

Immigration, Compliance & Investigations Data, Allocation and Triage Realignment

Proposal for Change – October 2024

Introduction from Steve Watson, General Manager Immigration Compliance and Investigations

Firstly, I want to thank you all for the tremendous work you do every day to protect the integrity of the immigration system. This has a positive effect on reducing harm and improving compliance and market conduct. I'm really proud of what we've achieved as a small branch in a short time, however I acknowledge this has not been without its difficulties, least of all an increase in demand.

Compliance and investigations capabilities are essential to the integrity of the regulatory systems managed by MBIE. This work ensures accountability so that those subject to regulation meet their obligations. We gain insight into the reasons for non-compliance and a sound platform for other types of interventions (e.g. information and education approaches). We also increasingly support victims of regulatory non-compliance.

Immigration New Zealand (INZ) and Te Whakatairanga Service Delivery already work in partnership across the Immigration system and when our branch was created it was based around the transfer of existing teams from within INZ. I believe we can strengthen our ability to do the right mahi by using better data and reporting tools and dedicating people to specifically focus on and specialise in this work to build our capability and provide opportunities for future partnership. Over the last year, the ICI Leadership team has been intentionally focussed on enhancing the delivery of our priorities by aligning ourselves where we are best placed to make a more effective impact.

There is still an outstanding issue around increasing demand and how the Allocation and Triage (A&T) team is organised. Our year in review has shown us that the A&T model that came into ICI no longer meets our requirements.

We also welcomed the Intelligence Team into the branch this year and to ensure they were welcomed and had the necessary support for field work, we placed them with the Investigations team. It is now timely to review that decision.

Our structure needs to be agile as our operating environment changes to ensure we can deliver on our objectives. This means being deliberate in how we structure our branch and how we work together. This proposal is designed to ensure we have the right capability and capacity where we need it to manage our priorities. Your feedback on this is critical to ensuring we get this right, so I am really looking forward to engaging with and hearing from you all.

I acknowledge that this change proposal may not be the only change that you are experiencing within work or outside of it, and that change can present us with difficulties and challenges that will be unique to each person. I encourage you to show kindness to each other during this time. Please consider what support you may need during the consultation process and discuss this with your people leader and ensure that you look at the range of support options available later in this document. I am also happy to talk to any of you individually if needed.

Ngā mihi nui



Steve Watson
General Manager Immigration Compliance and Investigation

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How to read this document

Scope of this change proposal

This consultation document outlines proposed changes, to the Allocation and Triage and Collections Teams within the Immigration, Investigations and Compliance branch.

These proposals aim to limit concern and disruption for our people and current work underway. Wherever possible, teams have been kept together and the number of positions impacted have been minimised.

Understanding proposed changes to your position

If changes are proposed to your position this will be outlined in this proposal. Current and proposed organisational charts have been included at the end of this proposal to help demonstrate the impacts that proposed changes would have to the structure of our branch. There is a summary table with more detail about proposed changes to individual positions and proposed new positions at the end of this document.

In addition, all people who may be significantly impacted by the proposal will receive a letter that outlines specific detail about their position and proposed change process.

Proposed change process

Find out more about MBIE's proposed change process in **Appendix 1**. This determines how we classify the impact to our people, based on the proposed impacts to their position.

This change document also includes the proposed expression of interest (EOI) and selection process for people who would be affected if any changes are confirmed as result of this consultation process.

As part of this consultation process, you are invited to provide feedback on both the proposal and the proposed change process.

Let us know

The information included in this document reflects the organisational structure as recorded in MBIE systems on **5 August 2024**.

If you notice any inconsistencies in the organisational structure represented, please advise your people leader or email ICChange@MBIE.govt.nz

Supporting our people through change

People will have a wide variety of feelings in relation to the proposed changes. Please remember to be respectful of each other's opinions and privacy. If you have further questions regarding this change proposal or your personal situation, have a conversation with your People Leader.

Further information on the support available is outlined in **Appendix 2**

Providing feedback and indicative timeframes

Your feedback is important to the success of any changes we make and will be carefully considered. You have a unique perspective about how we work as and what opportunities exist to improve customer experiences and excel at our mahi.

We welcome your feedback on all aspects of this proposal for change and the process, including the EOI process and position descriptions which include the selection criteria, if applicable. You are also welcome to provide feedback even if you may not be directly impacted by it. Feedback can be provided individually or as a group.

