

Josh Kennedy

From: Gabriel Kenny
Sent: Friday, 13 September 2019 5:07 p.m.
To: Katy MacLeod
Subject: RE: DRAFT Op Pol work and resourcing [IN-CONFIDENCE]

Follow Up Flag: Follow up
Flag Status: Completed

<https://www.immigration.govt.nz/about-us/media-centre/newsletters/korero/korero-july-2019>

From: Katy MacLeod
Sent: Friday, 13 September 2019 4:32 p.m.
To: Gabriel Kenny
Subject: RE: DRAFT Op Pol work and resourcing [IN-CONFIDENCE]

Thanks – I am asking Rob Perry

From: Gabriel Kenny
Sent: Friday, 13 September 2019 1:33 p.m.
To: Katy MacLeod
Subject: RE: DRAFT Op Pol work and resourcing [IN-CONFIDENCE]

It was in the July edition of the Korero, but I don't have a copy/link

From: Katy MacLeod
Sent: Friday, 13 September 2019 12:31 p.m.
To: Gabriel Kenny
Subject: FW: DRAFT Op Pol work and resourcing [IN-CONFIDENCE]

Do you know how this was communicated? We probably need to let Tania know ... and Ale?

From: Katy MacLeod
Sent: Friday, 13 September 2019 12:31 p.m.
To: Zoe Goodall
Subject: RE: DRAFT Op Pol work and resourcing [IN-CONFIDENCE]

Yes – I just asked Gabe about this and he remembered so between us we will let Tania know.

From: Zoe Goodall
Sent: Friday, 13 September 2019 12:30 p.m.
To: Katy MacLeod
Subject: RE: DRAFT Op Pol work and resourcing [IN-CONFIDENCE]

Lo! – let's not go anywhere near the Instructions!!!!, But if the SOP is there then, providing its fit for purpose, can we find out what has been done to promulgate it to staff and make sure Tania knows so she can factor that in to her decision / response to the Ombudsman

Zoe Goodall
DIRECTOR, RISK & ASSURANCE - IMMIGRATION

Business, Strategy & Governance Branch

Immigration New Zealand

zoe.goodall@mbie.govt.nz | Mobile: Section 9(2)(a)
Level 1, 15 Stout Street, Wellington



New Zealand Government

From: Katy MacLeod
Sent: Friday, 13 September 2019 12:10 p.m.
To: Zoe Goodall
Subject: RE: DRAFT Op Pol work and resourcing [IN-CONFIDENCE]

Hey Zoe

Well here is a funny thing – I just took a look at the SOPs to see if we could copy something already there and guess what ... the SOP seems to already be there as of 13 June 2019.

<http://inzkit/publish/globalprocessmanual/#72528.htm>

Immigration instructions are another story ... it is probably more work for Op Pol if we do it and then they have to review it and I suspect they won't want that task to be outsourced outside of their team – but I could be wrong.

Katy

From: Zoe Goodall
Sent: Friday, 13 September 2019 12:02 p.m.
To: Katy MacLeod
Subject: RE: DRAFT Op Pol work and resourcing [IN-CONFIDENCE]

Given the amount of work Op Pol have on, and in light of the fact that Ale still needs to recruit the two dedicated SOP writers, I have a sneaking suspicion that it may fall to us to draft the SOP – especially given the looming deadline for response to the Ombudsman etc.

Given it's in our interest to maintain a good relationship with the Ombudsman, hypothetically is we were to take ownership of this (in the spirit of "getting sh*t done" and all that)... How much work do you reckon it would be, what sort of person would we need to pull together an initial draft (which Ale, Tania et al could then review) and do we have such a person (noting our Principal Analyst doesn't find out they're ours until at least next week) and you're heading away on leave soon.....

Zoe Goodall
DIRECTOR, RISK & ASSURANCE - IMMIGRATION

Business, Strategy & Governance Branch
Immigration New Zealand

zoe.goodall@mbie.govt.nz | Mobile: Section 9(2)(a)
Level 1, 15 Stout Street, Wellington

From: Katy MacLeod
Sent: Friday, 13 September 2019 11:40 a.m.
To: Zoe Goodall
Subject: RE: DRAFT Op Pol work and resourcing [IN-CONFIDENCE]

Yes! I just sent Porirua an email telling them about the opinion. I'll ask if they have an idea of numbers.

I'll also forward you the email I just sent about the Legal meeting – I was wondering whether to cc you in. Happy to from here on – probably makes sense to?

From: Zoe Goodall
Sent: Friday, 13 September 2019 11:38 a.m.
To: Katy MacLeod
Subject: RE: DRAFT Op Pol work and resourcing [IN-CONFIDENCE]

B*gger!

Have a think about whether it's worth asking Business Migration for approximate numbers...working on the premise "forewarned is forearmed", given the level of noise around INZ right now. Did you go to the meeting with Tania etc?

Z

Zoe Goodall
DIRECTOR, RISK & ASSURANCE - IMMIGRATION

Business, Strategy & Governance Branch
Immigration New Zealand

zoe.goodall@mble.govt.nz | Mobile: Section 9(2)(b)
Level 1, 15 Stout Street, Wellington

From: Katy MacLeod
Sent: Friday, 13 September 2019 11:29 a.m.
To: Zoe Goodall
Subject: RE: DRAFT Op Pol work and resourcing [IN-CONFIDENCE]

Hi Zoe

Yes – they can complain. And if they did we would most likely accept it for investigation as would the Ombudsman Office.

We haven't asked for any numbers on how many applications were in this situation – it is something I could ask Business Migration but we can't really predict whether people will realise and lodge a complaint.

But yes, It would create extra work for us.

Katy

From: Zoe Goodall
Sent: Friday, 13 September 2019 9:08 a.m.
To: Katy MacLeod
Subject: RE: DRAFT Op Pol work and resourcing [IN-CONFIDENCE]
Importance: High

Katy

Sorry – but something else that has just occurred to me.

The people whose applications we declined during this period i.e. after we “unreasonably” changed the practice.....will they have the right to appeal? Are they likely to complain? Will this create extra work for us?

Z

Zoe Goodall
DIRECTOR, RISK & ASSURANCE - IMMIGRATION

Business, Strategy & Governance Branch
Immigration New Zealand

zoe.goodall@mbie.govt.nz | Mobile: Section 9(2)(a)
Level 1, 15 Stout Street, Wellington



From: Katy MacLeod
Sent: Thursday, 12 September 2019 2:32 p.m.
To: Zoe Goodall
Subject: FW: DRAFT Op Pol work and resourcing [UNCLASSIFIED]

FYI

From: Margaret Cantlon
Sent: Thursday, 12 September 2019 2:01 p.m.
To: Tania Turfrey
Cc: Katy MacLeod; Gabriel Kenny; Mike Harvey
Subject: Re: DRAFT Op Pol work and resourcing [UNCLASSIFIED]

Thanks Tania, I invited Ale to our catchup tomorrow. I'm sick so unlikely to be in but discussion should definitely go ahead. Regards M

Sent from my iPhone

On 9/09/2019, at 6:41 PM, Tania Turfrey <Tania.Turfrey@mbie.govt.nz> wrote:

9(2)(b), 9(2)(g)(i)



Tania

From: Margaret Cantlon
Sent: Monday, 9 September 2019 5:08 p.m.
To: Tania Turfrey
Cc: Katy MacLeod; Gabriel Kenny; John Pasene
Subject: FW: DRAFT Op Pol work and resourcing [UNCLASSIFIED]

Hi Tania, this relates to the ^{9(2)(a)}final view of the Ombudsman (the PPI issue to do with Entrepreneur work visa policy). Alejandra, Manager Operational Policy has been persuaded that we will have to change the instruction but she wants it deferred for six months as their work programme is full and she already has a load of work that she is not able to allocate to anyone (attached is a draft workload paper).

I have told her that I don't think we can defer it that long but that I'd ask you what you thought because ultimately you will be signing the letter to the Omb. telling him what we're going to do.

Happy to discuss.

Thanks and regards,
Margaret

Margaret Cantlon
Manager, Immigration Resolutions
Service Design and Performance
Immigration New Zealand
Ministry of Business, Innovation & Employment

Margaret.Cantlon@mbie.govt.nz | Telephone: +64 (0)4 896 5394 | Mobile: Section 9(2)(a)
Level 12, 160 Lambton Quay, Wellington 6011, PO Box 1473, Wellington 6140

'Best People, By Design'
<image001.png>

From: Alejandra Mercado
Sent: Friday, 6 September 2019 11:53 a.m.
To: Katy MacLeod; Margaret Cantlon
Subject: DRAFT Op Pol work and resourcing [UNCLASSIFIED]

Hi

Draft work programme. Stephen hasn't seen this yet so it's still draft.

Sorry to be an absolute pain about this.

Cheers
Ale

Released Under the Official Information Act 1982

Josh Kennedy

From: Margaret Cantlon
Sent: Monday, 9 September 2019 5:08 p.m.
To: Tania Turfrey
Cc: Katy MacLeod; Gabriel Kenny; John Pasene
Subject: FW: DRAFT Op Pol work and resourcing [UNCLASSIFIED]
Attachments: Op Pol work and resourcing.docx

Follow Up Flag: Follow up
Flag Status: Completed

9(2)(g)

Hi Tania, this relates to the **Section 9(2)(g)** final view of the Ombudsman (the PPI issue to do with Entrepreneur work visa policy). Alejandra, Manager Operational Policy has been persuaded that we will have to change the instruction but she wants it deferred for six months as their work programme is full and she already has a load of work that she is not able to allocate to anyone (attached is a draft workload paper).

I have told her that I don't think we can defer it that long but that I'd ask you what you thought because ultimately you will be signing the letter to the Omb. telling him what we're going to do.

Happy to discuss.

Thanks and regards,
Margaret

Margaret Cantlon

Manager, Immigration Resolutions
Service Design and Performance
Immigration New Zealand
Ministry of Business, Innovation & Employment

Margaret.Cantlon@mbie.govt.nz | Telephone: +64 (0)4 896 5394 | Mobile: **Section 9(2)(e)**
Level 12, 160 Lambton Quay, Wellington 6011, PO Box 1473, Wellington 6140

'Best People, By Design'



**Ministry of Business,
Innovation & Employment**

From: Alejandra Mercado
Sent: Friday, 6 September 2019 11:53 a.m.
To: Katy MacLeod; Margaret Cantlon
Subject: DRAFT Op Pol work and resourcing [UNCLASSIFIED]

Hi

Draft work programme. Stephen hasn't seen this yet so it's still draft.

Sorry to be an absolute pain about this.

Cheers
Ale

Released Under the Official Information Act 1982

Josh Kennedy

From: Karen Swann
Sent: Tuesday, 17 September 2019 3:36 p.m.
To: Katy MacLeod
Cc: Ravi Bellihal; Craig Pontifex
Subject: FW: EWW - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Follow Up Flag: Follow up
Flag Status: Completed

Hi Katy – an indication of those numbers are - this covers October 2017 until April 2018.

