



**Ministry of Business, Innovation and Employment Briefing: Terms of Reference for the Review of the Immigration Profiling Branch and Associated Risk Management Functions**

Date Sent:	27 June 2013	Tracker No:	13/03532
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**Action Sought**

	Action Sought	Deadline for Action
Minister of Immigration (Hon Michael Woodhouse)	Agree to the attached Terms of Reference and refer to the Minister of Foreign Affairs and the Minister in Charge of the New Zealand Security Intelligence Service	N/A
Minister of Foreign Affairs (Hon Murray McCully) Minister in Charge of the New Zealand Security Intelligence Service (Rt Hon John Key)	For your information, and feedback if you wish	

**Agencies Consulted (include contact where relevant)**

Ministry of Foreign Affairs and Trade  
New Zealand Security Intelligence Service  
Office of the Department of Prime Minister and Cabinet  
New Zealand Police

**Contact for Telephone Discussion (if required)**

Name	Position	Telephone	1st Contact
Steve McGill			√

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**Minister's Office Actions (if required)**

For referral to the offices of the Prime Minister and the Minister of Foreign Affairs

**Enclosures: Terms of Reference for the Review of the Immigration Profiling Branch and Associated Risk Management Functions – Appendix A**

**MBIE Briefing: Minister's Comments**

27 June 2013

**Ministry of Business, Innovation and Employment Briefing:**  
**Terms of Reference for the Review of the Immigration Profiling Branch**

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**Recommended Action**

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

- a) **agree** to the proposed scope, governance and timelines of the review of the processes INZ has adopted to manage immigration security and reputational risk; and

**Agree / Discuss**

- b) **sign** the attached letters to the Prime Minister and the Minister of Foreign Affairs and Trade.

**Agree / Discuss**

Steve McGill  
**Acting Deputy Chief Executive - Immigration  
Ministry of Business, Innovation  
and Employment**

Hon Michael Woodhouse  
**Minister of Immigration**

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## Purpose

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1. This briefing provides you with a brief outline on the proposal to review the Immigration Profiling Branch (IPB). Also attached is a draft Terms of Reference which defines the proposed scope, governance and timelines of this review.

## Background and Context

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2. In May 2005, the IPB was established to make decisions on applications from migrants that might pose a risk to New Zealand's international reputation. International reputation is defined as "an applicant who may have had an association with, membership of or involvement with any government, regime, group or agency that has advocated or committed war crimes, crimes against humanity and/or other gross human rights abuses".
3. At that time of its establishment, the Officials Domestic and External Security Committee formed the Inter-agency Advisory Group, a working group of officials from INZ, the Department of Prime Minister and Cabinet, New Zealand Security Intelligence Service, New Zealand Police and the Ministry of Foreign Affairs and Trade. This group supported INZ to determine criteria to identify visa applicants that may pose an unacceptable risk to New Zealand's international reputation and should therefore be referred to the IPB for a decision. The criteria is country-based. The referral of *all* visa applications from particular countries was considered, at the time, to be the most appropriate mechanism to manage reputational risk.
4. As set out in the attached Terms of Reference, the proposal is that the IPB be reviewed over the next three months with resulting outcomes and recommendations submitted to Cabinet in October 2013.

## INZ Strategy

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5. INZ's vision is that in 2015 we are recognised as a trusted partner delivering outstanding immigration services and bringing in the best people New Zealand needs to prosper. In order to achieve this, INZ needs to continually review and develop its business processes, practices, infrastructure and the technology it uses.
6. To achieve this, INZ has recently reviewed and implemented the way that it delivers its services with a focus on achieving:
  - Operational excellence
  - Providing better services with greater reach at lower cost

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In the implementation of this review, the structure of the business was changed, some branches were recommended for closure and Visa Application Centres<sup>1</sup> were introduced. The IPB however remained relatively unchanged because any significant changes to its operation would need careful management and Cabinet agreement.

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<sup>1</sup> INZ has partnered with Visa Application Centres to improve the service that it offers. For applications that are lodged with a VAC, Immigration Officers can proceed directly to the decision stage.

## Why a review of the IPB is timely

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8. INZ considers that a formal review of the IPB is required to ensure that the business objectives of INZ continue to be met and that the:
  - original intent as agreed by Cabinet continues to be relevant
  - current model applied in 2005 is still fit for purpose
  - current structure is efficient and effective in managing risks to our international reputation.

## Who have we consulted with?

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9. INZ has circulated the Terms of Reference to the Ministry of Foreign Affairs and Trade, the Security Intelligence Service, Police and also the Department of Prime Minister and Cabinet. These agencies are comfortable with the proposed review.

## Next Steps

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10. The draft Terms of Reference will be discussed and noted by the Officials Domestic and External Security Committee meeting on 5 July 2013.
11. A Cabinet paper will be developed for consideration by Cabinet in October 2013.

RELEASED UNDER THE OFFICIAL INFORMATION ACT



## DRAFT

### Terms of Reference for the Review of the Immigration Profiling Branch and Associated Risk Management Functions

#### Background

1. Immigration risk is managed through all parts of Immigration New Zealand (INZ). Security and reputational risks are primarily managed through the Immigration Profiling Branch (IPB) *S6a S6c*

2. The IPB was established in 2005 following the naming in Parliament of two Iraqi nationals who were identified as having an association with Saddam Hussein. The presence of these individuals here was deemed, at the time, to pose a risk to New Zealand's international reputation. The IPB processes applications from countries identified as high risk. *S6a S6c*

3. Since the IPB was set up, further work has been added to its brief and it is now responsible for determining applications involving *S6a S6c* and assessing counter proliferation risks with particular regard to the proposed fields of study for foreign students. In the context of INZ Vision 2015 and its change programme for the Global Service Delivery Model (GSDM) and the Immigration Global Management System (IGMS), it is timely to review the IPB's role given the technology advancements that IGMS may provide.

4. Other immigration security risk management processes do not directly involve the IPB, *S6a S6c*  
This review will look at the value (from the perspective of INZ, but also a wider frame of NZ Inc / whole-of-government) of this screening function, and whether there are better alternatives.

#### INZ's Vision 2015

5. INZ's Vision 2015 is one of the drivers of this review. The Vision is "to be recognised as a trusted partner, delivering outstanding immigration services and bringing the best people New Zealand needs to prosper". Achieving the Vision will be a key objective when determining the best operating model. INZ has recently reviewed, and is implementing, through a new GSDM, the way that it delivers its services with a focus on:

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- Operational excellence;
- Providing better services with greater reach at lower cost; and
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6. In the implementation of the review visa processing within the business was changed, some branches were recommended for closure and Visa Application Centres (VACs) were introduced<sup>1</sup>.

### INZ's Global Service Delivery Model (GSDM)

7. The GSDM documentation recommended that the work of the IPB be carried out by INZ processing hubs. However, a decision was made following the GSDM consultation to retain a specialist office in Wellington for immigration profiling for the time being.

S6C S6C

8. Further options were also identified as needing to be explored (e.g. possible relocation of the IPB with the S6C In the interim a fixed term immigration manager has been appointed to the IPB, pending further work on options for its future.

### Immigration Global Management System (IGMS)

9. IGMS will bring significant changes to the INZ operating model, some of which may render aspects of current business design for the IPB redundant, for example the

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Work needs to be done to ensure that the future model for managing security and reputational risk takes full advantage of the functionality IGMS will offer.

### Problem Definition

10. In funding the establishment of the IPB in 2005, Cabinet agreed [CBC MIN (05) 17/14] that the outcomes sought were to:
- a. Enhance the quality and consistency of decision making;
  - b. Control decision making in New Zealand;
  - c. Apply profiling across the business;
  - d. Improve the reach and quality of client risk management strategies (including profiling, fraud and border security);
  - e. Fit the configuration and resourcing of the delivery network and the IT infrastructure for the tasks required;
  - f. Continue to offer good customer service and attract quality migrants; and
  - g. Raise the level of public confidence in immigration decision making.

11. The Cabinet paper also noted that "the strategy envisages that within the next five years immigration decision making will be moved onshore, with decisions made by New Zealanders". A decision was subsequently taken by Cabinet not to proceed with this proposal however, as it was considered impracticable.

<sup>1</sup> INZ has partnered with VACs to improve the service that it offers. For applications that are lodged with a VAC, Immigration Officers can proceed directly to the decision stage.

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12. The purpose of this review is to:
  - Review against 2005 intent: review to what extent Cabinet's original intent has been met;
  - Fit-for-Purpose: review, and consider if the current model is still "fit-for-purpose", particularly in the context of a changing operating environment and perceptions of an appetite for risk;
  - Effectiveness and efficiency: review current structure in terms of its cost and impact and assess a number of alternative options/models that may offer a more effective and/or more efficient way of achieving Cabinet's intent.
13. A review of the IPB and its function is therefore required to ensure that it continues to meet Cabinet's 2005 outcomes while ensuring that reputational risks are appropriately managed.