This proposal has been shared with the Public Service Association (PSA). You can contact the PSA during the consultation period for support and to discuss your feedback.

MBIE recognises that feedback can be provided in formats other than written, and as such will enable verbal submissions upon request. This also includes where the PSA wishes to speak to their collective submission orally.

You can contact the following union representatives:

- Niki Williams (PSA): niki.williams@mbie.govt.nz
- Patrick Feaunati (PSA): patrick.feaunati@mbie.govt.nz

There are several ways for you to provide your feedback, including:

- Drop-in sessions over Teams where you will have the opportunity to ask any questions. ***We will let you know the dates and times for these sessions during the consultation period.***
- Email feedback from individuals or groups – open for duration of consultation.

If you wish to provide your feedback via email, please send your feedback to: ICChange@MBIE.govt.nz by **5pm October 17, 2024**. If you wish to provide your feedback verbally, please email the consultation address and we will arrange a suitable time.

Once the consultation period has closed, all feedback will be carefully considered by Steve Watson before final decisions are put forward to Suzanne Stew, Deputy Chief Executive Te Whakatairanga Service Delivery for approval. If the final decision is made to proceed, we will confirm the new structure, its impact on positions and the change process including the Expression of Interest (EOI) process if applicable.

Indicative timeline

Activity	Indicative Timeframes
Consultation opens	3 October 2024
Consultation closes	17 October 2024
Feedback reviewed and considered	18 – 29 October 2024
Final decision	30 October 2024
Expressions of interest (EOI) and selection process starts	31 October – 11 November 2024
Proposed 'go-live' of new structure	18 November 2024

Proposal

Why change is proposed

In July 2023, the Immigration, Compliance and Investigations branch was established within TWSD to assist MBIE to integrate and build greater capability in compliance, investigation and enforcement activity across all regulatory systems over time. As a branch, we have continued to review our services and operating model to identify efficiencies or opportunities for contributing towards MBIE's organisational goals, and to support the Government in an effective way.

As part of the establishment of ICI in 2023, the leadership and organisational structure for the Allocation and Triage (A&T) function was amended to better reflect the breath and scope of the service required at that time. As we have matured as a branch, we have reviewed whether this initial structure is still fit for purpose given our changing operating environment and requirements.

As part of the transition of ICI from INZ to TWSD, the data analysis and reporting functionality transitioned to sit within the branch. Previously, data analysis and reporting were managed externally to the branch. There has been no additional resourcing to manage the additional data functionality that transitioned with ICI to TWSD.

The A&T team have seen an increase in demand for data entry, production and reporting as a result of changes to the Accredited Employer Work Visa (AEWV) settings and the introduction of the Immigration Infringement Scheme, both of which occurred in April 2024, and are administered by A&T. As a result, there is a need to propose changes to our resourcing and organisational structure to ensure that the A&T team is well placed to manage their functions and responsibilities in a more effective way now and into the future.

In addition to these changes, the Intelligence Collections team transitioned into ICI from Digital Data and Insights (DDI) in February 2024. This was to create efficiency gains through maximising use of existing resources, leveraging well-established assurance, and authorising systems and processes, and reducing complexity by situating the Collections team together with Investigators.

There is now an opportunity to explore efficiencies through the consolidation of intelligence with all data and information and A&T functions under a single leadership structure. This would also ensure an appropriate level of independence as the Investigations function is required to commission work from the Collections team.

We believe that the proposed changes would have the following benefits:

- Improved timeliness of reporting and analysis and reductions in waitlists through allocating resource to where additional work has been brought into the branch.
- Create more efficient use of resources by amalgamating the current A&T teams.
- Increase resourcing within ICI to areas in the branch where there are bottlenecks of work.
- Reduce the number of operational managers reporting to the GM to allow the GM to concentrate on the strategic requirements of the function rather than the operational.
- Allow a consolidated level of management and oversight over all data, information and intelligence collections.

Further detail on the proposed change is provided below.

Consolidated Leadership

To improve the efficiency and effectiveness of delivery, it is proposed that a new position, the Manager Data, Allocation and Intelligence Collection, reporting directly to the General Manager, would be established to manage the overall consolidated

function of data, allocation and intelligence collection work across ICI which currently is dispersed throughout the branch.

The proposed Manager Data, Allocation and Intelligence Collection position would also allow the GM to manage the high-level functionality whilst the Manager will oversee operational management issues and approvals thus removing the need for operational managers to report to the GM.

