

MINISTRY OF BUSINESS, INNOVATION & EMPLOYMENT HĪKINA WHAKATUTUKI



BRIEFING

Accredited Employer Work Visa: New implementation date and transitional arrangements

Date:	24 September 2021	Priority:	Medium	
Security classification:	In Confidence	Tracking number:	2122-0382	

Action sought			
	Action sought	Deadline	
Hon Kris Faafoi Minister of Immigration	Agree to implement the Accredited Employer Work Visa on 4 July 2022 Agree to the proposed arrangements to transition employers and migrants into the new system	1 October 2021	
Hon Phil Twyford Associate Minister of Immigration	Copy for your information	NA	

Contact for telephone discussion (if required)				
Name	Position Telephone		1st contact	
Andrew Craig	Manager, Immigration Policy (Skills and Residence)	Privacy of natural persons		
Bronwyn Chapman	Senior Policy Advisor, Immigration Policy (Skills and Residence)			

The following departments/agencies have been consulted	
Ministry of Social Development	

Minister's office to complete:

Approved

Noted

Seen

See Minister's Notes

DeclinedNeeds change

Overtaken by Events

Withdrawn

Comments

BRIEFING



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Accredited Employer Work Visa: New implementation date and transitional arrangements

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Purpose

To provide you with advice on a new timeframe for implementing the Accredited Employer Work Visa and transitioning employers and migrants into the new system, following Cabinet's decision to delay implementation until mid-2022.

Executive summary

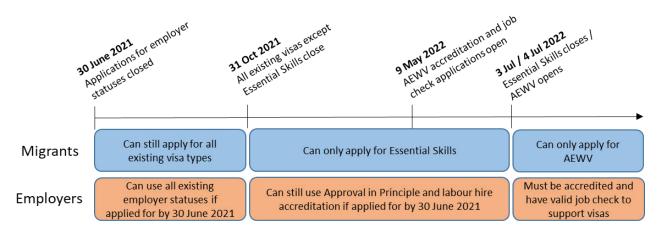
Cabinet recently agreed to a suite of changes to maximise the onshore migrant workforce while the border remains closed [CAB-21-MIN-0272 refers], including:

- extending the maximum duration of Essential Skills visas for jobs paid below the median wage
- streamlining the application process for Essential Skills visas until 1 July 2022
- deferring the implementation of the Accredited Employer Work Visa (AEWV), which will replace six existing visa types, including Essential Skills, from 1 November 2021 until 1 June 2022.

Cabinet was also informed that the strengthened labour market test, which was intended to be introduced as part of the AEWV, would be applied to Essential Skills visas from 1 November 2021.

This briefing sets out a new proposed timeline for transitioning migrants and employers into the new AEWV system, in light of these decisions. The proposed new timeline is summarised in Figure One, below:

Figure One: Proposed AEWV transition timeline, based on July 2022 implementation



The key decisions needed to implement this proposed timeline are:

• **delay opening the AEWV until 4 July 2022** (and keep Essential Skills open until 3 July 2022) – this will avoid dual policies operating at the same time and align the start date for the AEWV with the start of the working week

- **open AEWV accreditation and job check applications on 9 May 2022** this will give employers a 'head start' so that they are more prepared to support an AEWV application, and will reduce the risk of migrants facing a delay in being able to apply for an AEWV due to the employer needing to progress through accreditation and the job check
- close existing visa categories (except Essential Skills) to new applications on 31 October 2021 as originally planned – these visa categories are either not working as intended, or are no longer needed, and Essential Skills will be available for any new visa applications right up until the AEWV is implemented
- keep employer programmes associated with the Essential Skills visa category closed to new applications these programmes (Approval in Principle and Labour Hire Accreditation) closed on 30 June 2021 and there would be low demand for them if they reopened
- do not strengthen the labour market test for Essential Skills visas before the category closes- the work required to implement the 2021 Residence Visa means that the earliest INZ could now implement the strengthened labour market test is March 2021, which will limit the effectiveness of the change, and risk overwhelming employers with multiple changes in a short period.

We also recommend some changes to work to residence visa settings, to preserve residence pathways for visa holders and ensure applicants are not disadvantaged by the closure of accreditation applications in the Talent (Accredited Employer) visa category.