From 17/Oct/2017 until 01/Apr/2018 a total of 211 EWW-Interim applications were decided

17 EWW Approved
194 EWW Declined

On the 17/Oct/2017 we sent a letter to all EWW applicants in the managed queue to implement a Quick Decision model.

We provided an opportunity for all EWW interim visa applicants to submit documents in support of their applications to demonstrate they meet policy instructions and to ensure they had a complete.

This was in lieu of a PPI which would normally request the information that was missing to demonstrate the applicant meets policy instructions.

Approx 77% of EWW-Interim applicants were offshore (@162 apps) during this Quick Decision model timeframe. It is estimated approx 20% (@32 apps) of these would have still been issued a PPI if the case officer believed they could meet the objective of policy instructions (BB1) and the business plan could meet policy instructions with just a little more information.

This leaves a total of 130 and 17 of these were approved.

If we only consider the Decline apps this means approx 113 EWW's may not have been sent a PPI even though we sent a letter in October requesting information to support the business plan and applicant meet policy instructions.

Cheers
Karen

From: Katy MacLeod
Sent: Friday, 13 September 2019 3:40 p.m.
To: Karen Swann
Cc: Craig Pontifex; Ravi Bellihal
Subject: RE: EWW - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Hi Karen,

Yes – the group that weren't PPI'd are the numbers we are interested in.

Thanks Karen – have a good weekend all,

Katy

From: Karen Swann
Sent: Friday, 13 September 2019 3:17 p.m.

To: Katy MacLeod
Cc: Craig Pontifex; Ravi Bellihal
Subject: RE: EWV - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Hi Katy – looking to see if we can get this from the portal via AMS recordings of PPI letters for that period.

Just to clarify also – the only apps that were not PPI's were those that were considered to be clearly not able to be approved i.e. there were a number during this time that were PPI'd.

Cheers
Karen

From: Katy MacLeod
Sent: Friday, 13 September 2019 11:49 a.m.
To: Karen Swann
Cc: Craig Pontifex; Ravi Bellihal
Subject: RE: EWV - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Thanks Karen.

I will record your response on the relevant MAKO file.

Zoe Goodall (incoming GM for our space) has asked me to check in with you on an indication on the number of EWV applicants who did not receive a PPI letter.

Thanks,

Katy

From: Karen Swann
Sent: Friday, 13 September 2019 11:43 a.m.
To: Katy MacLeod
Cc: Craig Pontifex; Ravi Bellihal
Subject: Re: EWV - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Hi Katy
We've had multiple emails on this from Michael C and Pete E! :)

I have given Craig a verbal summary regards background on this - rest assured we have been PPIing offshore EWV applicants since April 2018 (last year).

Current EWV on hand is very low now (approx 10) so will see what happens from here on in regards past applicants. My understanding is we would only review past applicants if we were approached to do so.

Happy to discuss

Cheers
Karen

Sent from my iPhone

On 13/09/2019, at 11:26 AM, Katy MacLeod <Katy.MacLeod@mbie.govt.nz> wrote:

Hi Craig

This email is to let you know that the Chief Ombudsman has found that the Ministry acted unreasonably in changing the PPI practice for the EWV category in October 2017. He has stated that

the subsequent actions taken to advise BIS to revert to the previous practice is insufficient to remedy the situation. There have been further recommendations that we are currently working through with Operational Policy. We have also been required to provide input to the Minister's report as he has written to the Minister in accordance with section 22(3) of the Ombudsmen Act providing him with the details of his opinion.

I realise Craig that you probably don't have all the background information on this so if you want to give me a call I can fill you in.

The intent of my email is to confirm with your office that it is really important that the Porirua office PPIs all applications for EWV. I know that this is your current practice, but this must be maintained.

I would also note that communication between the Ministry and Ombudsman is not released as it is excluded under s55(d) OA and s2(1)(i) OIA – for this reasons we don't usually share the final opinion letters widely so we can manage any requests under the OIA or PA centrally here but should you want to see the correspondence I can send that through separately.

Any questions – let me know,

Kind regards,

Katy MacLeod
TEAM LEADER

Central Feedback Team (CFT)
Complaints and Solutions Team (CAST)
Immigration Resolutions
Ministry of Business, Innovation & Employment

katy.macleod@mbie.govt.nz | Telephone: Section 9(2)(g)
Level 12, 160 Lambton Quay, Wellington

<image001.png>

Released Under the Official Information Act 1982

Josh Kennedy

From: Alejandra Mercado
Sent: Friday, 13 September 2019 3:51 p.m.
To: Katy MacLeod; Margaret Cantlon
Cc: Mike Harvey; Gabriel Kenny; Tania Turfrey
Subject: RE: EWV - PPI instructions and SOP [IN-CONFIDENCE]

Follow Up Flag: Follow up
Flag Status: Completed

Thanks Katy. Sorry I couldn't make it today I had a meeting clash.

Tania, I've just sent you an invite.

Cheers
Ale

From: Katy MacLeod
Sent: Friday, 13 September 2019 11:33 a.m.
To: Margaret Cantlon; Alejandra Mercado
Cc: Mike Harvey; Gabriel Kenny; Tania Turfrey
Subject: EWV - PPI instructions and SOP [IN-CONFIDENCE]

Hi Margaret and Ale,

We discussed your views on the PPI instructions and SOP as recommended by the Ombudsman Office at this morning's meeting with Tania.

Ale – can you make a time to meet with Tania? She would like to hear your views on this directly so she can shape up the pros and cons.

Tania noted that Greg would need to make the decision on how we respond (response is currently due on 30 September).

Thanks

Katy MacLeod
TEAM LEADER

Central Feedback Team (CFT)
Complaints and Solutions Team (CAST)
Immigration Resolutions
Ministry of Business, Innovation & Employment

katy.macleod@mbie.govt.nz | Telephone: Section 9(2)(a)
Level 12, 160 Lambton Quay, Wellington



Josh Kennedy

From: Gabriel Kenny
Sent: Monday, 16 September 2019 3:24 p.m.
To: Katy MacLeod
Subject: RE: PPI practice for EWV applications - Korero [UNCLASSIFIED]

Follow Up Flag: Follow up
Flag Status: Completed

Katy – let's discuss this sometime. Do we still want this to go ahead?

From: Rob Perry
Sent: Monday, 16 September 2019 1:57 p.m.
To: Gabriel Kenny; Claire Owens; Fraser Stretton
Subject: RE: PPI practice for EWV applications - Korero [UNCLASSIFIED]

Hi all,

Just to confirm, the message below will be sent to 1400 Immigration Advisers and 320 Immigration lawyers.

Confirmation of potentially prejudicial information (PPI) practice when assessing applications under the Entrepreneur Work Visa (EWV) category

When to use

When an immigration officer has been allocated an application under the Entrepreneur Work Visa category to assess

Guidelines

Immigration instructions E7.15.1 (Applicants outside New Zealand) and E7.15.5 (Applicants in New Zealand) identify differences in the treatment of PPI depending on whether an applicant is in or outside New Zealand.

INZ has confirmed that instructions E7.15.5 (Applicants in New Zealand) will also apply to all applicants who have made applications under the EWV category, even if they are outside New Zealand.

If someone can confirm I'll ensure the message goes out.

Rob

Rob Perry

RELATIONSHIP MANAGER

Immigration New Zealand – Visa Services
Ministry of Business, Innovation & Employment

rob.perry@mbie.govt.nz | Tel: [REDACTED] | Fax: +64 09 914 4118

P.O Box 76895, Manukau City, Auckland 2241

NZBN 9429000106078

From: Gabriel Kenny
Sent: Monday, 16 September 2019 1:36 p.m.
To: Claire Owens; Rob Perry; Fraser Stretton
Subject: RE: PPI practice for EWV applications - Korero [UNCLASSIFIED]

Thanks Claire and Rob

My view is that this should still go ahead if possible, as we said that we would be doing that. Also, any other changes may still take some time to be implemented.

From: Claire Owens
Sent: Monday, 16 September 2019 1:33 p.m.
To: Rob Perry; Gabriel Kenny; Fraser Stretton
Subject: RE: PPI practice for EWV applications - Korero [UNCLASSIFIED]

Thanks Rob

Gabe/Fraser – unfortunately this article hasn't been published. In light of the ombudsman's decision on this, could you please confirm with Rob whether you'd like it included in the September edition?

Thanks
Claire

From: Rob Perry
Sent: Monday, 16 September 2019 11:11 a.m.
To: Claire Owens <Claire.Owens@mbie.govt.nz>
Subject: RE: PPI practice for EWV applications - Korero [UNCLASSIFIED]

Hi Claire,

All well thank you. You can take Su Choi off the distribution list as she has another job (Practice Lead)

The article hasn't gone out via Korero.

We usually wait until we are sent an article and it is confirmed to be included. Not sure why this has slipped through.

Do you want the article (or another article) released in the edition about to be finalised? I am finalising the September edition this week.

Regards,

Rob

Rob Perry

RELATIONSHIP MANAGER

Immigration New Zealand – Visa Services
Ministry of Business, Innovation & Employment

rob.perry@mbie.govt.nz | Tel: Section 9(2)(a) | Fax: +64 09 914 4118
P.O Box 76895, Manukau City, Auckland 2241

NZBN 9429000106078

From: Claire Owens
Sent: Monday, 16 September 2019 11:01 a.m.
To: Rob Perry
Cc: Su Choi; Gabriel Kenny; Fraser Stretton
Subject: RE: PPI practice for EWV applications - Korero [UNCLASSIFIED]

Hi Rob

Hope you are well. Just checking in on what happened to this item for the Korero earlier this year.

We agreed that it could go in the July edition, but it doesn't appear to have been included. Could you please let me know which edition of the Korero this article appeared in?

Thanks

Claire Owens
Advisor – People Smuggling and Trafficking in Persons

Compliance, Risk and Intelligence, Immigration New Zealand
Ministry of Business, Innovation & Employment

claire.owens@mbie.govt.nz | Telephone: +64 (0)4 901 8795
PO Box 1473, 15 Stout Street, Wellington 6011

From: Claire Owens
Sent: Wednesday, 19 June 2019 10:34 a.m.
To: Rob Perry <Rob.Perry@mbie.govt.nz>
Cc: Su Choi <Su.Choi@mbie.govt.nz>
Subject: RE: PPI practice for EWV applications - Korero [UNCLASSIFIED]

Hi Rob

The end of July is absolutely fine for this to go out, there isn't a huge rush.

Thank you

Claire

From: Rob Perry
Sent: Tuesday, 18 June 2019 8:23 a.m.
To: Claire Owens
Cc: Su Choi
Subject: RE: PPI practice for EWV applications - Korero [UNCLASSIFIED]

Hi Claire,

Thank you.