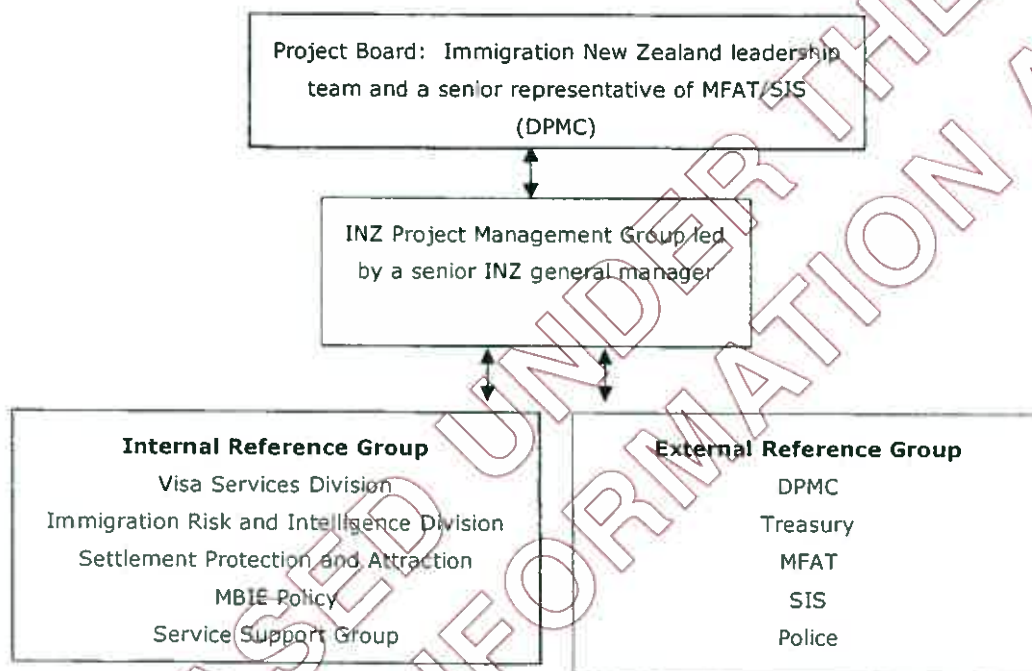
### Scope

14. The project is limited to investigating whether there are better ways of managing immigration security and reputational risks than the current organisational structure and business process, with a particular focus on evaluating to what degree the outcomes agreed to by Cabinet have been met and whether the current arrangements are the most effective way of managing reputational risk. This will involve looking at current state, in-depth analysis and also the development of a range of options. Issues that will be addressed in this review include:
  - Is the current way INZ defines and manages risk to New Zealand's international reputation still appropriate?;
  - Is defining risk by country the best mechanism and process for identifying high risk applications?;
  - What is the most effective way of assessing risk to our international reputation? (This includes identifying the cost of accepting a migrant who is deemed to pose an unacceptable risk to New Zealand's reputation);
  - How can any new organisational strategy for managing reputational risk leverage the capabilities IGMS will offer?;
  - What do our Five Country Conference partners do in this area and what learning's are there for New Zealand?;
  - Are we making the most use of our New Zealand partners to support our decision making?; and
  - Full analysis, including a cost-benefit analysis, of the current model versus a range of alternatives. This will include looking at the present cost of IPB decisions against the benefits which is/has been derived from screening out those who pose reputational risk (since 2005, the IPB has been allocated approximately \$20million, and the cost of making an IPB decision has increased to just over \$600 since 2008/09 as opposed to \$110 for other branches).
15. The scope does not include any purview over the operational management of the IPB or any potential successor(s).

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**Governance and Resources**

16. As this review impacts across INZ and externally, INZ will lead and coordinate it in close consultation with the relevant areas of the business.
17. INZ will invite MFAT, Police, the SIS, Treasury and the Department of Prime Minister and Cabinet to form an external reference group to help INZ develop and test ideas.
18. The following diagram illustrates the proposed Governance Structure. All decisions relating to recommendations will be made by INZ in prior consultation with the Project Board. The Project Board will consist of senior INZ members as well as senior representatives of SIS and MFAT. DPMC officials will be invited to attend as and when required. A General Manager within INZ will lead the review



**Timeline**

19. The timeline conforms to GSDM processes (the IPB has a manager appointed for a 12 month fixed term in June 2013).

Task	Completed by
ILT Sign off to Terms of Reference and establishment of a project group	May 2013
Draft up key messages and communication plan	To be finalised by end June 2013
ODESC noting of the Terms of Reference	5 July 2013
Consult Terms of Reference with Minister of Immigration, and draft up key holding messages	End June



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Analysis and review	July 2013
Development of options for a recommended approach	July 2013
Development of a business case – including a cost benefit analysis and identification of resources required	August 2013
Cabinet paper development and consideration	October 2013

### Risks

Risk	Mitigation
Resourcing pressures hinder progress	There is very limited scope for internal reprioritisation in Service Support. If this becomes an issue, it may be necessary to contract in external support.
Internal disagreement	Escalation to Project Boards
External agency pushback on change proposals	To be managed, if necessary, through ministerial consultation.
Media leaks	Communication plan to be developed by early June
Staff uncertainty / morale impacts	Communication plan to be developed by early June
Ministers prefer no change	Close ministerial consultation throughout the process. Also, recognition throughout the review that an 'enhanced status quo' is a live option.
Timeframe needs to be extended due to external consultation	Escalation to Project Board

### Recommendations

20. It is recommended that you agree to the proposed scope of this ToR and the governance structure associated with the review.

  
Steve McGill  
Acting Deputy Chief Executive - Immigration  
Ministry of Business, Innovation  
and Employment

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## Office of Hon Michael Woodhouse

Minister of Immigration  
Minister of Veterans' Affairs

Associate Minister of Transport  
National Member of Parliament

04 JUL 2013

Rt Hon John Key  
Prime Minister  
Parliament Buildings  
WELLINGTON

Dear Prime Minister

I am writing to you in your capacity as the Minister in Charge of the New Zealand Security Intelligence Service.

I am writing to inform you of an intended review of Immigration New Zealand's (INZ) Immigration Profiling Branch (IPB). I have attached, for your information, the draft Terms of Reference and a briefing paper provided by my officials.

As you will be aware, the IPB was established in May 2005 following the identification of two Iraqi nationals associated with the regime of Saddam Hussein. The IPB has been fully operational for the last eight years and I consider it timely to review the IPB's functions, structure and processes to ensure that it is achieving its original objectives as agreed by Cabinet. Also, I wish to ensure that the IPB function is appropriately structured to support Immigration New Zealand's Vision 2015.

INZ intends to place this item on the agenda for the Officials Committee for Domestic and External Security Coordination to discuss at its next meeting in July, with the intention of submitting a paper for Cabinet consideration in October 2013. The Department of Prime Minister and Cabinet, the Security Intelligence Service, and the Ministry of Foreign Affairs and Trade will play an active part in the governance of this review.

I would be grateful for any feedback you wish to provide.

Yours sincerely

Hon Michael Woodhouse  
Minister of Immigration



# Office of Hon Michael Woodhouse

Minister of Immigration  
Minister of Veterans' Affairs

Associate Minister of Transport  
National Member of Parliament

04 JUL 2013

Hon Murray McCully  
Minister of Foreign Affairs  
Parliament Buildings  
WELLINGTON

  
Dear Minister

I am writing to inform you of an intended review of Immigration New Zealand's (INZ) Immigration Profiling Branch (IPB). I have attached, for your information, the draft Terms of Reference and a briefing paper provided by my officials.

As you will be aware, the IPB was established in May 2005 following the identification of two Iraqi nationals associated with the regime of Saddam Hussein. The IPB has been fully operational for the last eight years and I consider it timely to review the IPB's functions, structure and processes to ensure that it is achieving its original objectives as agreed by Cabinet. Also, I wish to ensure that the IPB function is appropriately structured to support INZ's Vision 2015.

INZ intends to place this item on the agenda for the Officials Committee for Domestic and External Security Coordination to discuss at its next meeting in July, with the intention of submitting a paper for Cabinet consideration in October 2013. The Department of Prime Minister and Cabinet, the Security Intelligence Service, and the Ministry of Foreign Affairs and Trade will play an active part in the governance of this review.

I would be grateful for any feedback you wish to provide.

Yours sincerely

Hon Michael Woodhouse  
Minister of Immigration

# Coversheet for ODESC Item

**Meeting Date:**

5 July 2013

**Responsible Agency:**

Ministry of Business Innovation and Employment (Immigration)

**Title of Paper:** Terms of Reference for the Review of the Immigration Profiling Branch and Associated Risk Management Functions.**Purpose**

1. The purpose of this note is to advise ODESC of the upcoming review of the Immigration Profiling Branch. A draft Terms of Reference is attached for you to note or to provide comment.