Allocation and Triage

The scope of the Allocation and Triage teams and their workload has grown significantly since the move to TWSD. There are currently two teams delivering work related to Allocation and Triage. It is proposed that amalgamating these teams would enable us to consolidate the allocation system, creating efficiencies and enabling better management of allocations. The proposal to bring the teams together would also help ensure consistency, a better focus on the core deliverables of allocation work and allow dedicated operational leadership accountability across the allocation system.

As a result, the number of Manager A&T positions are proposed to reduce from two to one with the existing positions split across the two leaders becoming part of a single team.

This proposal would ensure that the Manager A&T would have a reasonable span of leadership.

In recognition of the enhanced data and reporting requirements, a new Senior Data Analyst position is proposed to be established within in the team to allow for senior oversight of technical matters. This would ensure that technical support and expertise at a more senior level is available to support operational delivery and increase the output of the team. It is proposed that this position would report directly to the new Manager Data, Allocation and Intelligence Collection to allow the Manager A&T to focus on strategic direction of the A&T team and people leadership.

To support the growing A&T workload, it is proposed that one additional Senior Support Officer and one additional Support Officer position would be established. This would allow for additional technical expertise, oversight and support across the team, which in turn would allow the Manager A & T role to provide dedicated people leadership, stakeholder engagement and contribute to the strategic planning of the function. It is envisaged this would redistribute the workload of the team and allow some of the reporting and analysis currently undertaken by the Manager A&T to be delivered by these proposed additional positions. It is also envisaged the additional Support Officer role would process some of the additional work that has come to the A&T Team from the AEWV change of circumstances and Immigration Infringement Scheme and help prevent backlogs of work.

It is also proposed that the three Business Analyst roles currently reporting to one of the Manager Allocation and Triage would have a reporting line change to the proposed new Manager Data, Allocation and Intelligence Collections role. This is to enable the provision of technical expertise and oversight of the data functionality of the team.

Intelligence Collections

The Intelligence Collections team currently sits within the investigation arm of ICI. Their work requires them to collect and interrogate information that is used for intelligence products. The proposal to locate the Intelligence Collections team under the Manager Data, Allocation and Intelligence Collection will allow for better oversight and approvals of their intelligence reporting functionality whilst still having the team situated within an operational branch. It is anticipated that the efficiencies gained through the proposal to bring the teams closer together would result in fewer resources required, and as such it is proposed that the two vacant field officer roles would be disestablished.

The following changes are proposed:

- Bring all data, allocation and intelligence collection in ICI into one team
- Establish a new Manager Data, Allocation and Intelligence Collection position

- Minor change in scope and reduction in number of direct reports for the National Manager Investigation.
- Reduce the number of Manager A&T positions from 2 to 1 to be filled via a contestable re-confirmation process ring fenced to the current incumbents.
- Change the reporting line for the Manger Collections and therefore the Intelligence Collections team from National Manager Investigations to the proposed new Manager Data, Allocation and Triage position.
- Establish an additional Senior Support Officer position reporting to the Manager Allocation and Triage
- Establish an additional Support Officer position reporting to the Manager Allocation and Triage
- Change the reporting line for the Business Analysts to the Manager Data, Allocation and Intelligence Collection...
- Disestablish two vacant Intelligence Officer positions
- Establish a new Senor Data Analyst role be established reporting to the proposed Manager Data, Allocation and Intelligence Collections.

We ask you to consider whether changes under this proposal will achieve our desired outcomes.