Korero will not be due for release until end of July (assuming enough content) so;

- 1) Do you want to wait until then
- 2) Do you want us to send as a separate e-mail to our distribution list now (LIA/Lawyer 1400 recipients)

Look forward to your advice.

Rob

Rob Perry

RELATIONSHIP MANAGER

Immigration New Zealand – Visa Services
Ministry of Business, Innovation & Employment

rob.perry@mbie.govt.nz | Tel: Section 9(2)(a) | Fax: +64 09 914 4118
P.O Box 76895, Manukau City, Auckland 2241

NZBN 9429000106078

From: Claire Owens
Sent: Monday, 17 June 2019 9:41 a.m.
To: Rob Perry; Su Choi
Cc: Michael Carley
Subject: FW: PPI practice for EWV applications - Korero [UNCLASSIFIED]

Hi Rob/Su

In response to feedback from the Ombudsman, we have agreed to publish the attached advice on the INZ staff toolkit and in the Korero. SDP confirmed last week that it had been published in the Global Process Manual <http://inzkit/publish/globalprocessmanual/#72528.htm>

Could you please assist with publishing it in the Korero? And please let me know if you have any questions or need changes to the format.

Thanks

Claire

From: Lariza Balina
Sent: Friday, 14 June 2019 8:53 a.m.
To: Claire Owens
Subject: RE: SOP for the INZ toolkit [UNCLASSIFIED]

Hi Claire,

This is now published in Glo Pro.

Thanks.

Regards
Lariza

From: Claire Owens
Sent: Tuesday, 11 June 2019 3:35 p.m.
To: Lariza Balina
Subject: RE: SOP for the INZ toolkit [UNCLASSIFIED]

That's great, thanks for your help Lariza.

I have reformatted the SOP to align with what's in the Global Process Manual – please see attached.

Thanks
Claire

From: Lariza Balina
Sent: Tuesday, 11 June 2019 3:34 p.m.
To: Claire Owens
Subject: RE: SOP for the INZ toolkit [UNCLASSIFIED]

Hi Claire,

Yes the Global Process Manual has the SOPs. There is really no SOP in terms of EWVs but they would still fall under Temporary Visas. Maybe we can put it under "Temporary Visas". I will discuss with my TL. I have already forwarded you request to Jason.

Thanks.

Regards
Lariza

From: Claire Owens
Sent: Tuesday, 11 June 2019 3:29 p.m.
To: Lariza Balina
Subject: RE: SOP for the INZ toolkit [UNCLASSIFIED]

Hi Lariza

Thanks for this. Is the Glo Pro the Global Process Manual? If the formatting is an issue I can easily fix this, I will just follow how it looks on the intranet.

There isn't really an ideal space that this would fit but we do need it published – I think it could have its own heading under "Assess Temporary Visas" <http://inzkit/publish/globalprocessmanual/#72403.htm>.

Thanks
Claire

From: Lariza Balina
Sent: Tuesday, 11 June 2019 3:26 p.m.
To: Claire Owens
Subject: RE: SOP for the INZ toolkit [UNCLASSIFIED]

Hi Claire,

It is me again. Is this really an SOP as its formatting is very different to the current SOP format in Glo Pro.

Thank you.

Regards

Lariza

From: Lariza Ballina
Sent: Tuesday, 11 June 2019 3:21 p.m.
To: Claire Owens
Subject: RE: SOP for the INZ toolkit [UNCLASSIFIED]

Hi Claire,

Yes I could publish the SOPs in Glo Pro. Would you be able to let me know where you want this SOP located in Glo Pro.

Thanks.

Regards
Lariza

From: Claire Owens
Sent: Tuesday, 11 June 2019 11:52 a.m.
To: Lariza Ballina
Subject: FW: SOP for the INZ toolkit [UNCLASSIFIED]

Hi Lariza

Someone in my team suggested you might know the process for getting a new SOP uploaded to the INZ toolkit. It is very short SOP and only relates to Business Migration (attached), but to settle a matter with the Ombudsman we have agreed to get it published. We will also get it published in the next Korero (but I understand Rob Perry and Su Choi are responsible for that).

I have consulted with the branch and it has been approved by my manager.

Grateful for any advice ☺

Claire

From: Michael Carley
Sent: Monday, 10 June 2019 10:36 a.m.
To: Claire Owens
Subject: RE: Provisional opinion [Section 9(2)] your ref 481815 [UNCLASSIFIED]

That's fine and good to go. 9(2)(a)

From: Claire Owens
Sent: Monday, 10 June 2019 10:34 a.m.
To: Michael Carley
Subject: RE: Provisional opinion [Section 9(2)] your ref 481815 [UNCLASSIFIED]

Hi Michael 9(2)(a)

Final (final) version for your review – after discussion with Gabe and Josh we rejigged the last sentence slightly as the old version didn't quite close things off at the end.

Thanks
Claire

Confirmation of potentially prejudicial information (PPI) practice when assessing applications under the Entrepreneur Work Visa (EWV) category

Immigration instructions E7.15.1 (Applicants outside New Zealand) and E7.15.5 (Applicants in New Zealand) identify differences in the treatment of PPI depending on whether an applicant is in or outside New Zealand.

INZ has confirmed that instructions E7.15.5 (Applicants in New Zealand) will also apply to all applicants who have made applications under the EWV category, even if they are outside New Zealand.

From: Gabriel Kenny
Sent: Friday, 7 June 2019 4:42 p.m.
To: Claire Owens
Subject: RE: Provisional opinion [Section 9(2)(a)] your ref 481815 [UNCLASSIFIED]

Happy – thanks Claire

9(2)(a)

From: Claire Owens
Sent: Friday, 7 June 2019 4:40 p.m.
To: Josh Kennedy; Gabriel Kenny
Subject: RE: Provisional opinion [Section 9(2)(a)] your ref 481815 [UNCLASSIFIED]

Ok, what about...

9(2)(a)

Confirmation of potentially prejudicial information (PPI) practice when assessing applications under the Entrepreneur Work Visa (EWV) category

Immigration instructions E7.15.1 (Applicants outside New Zealand) and E7.15.5 (Applicants in New Zealand) identify differences in the treatment of PPI depending on whether an applicant is in or outside New Zealand.

INZ has confirmed that instructions E7.15.5 (Applicants in New Zealand) will also apply to all applicants who have made applications under the EWV category, even if they are outside New Zealand.

From: Josh Kennedy
Sent: Friday, 7 June 2019 4:34 p.m.
To: Claire Owens; Gabriel Kenny
Subject: RE: Provisional opinion [Section 9(2)(a)] your ref 481815 [UNCLASSIFIED]

Yup all good – could you just state INZ has agreed to treat applicants for an Entrepreneur Work Visa in line with E7.15.5 (Applicants in New Zealand) regardless of their location.

From: Gabriel Kenny
Sent: Friday, 7 June 2019 4:32 p.m.
To: Claire Owens
Cc: Josh Kennedy
Subject: RE: Provisional opinion [Section 9(2)(a)] your ref 481815 [UNCLASSIFIED]

Looking good... maybe it's just me not being used to these, but I do think there needs to be something in the body to say that this verbal instruction is being formalised (i.e. they need to PPI offshore applications). If you think this is covered by the heading, all good

From: Claire Owens
Sent: Friday, 7 June 2019 4:09 p.m.
To: Gabriel Kenny 9(2)(a)
Cc: Josh Kennedy
Subject: FW: Provisional opinion [Section 9(2)(a)] your ref 481815 [UNCLASSIFIED]

Michael has asked that I remove the last line as it doesn't really add anything (although makes sense in the response to the Omb).

If you are both ok with it, I will then try to figure out how to get it published in the SOPs!

From: Michael Carley
Sent: Friday, 7 June 2019 4:07 p.m. 9(2)(g)
To: Claire Owens
Subject: RE: Provisional opinion [Section 9(2)(a)] your ref 481815 [UNCLASSIFIED]

Good to go

From: Claire Owens
Sent: Friday, 7 June 2019 3:49 p.m. 9(2)(a)
To: Michael Carley
Subject: RE: Provisional opinion [Section 9(2)(a)] your ref 481815 [UNCLASSIFIED]

Hi Michael

Below is the SOP I've drafted – both Josh and Gabe are happy with it. Let me know if you have any feedback.

Next will be figuring out how to get it published on the toolkit, and where...

Confirmation of potentially prejudicial information (PPI) practice when assessing applications under the Entrepreneur Work Visa (EWV) category

Immigration instructions E7.15.1 (Applicants outside New Zealand) and E7.15.5 (Applicants in New Zealand) identify differences in the treatment of PPI depending on whether an applicant is in or outside New Zealand.

Previously INZ has verbally directed staff that instructions E7.15.5 (Applicants in New Zealand) will also apply to all applicants who have made applications under the EWV category, even if they are outside New Zealand.

INZ is now confirming its universal PPI practice in writing by integrating this directive into the standard operating procedures.

From: Michael Carley
Sent: Thursday, 6 June 2019 2:09 p.m. 9(2)(a)
To: Claire Owens
Subject: FW: Provisional opinion [Section 9(2)(a)] your ref 481815 [UNCLASSIFIED]

As discussed – can you please complete a short SOP to cover this and consult with Josh K before we look to finalise it and have it in Korero and on the website.

Michael

From: Gabriel Kenny
Sent: Thursday, 6 June 2019 1:43 p.m.

To: Michael Carley
Subject: RE: Provisional opinion [Section 9(2)(a)] your ref 481815 [UNCLASSIFIED]

Thanks Michael 9(2)(a)

Happy with that – I will relay this to the Ombudsman's office

From: Michael Carley
Sent: Thursday, 6 June 2019 8:51 a.m.
To: Gabriel Kenny
Cc: Claire Owens; John Pasene
Subject: RE: Provisional opinion [Section 9(2)(a)] your ref 481815 [UNCLASSIFIED]

Gabe, 9(2)(a)

The best way would be to publish the SOP on the website and then also do a Korero article. You should remind the Ombudsman that almost all Entrepreneur applicants use an advisor so the Korero article will in fact reach most if not all applicants.

From: Gabriel Kenny
Sent: Tuesday, 4 June 2019 10:38 a.m.
To: Michael Carley
Cc: Claire Owens; John Pasene
Subject: FW: Provisional opinion [Section 9(2)(a)] your ref 481815 [UNCLASSIFIED]

Good morning Michael, 9(2)(a)

I see you're away, but maybe we can discuss this when you're back. Please see the below email.

The Ombudsman would like us to make the change of process known to applicants. I suggested a Korero article, but Claire pointed out that would only go to advisers. Perhaps a small addition to the letter acknowledging their application?