**Action required**

2. To note / discuss and or to provide comment on the draft Terms of Reference.

**Comments**

3. In May 2005, the IPB was established to make decisions on applications from migrants that might pose a risk to New Zealand's international reputation. International reputation is defined as "an applicant who may have had an association with, membership of or involvement with any government, regime, group or agency that has advocated or committed war crimes, crimes against humanity and/or other gross human rights abuses".
4. At that time of its establishment, the Officials Domestic and External Security Committee formed the Inter-agency Advisory Group, a working group of officials from INZ, the Department of Prime Minister and Cabinet, New Zealand Security Intelligence Service, New Zealand Police and the Ministry of Foreign Affairs and Trade. This group supported INZ to determine criteria to identify visa applicants that may pose an unacceptable risk to New Zealand's international reputation and should therefore be referred to the IPB for a decision. The criteria is country-based. The referral of *all* visa applications from particular countries was considered, at the time, to be the most appropriate mechanism to manage reputational risk
5. INZ considers that a formal review of the IPB is required to ensure that the business objectives of INZ continue to be met and that the:
  - original intent as agreed by Cabinet continues to be relevant
  - current model applied in 2005 is still fit for purpose; and
  - current structure is efficient and effective in managing risks to our international reputation.
6. INZ has circulated the Terms of Reference to the Ministry of Foreign Affairs and Trade, the Security Intelligence Service, Police and also the Department of Prime Minister and Cabinet. These agencies are comfortable with the proposed review.



## DRAFT

### Terms of Reference for the Review of the Immigration Profiling Branch and associated risk management functions

#### Background

1. Immigration risk is managed through all parts of Immigration New Zealand (INZ). Security and reputational risks are primarily managed through the Immigration Profiling Branch (IPB)

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s 6c

2. The IPB was established in 2005 following the naming in Parliament of two Iraqi nationals who were identified as having an association with Saddam Hussein. The presence of these individuals here was deemed, at the time, to pose a risk to New Zealand's international reputation.

3. Since the IPB was set up, further work has been added to its brief and it is now responsible for determining applications involving and assessing counter proliferation risks with particular regard to the proposed fields of study for foreign students. In the context of INZ Vision 2015 and its change programme for the Global Service Delivery Model (GSDM) and the Immigration Global Management System, it is timely to review the IPB's role.

s 6a  
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4. Other immigration security risk management processes do not directly involve the IPB,

This review will look at the value (from the perspective of INZ, but also a wider frame of NZ Inc / whole-of-government) of this screening function, and whether there are better alternatives.

s 6a  
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#### INZ's Vision 2015

5. INZ's Vision 2015 is the driver of this review. The Vision is "to be recognised as a trusted partner, delivering outstanding immigration services and bringing the best people New Zealand needs to prosper". Achieving the Vision will be a key objective when determining the best operating model.

#### INZ's Global Service Delivery Model (GSDM)

6. The GSDM consultation document recommended that the work of the IPB be carried out by INZ processing hubs. However, a decision was made following the GSDM consultation to retain a specialist office in Wellington for immigration profiling for the

time being.

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S6c

7. Further options were also identified as needing to be explored (e.g. possible relocation of the IPB with the \_\_\_\_\_). In the interim a fixed term immigration manager has been appointed to the IPB, pending further work on options for its future.

### Immigration Global Management System (IGMS)

8. IGMS will bring significant changes to the INZ operating model, some of which may render aspects of current business design redundant. This could include some of the drivers for maintaining the IPB in its present form. Work needs to be done to ensure that the future model for managing security and reputational risk takes full advantage of the functionality IGMS will offer.

### Problem Definition

9. In funding the establishment of the IPB in 2005, Cabinet agreed [CBC MIN (05) 17/14] that the outcomes sought were to:
- Enhance the quality and consistency of decision making;
  - Control decision making in New Zealand;
  - Apply profiling across the business;
  - Improve the reach and quality of client risk management strategies (including profiling, fraud and border security);
  - Fit the configuration and resourcing of the delivery network and the IT infrastructure for the tasks required;
  - Continue to offer good customer service and attract quality migrants; and
  - Raise the level of public confidence in immigration decision making.
10. The Cabinet paper also noted that "the strategy envisages that within the next five years immigration decision making will be moved onshore, with decisions made by New Zealanders". A decision was subsequently taken by Cabinet not to proceed with this proposal however, as it was considered impracticable.
11. The purpose of this review is to:
- Review against 2005 intent: review to what extent Cabinet's original intent has been met;
  - Fit-for-Purpose: review, and consider if the current model is still "fit-for-purpose", particularly in the context of a changing operating environment and perceptions of an appetite for risk;
  - Effectiveness and efficiency: review current structure in terms of its cost and impact and assess a number of alternative options/models that may offer a more effective and/or more efficient way of achieving Cabinet's intent.
12. A review of the IPB and its function is therefore required to ensure that it continues to meet Cabinet's 2005 outcomes while ensuring that reputational risks are appropriately managed.

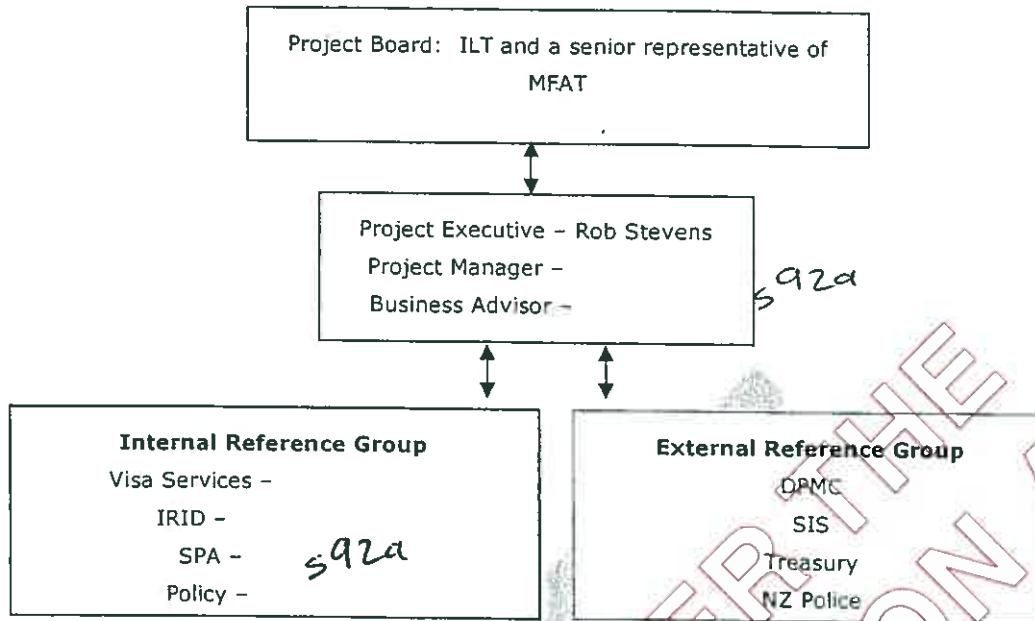
**Scope**

13. The project is limited to investigating whether there are better ways of managing immigration security and reputational risks than the current organisational structure and business process, with a particular focus on evaluating to what degree the outcomes agreed to by Cabinet have been met; and whether the current arrangements are the most effective way of managing reputational risk. This will involve looking at current state, in-depth analysis and also the development of a range of options. Issues that will be addressed in this review include:
- Is the current way INZ defines and manages risk to New Zealand's international reputation still appropriate?;
  - Is defining risk by country the best mechanism and process for identifying high-risk applications?;
  - What is the most effective way of assessing risk to our international reputation? (This includes identifying the cost of accepting a migrant who is deemed to pose an unacceptable risk to New Zealand's reputation);
  - How can any new organisational strategy for managing reputational risk leverage the capabilities IGMS will offer?;
  - What do our Five Country Conference partners do in this area and what learning's are there for New Zealand?; and
  - Full analysis, including a cost-benefit analysis, of the current model versus a range of alternatives. This will include looking at the present cost of IPB decisions against the benefits which is/has been derived from screening out those who pose reputational risk (since 2005, the IPB has been allocated approximately \$20million, and the cost of making an IPB decision has been increasing to just over \$600 since 2008/09 as opposed to \$110 for other branches).
14. The scope does not include any purview over the operational management of the IPB or any potential successor(s).

**Governance and Resources**

15. As this review impacts across INZ and externally, Service Support Division will lead and coordinate it in close consultation with the relevant areas of the business. Consultation in the first instance will be limited to ILT members before further discussion with the reference groups.
16. INZ will invite MFAT, Police, the SIS, Treasury and the Department of Prime Minister and Cabinet to form an external reference group to help INZ develop and test ideas.
17. The following diagram illustrates the proposed Governance Structure. All decisions relating to recommendations will be made by ILT in prior consultation with the Senior Users. As General Manager of Service Support, Rob Stevens will be the Executive. An internal reference group will help inform the review and drive its progress.

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18. The General Manager - Service Support will lead the development of this work and will require the following resources:
- 0.5 Principal Advisor to the General Manager
  - 0.25 Business Advisor; and
  - access to subject matter experts through the Internal Reference Group.