Recommended action

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

- a **Note** that, on 12 July 2021, Cabinet agreed to:
 - i. extend the maximum duration of Essential Skills visas for jobs paid below the median wage, and introduce a streamlined application process
 - ii. make the streamlined application process available until 1 July 2022
 - iii. delay the implementation of the Accredited Employer Work Visa (AEWV) from 1 November 2021 until 1 June 2022 [CAB-21-MIN-0272].

Noted

- b **Note** that the AEWV will replace the following visa categories:
 - i. Essential Skills Work Visa
 - ii. Essential Skills Work Visa approved in principle
 - iii. Talent (Accredited Employer) Work Visa
 - iv. Long Term Skill Shortage List Work Visa
 - v. Silver Fern Job Search Visa (closed 7 October 2019)
 - vi. Silver Fern Practical Experience Work Visa.

Noted

Implementation dates for the AEWV

С Agree to delay the closing of the Essential Skills Work Visa to Sunday 3 July 2022, and the implementation of the AEWV to Monday 4 July 2022, to avoid dual policies operating at the same time, and align the launch of the new visa with the start of the working week.

Agree / Disagree

d Agree that the streamlined application process for Essential Skills Work Visas will therefore be available up to and including 3 July 2022.

Agree / Disagree

Agree that employers will be able to apply for accreditation and job checks from 9 May 2022, е so that they can be prepared to support AEWV applications when they open in July 2022.

Agree / Disagree

- f **Note** that Cabinet was informed that the strengthened labour market test, which was intended to be introduced as part of the AEWV, would apply to Essential Skills Work Visas from 1 November 2021.
- Agree not to strengthen the labour market test for Essential Skills Work Visas before the g category closes, as the work required to implement the 2021 Residence Visa means that the earliest INZ could now implement the strengthened labour market test is March 2021, which will limit the effectiveness of the change, and risk overwhelming employers with multiple changes in a short period.

Agree / Disagree

Closing dates for existing visa policies

h Note that the existing visa categories were originally scheduled to close on 31 October 2021, the day before the AEWV was scheduled to launch.

Noted

i **Note** that three employer programmes associated with the existing visa categories (Approval in Principle, Labour Hire Accreditation, and employer accreditation under the Talent visa category) closed to new applications on 30 June 2021, in anticipation of these visas closing on 31 October 2021.

Noted

Agree that the Talent (Accredited Employer), Long Term Skill Shortage List, and Silver Fern İ Practical Experience visas will still close to new applications on 31 October 2021, as originally planned, as these visa categories are either not working as intended, or are no longer needed.

Agree / Disagree

k **Note** that applications for employer accreditation under the Talent visa category will therefore remain closed.

Noted

I **Note** that employers will still be able to support migrant workers on Essential Skills visas right up until the AEWV is implemented, and that people who already hold a Talent (Accredited Employer) or Long Term Skill Shortage List visa will be able to continue on their residence pathway after these visa categories close.

Noted

Noted

m **Agree** that, although the Essential Skills Work Visa will now remain open until July 2021, applications for employer statuses associated with the Essential Skills visa category (Approval in Principle and Labour Hire Accreditation) will remain closed, as there would be very low demand for these programmes.

Agree / Disagree

Preserving pathways to residence for work to residence visa holders and ensuring visa applicants are not disadvantaged by the closure of the existing accreditation scheme

n **Note** that the Talent (Accredited Employer) visa requires the visa holder to work for an accredited employer, and that the pool of accredited employers is reducing since applications for accreditation closed on 30 June 2021.

Noted

Agree to relax the rules for variation of conditions for Talent (Accredited Employer) work visas to allow visa holders to change to an employer whose accreditation expired after 31 March 2021, to reduce the risk that visa holders become trapped with their current employer and are unable to take advantage of a better job offer without breaking their pathway to residence.

Agree / Disagree

p **Agree** to allow Talent (Accredited Employer) visas to be granted where the employer's accreditation has expired between the visa application being lodged and being decided, and the employer is not awaiting the outcome of a further accreditation application.

Agree / Disagree

q **Note** that we estimate there are about 380 people who had started working in New Zealand on a Talent (Accredited Employer) or Long Term Skill Shortage List visa, and were offshore when the border closed and have not yet been able to return, and that the majority of them are unlikely to meet the wage threshold (twice the median wage) to qualify for residence under the new AEWV.