Thanks
Gabe

2(1)(b)

2(1)(g)

2(1)(g)



Ministry of Business,
Innovation & Employment

www.govt.nz - your guide to finding and using New Zealand government services

Any opinions expressed in this message are not necessarily those of the Ministry of Business, Innovation and Employment. This message and any files transmitted with it are confidential and solely for the use of the intended recipient. If you are not the intended recipient or the person responsible for delivery to the

Josh Kennedy

From: Katy MacLeod
Sent: Monday, 13 May 2019 2:17 p.m. 9(2)(a)
To: John Pasene
Cc: Gabriel Kenny; Margaret Cantlon
Subject: FW: OA investigation - Provisional opinion - Section 9(2)(a) 481815 [IN-CONFIDENCE]
Attachments: 0_1-481815-3772365.pdf

Hi John

A provisional opinion is attached regarding PPI and EWV – particularly notes that the verbal directive to revert to the practice of PPIing is insufficient.

S 2(1)(i)

2(1)(i)

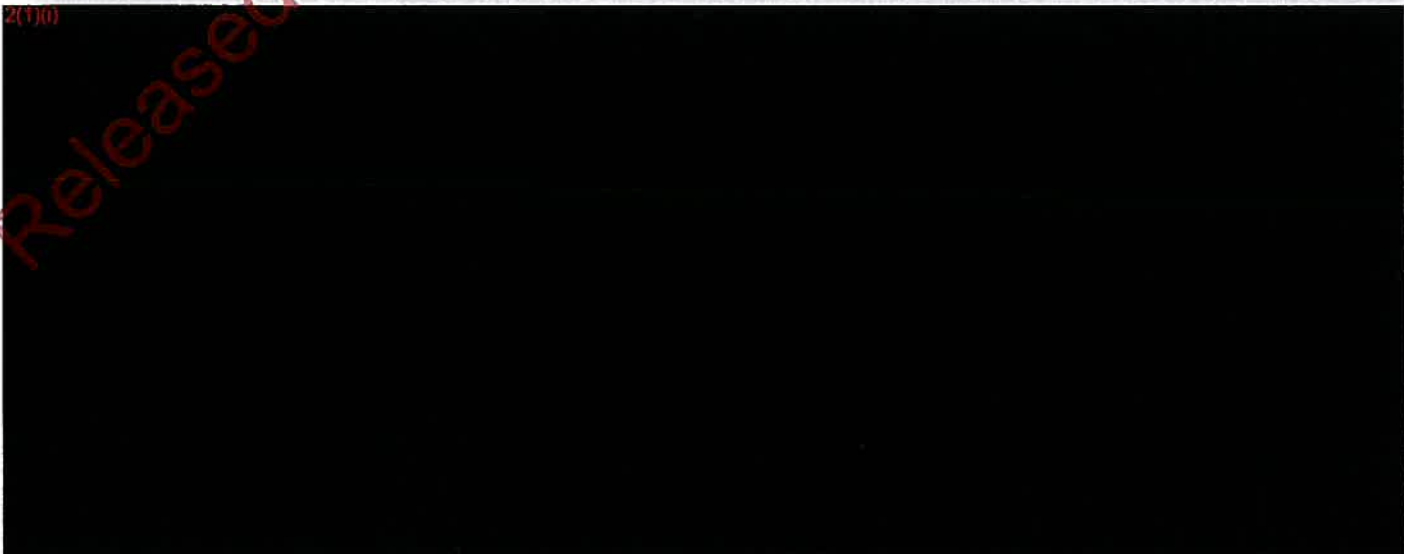


Katy MacLeod
TEAM LEADER

Central Feedback Team (CFT)
Complaints and Solutions Team (CAST)
Immigration Resolutions
Ministry of Business, Innovation & Employment

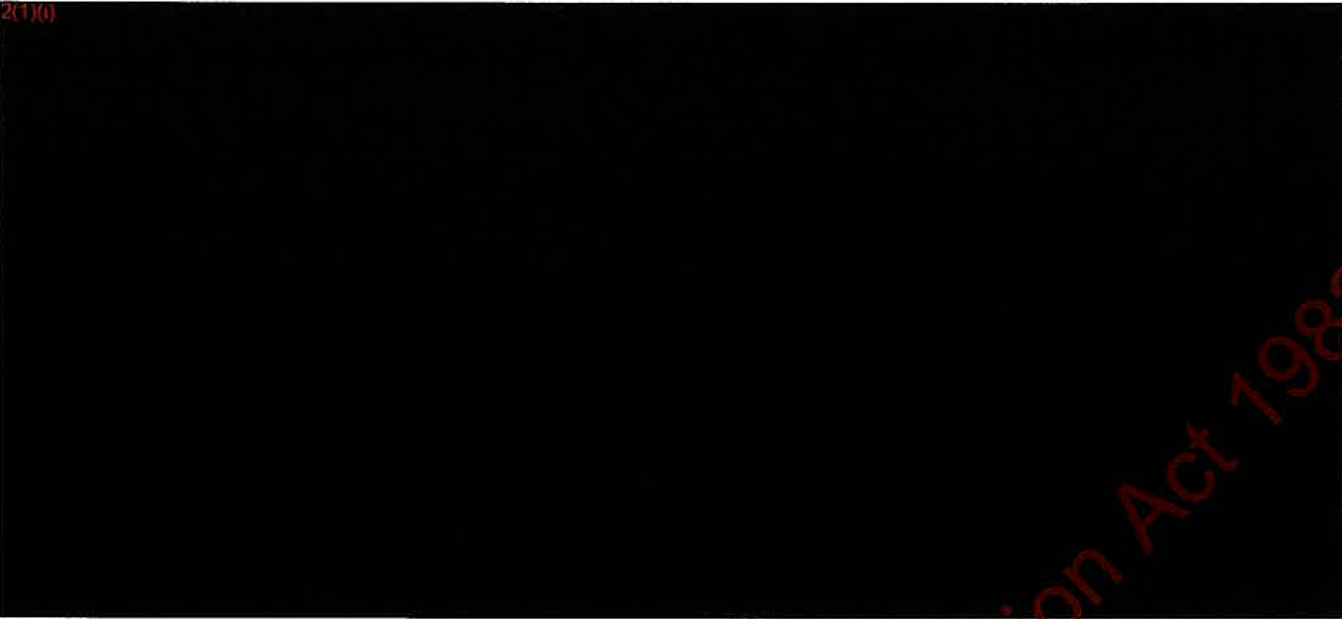
katy.macleod@mbie.govt.nz | Telephone: +64 (0)4 896 5374
Level 12, 160 Lambton Quay, Wellington

2(1)(i)



Released Under the Official Information Act 1982

2(1)(b)



Released Under the Official Information Act 1982

Josh Kennedy

From: Katy MacLeod
Sent: Friday, 13 September 2019 12:01 p.m.
To: John Pasene
Cc: Gabriel Kenny
Subject: FW: EWV - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

I have put this response in the MAKO folder for our records.

From: Craig Pontifex
Sent: Friday, 13 September 2019 11:38 a.m.
To: Katy MacLeod
Cc: Karen Swann; Ravi Bellihal; Josh Kennedy; Margaret Cantlon; Gabriel Kenny
Subject: RE: EWV - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Hi Katy

The team here have been really good at apprising me of this situation already. I have the context and we have recently confirmed (this week) with Peter Elms that we recommenced the PPI practice for both offshore applicants some time ago and this remains in place.

We understand that this practice will remain and that it is likely to be ordained in instructions.

Regards

Craig

Craig Pontifex
HEAD OF OPERATIONS - PORIRUA

Visa Services - Porirua, Immigration New Zealand
Ministry of Business, Innovation & Employment

craig.pontifex@mbie.govt.nz | Telephone: +64 (0)4 897 6331 | Mobile: Section 9(2)(a)
7 Heriot Drive, Porirua, New Zealand

NZBN 9429000106078



**MINISTRY OF BUSINESS,
INNOVATION & EMPLOYMENT**
HĪKINA WHAKATUTUKI

From: Katy MacLeod
Sent: Friday, 13 September 2019 11:27 a.m.
To: Craig Pontifex <Craig.Pontifex@mbie.govt.nz>
Cc: Karen Swann <Karen.Swann@mbie.govt.nz>; Ravi Bellihal <Ravi.Bellihal@mbie.govt.nz>; Josh Kennedy <Josh.Kennedy@mbie.govt.nz>; Margaret Cantlon <Margaret.Cantlon@mbie.govt.nz>; Gabriel Kenny <Gabriel.Kenny@mbie.govt.nz>
Subject: EWV - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Hi Craig

This email is to let you know that the Chief Ombudsman has found that the Ministry acted unreasonably in changing the PPI practice for the EWV category in October 2017. He has stated that the subsequent actions taken to advise BIS to revert to the previous practice is insufficient to remedy the situation. There have been further recommendations that we are currently working through with Operational Policy. We have also been required to provide input to the Minister's report as he has written to the Minister in accordance with section 22(3) of the Ombudsmen Act providing him with the details of his opinion.

I realise Craig that you probably don't have all the background information on this so if you want to give me a call I can fill you in.

The intent of my email is to confirm with your office that it is really important that the Porirua office PPIs all applications for EWV. I know that this is your current practice, but this must be maintained.

I would also note that communication between the Ministry and Ombudsman is not released as it is excluded under s55(d) OA and s2(1)(i) OIA – for this reasons we don't usually share the final opinion letters widely so we can manage any requests under the OIA or PA centrally here but should you want to see the correspondence I can send that through separately.

Any questions – let me know,

Kind regards,

Katy MacLeod
TEAM LEADER

Central Feedback Team (CFT)
Complaints and Solutions Team (CAST)
Immigration Resolutions
Ministry of Business, Innovation & Employment

katy.macleod@mbie.govt.nz | Telephone: +64 (0)4 896 5374
Level 12, 160 Lambton Quay, Wellington



Josh Kennedy

From: Katy MacLeod
Sent: Friday, 13 September 2019 11:27 a.m.
To: Craig Pontifex
Cc: Karen Swann; Ravi Bellihal; Josh Kennedy; Margaret Cantlon; Gabriel Kenny
Subject: EWV - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Hi Craig

This email is to let you know that the Chief Ombudsman has found that the Ministry acted unreasonably in changing the PPI practice for the EWV category in October 2017. He has stated that the subsequent actions taken to advise BIS to revert to the previous practice is insufficient to remedy the situation. There have been further recommendations that we are currently working through with Operational Policy. We have also been required to provide input to the Minister's report as he has written to the Minister in accordance with section 22(3) of the Ombudsmen Act providing him with the details of his opinion.

I realise Craig that you probably don't have all the background information on this so if you want to give me a call I can fill you in.

The intent of my email is to confirm with your office that it is really important that the Porirua office PPIs all applications for EWV. I know that this is your current practice, but this must be maintained.

I would also note that communication between the Ministry and Ombudsman is not released as it is excluded under s55(d) OA and s2(1)(i) OIA – for this reasons we don't usually share the final opinion letters widely so we can manage any requests under the OIA or PA centrally here but should you want to see the correspondence I can send that through separately.