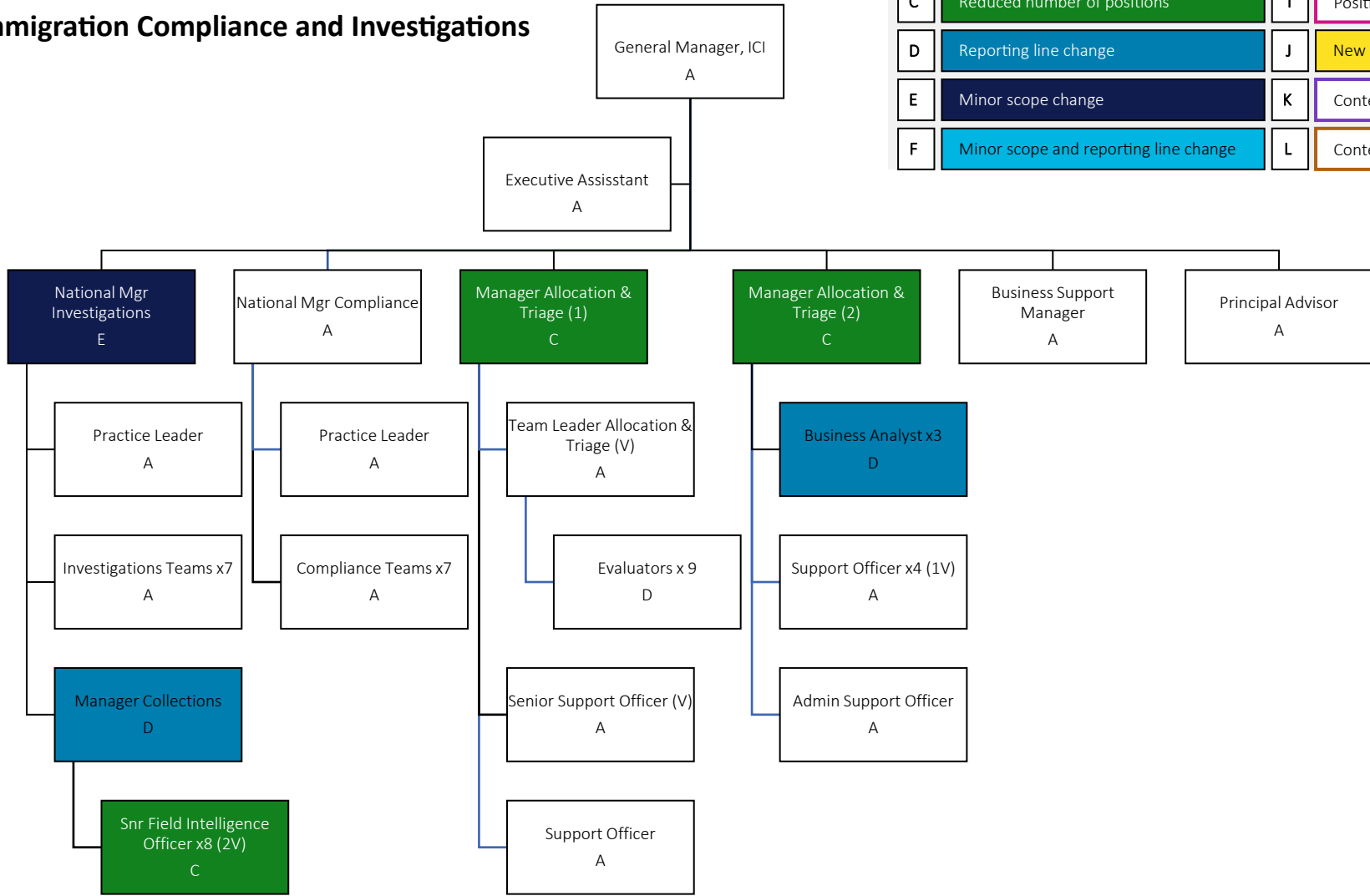
Organisational charts are provided on the following pages to demonstrate how proposed changes would impact current positions and reporting lines. More detail about proposed changes to individual positions and proposed new positions is provided at the [end of this document](#).

We welcome your thoughts on where this proposal could be strengthened to better deliver on our change aspirations. If you believe there is an alternative to the changes proposed, please share your thoughts, and include how you see the alternative improving on desired outcomes.