Noted

- r **Agree** to keep the Talent (Accredited Employer) and Long Term Skill Shortage List visa categories open after 31 October for a subsequent application from the cohort identified in recommendation q, i.e. people who:
 - i. held a Talent (Accredited Employer) or Long Term Skill Shortage List visa and were offshore on 19 March 2020 (when the border was closed), and
 - ii. did not return to New Zealand by 31 October 2021, and
 - iii. had begun working in New Zealand in the role the visa was issued for before they left New Zealand.

Agree / Disagree

Privacy of natural persons

Andrew Craig Manager, Immigration Policy (Skills and Residence) Labour, Science and Enterprise, MBIE

24 September 2021

Hon Kris Faafoi Minister of Immigration

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Background

- 1. On 12 July 2021, Cabinet agreed to extend the maximum duration of Essential Skills visas for jobs paid below the median wage, and streamline the application process by removing labour market testing for workers remaining in their current roles, and removing the requirement to provide police and medical certificates where they have previously been provided. Cabinet agreed that the streamlined application process would be available until 1 July 2022 (inclusive) [CAB-21-MIN-0272].
- 2. Cabinet also agreed that the implementation of the Accredited Employer Work Visa (AEWV) would be deferred from 1 November 2021 until 1 June 2022. This will mean that people do not have to rush to get an application in before 1 November 2021 to take advantage of the streamlined process.
- 3. The AEWV will replace six visa categories:
 - a. Essential Skills Work Visa
 - b. Essential Skills Work Visa approved in principle
 - c. Talent (Accredited Employer) Work Visa
 - d. Long Term Skill Shortage List Work Visa
 - e. Silver Fern Job Search Visa, (closed 7 October 2019)
 - f. Silver Fern Practical Experience Work Visa
- 4. We previously provided you with advice on a timeline for transitioning employers and migrants from the existing visas into the AEWV system, based on the November implementation date (BR 2021-1519). A summary of this timeline is set out in Figure Two, below:

Figure Two: AEWV transition timeline, based on November 2021 implementation



5. This briefing sets out a new proposed timeline, following the decision to delay implementation.

We recommend opening the new visa and making it compulsory for all new applications on 4 July 2022

- 6. Cabinet agreed in July 2021 that the streamlined application process for Essential Skills visas would be available until 1 July 2022 (inclusive), and that the implementation of the AEWV would be deferred until 1 June 2022. This would result in a one-month period where the Essential Skills and AEWV policies are both operating at the same time.
- 7. We therefore recommend delaying the closure of Essential Skills until Sunday 3 July 2022, and the implementation of the AEWV until Monday 4 July 2022, to avoid dual policies operating at the same time. This is consistent with the approach taken in the original transitional timeline. Keeping the existing categories open for a transitional period after the AEWV goes live was considered, but was not recommended, because a dual policy system is likely to cause confusion to applicants about which policy they can or should apply under, and would result in the full transition to the new system being delayed. This will also align the go-live date for the AEWV with the start of the work week.
- 8. We recommend that the streamlined application process for Essential Skills visas should remain available until the category closes. Applications for Essential Skills visas that are submitted before 4 July 2022 will continue to be processed and may be approved after this date. Visas that have already been granted will remain valid until their expiry date.

We recommend opening accreditation and job check applications on 9 May 2022

- 9. Employers will be able to apply for accreditation and job checks ahead of the AEWV becoming compulsory. This will give employers a 'head start' so that they are more prepared to support an AEWV application, and will reduce the risk of migrants facing a delay in being able to apply for an AEWV due to the employer needing to progress through accreditation and the job check. We recommend opening applications for accreditation and job checks from 9 May 2022.
- 10. In the original implementation timeline, accreditation was scheduled to open four to six weeks ahead of the AEWV going live. A longer lead-in time was not possible due to the time needed for Immigration New Zealand (INZ) to design and build the new online forms, and complete and test the new ICT system. Delaying implementation of the visa will allow us to extend the lead-in time for employers to eight weeks, which, combined with the reduction in application volumes expected as a result of changes to Essential Skills visa settings and the forthcoming implementation for the 2021 Residence Visa, will allow INZ to process a greater proportion of applications ahead of time. INZ does not recommend opening accreditation and job check applications earlier than May 2021, as a large numbers of 2021 Residence Visa applications are expected throughout March and April 2021.
- 11. You have previously agreed that, to ensure employers are not disadvantaged by submitting an application early during the pre-accreditation period, accreditation and job checks granted in this period will be for a duration of 12 months (for accreditation) or six months (for job checks) from the date the AEWV opens, rather than 12 or six months from the date the accreditation or job check is granted (BR 2021-1519). For example, if accreditation is granted 20 days before the AEWV opens on 4 July 2022, the accreditation will be granted with a duration of 12 months and 20 days.