Any questions – let me know,

Kind regards,

Katy MacLeod
TEAM LEADER

Central Feedback Team (CFT)
Complaints and Solutions Team (CAST)
Immigration Resolutions
Ministry of Business, Innovation & Employment

katy.macleod@mbie.govt.nz | Telephone: +64 (0)4 896 5374
Level 12, 160 Lambton Quay, Wellington



Josh Kennedy

From: Katy MacLeod
Sent: Friday, 13 September 2019 11:54 a.m.
To: Craig Pontifex
Subject: RE: EWV - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Thanks very much Craig,

Katy

From: Craig Pontifex
Sent: Friday, 13 September 2019 11:38 a.m.
To: Katy MacLeod
Cc: Karen Swann; Ravi Bellihal; Josh Kennedy; Margaret Cantlon; Gabriel Kenny
Subject: RE: EWV - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Hi Katy

The team here have been really good at apprising me of this situation already. I have the context and we have recently confirmed (this week) with Peter Elms that we recommenced the PPI practice for both offshore applicants some time ago and this remains in place.

We understand that this practice will remain and that it is likely to be ordained in instructions.

Regards

Craig

Craig Pontifex
HEAD OF OPERATIONS - PORIRUA

Visa Services - Porirua, Immigration New Zealand
Ministry of Business, Innovation & Employment

craig.pontifex@mbie.govt.nz | Telephone: +64 (0)4 897 6331 | Mobile: Section 9(2)(a)
7 Heriot Drive, Porirua, New Zealand

NZBN 9429000106078



From: Katy MacLeod
Sent: Friday, 13 September 2019 11:27 a.m.
To: Craig Pontifex <Craig.Pontifex@mbie.govt.nz>
Cc: Karen Swann <Karen.Swann@mbie.govt.nz>; Ravi Bellihal <Ravi.Bellihal@mbie.govt.nz>; Josh Kennedy <Josh.Kennedy@mbie.govt.nz>; Margaret Cantlon <Margaret.Cantlon@mbie.govt.nz>; Gabriel Kenny <Gabriel.Kenny@mbie.govt.nz>
Subject: EWV - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Hi Craig

This email is to let you know that the Chief Ombudsman has found that the Ministry acted unreasonably in changing the PPI practice for the EWV category in October 2017. He has stated that the subsequent actions taken to advise BIS to revert to the previous practice is insufficient to remedy the situation. There have been further recommendations that we are currently working through with Operational Policy. We have also been required to provide input to the Minister's report as he has written to the Minister in accordance with section 22(3) of the Ombudsmen Act providing him with the details of his opinion.

I realise Craig that you probably don't have all the background information on this so if you want to give me a call I can fill you in.

The intent of my email is to confirm with your office that it is really important that the Porirua office PPIs all applications for EWV. I know that this is your current practice, but this must be maintained.

I would also note that communication between the Ministry and Ombudsman is not released as it is excluded under s55(d) OA and s2(1)(i) OIA – for this reasons we don't usually share the final opinion letters widely so we can manage any requests under the OIA or PA centrally here but should you want to see the correspondence I can send that through separately.

Any questions – let me know,

Kind regards,

Katy MacLeod
TEAM LEADER

Central Feedback Team (CFT)
Complaints and Solutions Team (CAST)
Immigration Resolutions
Ministry of Business, Innovation & Employment

katy.macleod@mbie.govt.nz | Telephone: +64 (0)4 896 5374
Level 12, 160 Lambton Quay, Wellington



Josh Kennedy

From: Katy MacLeod
Sent: Wednesday, 18 September 2019 11:37 a.m.
To: Zoe Goodall
Cc: Gabriel Kenny
Subject: FW: EWV - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Hi Zoe

As requested – around 113 EWVs did not receive a PPI.

Katy

From: Karen Swann
Sent: Tuesday, 17 September 2019 3:36 p.m.
To: Katy MacLeod
Cc: Ravi Bellihal; Craig Pontifex
Subject: FW: EWV - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Hi Katy – an indication of those numbers are - this covers October 2017 until April 2018.

From 17/Oct/2017 until 01/Apr/2018 a total of 211 EWV-Interim applications were decided

17 EWV Approved
194 EWV Declined

On the 17/Oct/2017 we sent a letter to all EWV applicants in the managed queue to implement a Quick Decision model.

We provided an opportunity for all EWV interim visa applicants to submit documents in support of their applications to demonstrate they meet policy instructions and to ensure they had a complete.

This was in lieu of a PPI which would normally request the information that was missing to demonstrate the applicant meets policy instructions.

Approx 77% of EWV-Interim applicants were offshore (@162 apps) during this Quick Decision model timeframe. It is estimated approx 20% (@32 apps) of these would have still been issued a PPI if the case officer believed they could meet the objective of policy instructions (BB1) and the business plan could meet policy instructions with just a little more information.

This leaves a total of 130 and 17 of these were approved.

If we only consider the Decline apps this means approx 113 EWV's may not have been sent a PPI even though we sent a letter in October requesting information to support the business plan and applicant meet policy instructions.

Cheers
Karen

From: Katy MacLeod
Sent: Friday, 13 September 2019 3:40 p.m.
To: Karen Swann
Cc: Craig Pontifex; Ravi Bellihal
Subject: RE: EWV - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Hi Karen,

Yes – the group that weren't PPI'd are the numbers we are interested in.

Thanks Karen – have a good weekend all,

Katy

From: Karen Swann
Sent: Friday, 13 September 2019 3:17 p.m.
To: Katy MacLeod
Cc: Craig Pontifex; Ravi Bellihal
Subject: RE: EWV - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Hi Katy – looking to see if we can get this from the portal via AMS recordings of PPI letters for that period.

Just to clarify also – the only apps that were not PPI's were those that were considered to be clearly not able to be approved i.e. there were a number during this time that were PPI'd.

Cheers
Karen

From: Katy MacLeod
Sent: Friday, 13 September 2019 11:49 a.m.
To: Karen Swann
Cc: Craig Pontifex; Ravi Bellihal
Subject: RE: EWV - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Thanks Karen.

I will record your response on the relevant MAKO file.

Zoe Goodall (incoming GM for our space) has asked me to check in with you on an indication on the number of EWV applicants who did not receive a PPI letter.

Thanks,

Katy

From: Karen Swann
Sent: Friday, 13 September 2019 11:43 a.m.
To: Katy MacLeod
Cc: Craig Pontifex; Ravi Bellihal
Subject: Re: EWV - PPI - Ombudsman Final Opinion [IN-CONFIDENCE]

Hi Katy
We've had multiple emails on this from Michael C and Pete EI :)

I have given Craig a verbal summary regards background on this - rest assured we have been PPIing offshore EWV applicants since April 2018 (last year).

Current EWV on hand is very low now (approx 10) so will see what happens from here on in regards past applicants. My understanding is we would only review past applicants if we were approached to do so.

Happy to discuss

Cheers
Karen

Sent from my iPhone

On 13/09/2019, at 11:26 AM, Katy MacLeod <Katy.MacLeod@mbie.govt.nz> wrote:

Hi Craig

This email is to let you know that the Chief Ombudsman has found that the Ministry acted unreasonably in changing the PPI practice for the EWV category in October 2017. He has stated that the subsequent actions taken to advise BIS to revert to the previous practice is insufficient to remedy the situation. There have been further recommendations that we are currently working through with Operational Policy. We have also been required to provide input to the Minister's report as he has written to the Minister in accordance with section 22(3) of the Ombudsmen Act providing him with the details of his opinion.

I realise Craig that you probably don't have all the background information on this so if you want to give me a call I can fill you in.

The intent of my email is to confirm with your office that it is really important that the Porirua office PPIs all applications for EWV. I know that this is your current practice, but this must be maintained.

I would also note that communication between the Ministry and Ombudsman is not released as it is excluded under s55(d) OA and s2(1)(i) OIA – for this reasons we don't usually share the final opinion letters widely so we can manage any requests under the OIA or PA centrally here but should you want to see the correspondence I can send that through separately.

Any questions – let me know,

Kind regards,

Katy MacLeod
TEAM LEADER

Central Feedback Team (CFT)
Complaints and Solutions Team (CAST)
Immigration Resolutions
Ministry of Business, Innovation & Employment

katy.macleod@mbie.govt.nz | Telephone: +64 (0)4 896 5374
Level 12, 160 Lambton Quay, Wellington

<image001.png>

Josh Kennedy

From: Katy MacLeod
Sent: Friday, 13 September 2019 11:40 a.m.
To: Zoe Goodall
Subject: FW: EWV - PPI instructions and SOP [IN-CONFIDENCE]

From: Katy MacLeod
Sent: Friday, 13 September 2019 11:33 a.m.
To: Margaret Cantlon; Alejandra Mercado
Cc: Mike Harvey; Gabriel Kenny; Tania Turfrey
Subject: EWV - PPI instructions and SOP [IN-CONFIDENCE]

Hi Margaret and Ale,

We discussed your views on the PPI instructions and SOP as recommended by the Ombudsman Office at this morning's meeting with Tania.

Ale – can you make a time to meet with Tania? She would like to hear your views on this directly so she can shape up the pros and cons.

Tania noted that Greg would need to make the decision on how we respond (response is currently due on 30 September).

Thanks

Katy MacLeod
TEAM LEADER

Central Feedback Team (CFT)
Complaints and Solutions Team (CAST)
Immigration Resolutions
Ministry of Business, Innovation & Employment

katy.macleod@mbie.govt.nz | Telephone: +64 (0)4 896 5374
Level 12, 160 Lambton Quay, Wellington



Josh Kennedy

From: Katy MacLeod
Sent: Thursday, 12 September 2019 1:24 p.m.
To: Zoe Goodall
Subject: FW: Item for Minister's weekly report [IN-CONFIDENCE]
Attachments: EWV PPI legal opinion.pdf; FW: OA investigation - Final opinion – Luo 481815 [IN-CONFIDENCE]
Importance: High

Hi Zoe

SOPs are *usually* drafted by Operational Policy. Although I am aware that there are no SOPs in place for the Business Migration Team so this one would stand-alone.

Tania will sign out the response to the Ombudsman. We have a meeting with her tomorrow to ask what she wants to agree to as Ale has asked that the immigration instructions not be amended for at least another 6 months. Tania will advise tomorrow how she wants to approach this.

Normally Margaret would have oversight of any Ombudsman decision against INZ of this nature or she would hand this over to the relevant Manager (Ale).

Hope that all makes sense?