Current organisational chart

Immigration Compliance and Investigations

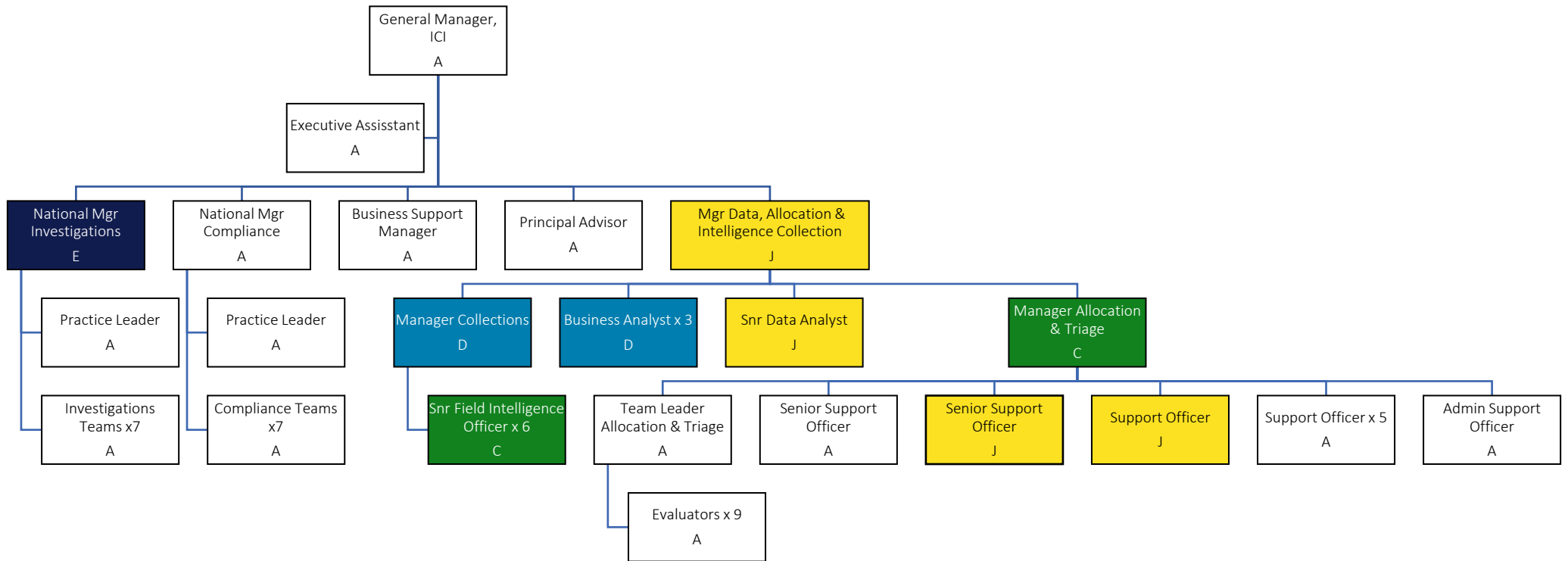
KEY			
A	No change	G	Position title change
B	Disestablished position	H	Branch/unit change
C	Reduced number of positions	I	Position title and branch/unit change
D	Reporting line change	J	New position
E	Minor scope change	K	Contestable reconfirmation
F	Minor scope and reporting line change	L	Contestable reassignment



Proposed organisational chart

Immigration Compliance and Investigations

KEY			
A	No change	G	Position title change
B	Disestablished position	H	Branch/unit change
C	Reduced number of positions	I	Position title and branch/unit change
D	Reporting line change	J	New position
E	Minor scope change	K	Contestable reconfirmation
F	Minor scope and reporting line change	L	Contestable reassignment



Summary of proposed changes

Overall proposed changes

Proposed changes	
Number of positions proposed to be disestablished	3
Number of positions proposed to be part of a contestable reconfirmation process	1
Number of proposed new positions	4
Number of positions proposed to have minor changes such as minor scope, reporting line, branch etc.	8
Overall proposed reduction in FTE	none

Proposed new positions

Position title	Reporting line	Branch	Indicative Band
Manager Data, Allocation and Intelligence Collection	General Manager ICI	Immigration Compliance and Investigations	X
Senior Data Analyst	Manager Data, Allocation and Intelligence Collection	Immigration Compliance and Investigations	R
Senior Support Officer	Manager Allocation & Triage	Immigration Compliance and Investigations	E
Support Officer	Manager Allocation & Triage	Immigration Compliance and Investigations	B

Proposed disestablished positions

Position title	Reporting line	Branch
Manager Allocations & Triage reduction from 2 to 1	General Manager ICI	Immigration Compliance and Investigations
Senior Field Intelligence Officer reduction from 8 to 6 (currently vacant)	Manager Collections	Immigration Compliance and Investigations

Proposed minor changes

Position title	Branch	Description of change
National Manager Investigation	Immigration Compliance and Investigations	Minor Scope Change and reduction in Direct Reports
Manager Allocations and Triage	Immigration Compliance and Investigations	Change in Reporting Line to Manager Data, Allocation and Intelligence Collection
Business Analyst x 3	Immigration Compliance and Investigations	Change in Reporting Line to Manager Data, Allocation and Intelligence Collection
Manager Collections	Immigration Compliance and Investigations	Change in Reporting Line to Manager Data, Allocation and Intelligence Collection

Appendix 1: Proposed change process

Consistent with MBIE’s employment agreements and recruitment policy, the following information summarises the standard change processes which would apply to any changes confirmed as a result of this consultation process. This includes reconfirmation, reassignment, selection, and redeployment.