**Timeline**

19. The timeline conforms to GSDM processes (the IPB will have a manager appointed for a 12 month fixed term in June 2013)

Task	Completed by
ILT Sign off to Terms of Reference and establishment of a project group	End May 2013
Draft up key messages and communication plan	End May 2013
Consult Terms of Reference with Minister of Immigration, and draft up key holding messages	End May 2013
Analysis and review	July
Development of options for a recommended approach	September
Development of a business case – including a cost benefit analysis and identification of resources required	November
Cabinet paper development and consideration	February 2014

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**Risks**

Risk	Mitigation
Resourcing pressures hinder progress	There is very limited scope for internal reprioritisation in Service Support. If this becomes an issue, it may be necessary to contract in external support.
Internal disagreement	Escalation to Senior Users
External agency pushback on change proposals	To be managed, if necessary, through ministerial consultation.
Media leaks	Communication plan to be developed by early April
Staff uncertainty / morale impacts	Communication plan to be developed by early April
Ministers prefer no change	Close ministerial consultation throughout the process. Also, recognition throughout the review that an 'enhanced status quo' is a live option.

**Recommendations**

20. It is recommended that you agree to the proposed scope, governance and timelines of the review of the processes and organisational structure INZ has adopted to manage immigration security and reputational risk.

Rob Stevens  
 General Manager  
 Service Support

## DRAFT

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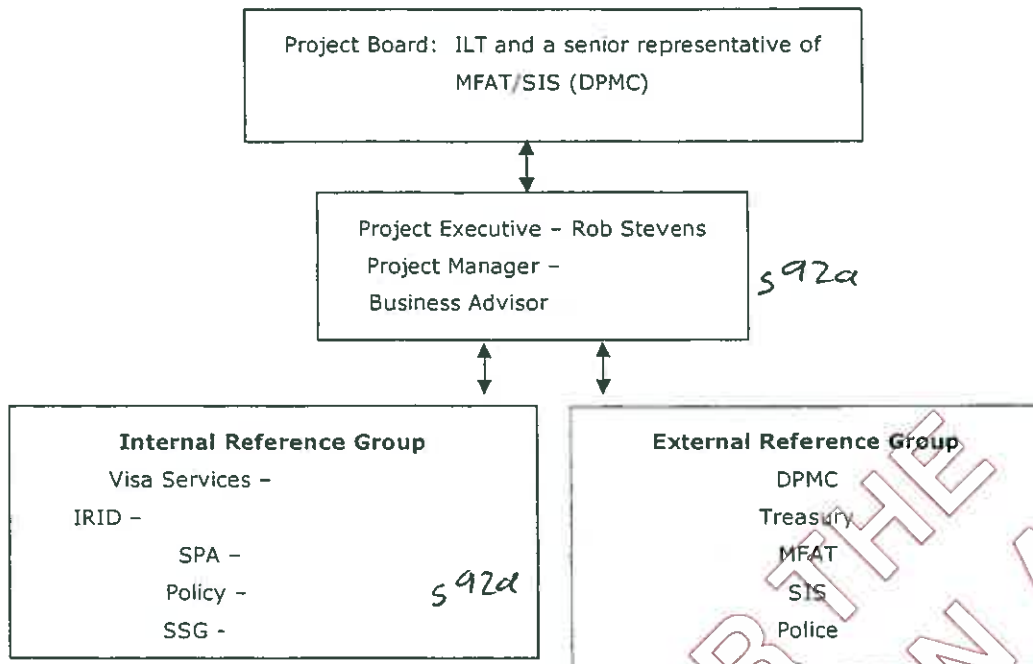
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14. The scope does not include any purview over the operational management of the IPB or any potential successor(s).

## Governance and Resources

15. As this review impacts across INZ and externally, Service Support Division will lead and coordinate it in close consultation with the relevant areas of the business. Consultation in the first instance will be limited to Immigration Leadership Team (ILT) members before further discussion with the reference groups.
16. INZ will invite MFAT, Police, the SIS, Treasury and the Department of Prime Minister and Cabinet to form an external reference group to help INZ develop and test ideas.
17. The following diagram illustrates the proposed Governance Structure. All decisions relating to recommendations will be made by ILT in prior consultation with the Senior Users/Project Board. The Project Board will consist of ILT members as well as senior representatives of SIS and MFAT. DPMC officials will be invited to attend as and when required. The General Manager of Service Support, Rob Stevens will be the Executive. An internal reference group will help inform the review and drive its progress.



18. The General Manager - Service Support will lead the development of this work and will require the following resources:
- 0.5 Principal Advisor to the General Manager
  - 0.25 Business Advisor; and
  - access to subject matter experts through the Internal Reference Group.

**Timeline**

19. The timeline conforms to GSDM processes (the IPB will have a manager appointed for a 12 month fixed term in June 2013).

Task	Completed by
ILT Sign off to Terms of Reference and establishment of a project group	May 2013
Draft up key messages and communication plan	To be finalised by early June 2013
Consult Terms of Reference with Minister of Immigration, and draft up key holding messages	Early June
Analysis and review	June 2013
Development of options for a recommended approach	July 2013
Development of a business case – including a cost benefit analysis and identification of resources required	August 2013
Cabinet paper development and consideration	October 2013

**Risks**

Risk	Mitigation
Resourcing pressures hinder progress	There is very limited scope for internal reprioritisation in Service Support. If this becomes an issue, it may be necessary to contract in external support.
Internal disagreement	Escalation to Project Boards
External agency pushback on change proposals	To be managed, if necessary, through ministerial consultation.
Media leaks	Communication plan to be developed by early June
Staff uncertainty / morale impacts	Communication plan to be developed by early June
Ministers prefer no change	Close ministerial consultation throughout the process. Also, recognition throughout the review that an 'enhanced status quo' is a live option.
Timeframe needs to be extended due to external consultation	Escalation to Project Board

**Recommendations**

20. It is recommended that you agree to the proposed scope, governance and timelines of the review of the processes and organisational structure INZ has adopted to manage immigration security and reputational risk.

Rob Stevens  
 General Manager  
 Service Support



// July 2013

Ms Carolyn Tremain  
Comptroller  
New Zealand Customs  
PO Box 2218  
WELLINGTON 6140

Copy

Dear Ms Tremain

As you may be aware the Ministry of Business Innovation and Employment (the Ministry) recently began a review of its Immigration Profiling Branch (IPB) within Immigration New Zealand (INZ). The IPB is responsible for assessing risk to New Zealand's international reputation and was established as a result of concerns raised publicly over former high ranking Iraqi officials in New Zealand. At the time of its establishment it was considered that defining risk by country was the most appropriate mechanism. The Officials Domestic External Security Committee (ODESC) endorsed the countries to be referred to the IPB for processing. The IPB has now been in operation since May 2005 and it is considered that a review of the IPB is required to determine whether the current model of operating is still fit for purpose.

Given ODESC's involvement in the initial establishment of the IPB, a paper was put to them which included a draft Terms of Reference for their noting. This draft Terms of Reference included a Governance structure which had the Ministry of Foreign Affairs and Trade, the Security Intelligence Service and the Department of Prime Minister and Cabinet as participants in the Project Board.

After discussion with ODESC it was considered that it would be beneficial for New Zealand Customs to be part of the external working group as well as a member of the Project Board. This letter is to formally invite New Zealand Customs to participate in this review. While the external reference group will meet frequently over the next four months the Project Board will only be required at key decision making points or for problem resolution.

We would be grateful if you could nominate a contact in New Zealand Customs who could participate on the external reference group and a contact for the Project Board.

Yours sincerely

Rob Stevens  
General Manager, Service Support  
Immigration New Zealand

# Coversheet for ODESC Item

**Meeting Date:**

1 November 2013

**Responsible Agency:**

Ministry of Business Innovation and Employment (Immigration)

**Title of Paper:** Immigration New Zealand changes to assessment of visa applications against risk to international reputation.

**Purpose**

1. This note informs ODESC of Immigration New Zealand's (INZ) plans to reorganise assessment of, and visa processing for, applicants who may pose a risk to New Zealand's international reputation, including by:
  - removing the s 92(a) 'country list' approach to profiling for reputational risk, and replacing it with s 69
  - moving much of the visa decision making for 'country list' visa applicants to immigration offices in INZ's global network, as opposed to processing every application from these countries in the Immigration Profiling Branch (IPB).
  - [s6(c)] s 6(a)
  - maintaining the IPB as a specialist rather than large processing office.

**Action required**

1. Endorse the proposed approach as outlined in the attached paper.

**Comments**

2. This paper is pursuant to the Terms of Reference for a review of the IPB that was agreed by ODESC in July 2013. INZ has circulated this paper to the Ministry of Foreign Affairs and Trade, the Security Intelligence Service, Police and also the Department of Prime Minister and Cabinet. These agencies either support the proposed approach (MFAT, DPMC), or have not provided comment (Police, SIS).