Katy

From: Zoe Goodall
Sent: Thursday, 12 September 2019 1:12 p.m.
To: Katy MacLeod
Subject: FW: Item for Minister's weekly report [IN-CONFIDENCE]
Importance: High

Hey Katy

Just a quick question on this one (well.... A couple actually!):

Who will be drafting the SOP for implementation in Porirua?
Will you / Margaret / we have any input or ability to review prior to its completion and roll out to ensure it meets any requirements of the Ombudsman?
Who is responsible for reporting back to the Ombudsman that we have completed this action and (I assume) providing him / his office with a copy of the SOP? – Is that us?

Sorry for all the questions. I am not ignoring your other emails either – will give you a call tomorrow to talk through as I know you'll be heading away soon.

Cheers

Z

Zoe Goodall
DIRECTOR, RISK & ASSURANCE - IMMIGRATION

Business, Strategy & Governance Branch
Immigration New Zealand



New Zealand Government

From: Margaret Cantlon
Sent: Tuesday, 10 September 2019 11:17 a.m.
To: Stephen Dunstan; Pat Toole
Cc: Andrew Craig; Alejandra Mercado; Katy MacLeod; Gabriel Kenny; John Pasene; Louisa Coxon; Michael Carley; Tania Turfrey; Nick Story; Kate Manners; Zoe Goodall
Subject: Item for Minister's weekly report [IN-CONFIDENCE]
Importance: High

Hello Stephen, I was asked by Kate Manners to provide a short piece about a recent Ombudsman final view requiring INZ to amend instructions as they relate to PPI and the Entrepreneur Work Visa category. 9(2)(h)

9(2)(h)
also attach the Ombudsman's final view. 9(2)(h)

Note that I have not been able to establish exactly when and why the practice of PPIing was reinstated but I think it came about around April 2018 due to a change of management at Porirua office and increasing 'noise' from this client group and their advocates.

Happy to discuss.

Regards,
Margaret

Final Opinion and Recommendations of the Chief Ombudsman

Prior to October 2017 offshore applicants for visas under the Entrepreneur work visa category were provided with an opportunity to comment on any potentially prejudicial information (PPI) before a decision was made on their application. From October 2017 this practice was changed to align with the November 2016 change to the way in which PPI was defined in relation to temporary entry applicants offshore. This meant that many of these applicants did not get an opportunity to comment on PPI. This practice was later reversed.

In the interim the Office of the Ombudsman investigated a complaint about the matter. On 2 September 2019 the Chief Ombudsman issued a final opinion that the Ministry acted unreasonably in changing the Potential Prejudicial Information practice for the Entrepreneur Work Visa category in October 2017, and the subsequent actions taken to advise immigration officers to revert to the previous practice were insufficient to remedy the situation. Those actions were relatively informal.

Along with his final opinion the Chief Ombudsman recommended that the Ministry take all appropriate steps to change the immigration instructions for the Entrepreneur Visa category, to reflect that for the purposes of assessing applications under this category, potentially prejudicial information is defined as it is for applicants who are in New Zealand. This means that the applicant must be given an opportunity to comment on any factual information or material that will or may adversely affect their application.

The Chief Ombudsman went on to recommend that in the interim the Ministry produce a Standard Operating Procedure document to provide guidance to all relevant staff to confirm the PPI practice for this visa category, which should be made publicly available and communicated to advisors through the appropriate forum.

The Ministry is currently considering the timing of implementation of these recommendations and is due to report back to the Chief Ombudsman by 30 September 2019.

Margaret Cantlon

Manager, Immigration Resolutions
Service Design and Performance
Immigration New Zealand
Ministry of Business, Innovation & Employment

Margaret.Cantlon@mbie.govt.nz | Telephone: +64 (0)4 896 5394 | Mobile: Section 9(2)(a)
Level 12, 160 Lambton Quay, Wellington 6011, PO Box 1473, Wellington 6140

'Best People, By Design'



**Ministry of Business,
Innovation & Employment**

Released Under the Official Information Act 1982

Josh Kennedy

From: Katy MacLeod
Sent: Monday, 2 September 2019 9:39 a.m.
To: John Pasene; Margaret Cantlon; Gabriel Kenny
Subject: FW: OA investigation - Final opinion - Sec 9(2)(g) 481815 [IN-CONFIDENCE]
Attachments: 0_1-481815-3879566.pdf

Hi everyone

Final opinion that INZ has acted unreasonably for the EWV case.

Note the recommendations made.

Has requested that INZ advise of the action taken to implement the recommendation by 30 September 2019.

John – Maria will close this in CFS and MAKO. You will need to close in AMS please. Please discuss with Margaret and Gabe about the response to the recommendation.

Thanks,

Katy

2(1)(g)

2(1)(g)

in

Josh Kennedy

From: John Pasene
Sent: Tuesday, 3 September 2019 5:10 p.m.
To: Alejandra Mercado; Margaret Cantlon
Cc: Gabriel Kenny; Katy MacLeod
Subject: RE: Final View of Ombudsman - ppi and entrepreneur work visas [UNCLASSIFIED]

Hi Ale,

Please refer to the link below:

https://mako.wd.govt.nz/otcs/llisapi.dll?func=ll&objId=88253764&objAction=browse&logStopConditionID=33243811548087131_8_open

-----Original Message-----

From: Alejandra Mercado
Sent: Tuesday, 3 September 2019 5:06 p.m.
To: Margaret Cantlon
Cc: Gabriel Kenny; John Pasene; Katy MacLeod
Subject: RE: Final View of Ombudsman - ppi and entrepreneur work visas [UNCLASSIFIED]

Hi

9(2)(g)(i)



And thanks, I definitely want to be included in any correspondence that relates to amending immigration instructions. Perhaps it isn't always clear what direction these complaints will go at an early stage and maybe that's not feasible?

I'm not sure our team is all that familiar with these Omb/Stat complaints processes so there's probably some value in getting one of your people along to an Op Pol team meeting to shed some light on this at some stage.

Could someone send me the previous correspondence with the Omb on this, maybe the MAKO link?

Cheers
Ale

-----Original Message-----

From: Margaret Cantlon
Sent: Tuesday, 3 September 2019 4:31 p.m.
To: Alejandra Mercado
Cc: Gabriel Kenny; John Pasene; Katy MacLeod
Subject: Final View of Ombudsman - ppi and entrepreneur work visas [UNCLASSIFIED]

Hi Ale, I see that Gabe will be setting up a meeting and he will invite you. I don't think it will set a precedent for other PPI as it is very specific to the entrepreneur category and I'm sure we can find a way around wording.

I've attached the chain of correspondence between INZ and the OotO. We did not seek specific legal advice in handling this complaint but Tania signs out the correspondence. I understand that Jason and Paul were invited to a meeting after the provisional view was received but that Chris came on behalf of Op Pol instead. Craig Forbes from Policy also attended (see attached).

I don't think there has been a process failure as such although we will note that in future any provisional views that come through that relate to instructions will be forwarded to you as well.

Regards,
Margaret

Margaret Cantlon
Manager, Immigration Resolutions
Service Design and Performance
Immigration New Zealand
Ministry of Business, Innovation & Employment

Margaret.Cantlon@mbie.govt.nz | Telephone: +64 (0)4 896 5394 | Mobile: Section 9(2)(a) level 12, 160
Lambton Quay, Wellington 6011, PO Box 1473, Wellington 6140

'Best People, By Design'

-----Original Message-----

From: ApeosPort-VI C4471 [<mailto:PM-WLH-1305@mbie.govt.nz>]

Sent: Tuesday, 3 September 2019 4:16 p.m.

To: Margaret Cantlon

Subject: Scan Data from PM-WLH-1305

Sent by: [Margaret.Cantlon@mbie.govt.nz] Number of Images: 16 Attachment File Type: PDF

Device Name: ApeosPort-VI C4471

Device Location:

Confirmation of potentially prejudicial information (PPI) practice when assessing applications under the Entrepreneur Work Visa (EWV) category

When to use

When an immigration officer has been allocated an application under the Entrepreneur Work Visa category to assess

Guidelines

Immigration instructions E7.15.1 (Applicants outside New Zealand) and E7.15.5 (Applicants in New Zealand) identify differences in the treatment of PPI depending on whether an applicant is in or outside New Zealand.

INZ has confirmed that instructions E7.15.5 (Applicants in New Zealand) will also apply to all applicants who have made applications under the EWV category, even if they are outside New Zealand.

Released Under the Official Information Act 1982

Josh Kennedy

From: Margaret Cantlon
Sent: Tuesday, 3 September 2019 4:31 p.m.
To: Alejandra Mercado
Cc: Gabriel Kenny; John Pasene; Katy MacLeod
Subject: Final View of Ombudsman - ppi and entrepreneur work visas [UNCLASSIFIED]
Attachments: 03092019161626-0001.pdf; [UNCLASSIFIED]

Hi Ale, I see that Gabe will be setting up a meeting and he will invite you. I don't think it will set a precedent for other PPI as it is very specific to the entrepreneur category and I'm sure we can find a way around wording.

I've attached the chain of correspondence between INZ and the OotO. We did not seek specific legal advice in handling this complaint but Tania signs out the correspondence. I understand that Jason and Paul were invited to a meeting after the provisional view was received but that Chris came on behalf of Op Pol instead. Craig Forbes from Policy also attended (see attached).

I don't think there has been a process failure as such although we will note that in future any provisional views that come through that relate to instructions will be forwarded to you as well.

Regards,
Margaret

Margaret Cantlon
Manager, Immigration Resolutions
Service Design and Performance
Immigration New Zealand
Ministry of Business, Innovation & Employment

Margaret.Cantlon@mbie.govt.nz | Telephone: +64 (0)4 896 5394 | Mobile: Section 9(2)(a) Level 12, 160
Lambton Quay, Wellington 6011, PO Box 1473, Wellington 6140

'Best People, By Design'

-----Original Message-----

From: ApeosPort-VI C4471 [<mailto:PM-WLH-1305@mbie.govt.nz>]
Sent: Tuesday, 3 September 2019 4:16 p.m.
To: Margaret Cantlon
Subject: Scan Data from PM-WLH-1305

Sent by: [Margaret.Cantlon@mbie.govt.nz] Number of Images: 16 Attachment File Type: PDF

Device Name: ApeosPort-VI C4471
Device Location:

Josh Kennedy

From: Alejandra Mercado
Sent: Tuesday, 17 September 2019 3:00 p.m.
To: Simon Barrett; Mike Harvey
Subject: Fwd: Final View of Ombudsman - ppi and entrepreneur work visas [UNCLASSIFIED]

Sent from my iPhone

Begin forwarded message:

From: Fraser Richards <Fraser.Richards@mbie.govt.nz>
Date: 4 September 2019 at 10:59:04 AM NZST
To: Alejandra Mercado <Alejandra.Mercado@mbie.govt.nz>
Subject: RE: Final View of Ombudsman - ppi and entrepreneur work visas [UNCLASSIFIED]

[LEGALLY PRIVILEGED]

9(2)(h)

9(2)(h)



-----Original Message-----

From: Alejandra Mercado
Sent: Tuesday, 3 September 2019 4:51 p.m.
To: Fraser Richards
Subject: FW: Final View of Ombudsman - ppi and entrepreneur work visas [UNCLASSIFIED]

I'd be keen for your vies on this.