We no longer recommend strengthening the labour market test for Essential Skills visas before the visa category closes

12. While the implementation of the new visa has been delayed, Cabinet was informed that the strengthened labour market test, which was intended to be introduced as part of the AEWV,

would still apply to Essential Skills visas from 1 November 2021. This would ensure that employers make genuine efforts to recruit New Zealanders for any new vacancies.

- 13. The strengthened labour market test includes:
 - a. removing the employer's ability to hire a migrant for a role paid below the median wage if they have rejected an MSD-referred jobseeker, except in specific circumstances,¹ and
 - b. strengthening advertising requirements, including requiring that advertising include the pay rate and minimum skills requirements.
- 14. The work required to implement the 2021 Residence Visa means that the earliest INZ could now implement the strengthened labour market test for Essential Skills visas is March 2021. This would limit the effectiveness of the change, as it would only be in effect for four months before the Essential Skills visa category closes. It would also risk overwhelming employers with multiple changes, as they will likely be preparing to apply for accreditation and AEWV job checks at this time.
- 15. We therefore do not recommend implementing the strengthened labour market test for Essential Skills visas before the visa category closes. The strengthened labour market test will still apply to all job checks made under the AEWV system from 9 May 2021.

Closing dates for existing visa policies

We recommend closing existing visa categories (except for Essential Skills) on 31 October 2021 as planned

- 16. Despite the delay in the implementation of the AEWV, we recommend closing the Talent (Accredited Employer) TAE, Long Term Skill Shortage List (LTSSL), and Silver Fern Practical Experience (SFPE) Work Visas to new applications on 31 October 2021, as originally planned, because these visa categories are either not working as intended, or are no longer needed. You have already communicated that this will happen in your response to written parliamentary question 31214 by Erica Stanford. Employers who were previously using these visa categories will still be able to sponsor new visa applications through the Essential Skills Visa category right up until the AEWV is implemented.
- 17. The TAE and LTSSL visas are work to residence visas, which allow the visa holder to apply for residence after two years. These visas are not targeted enough to achieve the objectives of our residence from work programme, i.e. to attract genuinely higher-skilled workers who can grow New Zealand's skill base and increase productivity. Keeping these categories open for longer would result in more residence applications that are not in line with these objectives. People who are already on a work to residence pathway will be able to continue on this pathway after 31 October 2021.
- 18. Closing the TAE visa on 31 October 2021, as planned, means that applications for employer accreditation under this category (which closed on 30 June 2021) will also remain closed.² As with other employer statuses, accreditation applications were closed in advance of the visa itself closing, partly to ensure value for money for employers and to manage processing pressures for INZ. Employers who want to support a TAE visa between now and 31 October 2021 will not be disadvantaged by the decision to keep accreditation applications closed, as communications prior to closing accreditation were clear that they would need to apply by 30 June 2021 if they wanted to do this.

¹ See BR 2021-2857

² Note that employer accreditation under the TAE visa category is different from accreditation under the new AEWV category.

- 19. The SFPE visa is part of the Silver Fern scheme, which was designed to attract young, qualified people to New Zealand who would be good candidates for the Skilled Migrant Category. The Silver Job Search Visa (SFJS), which closed in 2019, enabled these people to search for skilled employment in New Zealand. Once they have found skilled employment, the SFPE enables them to work for up to two years, after which they may be eligible to apply for residence under the Skilled Migrant Category. As the SFJS visa has been closed since 2019 and there are no more SFJS visa holders, the number of people eligible for a SFPE visa is now very low as at May 2021, only ten people would benefit from applying for a further SFPE visa. There is therefore little need to continue this visa category.
- 20. Employers are likely to be disappointed by the decision to close work to residence visas as planned, as a pathway to residence can make it easier to attract migrant workers, and can give employers longer-term certainty about their workforce. It also appears that many employers have assumed that work to residence will be extended in light of the decision to delay the introduction of the AEWV. The announcement of the 2021 Residence Visa will help to manage this, as it will provide a residence pathway for the majority of their migrant workforce.