24 October 2013

Members,  
Officials Committee for Domestic and External Security Coordination

**IMMIGRATION NEW ZEALAND CHANGES TO ASSESSMENT OF VISA APPLICATIONS AGAINST RISK TO INTERNATIONAL REPUTATION**

**Purpose**

1. This note informs ODESC of Immigration New Zealand's (INZ) plans to reorganise assessment of, and visa processing for, applicants who may pose a risk to New Zealand's international reputation, including by:
  - removing the <sup>§ 9 Z(1)(i)</sup> 'country list' approach to profiling for reputational risk, and replacing it with a
  - moving much of the visa decision making for 'country list' visa applicants to immigration offices in INZ's global network, as opposed to processing every application from these countries in the Immigration Profiling Branch (IPB).
  - 
  - maintaining the IPB as a small to medium sized specialist office, rather than as a large processing office.

[s6(c)]

**Introduction**

2. The 'country list' approach is a <sup>§ 9 Z(1)(i)</sup> tool for assessing whether visa applicants pose a reputational risk to New Zealand. Of the 3,643 applicants referred from the list in 12/13, only 23 (0.63%) were declined on grounds of reputational risk.
3. Currently, all applications from 'country list' nationals are sent to the IPB in Wellington for processing. This limits flexibility and has resulted in unnecessarily long processing times. More <sup>§ 6c</sup> will enable significant service and reputational improvements, by enabling applications that pose no reputational risk to be processed elsewhere in INZ's global network.
4. Transferring the management and maintenance of profiling for reputational risk to INZ, will create efficiencies and add flexibility <sup>§ 6a</sup> countries on the list.

[s6(c)]

5. With the rollout of the Immigration Global Management System (IGMS), INZ will be able to more effectively manage high-risk applications <sup>§ 6c</sup>. This will further decrease application times for all applicants from high-risk countries, as well as create additional efficiencies within INZ. This functionality will be available in 2015/16.

**Background**

***Immigration Profiling Branch***

- 6. The IPB was established in 2005 following the naming in Parliament of two Iraqi nationals who were in New Zealand and were identified as having an association with Saddam Hussein. The presence of these individuals here was deemed, at the time, to pose a risk to New Zealand's international reputation.
- 7. The IPB is a specialist unit located in Wellington where all visa applications from list countries are sent for processing.

[s6(c)]

8.

[s6(c)]

s 6(a)

e

1. In terms of risk management it has also performed well in that since the establishment of the policy provisions and IPB, there have been no further incidents which have caused concern from the point of view of international reputation.

- 9. The definition of someone who may, if issued a visa, create a risk to New Zealand's international reputation was agreed to by Cabinet in 2005. It includes (but is not exclusive to) applicants "who may have had an association with, membership of or involvement with any government, regime, group or agency that has advocated or committed war crimes, crimes against humanity and/or other gross human rights abuses". Based on this definition the nationals of countries were initially identified as being potentially of high reputational risk by the ODESC using advice from the Interagency Advisory group (IAG).
- 10. The IPB is also responsible for processing applications of Counter-Proliferation concern. New Zealand has signed multiple international agreements agreeing to manage Counter-Proliferation within New Zealand.

s 6a  
s 6c

***International approaches for managing reputational risk***

11.

[s6(b)]

[s6(c)]

s 6a

**Problem Definition**

- 12. There are three inter-related problems with the processes and operating model associated with the IPB which this paper proposes to rectify.

***Processing is slow in comparison to other INZ offices***

- 13. Median processing times for temporary visas for non-IPB applications are four days; median processing times for IPB applications are 49 days. Currently all offshore applications and onshore residence applications from nationals from list countries are transferred to the IPB for processing. Maintaining a high level of customer service has been problematic for IPB since its establishment, particularly around timeliness. This

is caused by applications having to be physically being transported to New Zealand and backlogs being not able to be transferred to another branch. These time delays have subsequently disadvantaged anybody applying from the countries on the IPB list.

14. Differences in processing times are demonstrated in the following table.



Percentage of temporary decisions made within 29 days, within 59 days and within 90 days for the 2012/13 financial year at the IPB compared to all branches.

**Nationality-based selection criteria is - applications are referred unnecessarily**

15. Nationality is a useful factor for identifying risk potential. But using an applicant's nationality alone as the basis for referral is inefficient, as it results in applications that pose no risk being referred. Of the applications referred, since the IPB's establishment, less than one per cent, have been declined on the basis of risk to New Zealand's reputation (see table below).

Year	Decisions	Declined for reputational risk
05/06	6,113	22
06/07	6,016	26
07/08	4,659	25
08/09	3,759	20
09/10	3,390	23
10/11	3,803	23
11/12	3,286	34
12/13	3,643	23

16. Currently, around 10 per cent of the applications assessed at the IPB are excluded from being of reputational concern based on age and gender alone. Of the remaining

[s6(c)]

90 per cent, around 10 per cent are referred by the IPB to the ) for a thorough risk assessment.

- 17. The criteria for referral to the IPB is outdated – illustrated by the fact that 10 per cent of risk unacceptable applicants (excluding applicants from the Refugee Quota Branch) were from countries not on the list and were processed by branches other than the IPB. The [redacted] has already begun developing referral profiles for non-IPB countries to counteract the inflexibility of the current referral criteria.

[s6(c)]

S6c

**Existing process for reviewing the country list is unclear**

17

[s6(c)]

S6a

**New technology renders the country list approach redundant**

- 19. IGMS capabilities will render redundant the current 'country list' approach. IGMS will electronically capture data that is contained in the current IPB supplementary form (such as military service and government employment).

S6a S6c

**Proposed approach**

**Retain a (smaller) centralised reputational and risk management function**

- 20. INZ needs to retain a capability for centralised management of reputational and security risk, because:
  - assessment of some applications requires using [redacted] which cannot easily be sent to offices overseas (and would not normally be made available to non-New Zealand citizens)<sup>1</sup>
  - [redacted]

S6a S6c

S6a

[s6(c)]

- there are benefits from having a centralised repository of skills and knowledge pertaining to the management of reputational and security risk. These risks are quite different in nature from the standard immigration risks (i.e. non-compliance with visa conditions) that are normally assessed in immigration offices.

- 21. However, this centralised capability does not need to be the size of the current IPB. Currently, IPB has around 30 FTE positions. Following the full implementation of the [redacted], it is expected that a much smaller team would be required.

S6c

**Change the application referral model**

22.

[s6(c)]

<sup>1</sup>

S6c

[s6(c)]

25. Adopting this process would see a significant drop in the number of applications being processed by the IPB (and consequentially, more in the rest of INZ's global network). The table below gives an indication of the potential change in volume.

S6a

[s6(c)]

	2011 / 12	2012 / 13
Cases transferred to IPB	3,286	3,647
Cases referred to <i>SEC</i>	340	374
Declines for risk to NZ's international reputation ( <i>IPB decisions only</i> )	15	11
% declines	0.45%	0.30%

26. There could eventually be up to a roughly 70% reduction in the number of branch referrals to the IPB. Some of this volume drop would be compensated for by

extending the range of

s6a

[s6(c)]

***An incremental approach to the transition is preferable***

27. The process for removing the country-wide referral system and replacing it with <sup>s6c</sup> would be iterative. This will have several advantages.

- It would give time to socialise and get agreement on the <sup>s6c</sup> with INZ's partner agencies.
- It would ensure that learnings can be captured and utilised in the transition process.
- 'Big bang' impacts on the IPB would be lessened. Some of the likely head count reduction could be managed through attrition and the expiry of fixed term contracts, in turn limiting transitional costs.
- The proposed incremental transition from the country list approach to <sup>s6c</sup> would help manage the impacts on other INZ offices. It will allow time for regional planning, and mean the transition timeframe has flexibility to respond to any emerging pressures in other INZ offices.

28. The process for rolling out <sup>s6c</sup> would need to be carefully managed to ensure an appropriate balance between potentially competing priorities:

- addressing foreign relations priorities
- ensuring close collaboration with INZ's partner agencies, and
- managing branch impacts (i.e. smoothing out volume drops in the IPB so that attrition can be used to minimise any need for redundancies).

***Benefits and risks of the proposed approach***

29. The benefits of the proposed approach are:

- better customer service for most of the existing IPB client group (as shown above, IPB decisions tend to take much longer), and
- INZ continues to manage reputational risk as government requires it to do (i.e. no change to the actual policy governing reputational risk).

30. Risks of the proposed approach are:

- misplaced perceptions that INZ is stepping back from its mandate to ensure that visa applications from persons posing reputational risk to New Zealand are identified and well managed, and

[s6(c)]

31. These risks are manageable.

- Perception risks can be managed by robust communications. It should be noted that there is no proposal to close the IPB.

[s6(c)]

**External Consultation**

32. INZ has circulated this paper to the Ministry of Foreign Affairs and Trade, the Security Intelligence Service, Police and also the Department of Prime Minister and Cabinet.

These agencies either support the proposed approach (MFAT, DPMC), or have not provided comment (Police, SIS).

**Next steps**

33. The Minister of Immigration will brief his colleagues (the Minister of Foreign Affairs, the Minister Responsible for the GSCB and the Minister in Charge of the New Zealand Security Service) seeking agreement to the new operating model. If agreement is forthcoming, INZ expects to implement the changes from January 2014.