Reconfirmation

As part of the consultation process your substantive position may be proposed to be “reconfirmed”. In these circumstances your substantive position in the proposed new structure is substantially the same as your current substantive position and you are the only person able to be reconfirmed to the role. Examples include - change in reporting line, title, a minor change in work content.

For reconfirmation to apply:

- The position description you are being reconfirmed into is the same (or substantially the same) as what you currently do, and
- Salary and other terms and conditions for the position are no less favourable, and
- Location of the position is in the same local area (note: this need not necessarily mean the same building and/or the same street).

If your substantive position is reconfirmed as part of the final structure, you will not need to take any action as you will automatically be reconfirmed into the position.

Where there are more affected employees who could be considered for reconfirmation than the number of positions available in the new structure (i.e., where we are reducing the number of existing positions), then you may be proposed to be subject to “**contestable reconfirmation**” via an Expression of Interest (EOI) process. In this situation we will use a contestable selection process to determine who is the best fit

for the role. This process would be based on selection criteria from within the position description for the role.

Reassignment

As part of the consultation process, you may be proposed to be “directly reassigned”. In these circumstances we are proposing to directly reassign you into a different but substantially similar role.

For direct reassignment to apply:

- The new or revised position description has been assessed as comparable to your current position and any change of duties are not so significant as to be unreasonable taking account of your skills, abilities and potential to be retrained; and
- You have the required skills, knowledge, experience, and abilities to undertake the position, as well as the potential for retraining on any new or unfamiliar aspects of the position; and
- The salary and other terms and conditions for the position are no less favourable; and
- Location of the position is in the same local area (note: this need not necessarily mean the same building and/or the same street).

If you are confirmed to be directly reassigned as part of the final structure you will not need to take any action as you will automatically be directly offered reassignment into the position.

Where there are more affected employees who are a direct match or currently perform a comparable role than the number of positions available in the new structure (i.e., where we are reducing the number of existing positions), then you may be proposed to be subject to “**contestable reassignment**” via an Expression of Interest (EOI) process.

In this situation we will use a contestable selection process to determine who is the best fit for the role. This process would be based on selection criteria from within the position description for the role.

New positions

All new positions that are not filled via reconfirmation or direct reassignment, will be advertised internally first to employees affected by the change via an EOI process.

Where the specialised nature of a role requires it to be advertised externally in parallel, this will be specified as part of the proposal and decision pack along with the supporting rationale. First consideration will always be given to affected employees over other applicants subject to them meeting the suitability requirements of the position.

Selection and Expression of Interest (EOI) process

If, following the consultation process, you are confirmed as being significantly affected by any of the confirmed changes you would have the following available options:

- Express an interest in available positions within the confirmed structure that you are suitably qualified for by submitting an EOI form, and/or
- Apply for any other existing MBIE vacancies that you are suitably qualified/experienced for. This can be done via the MBIE website.
- Express an interest in voluntarily ending your employment without actively seeking reassignment opportunities within MBIE. MBIE may decline any expression of interest on the grounds that you have skills and experience that need to be retained and a reassignment option is available.

You will be considered an affected employee if you are permanently employed in a position that is:

- To be disestablished.
- To be changed to the extent that it cannot reasonably be considered to be the same position or a substantially similar position; or

- Subject to a significant location change outside of the current local area.

Please note that you will not be considered an affected employee if your substantive position is confirmed as having a change in business group, reporting line, job title or work location (where work location is within the “same local area” or region).

To participate in an EOI process you would need to submit an EOI form which would allow you to express interest in up to 5 available position/s for which you are suitably qualified. Using the EOI form you would provide information such as your capabilities, experience and examples, for the relevant selection criteria for the roles you are expressing an interest in. The selection criteria is in the draft position descriptions and will be outlined as part of the decision document along with final position descriptions. For people leader roles selection criteria may also include the Leadership Success Profile. A CV would not be required as part of any EOI submission, however if you wish to provide one this is optional. You may also provide additional supporting information as part of your EOI, whether this be a covering letter, or other additional information such as location preference. However, please note that this would not be mandatory.

Once the EOI and/or advertisement period closes, all submissions would be shortlisted against the position criteria (such as the knowledge, skills, experience, and behavioural competencies required).