We recommend keeping employer programmes associated with the Essential Skills Work Visa closed to new applications

- 21. Applications for Approvals in Principle (AIP) and Labour Hire Accreditation closed on 30 June 2021. These are employer statuses associated with the Essential Skills Work Visa category. The AIP policy allows an employer to complete employer checks and labour market testing ahead of time, to get advance approval to employ migrants on an Essential Skills visa, and is often used by employers with high-volume seasonal recruitment needs. Labour Hire Accreditation allows a labour hire employer who meets certain accreditation requirements to support Essential Skills visas with a longer duration.
- 22. You agreed to close these programmes to new applications in advance of the Essential Skills visa category closing to prevent employers from applying and paying for statuses that they would only be able to use for a short time. Closing the programmes early also minimises pressure on INZ to process applications quickly, and frees up INZ staff to be trained in preparation for the AEWV, and to process any influx in work visa applications submitted before the AEWV comes into effect.
- 23. Although the Essential Skills Work Visa category will now remain open for an additional eight months, we do not recommend reopening AIP and Labour Hire Accreditation applications, as there would be very low demand for these programmes. The volume of AIP applications had dropped significantly since the border closure anyway (only 61 AIP applications were accepted for processing from March 2020 February 2021, compared to 156 in the 12 months prior), and the recent changes to Essential Skills visas (extension of duration and introduction of streamlined application process for migrants staying in the same role) will have further reduced demand for AIPs. The extension to the duration of Essential Skills Work Visas has also removed much of the incentive for employers to apply for Labour Hire Accreditation. Keeping AIP and Labour Hire Accreditation applications closed will also smooth the transition to the new policy, as there will be less time where employers hold statuses under both the old and new policies.
- 24. Employers who have previously used AIPs or Labour Hire Accreditation will continue to be able to support Essential Skills Work Visa applications through the normal process.

Some additional policy decisions are needed to preserve pathways to residence for work to residence visa holders and ensure applicants are not disadvantaged by the closure of the existing accreditation scheme

Changes to variation of conditions requirements for TAE visas

- 25. The TAE visa requires the visa holder to work for an accredited employer.³ Employers who are accredited under the TAE visa category have undergone checks to ensure they are in a sound financial position, have HR policies of a high standard, a demonstrable commitment to training and employing New Zealanders, and good workplace practices.
- 26. If a TAE visa holder wants to change to a new job with a new employer, they can apply for a variation of conditions, but to protect the integrity of the TAE visa category, immigration instructions require that the new employer must also hold accreditation. Previously, this did not present any problems, as the employer could apply to INZ to become accredited if they were not already. However, since accreditation applications under the TAE visa category closed on 30 June 2021, visa holders are only able to get a variation of conditions to work for an employer who already holds accreditation. As the demand for variation of conditions remains relatively high (there are over 10,000 TAE visa holders onshore, and over 1,000 variations of conditions applications were submitted by TAE visa holders in the first six months of 2021), there is a risk that migrants will be unable to take advantage of a better job offer without breaking their pathway to residence, as the pool of accredited employers reduces.
- 27. We therefore recommend that the variation of conditions rules for TAE visas be relaxed to allow visa holders to change to an employer whose accreditation expired after 31 March 2021. This will provide visa holders with more flexibility (there will be a total pool of about 2,500 eligible employers), while also providing some assurance that the employer is likely to meet the accreditation requirements for the TAE visa category, as they have previously been assessed as meeting the accreditation criteria. The closing of the TAE visa was announced in May 2021, so employers who let their accreditation lapse due to the visa category closing will not be disadvantaged by the change.

Treatment of Talent (Accredited Employer) visa applications where the employer's accreditation has expired before the application is decided

- 28. Current instructions require that, for a TAE visa to be granted, the employer must hold valid accreditation at the time the visa is approved, not just at the time the visa application is made. However, employers are not always aware of this requirement. There is currently also a wait time for a TAE visa application to be allocated, due to a surge in applications before existing visa categories are replaced by the AEWV, and increased demand due to the lack of alternative residence pathways with the Skilled Migrant Category effectively closed to new applications. As a result, there is a small, but growing, number of cases where the employer's accreditation has expired before the visa application has been decided. Previously employers would have been able to renew their accreditation, allowing the visa to be granted, however this is no longer possible since accreditation applications under the TAE visa category closed on 30 June 2021.
- 29. To ensure that employers and migrants are not disadvantaged by any processing queues, we recommend allowing TAE visa applications to be granted if the employer's accreditation has expired between the visa application being lodged and being decided. Given that the employer's accreditation would have expired recently, as it had to be valid when the application was submitted, we consider that the objectives of the accreditation system will

