



17 December 2021

**New Zealand Productivity Commission
PO Box 8036
Wellington 6143**

Submitted via webform

**Immigration: Fit for the Future
Submission from ComVoices**

Thank you for the opportunity to offer our feedback on proposed changes to the immigration system to better facilitate New Zealand's long-term economic growth and promote the wellbeing of New Zealanders.

We responded to the questions as they appeared in the [proposal document](#), on pages 56-60.

Who we are:

ComVoices is a network of 23 peak bodies working nationally and regionally across the community and voluntary sector. We amplify the voices of Aotearoa's community sector to influence decision-makers. Our vision is confident, connected communities served by a valued and collaborative community sector. We promote the value that community and voluntary sector organisations add to Aotearoa New Zealand's economic and social wellbeing. We provide a collaborative platform so that members of ComVoices can encourage the development of a policy and regulatory environment that is supportive of sector organisations and their communities and can provide effective responses to the New Zealand Government on emerging issues.

This submission was developed with support and input from our members and reflects the views from a broad section of the community and voluntary sector. A list of members endorsing this submission can be found at the end of this document.

There is great potential to ensure inclusion and collaboration with the many organisations we represent and more, who provide services to former refugees and migrants.

Questions 1:

To what extent does access to migrant labour reduce training and upskilling activity by employers?

Feedback from our members is that the opposite is true: access to migrant labour increases and structures the training and upskilling activity for all staff, organised by us as employers.

For example, there is a scarcity of nurses in New Zealand, and this has been exacerbated by Covid 19's outbreak and our border closure, because employers had already developed a reliance on recruitment measures taken in overseas job markets. New Zealand's nurse shortage is regardless of

specialty: One employer may require mental health nursing experience, other employers may require paediatric nurse specialisation, others aged care, etc. The scarcity means however, that all employers must cost-factor into recruitment costs induction training post-recruitment, to enable their recruitment strategy to go broad enough to find and then recruit any applicants at all.

Do effects on training and development differ by industry?

Our view is that this depends on the value placed by employers in any industry on training and development.

In our network, ongoing training and professional development opportunities for our staff and volunteer workforces are valued highly. This is because evidence-based best practice is expected and accounted for in our industries, mainly social services and community development providers.

The costs of providing training and development, however, are largely unfunded. Many of our network's members, it should be noted, are either partially or entirely government funded and the implication is that this investment is not as highly valued within government as it is out in our community sector.

We urge the government to place higher value on training and development, by investing in them properly within its funding models for service contracting and procurement of all its service providers. This would show leadership and model to all industries confidence in the cost-benefits of this social investment. He tangata, he tangata, he tangata.

Are there areas of the economy in which New Zealand should be training people that are currently disproportionately supplied by migrant workers? How could policy best respond?

The closure of New Zealand's borders in 2020 due to the Covid-19 pandemic, and the corresponding skills shortages in a range of sectors, has highlighted the contribution made by migrant workers to New Zealand's labour market and communities.

It is essential that migration policy is responsive to this and supports growing a workforce with capacity to provide the services needed today and in the future.

One pressing component of this is an urgent and considered review of the ability for migrants to have their qualifications achieved outside New Zealand, accepted in New Zealand. An urgent review of these processes is required to ensure equity and pay parity among migrants. Where there are pathways these are generally broad, blunt, and costly.

There are many highly skilled, well qualified individuals within our migrant communities. These people—and their skills—are often under-utilised as they are unable to achieve recognition of their overseas qualifications. This is a disservice to employers within New Zealand, who would employ these migrants in the professions they are internationally qualified for, if they could. It is also a disservice of course to the migrants themselves.

We strongly endorse the commissioning of work to understand the barriers to the recognition of overseas qualifications and experience within our existing immigration settings.