-----Original Message-----

From: Margaret Cantlon

Sent: Tuesday, 3 September 2019 4:31 p.m.
To: Alejandra Mercado
Cc: Gabriel Kenny; John Pasene; Katy MacLeod
Subject: Final View of Ombudsman - ppi and entrepreneur work visas [UNCLASSIFIED]

Hi Ale, I see that Gabe will be setting up a meeting and he will invite you. I don't think it will set a precedent for other PPI as it is very specific to the entrepreneur category and I'm sure we can find a way around wording.

I've attached the chain of correspondence between INZ and the OotO. We did not seek specific legal advice in handling this complaint but Tania signs out the correspondence. I understand that Jason and Paul were invited to a meeting after the provisional view was received but that Chris came on behalf of Op Pol instead. Craig Forbes from Policy also attended (see attached).

I don't think there has been a process failure as such although we will note that in future any provisional views that come through that relate to instructions will be forwarded to you as well.

Regards,
Margaret

Margaret Cantlon
Manager, Immigration Resolutions
Service Design and Performance
Immigration New Zealand
Ministry of Business, Innovation & Employment

Margaret.Cantlon@mbie.govt.nz | Telephone: +64 (0)4 896 5394 | Mobile: Section 9(2)(a)
Section 9(2) Level 12, 160 Lambton Quay, Wellington 6011, PO Box 1473, Wellington 6140

'Best People, By Design'

-----Original Message-----

From: ApeosPort-VI C4471 [<mailto:PM-WLH-1305@mbie.govt.nz>]
Sent: Tuesday, 3 September 2019 4:16 p.m.
To: Margaret Cantlon
Subject: Scan Data from PM-WLH-1305

Sent by: [Margaret.Cantlon@mbie.govt.nz] Number of Images: 16 Attachment File Type: PDF

Device Name: ApeosPort-VI C4471
Device Location:

Josh Kennedy

From: John Pasene
Sent: Friday, 6 September 2019 10:05 a.m.
To: Mike Harvey
Subject: RE: OA investigation - Final opinion - [Redacted] 481815 [IN-CONFIDENCE]
Attachments: RE: [Redacted] [UNCLASSIFIED]

9(2)(a)

Take 3, email attached.

From: Mike Harvey
Sent: Friday, 6 September 2019 9:50 a.m.
To: John Pasene
Subject: RE: OA investigation - Final opinion - [Redacted] 481815 [IN-CONFIDENCE]

9(2)(a)

Hi John

You need to un-archive it first. (Select the email in the inbox; Go to Enterprise Vault; hit 'restore' and wait a moment ...it should restore to a normal looking email)

M.

From: John Pasene
Sent: Friday, 6 September 2019 9:45 a.m.
To: Mike Harvey
Cc: Gabriel Kenny; Simon Barrett
Subject: RE: OA investigation - Final opinion - [Redacted] 481815 [IN-CONFIDENCE]

9(2)(a)

Hi Mike. See the attached generic advice that was sent to advisors. It seems that BMB no longer holds a copy of the email that was sent to advisors.

Regards

From: Mike Harvey
Sent: Friday, 6 September 2019 9:27 a.m.
To: John Pasene
Cc: Gabriel Kenny; Simon Barrett
Subject: FW: OA investigation - Final opinion - [Redacted] 481815 [IN-CONFIDENCE]

9(2)(a)

Hi John

Can you fill in a gap or two? The OMB provisional letter (first attachment, see red bit) talks about some email in Sept 2017 to advisors. Do you have a copy of that email? Is it perhaps the same email/letter Steffan refers to in his email to you (second attachment)? Whether same or different, can we also see the attachment Steffan refers to?

Mike

From: Simon Barrett
Sent: Wednesday, 4 September 2019 5:14 p.m.
To: Mike Harvey; Paul Gilbert
Cc: Kathy Tait
Subject: RE: OA investigation - Final opinion - [Redacted] 481815 [IN-CONFIDENCE]

9(2)(a)

Do you have a copy of the letter to LIAs saying INZ would treat all offshore temp the same?

From: Mike Harvey
Sent: Wednesday, 4 September 2019 5:01 p.m.
To: Paul Gilbert

9(2)(a)

Cc: Kathy Tait; Simon Barrett
Subject: FW: OA investigation - Final opinion - [redacted] 81815 [IN-CONFIDENCE]

Provisional view attached which gives more of the rationale for recommendation.

From: Jason Austin
Sent: Tuesday, 3 September 2019 1:24 p.m.
To: Simon Barrett; Mike Harvey
Subject: FW: OA investigation - Final opinion - [redacted] 81815 [IN-CONFIDENCE]

Ombudsmen decision re Entrepreneur Work Visas, as discussed.

From: Chris Holland
Sent: Tuesday, 3 September 2019 9:58 a.m.
To: Alejandra Mercado; Kathy Tait; Paul Gilbert; Jason Austin
Cc: Gabriel Kenny
Subject: FW: OA investigation - Final opinion - [redacted] 81815 [IN-CONFIDENCE]

FYI

From: Gabriel Kenny
Sent: Tuesday, 3 September 2019 9:43 a.m.
To: Michael Carley; Claire Owens; Craig Forbes; Chris Holland
Cc: John Pasene
Subject: FW: OA investigation - Final opinion - [redacted] 81815 [IN-CONFIDENCE]

Hi everyone,

Just passing on the Ombudsman's final opinion that WD1 instructions should be changed in respect of PPI. (Please only pass on if necessary)

We will set up a meeting soon to discuss a way forward.

Thanks
Gabe

Gabriel Kenny TECHNICAL SPECIALIST

Immigration Resolutions, Immigration New Zealand
Ministry of Business, Innovation & Employment

gabriel.kenny@mbie.govt.nz | Telephone: +64 (0)4 896 5402
Level 12, 160 Lambton Quay | PO Box 1473, Wellington 6140

From: Katy MacLeod
Sent: Monday, 2 September 2019 9:39 a.m.
To: John Pasene; Margaret Cantlon; Gabriel Kenny
Subject: FW: OA investigation - Final opinion - [redacted] 81815 [IN-CONFIDENCE]

Hi everyone

Final opinion that INZ has acted unreasonably for the EWV case.

Note the recommendations made.

Released Under the Official Information Act 1982

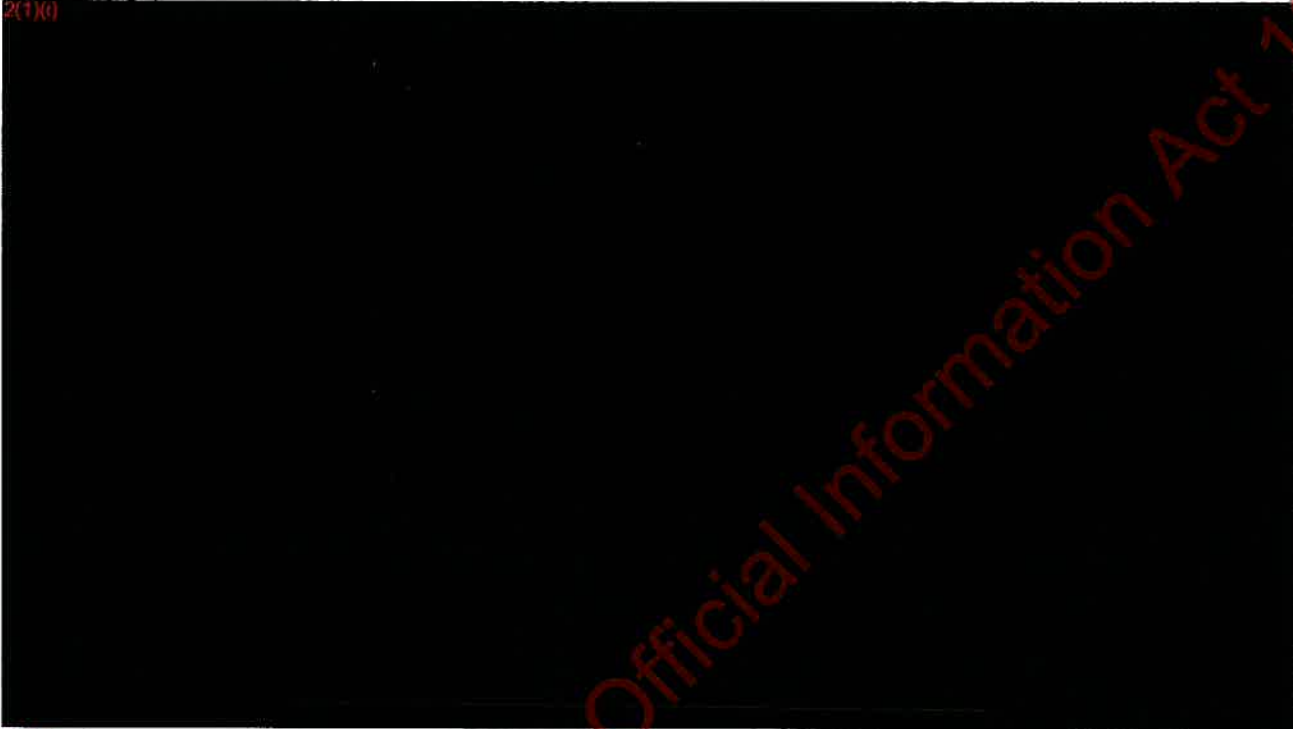
Has requested that INZ advise of the action taken to implement the recommendation by 30 September 2019.

John – Maria will close this in CFS and MAKO. You will need to close in AMS please. Please discuss with Margaret and Gabe about the response to the recommendation.

Thanks,

Katy

2(1)(g)



2(1)(g)



Released Under the Official Information Act 1982

Josh Kennedy

From: Steffan Christensen
Sent: Wednesday, 13 February 2019 3:37 p.m.
To: John Pasene
Cc: Karen Swann; Josh Kennedy; Ravi Bellihal
Subject: RE: [Section 9(2)(a)] UNCLASSIFIED]
Attachments: BMB Offshore PPI process letter Final (2).docx

9(2)(a)

Good Day,

Attached is the letter sent to all advisor and applicants. Prior to this letter, all offshore temporary visa applicants received a PPI letter in all instances even though temporary instructions do not require it in all circumstances.

In this client's case, the applicant lodged 3 EWV applications (2 EWV Interims and 1 Reconsideration). All of these were for the same tourism business. He was declined on 21/July/2016 after a PPI was sent to his advisor.