³ There is a limited exception to this requirement for people who have lost their job for reasons beyond their control (e.g. redundancy) – in these cases the visa holder can apply for a variation of conditions to work for a non-accredited employer.

still be met. To further manage any risks, this change will not apply in cases where the employer's accreditation has been rescinded between lodgement and decision, or where the employer has made a further accreditation application before applications closed on 30 June 2021, and is awaiting the outcome of that application (in these cases, any affected TAE visa applications will be held and either approved or declined under the normal rules once the employer's accreditation application has been decided).

Residence pathways for work to residence visa holders stuck offshore

- 30. You have previously indicated that you would like to consider options for keeping a residence pathway open after 1 November 2021 for work to residence visa holders who may not have been able to complete the required 24 months of employment in New Zealand in order to qualify for residency before their visa expires, due to becoming stuck offshore as a result of the border closure (BR 2021-3160).
- 31. We estimate that about 380-420 people who had started working in New Zealand on a TAE or LTSSL visa were offshore when the border closed and have not yet been able to return. The majority of them are unlikely to meet the wage threshold (twice the median wage) to qualify for residence under the new AEWV.
- 32. We recommend keeping the TAE and LTSSL visa categories open after 31 October 2021 for a subsequent application from people who:
 - a. held a TAE or LTSSL visa and were offshore on 19 March 2020 (when the border was closed), and
 - b. did not return to New Zealand by 31 October 2021, and
 - c. had begun working in the role in New Zealand the visa was issued for before they left New Zealand.
- 33. Applicants will still need to meet all of the requirements of the visa, including having a job offer from a qualifying employer and meeting a salary threshold (for TAE visas), and having a job offer in an area of long term skill shortage (for LTSSL visas). We are considering the specifics of how these requirements should be applied to this cohort and will provide you with further detail when you receive immigration instructions to certify the changes.
- 34. This does not mean that this cohort will be granted a border exception at this stage eligible migrants will need to wait until border settings allow them to return to New Zealand before they are able to apply for their subsequent TAE or LTSSL visa. However, we recommend taking a decision now to keep these visa categories open to them, as some of this cohort could potentially return under existing border settings, and it will give those affected more certainty about their options once the TAE and LTSSL visa categories close on 31 October 2021.
- 35. We do not recommend this is an open ended offer that someone could activate in five years' time, but with the uncertainty about timeframes for reconnecting with the world it is difficult to set an end date now. We will provide further advice on closing off this channel, and/or any limits on when an application can be made after a border exception becomes, next year when the situation should be clearer.

Certification of immigration instructions

- 36. We will provide you with immigration instructions to certify prior to 31 October 2021 to implement the closure of existing visa categories to new applications (except for Essential Skills) and changes to Talent (Accredited Employer) and Long Term Skill Shortage List visa settings.
- 37. Immigration instructions to implement the AEWV system (including accreditation, job check, and visa details) and the strengthened labour market test for Essential Skills visas will be finalised and provided to you for certification before implementation in May 2022.

Confirmation of fees for the AEWV system by Cabinet

38. The fees for the AEWV system, including the accreditation, job check, and visa application fees, need to be agreed by Cabinet and gazetted for 28 days before coming into force. We have previously provided you with advice and a draft Cabinet paper on fee levels (BR 2021-4228). We are reviewing volume forecasts as a result of the recent changes to Essential Skills visa settings and considering whether any changes are needed to fee levels. We will provide you with an updated Cabinet paper later in 2021.

Communications

- 39. Communications and engagement activity to promote the Accredited Employer Work Visa is ongoing. Detailed information about employer accreditation was released in May 2021. The next communications milestone is the release of detailed policy information about the job check and migrant check (BR 2021-3160). If you make decisions on the proposals in this paper by 1 October, we anticipate being able to communicate both the detailed job and migrant check information and the new implementation date and transitional arrangements in mid-October 2021.
- 40. The Accredited Employer Work Visa policy remains a priority topic for the Relationship Managers in the INZ Engagement Unit in 2021, and the Unit is also planning a series of regional information events in 2022. An education campaign is also planned for 2022, ahead of the introduction of the new policy, to raise awareness of the upcoming changes.