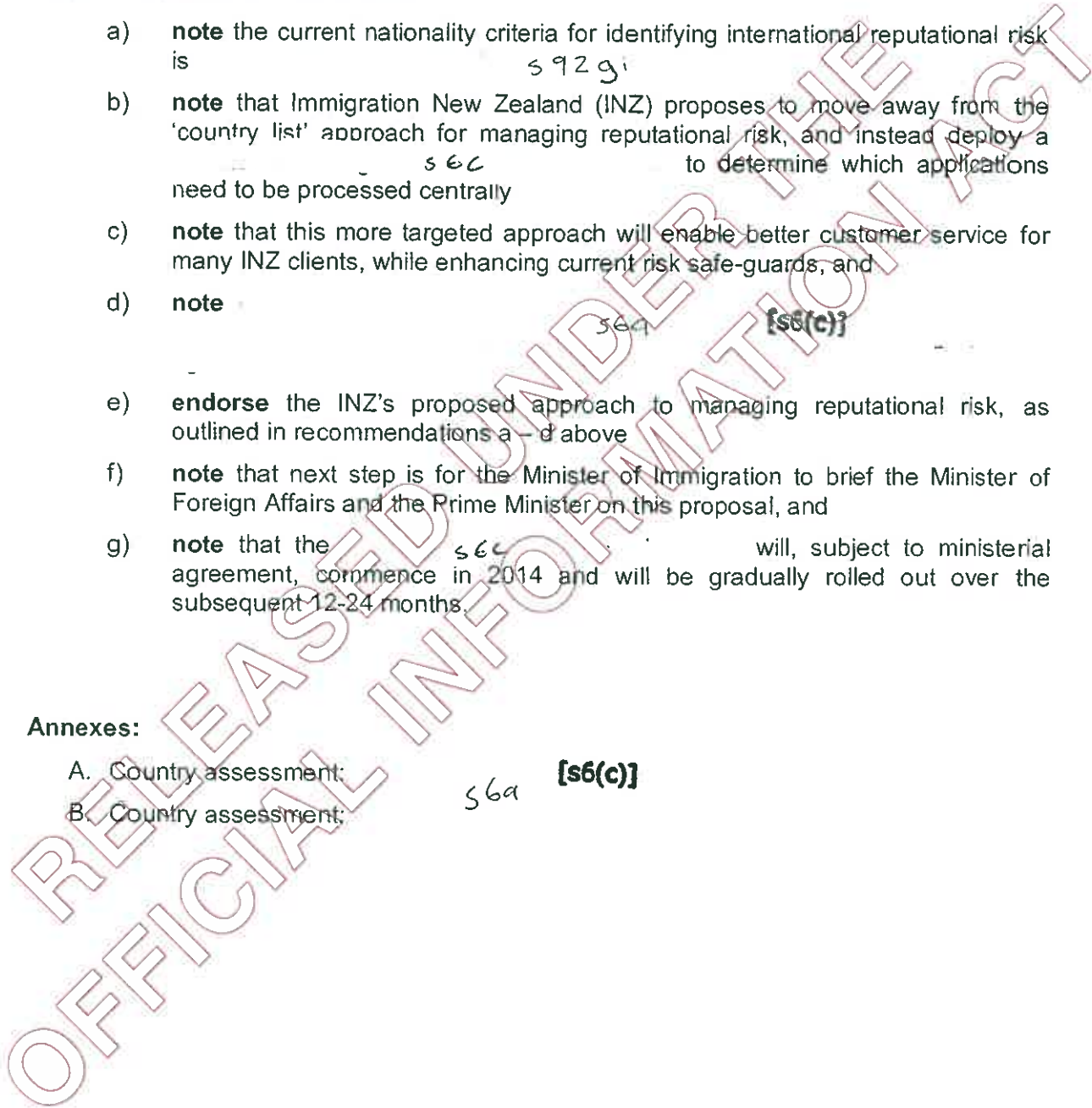
**Recommendations**

34. It is recommended that ODESC:

- a) **note** the current nationality criteria for identifying international reputational risk is *s 92 g*
- b) **note** that Immigration New Zealand (INZ) proposes to move away from the 'country list' approach for managing reputational risk, and instead deploy a *s 6c* to determine which applications need to be processed centrally
- c) **note** that this more targeted approach will enable better customer service for many INZ clients, while enhancing current risk safe-guards, and
- d) **note** *s 6a* **[s6(c)]**
- e) **endorse** the INZ's proposed approach to managing reputational risk, as outlined in recommendations a – d above
- f) **note** that next step is for the Minister of Immigration to brief the Minister of Foreign Affairs and the Prime Minister on this proposal, and
- g) **note** that the *s 6c* will, subject to ministerial agreement, commence in 2014 and will be gradually rolled out over the subsequent 12-24 months.

**Annexes:**

- A. Country assessment: *s 6a* **[s6(c)]**
- B. Country assessment:



RELEASED UNDER THE  
OFFICIAL INFORMATION ACT

[s6(c)]

s6 a



Annex

RELEASED UNDER THE  
OFFICIAL INFORMATION ACT

[s6(c)]

569

Annex

[s6(c)]

569

RELEASED UNDER THE  
OFFICIAL INFORMATION ACT

Annex

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OFFICIAL INFORMATION ACT

[s6(c)]

5/2/99

Annex

[s6(c)]

564

RELEASED UNDER THE  
OFFICIAL INFORMATION ACT

Annex

[s6(c)]

56a  
RELEASED UNDER THE  
OFFICIAL INFORMATION ACT

Annex

RELEASSED UNDER THE  
OFFICIAL INFORMATION ACT

[s6(c)]

569



**Ministry of Business, Innovation and Employment Briefing:  
Proposed changes to assessment of visa applications against risk  
to international reputation**

Date Sent:	14 November 2013	Tracker No:	13/05817
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**Action Sought**

	Action Sought	Deadline for Action
Minister of Immigration (Hon Michael Woodhouse)	Agree to recommendations and refer to the Minister of Foreign Affairs and the Minister in Charge of the New Zealand Security Intelligence Service	N/A
Minister in Charge of the New Zealand Security Intelligence Service (Rt Hon John Key)	For information	N/A
Minister of Foreign Affairs (Hon Murray McCully)		
Associate Minister of Immigration (Hon Nikki Kaye)		

**Agencies Consulted (include contact where relevant)**

Ministry of Foreign Affairs and Trade, New Zealand Security Intelligence Service, Department of Prime Minister and Cabinet, New Zealand Police
--

**Contact for Telephone Discussion (if required)**

Name	Position	Telephone	1st Contact
	Manager, Analysis & Project Management, Immigration New Zealand		
Nigel Bickle	Deputy Chief Executive, Immigration		✓

S92(a)

**Minister's Office Actions (if required)**

For referral to the offices of the Prime Minister and the Minister of Foreign Affairs
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**MBIE Briefing: Minister's Comments**

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RESTRICTED

14 November 2013

**Ministry of Business, Innovation and Employment Briefing:**  
**Proposed changes to assessment of visa applications against risk to international reputation**

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

- a) **note** the current nationality criteria for identifying international reputational risk is

5929i

Noted

- b) **note** that a more targeted approach will enable better customer service for many Immigration New Zealand clients, while enhancing current risk safe-guards

Noted

- c) **agree** to an approach to managing visa applications from individuals who may pose risks to New Zealand's international reputation which is based on:

- i. moving away from the 'country list' approach, and instead using a  
56c to determine which applications need to be  
processea centrally and

- ii.

56c 56c

Agree / Discuss

- d) **note** that the proposed new approach has been discussed and endorsed by the Officials Domestic and External Security Committee

Noted

- e) **note** that, if you agree, the  
56c will commence in early 2014 and will be gradually rolled out over the next 18-24 months using foreign affairs priorities to guide the implementation timetable, and

Noted

- f) **refer** this paper to the Minister in Charge of the Security Intelligence Service and Minister of Foreign Affairs.

Agree / Discuss

pp. 

Rob Stevens  
General Manager – Service Support  
Immigration New Zealand

Hon Michael Woodhouse  
Minister of Immigration

\_\_\_\_/\_\_\_\_/\_\_\_\_

14 / 11 / 2013



## Purpose

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1. Immigration New Zealand (INZ) has completed its review of the process by which visa applications are assessed against risk to New Zealand's international reputation. This briefing outlines the outcome of the review and seeks your agreement to proposals to reorganise assessment of, and visa processing for, applicants who may pose a risk to New Zealand's international reputation.

## Background and review findings

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2. In July 2013 you agreed to Terms of Reference for a review of the Immigration Profiling Branch (IPB). INZ has now completed the review. The findings and proposed new operating model have been shared with relevant agencies and presented to and endorsed by the Officials Domestic and External Security Committee (ODESC).
3. The review found there were three interrelated problems with the present operating model:
  - processing by IPB is significantly slower than other INZ offices <sup>s92g1</sup>
  - applications are referred to IPB unnecessarily due to <sup>s92g1</sup> selection criteria, and
  - existing processes for reviewing the country list are unclear.
4. INZ proposes to resolve these problems by making changes to INZ's approach to managing reputational risk, including by:
  - removing the <sup>s92g1</sup> 'country list' approach to profiling for reputational risk, and replacing it with a <sup>s6c</sup>
  - moving much of the visa decision making for 'country list' visa applicants to immigration offices in INZ's global network, as opposed to processing every application from these countries in the IPB
  - formalising INZ responsibility for the operational management and maintenance of reputational risk profiling <sup>s6a s6c</sup>
  - maintaining the IPB as a specialist rather than large processing office.
5. A detailed analysis of the issues and description of the proposed new operating model is appended.