The applicant sent in the same business plan again as a new application. We declined it on 30/Jan/2018 it without a PPI and noted in the write-up:

We also considered giving the PA the opportunity to comment before we made this decision to decline the application. However, all concerns with the application are based on information provided by the applicant or their advisor, or are reasonable conclusions drawn from that information. The concerns were not considered potentially prejudicial information as per immigration instructions E7.15 (see appendix). We therefore made the decision to decline the application without seeking further comment.

9(2)(a)

A subsequent reconsideration request was made by [Section 9(2)(a)] (the same advisor) for a reconsideration of this application.

When reconsidering the application, we sent another PPI on the same business plan which had already been assessed twice before as not meeting policy instructions.

The advisor was given an extension on the PPI deadline to facilitate a response. This was declined again on 30/May/2018.

After three assessments and 2 PPI's on this application, I am confident the advisor and applicant had every reasonable opportunity to address concerns the Business plan did not meet policy instructions.

I note, PPI's were sent where there was an expectation that a PPI was required under INZ policy instructions. The letter did not mean we would not send a PPI, but that if an applicant was offshore and clearly did not meet policy instructions, then a PPI would only be sent if required.

It is important the Office of the Ombudsman know that, when appropriate, PPI's were sent to applicants despite the letter attached to this email.

Let me know if you need anything else.

Cheers,

Steffan Christensen
TECHNICAL ADVISOR
Visa Services - Porirua, Immigration New Zealand
Ministry of Business, Innovation & Employment

Steffan.Christensen@mbie.govt.nz | Telephone: +64 (04) 896-5563
www.immigration.govt.nz

NZBN 9429000106078



**MINISTRY OF BUSINESS,
INNOVATION & EMPLOYMENT**
HĪKINA WHAKATUTUKI

From: Jonathan Maitland
Sent: Wednesday, 13 February 2019 2:48 p.m.
To: Ravi Bellihal; John Pasene; Andrew Newbery
Cc: Karen Swann; Steffan Christensen; Josh Kennedy
Subject: RE: Section 9(2)(a) [UNCLASSIFIED] 9(2)(a)

Actually the best person would be Steffan or Josh as this is an ENT applicant so the decision was made while Stefan was managing that team I think.

Jonathan Maitland
IMMIGRATION MANAGER

Visa Services - Porirua, Immigration New Zealand
Ministry of Business, Innovation & Employment

Jonathan.maitland@mbie.govt.nz | Telephone: +64 (04) 896 5554 | (027) 424 0089
www.immigration.govt.nz

NZBN 9429000106078



**MINISTRY OF BUSINESS
INNOVATION & EMPLOYMENT**
HĪKINA WHAKATUTUKI

From: Ravi Bellihal
Sent: Wednesday, 13 February 2019 1:30 p.m.
To: John Pasene; Jonathan Maitland; Andrew Newbery
Cc: Karen Swann
Subject: RE: Section 9(2)(a) [UNCLASSIFIED] 9(2)(a)

Kia Ora and Good Afternoon John,

I am forwarding your request to Jonathan as he may be in position to provide you with the information requested, change of process, etc. but have included Andrew just in case – Andrew currently manages the Investor/Entrepreneur teams.

Have a good day.

Kind Regards

Ravi Bellihal
HEAD OF OPERATIONS MANAGER (Acting)

Visa Services - Porirua, Immigration New Zealand
Ministry of Business, Innovation & Employment

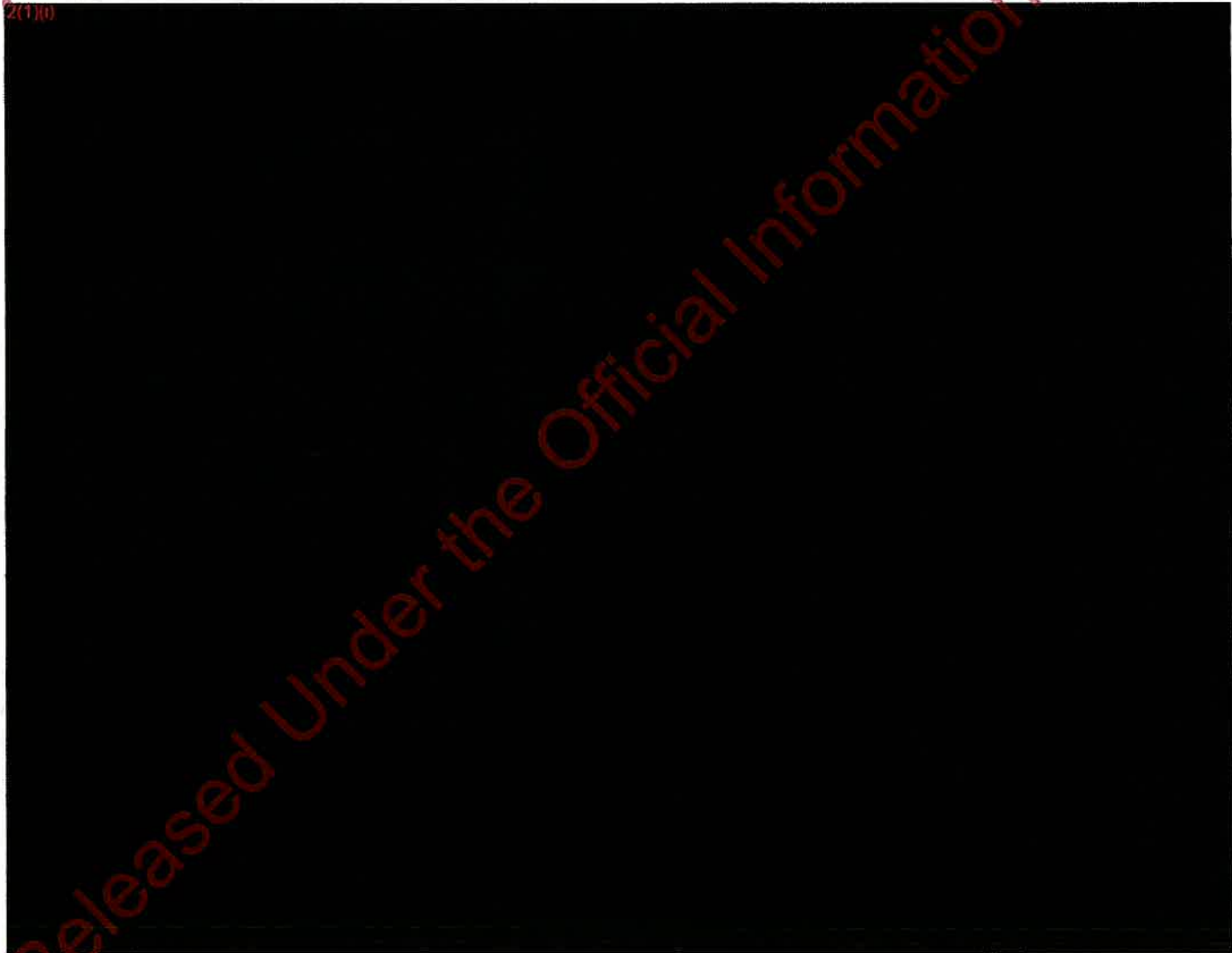
Ravi.Bellihal@mbie.govt.nz | Telephone: +64 (04) 901 1212 | Mobile: Section 9(2)(a)
www.immigration.govt.nz

NZBN 9429000106078



**MINISTRY OF BUSINESS,
INNOVATION & EMPLOYMENT**
HĪKINA WHAKATUTUKI

2(1)(b)



**Ministry of Business,
Innovation & Employment**

Dear _____,

You are receiving this letter because you represent one or more applications for an Entrepreneur Work Visa (Interim) which is awaiting allocation to a case officer in the managed queue at the Business Migration Branch.

As you may be aware, this queue is currently subject to a significant backlog. Applications are currently taking around 10 months for allocation to a Business Immigration Specialist. We acknowledge that this situation is unacceptable and that we cannot continue operating with such significant wait times. Market demand for this category has grown and we have therefore undertaken a process review to ensure correct processes are being followed.

As a result of this process review, the Business Immigration Specialists processing the Entrepreneur Work Visa (Interim) applications will be adhering to the instructions located at E7.15 (included below for your reference). Entrepreneur Work Visa (Interim) applications are applications for temporary visas, and therefore (unless explicitly directed by instructions) the generic instructions which apply to them are the generic temporary entry instructions. A consistent adherence to the correct instructions for every application across Immigration New Zealand is necessary in order to uphold the principles of fairness and natural justice.

The principles of fairness include considering whether an applicant is informed of information that might harm their case (often referred to as potentially prejudicial information). There is a definition of potentially prejudicial information (PPI) for principal applicants who are outside of New Zealand at E7.15.1:

E7.15.1 Applicants outside New Zealand

For the purpose of assessing an application for a temporary entry class visa from an applicant who is outside New Zealand, PPI is factual information or material that:

- a. was not obtained from the applicant or the applicant's authorised representative or agent; and*
- b. is not publicly available, or that the applicant is not necessarily aware of; and*
- c. will or may adversely affect the outcome of an application; and*
- d. the applicant has not previously had an opportunity to comment on.*

Note: *The submission of false or misleading information by an applicant or their agent is not potentially prejudicial information as that information has been obtained from the applicant or their agent.*

Effective 21/11/2016

This means that, if a principal applicant is outside of New Zealand, unless a decision is being based on information which does meet the definition of PPI, we will not be informing you of this information prior to making a decision on the application. Please note that information must meet each of these above criteria in order to be considered PPI.

For those principal applicants who are onshore, there will be no change to our current process.

Whilst this may not apply to the applications submitted by you or your organisation, we have noted an increase in applications which clearly do not contain evidence which demonstrates that the

applicants meet the relevant immigration instructions. We have concerns that some representatives may be waiting to receive a PPI letter to tell them what information INZ expects them to submit. We do not consider this to be acceptable, and we believe that by following the correct process we can spend more time on the quality applications which are submitted by the majority of representatives, reducing wait times and providing a better level of service to all our customers.

While Immigration New Zealand must strive to ensure its decisions are consistent (A1.5, effective 29 November 2010), the fact that we may have allowed comment on non-PPI material in other applications does not provide a justification for a process outside of the instructions.

We do note that, previously, prior to a decision being made you have been afforded an opportunity to comment on information even when it was outside of the above definition of PPI material. Because of this, out of fairness we have elected to afford you the opportunity to send an update to your clients' applications, in case you feel that there is any missing information, or any information which demonstrates that your client does not meet the relevant instructions. **Please send any updates to our office by 16 October 2017.** Please clearly reference the application number for any information that you send.

After 16 October 2017, we will continue assessing the offshore Entrepreneur Work Visa (Interim) applications in the managed queue using the E7.15.1 definition of PPI to inform our process for principal applicants who are outside of New Zealand. New Entrepreneur Work Visa (Interim) applications received will also be assessed using this definition.

If you have any questions about this process, you can send enquiries to INZ.Entrepreneurs@mbie.govt.nz.

Released Under the Official Information Act 1982