%	1.25	0.39	1.64
High Volume (6+) %		10%		95%	5%							
High Volume (6+) #	1390	139	4.4%	132	7	1011	292	1303	4.1%	0.68	0.20	0.88
Total	18226	644	20.3%	612	32	2858	873	3731	11.7%	1.93	0.59	2.52
System Health % of total allocation				4%								
Combined Total	20460	3178	100%	2342	836	10206	21630	31836	100%	6.90	14.63	21.53
RMR Activity % of Employers	15.5%											

¹⁴ See [Appendix Two](#) for AE RMR Allocation, Activity and Resourcing model assumptions.



APPENDIX FOUR – ACCREDITED EMPLOYER RISK MONITORING AND REVIEW: MODEL LEARNING CYCLE