## Proposed new operating model

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6. Under the current operating model all applications from a country list are transferred to the IPB where <sup>s6c</sup> are used to identify applications of potential reputational concern. These applications are referred to INZ's
7. It is proposed instead that INZ move to

[s6(c)]

8. The benefits of the proposed approach are:

- better customer service and faster processing of visa applications for most of the existing IPB client group, and
- INZ continues to manage reputational risk as government requires it to do (i.e. no change to the actual policy governing reputational risk).

9. Risks of the proposed approach are:

- misplaced perceptions that INZ is stepping back from its mandate to ensure that visa applications from persons posing reputational risk to New Zealand are identified and well managed, and
- [s6(c)]

10. These risks are manageable. Perception risks can be managed by robust communications. It should be noted that there is no proposal to close the IPB. And all counter-proliferation related applications will continue to be transferred to the IPB for processing.

11. It is proposed that the transition to targeted referral profiles would be iterative to lessen the impact of the changes across INZ and to enable learnings to be utilised. The order of the rollout would be managed to address foreign relations priorities.

## Consultation

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12. MFAT, the Security Intelligence Service, Police and the Department of Prime Minister and Cabinet were consulted on the review and the proposed new operating model. The proposed approach was endorsed by ODESC at its meeting of 1 November 2013.

13. We understand that a progress update for this review was discussed by yourself and the Minister of Foreign Affairs in your meeting of 23 October 2013. If you agree, your office will refer this paper to the Minister in Charge of the Security Intelligence Service and Minister of Foreign Affairs for their information and discussion if desired.

## Next Steps

---

14. INZ expects to begin a staged implementation of the changes from January 2014.

56a

[s6(c)]

## Appendix One – ODESC paper

**IMMIGRATION NEW ZEALAND CHANGES TO ASSESSMENT OF VISA APPLICATIONS AGAINST RISK TO INTERNATIONAL REPUTATION****Purpose**

1. This note sets out Immigration New Zealand's (INZ) plans to reorganise assessment of, and visa processing for, applicants who may pose a risk to New Zealand's international reputation, including by:
  - removing the <sup>S92g(1)</sup> 'country list' approach to profiling for reputational risk, and replacing it with <sup>S6a</sup>
  - moving much of the visa decision making for 'country list' visa applicants to immigration offices in INZ's global network, as opposed to processing every application from these countries in the Immigration Profiling Branch (IPB)
  - <sup>S6a S6c</sup>
  - maintaining the IPB as a small to medium sized specialist office, rather than as a large processing office.

**Introduction**

2. The current 'country list' approach used to identify visa applicants whose entry into New Zealand could potentially be a risk to our international reputation is a <sup>S92g</sup> tool. Of the 3,643 applicants referred from the list in 12/13, only 23 (0.63%) were declined on grounds of reputational risk.
3. Currently, all applications from 'country list' nationals are sent to the IPB in Wellington for processing. This limits flexibility and has resulted in unnecessarily long processing times. More <sup>S6c</sup> will enable significant service and reputational improvements, by enabling applications that pose no reputational risk to be processed elsewhere in INZ's global network.
4. Transferring the management and maintenance of profiling for reputational risk to INZ, <sup>S6a S6c</sup> will create efficiencies and add flexibility. countries on the list.
5. With the rollout of the Immigration Global Management System (IGMS), INZ will be able to more effectively manage high-risk applications <sup>S6c</sup>. This will further decrease application times for all applicants from high-risk countries, as well as create additional efficiencies within INZ. This functionality will be available in 2015/16.

**Background****Immigration Profiling Branch**

6. The IPB was established in 2005 following the naming in Parliament of two Iraqi nationals who were in New Zealand and were identified as having an association with Saddam Hussein. The presence of these individuals here was deemed, at the time, to pose a risk to New Zealand's international reputation.

7. The IPB is a specialist unit located in Wellington where all visa applications from list countries are sent for processing.

[s6(c)]

8.

[s6(c)]

S6a

In terms of risk management it has also performed well in that since the establishment of the policy provisions and IPB, there have been no further incidents which have caused concern from the point of view of international reputation.

9. The definition of someone who may, if issued a visa, create a risk to New Zealand's international reputation was agreed to by Cabinet in 2005. It includes (but is not exclusive to) applicants "who may have had an association with, membership of or involvement with any government, regime, group or agency that has advocated or committed war crimes, crimes against humanity and/or other gross human rights abuses". Based on this definition the nationals of countries were initially identified as being potentially of high reputational risk by the ODESC using advice from the Interagency Advisory group (IAG). S6a S6c
10. The IPB is also responsible for processing applications of Counter-Proliferation concern. New Zealand has signed multiple international agreements agreeing to manage Counter-Proliferation within New Zealand.

**International approaches for managing reputational risk**

11.

[s6(c)]

[s6(b)]

S6a

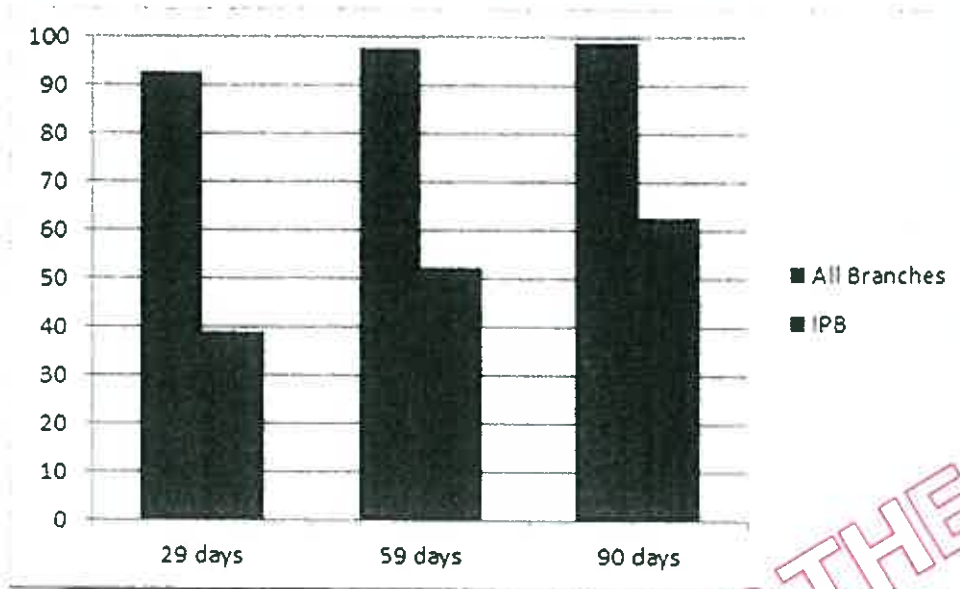
**Problem Definition**

12. There are three inter-related problems with the processes and operating model associated with the IPB which this paper proposes to rectify.

**Processing is slow in comparison to other INZ offices**

13. Median processing times for temporary visas for non-IPB applications are four days; median processing times for IPB applications are 49 days. Currently all offshore applications and onshore residence applications from nationals from list countries are transferred to the IPB for processing.
14. Maintaining a high level of customer service has been problematic for IPB since its establishment, particularly around timeliness. This is caused by applications having to be physically being transported to New Zealand and backlogs being not able to be transferred to another branch. These time delays have subsequently disadvantaged anybody applying from the countries on the IPB list.

15. Differences in processing times are demonstrated in the following table.



Percentage of temporary decisions made within 29 days, within 59 days and within 90 days for the 2012/13 financial year at the IPB compared to all branches.

**Nationality-based selection criteria is too <sup>s92(4)</sup> – applications are referred unnecessarily**

16. Nationality is a useful factor for identifying risk potential. But using an applicant's nationality alone as the basis for referral is inefficient, as it results in applications that pose no risk being referred. Of the applications referred, since the IPB's establishment, less than one per cent, have been declined on the basis of risk to New Zealand's reputation (see table below).

Year	Decisions	Declined for reputational risk
05/06	6,113	22
06/07	6,016	26
07/08	4,659	25
08/09	3,759	20
09/10	3,390	23
10/11	3,803	23
11/12	3,286	34
12/13	3,643	23

17. Currently, around 10% of the applications assessed at the IPB are excluded from being of reputational concern based on age and gender alone. Of the remaining 90%, around 10% are referred by the IPB to the [redacted] for a thorough risk assessment. The criteria for referral to the IPB is outdated – illustrated by the fact that 10% of risk unacceptable applicants (excluding applicants from the Refugee Quota Branch) were from countries not on the list and were processed by branches other than the IPB. The [redacted] has already begun developing referral profiles for non-IPB countries to counteract the inflexibility of the current referral criteria.