For example, recent data (NZ Aged Care Association) indicates more than 900 unfilled nursing vacancies in rest homes and about 1500 in DHBs. This situation is not sustainable because these

stakeholder partners in healthcare are forced to compete for the same human resource. Training more New Zealanders to become nurses will not resolve this shortage in the immediate to midterm.

Some services within our membership are already unable to take on new admissions until they can recruit new staff. For the short to midterm, this shortage will place undue stress and huge costs back upon our hospitals, when they are already burdened heavily by Covid 19.

Immigration settings responsive to this workforce shortage, where they are sector-wide such as nursing, is a solution. Where there is insufficient human resource within New Zealand's existing workforce sector-wide, employers – particularly government funded ones - could be encouraged and supported by government policy that simplifies and accelerates recruitment from New Zealand's international trade partners' workforces.

Tertiary institutions/Trade trainers could be supported also, however, to enlist enrolment to their courses from *international* students in these same trade partner nations. Pathways to residency for these students as they graduate could also ensure longevity to this human resource solution. It would also support good trade relations between New Zealand and its trading partners.

Question 2:

What objectives should be included in an immigration Government Policy Statement and Why?

Greater support options should be made available for employers hiring former refugees. These could take the form of extra training and English-language tuition for their employees.

Government agencies need support in upskilling client-facing staff about cultural awareness. The current one-size-fits-all approach from some agencies is an uneasy fit for former refugees who come from a range of backgrounds and hold an underprivileged position given their migration experience.

Many migrants (forced or otherwise) come to New Zealand from places where the government (and its agencies) may be less reliable - even oppressive. Consequently, it is vital to build the capabilities of client-facing New Zealand government staff in key agencies to ensure that they are responsive, sensitive and possess the requisite cultural awareness. This is key to achieving positive engagement with these communities.

There needs to be a clear pathway of support to move former refugees from being long-term beneficiaries and into stable employment. Work is often seasonal and short-term, and they are currently penalised financially if they take up temporary work.

Volunteering is a proven mechanism that can act as a bridge to paid employment. This can be particularly useful for migrants who do not have any work experience in New Zealand. In addition, volunteering provides recent migrants with opportunities to connect and bond to communities which, in turn, contributes to community goals through activities in and of themselves, enhancing individual and community resilience and capacity by building social capital, supporting personal development, social cohesion, connectivity and their skills. Therefore, the Government Policy Statement needs to acknowledge volunteering as a pathway to support better outcomes for migrants.

There are also many barriers for refugee-background women when it comes to gaining employment: limited work experience outside the home, low education levels, and low skill levels mean that most jobs offered are part-time, casual, seasonal that don't pay sick leave, annual leave or provide an entitlement to parental leave. It would be beneficial to include a more specific focus on a pathway to

employment for women from refugee background and those who do know how to read and write in their native language.

Communication is essential to realising the benefits that migrant communities can bring to our society. The members of these communities must be empowered and given voice—English proficiency is crucial to this. Actions specifically relating to developing English language proficiency would make the biggest and most tangible impact for communities, as well as supporting the achievement of other actions.

Question 3:

How could the Treaty of Waitangi interest in immigration policy be best reflected in new policies and institutions?

We support ongoing and meaningful involvement of iwi in the development of immigration policy. It is widely acknowledged that immigration has had a destructive impact on iwi, whānau and hapū. We believe any revision to the Immigration Act should include a clause requiring consultation with iwi leadership on all migration strategies and policies.

In addition, we support the inclusion of Te Ao Māori perspectives into any future redesign of immigration policy, with a particular emphasis on manaakitanga and rangatiratanga.

Question 4:

Should the annual number of residence visas on offer be reduced? If so, to what level and why? And if not, why not?

We don't believe that the number of residence visas on offer should be reduced.

We welcome the recent government initiatives that will simplify the pathway to residence for around 165,000 migrants already working in Aotearoa. This measure will go some way to retain skilled workers who were otherwise at risk of leaving New Zealand.