Where applicable, a panel interview would be used as a contributing selection tool to assess the demonstrated skills, experience and qualifications against the selection criteria as outlined in the position description. Action would be taken to minimise the number of interviews that any affected employee would be asked to attend, i.e., combining panels where appropriate for employees who have an EOI for multiple vacant roles. There may also be instances where an assessment and decision can be made based on the information provided in an applicant’s EOI submission and no additional information or interview would be required.

For some positions, additional selection tools may be appropriate, including:

- Demonstrated skill and experience level against the key accountabilities and deliverables as outlined in the position description.

- Consideration of skills, experience and qualifications against the person specifications as outlined in the position description.
- Consideration of skills and experience against the Leadership Success Profile.
- Presentation and/ or role specific testing.

All applicants will be advised if additional selection tools are required.

Selection and recruitment timeline

Where possible timeframes will be designed to enable recruiting People Leaders (existing and new where applicable) to lead the shortlisting and selection processes for their teams.

Timelines for each phase of recruitment will be set out in advance and recruiting People Leaders will be expected to treat this as a priority. The purpose of this is to ensure that processes are coordinated where they need to be and completed in a timely way.

Redeployment

If you wish to apply for any other existing MBIE vacancies (i.e., vacancies that are being advertised separately to the change processes), this can be done via the MBIE careers site at any stage of the process.

If you are considered an affected employee, this will need to be indicated as part of your application as first consideration will always be given to affected employees over other applicants subject to them meeting the suitability requirements of the position. Where applicable, a panel interview will be used as a contributing selection tool to assess the demonstrated skills, experience and qualifications against the key accountabilities and person specifications as outlined in the position description. In situations where there is more than one affected employee who meets the suitability

requirements of the position an assessment will be made of the employee who is best for the role.

Review process

If you disagree with the application of this process, including for example your reconfirmation or direct reassignment into a position as part of the final structure, you have the right of review. This process is set out in your employment agreement. You are encouraged to raise any concerns with your People Leader at the earliest opportunity so these can be worked through with you on a case-by-case basis.

Secondments and acting arrangements

If you are currently on secondment or acting in a different position, there may be decisions confirmed for that position as well as your permanent substantive position. However, you will only be considered an affected employee if your permanent substantive position is significantly impacted.

People will continue in their temporary position until the end of the term currently in place unless otherwise advised.

Process for casual and fixed term employees

Casual and fixed term employees, by the nature of their employment agreements, will not have access to the change processes set out above.

Upon completion of the change management process for affected permanent employees, any remaining vacant positions in the new structure would be openly advertised through standard recruitment and selection processes and any casual or fixed term employees would then be able to apply.

Appendix 2: Support through change

Work is a big part of your life. During organisational change, it's normal to have feelings of uncertainty, shock, anger, frustration, confusion, scepticism, and impatience. Please ask for support when you need it and remember to be understanding towards your colleagues who may be feeling anxious or distracted. You can talk to your People Leader, colleagues and/or union representative or the People and Culture team.

Wellbeing support options

We recognise that change may be difficult and encourage you to reach out to your support network and draw on the resources available to you. You can:

- Talk to your People Leader
- Contact your union delegate or representative ([PSA](#)) / ([NUPE](#))
- Reach out to the [Wellbeing, Health and Safety Team](#)
- Use our [Employee Assistance Programme](#), which provides support for both work and personal life
- Call or text [1737](#) to access free counselling services from the national telehealth service
- Access your [Te Puna Ora](#) dashboard both at work and remotely using your MBIE login details

Learning support options

Focusing on your personal growth and development is a helpful way to direct your attention during times of change and uncertainty – to reinforce your skills and explore career interests.

There are plenty of resources and directories to explore within MBIE, including:

- [Learn@MBIE](#) – our central learning platform that holds many free e-learning courses, including a series of e-learning modules focused on [change](#), suitable for all staff.
- [Percipio](#) – the world's largest online learning library. To access Percipio, select 'team/enterprise subscription' and then enter 'MBIE' in the site name field.
- [MBIE's library](#) – a large catalogue of books and scholarly works focused on subject expertise as well as broader skillsets like leadership capability.
- You can also reach out to People & Culture to discuss your development interests.

Career development support

Our Employee Assistance Programme can assist with general career advice and is available for self-referral. This also includes budgeting and financial advice, personal development and coaching and personal legal advice.