While this is a positive move, overseas workers with jobs in New Zealand continue to wait to enter Aotearoa. We recommend a corresponding accelerated and simplified pathway to attract migrant workers for targeted sectors with human resource shortages in New Zealand. We would also urge the government to step in and support whole sectors to work together to fill skills shortages in areas crucial to the wellbeing of all New Zealanders.

Even so, highly qualified migrants are often deterred by the arduous and expensive process with NZQA for getting overseas qualifications recognised for relevance in New Zealand.

Question 5:

Should the right to return for permanent residents who re-migrate out of New Zealand be limited? Under what conditions? What would be the costs and benefits?

Our members had no contributions to make to this question.

Question 6:

Should efforts by migrants to learn Te Reo be recognised in the residence or permanent residence approval process? If so, how would this best be done?

We support not simply Te Reo requirements but also levels of Te Tiriti understanding to be recognised in the processes of migration, at each level affecting positively the approval process. We urge the government to consult and partner with mana whenua - Reo educators and Tiriti experts - in developing the best process for establishing and recognising these efforts made by migrants, and how to incorporate them in the residence approval process.

Question 7:

Do particular groups of migrants need additional or targeted support to settle? If they do, what types of support would work best?

There are significant qualitative differences between the challenges faced by migrants from majority English speaking countries (such as the United Kingdom, USA, and Canada) and other recent migrants.

The differences in lived experience between these groups varies greatly, and these distinctions should be clearly articulated in policy.

There is great potential for providing English Language support and mentoring to highly skilled migrants. This would enable them to better apply their skills to their work and day-to-day life (for example, customer service, English for Employees, Professional Speaking, kiwi culture, English for work, broadening cultural awareness, etc.). We feel that English language proficiency is vital to the empowerment of migrant communities and their ability to engage with New Zealand society.

If a migrant worker cannot communicate effectively in English they are much less likely to know about and understand their rights, have the language skills or confidence to report exploitation, and raise concerns with their employers (or others) about their employment conditions.

There is also an uneasy overlap between language challenges, worker exploitation and exploitation by a family member. Many migrants work as part of family businesses (or with distant relatives). This is a particularly vulnerable demographic and deserves specific attention under this plan. This can also connect with a fear of losing a visa were they to leave employment or the family group. It should be noted that under a spouse/partnership visa, women can be dependent on an abusive partner/family.

Migrants with non-resident status would benefit greatly from English Language Support, both in terms of training for workplace culture and preparation courses for recognised English-language proficiency tests.

Some migrants, especially non-native English speakers and those who have difficulty in speaking English, need additional support. Besides providing English Language support and mentoring, these migrants can significantly benefit from a broad range of volunteering activities to create lasting bonds to New Zealand communities. Volunteering is often used as a network building opportunity and can lead to other opportunities related to employment, hobbies, friendships and more. Those who volunteer report higher levels of happiness, life satisfaction, self-esteem, a sense of control over life, and physical health, as well as lower levels of depression. Therefore, targeted support is required to assist volunteer-involving organisations to connect recent migrants with volunteering opportunities and provide necessary support so migrants can make the most out of their volunteering activities towards facilitating their settlement in New Zealand.

There is also great value in exploring paid work experience among migrant communities; however, this must be meaningful and targeted so that people benefit equally and that they are not exploited.

Success will be contingent on employers being brought to appreciate the unique value of employing migrants.

In addition, a focus on the challenges and opportunities of self-employment for migrants could be helpful, as this is often a route many take; however, access to face-to-face information, training and support is limited.

We thank the Productivity Commission for bringing forward this opportunity to consult on the proposed changes to immigration settings. As a network of peak bodies we are committed to and are available to engage in the Inquiry's next phase – please get in touch with me at any stage.

Kind regards



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This submission is endorsed by:

English Language Partners New Zealand
Hui E! Community Aotearoa
Presbyterian Support New Zealand
Volunteering New Zealand