[s8(c)]

**Existing process for reviewing the country list is unclear**

18.

S6a + S6c

S6c

**New technology renders the country list approach redundant**

19. IGMS capabilities will render redundant the current 'country list' approach. IGMS will electronically capture data that is contained in the current IPB supplementary form (such as military service and government employment),

S6a S6c

**Proposed approach**

**Retain a (smaller) centralised reputational and risk management function**

20. INZ needs to retain a capability for centralised management of reputational and security risk, because:

- assessment of some applications requires using [redacted] which cannot easily be sent to offices overseas (and would not normally be made available to non-New Zealand citizens)<sup>1</sup>

S6a S6c

[s6(c)] S6a

- there are benefits from having a centralised repository of skills and knowledge pertaining to the management of reputational and security risk. These risks are quite different in nature from the standard immigration risks (i.e. non-compliance with visa conditions) that are normally assessed in immigration offices.

21. However, this centralised capability does not need to be the size of the current IPB. Currently, IPB has around 30 FTE positions. Following the full implementation of the [redacted] it is expected that a much smaller team would be required.

S6c

**Change the application referral model**

22.

[s6(c)]

23

24.

[s6(c)]

25. Adopting this process would see a significant drop in the number of applications being processed by the IPB (and consequentially, more in the rest of INZ's global network). The table below gives an indication of the potential change in volume.

	2011 / 12	2012 / 13
Cases transferred to IPB	3,286	3,647
Cases referred to	340	374
Declines for risk to NZ's international reputation (IPB decisions only)	15	11
% declines	0.45%	0.30%

[s6(c)]

26. There could eventually be up to a roughly 70% reduction in the number of branch referrals to the IPB. Some of this volume drop would be compensated for by extending the range of

S6a S6c

**An incremental approach to the transition is preferable**

27. The process for removing the country-wide referral system and replacing it with would be iterative. This will have several advantages.

S6c

[s6(c)]

- It would give time to socialise and get agreement on the with INZ's partner agencies.
- It would ensure that learnings can be captured and utilised in the transition process.

- 'Big bang' impacts on the IPB would be lessened. Some of the likely head count reduction could be managed through attrition and the expiry of fixed term contracts, in turn limiting transitional costs.
- The proposed incremental transition from the country list approach to [s6(c)] would help manage the impacts on other INZ offices. It will allow time for regional planning, and mean the transition timeframe has flexibility to respond to any emerging pressures in other INZ offices.

28. The process for rolling out [s6(c)] would need to be carefully managed to ensure an appropriate balance between potentially competing priorities:

- addressing foreign relations priorities
- ensuring close collaboration with INZ's partner agencies, and
- managing branch impacts (i.e. smoothing out volume drops in the IPB so that attrition can be used to minimise any need for redundancies).

### **Benefits and risks of the proposed approach**

29. The benefits of the proposed approach are:

- better customer service for most of the existing IPB client group (as shown above, IPB decisions tend to take much longer), and
- INZ continues to manage reputational risk as government requires it to do (i.e. no change to the actual policy governing reputational risk).

30. Risks of the proposed approach are:

- misplaced perceptions that INZ is stepping back from its mandate to ensure that visa applications from persons posing reputational risk to New Zealand are identified and well managed, and

[s6(c)]

31. These risks are manageable.

- Perception risks can be managed by robust communications. It should be noted that there is no proposal to close the IPB.

[s6(c)]

### **Consultation**

32. INZ has consulted on the proposals in this paper with the Ministry of Foreign Affairs and Trade, the Security Intelligence Service, Police and also the Department of Prime Minister and Cabinet. These agencies either support the proposed approach (MFAT, DPMC), or provided no comment (Police, SIS).





**Ministry of Business, Innovation and Employment Briefing:  
Proposed changes to assessment of visa applications against risk  
to international reputation: Further Information**

Date Sent:	10 December 2013	Tracker No:	13/05817
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**Action Sought**

	Action Sought	Deadline for Action
Minister of Immigration (Hon Michael Woodhouse)	Note the following briefing	N/A
Associate Minister of Immigration (Hon Nikki Kaye)	For information	N/A

**Agencies Consulted (include contact where relevant)**

N/A
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**Contact for Telephone Discussion (if required)**

Name	Position	Telephone	1st Contact
	Manager, Analysis & Project Management, Immigration New Zealand	)	✓
Rob Stevens	General Manager, Service Support, Immigration New Zealand	(	

592a

**Minister's Office Actions (if required)**

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**Minister's Comments**

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10 December 2013

**Ministry of Business, Innovation and Employment Briefing:**  
Proposed changes to assessment of visa applications against risk to  
international reputation: Further Information

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**Recommended Action**

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

- a) **note** that the Immigration Profiling Branch (IPB) is currently 100% funded from fee payers Noted
  
- b) **note** that a proportion of the IPB budget will gradually be reallocated to other visa processing offices and Immigration Risk and Integrity Division (IRID) in line with the partial transfer of the IPB workload to these areas of the business Noted



Rob Stevens  
General Manager – Service Support  
Immigration New Zealand

10/12/13

Hon Michael Woodhouse  
Minister of Immigration

— / — / —

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## Purpose

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1. This briefing responds to your query as to whether savings from process changes at the Immigration Profiling Branch (IPB) will be reinvested in intelligence and compliance activity. This briefing supplements the briefing *Proposed changes to assessment of visa applications against risk to international reputation* (15 November 2013).

## INZ proposes to change its approach to managing reputational risk

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2. As outlined in the November briefing, Immigration New Zealand (INZ) proposes the following changes to the way it manages reputational risk:

- removing the <sup>s92a1</sup> 'country list' approach to profiling for reputational risk, and replacing it with a <sup>s6c</sup>
- moving much of the visa decision making for 'country list' visa applicants to immigration offices in INZ's global network, as opposed to processing every application from these countries in IPB
- formalising INZ responsibility for the operational management and maintenance of reputational risk profiling <sup>s6a s6c</sup>
- maintaining the IPB as a specialist rather than a large processing office.

3.

4. It is proposed that the transition to <sup>s6c</sup> would be iterative to lessen the impact of the changes across the business and to enable learnings to be utilised. The order of the rollout would be prioritised by foreign relations priorities.

## Cost savings are not the driver of this change

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5. The purpose of the proposed changes is to improve customer service, while ensuring no reduction in current levels of reputational risk management. INZ expects (over time) significant improvements in application processing timeliness.
6. Any cost savings will be realised gradually, in line with the transfer of processing to other INZ branches. Under the Government fees principles, such savings would be required to be reinvested in improved customer service, or returned to fee payers in the form of fee reductions.

## The IPB budget comes from fee payers

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7. In 2005 Cabinet agreed to fund the establishment of the Immigration Profiling Group (IPG) and to provide funding for subsequent years [CBC Min (05) 17/14]. As part of an immigration fees review in 2006, Cabinet agreed to full cost recovery for IPG functions with costs being spread across all fee payers from July 2007 [EXG Min(06) 3/8]. In 2010

the IPG was split into the [redacted] and the IPB (a visa processing branch within Visa Services).

8. The IPB is now 100% funded by fee payers and [redacted] is now 100% funded by the Crown. INZ continues to receive Crown funding for IPG functions as agreed by Cabinet in 2005. This funding is approximately equivalent to the [redacted] operating budget.

[s6(c)]

### IPB resources will be partially redistributed across INZ

8. IPB resources will need to be partially redistributed across INZ as the current proposal will result in a substantial amount of the current IPB workload being transferred to other visa processing offices and IRID.

[s6(c)]

56a

9. The IPB will remain in a smaller form performing the following processes.

- The identification and processing of Counter Proliferation related applications.
- The processing of applications that require full reputational risk assessments.
- The processing of ad hoc applications that for any other reason needs to be undertaken centrally.

10. It is proposed that existing IPB resources be reallocated to these other areas of the business as they take on IPB functions. Some of the current IPB resource will be invested in building Visa Services offshore risk capability. The transfer of resources from the IPB to other areas of INZ will be gradual, in line with the iterative implementation of the use of targeted risk profiles.

Draft



## MEMORANDUM

To: Immigration Leadership Team

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From: Rob Stevens, General Manager, Service Support

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Date: X September 2013

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Subject: Immigration Profiling Branch – preferred option for ILT endorsement

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### Purpose

1. This memo outlines our preferred option for the Immigration Profiling Branch (IPB), and seeks ILT endorsement before the proposal is taken externally.

### Aims of the IPB review

2. ILT signed off a review of the IPB on 28 May 2013. The aims of the review are as follows:
  - Review against 2005 intent: review to what extent Cabinet's original intent has been met.
  - Effectiveness and efficiency: review current structure in terms of its cost and impact and assess a number of alternative options/models that may offer a more effective and/or more efficient way of achieving Cabinet's intent.
  - Fit for purpose: consider if the current model is still "fit-for-purpose", particularly in the context of a changing operating environment and risk appetite.

### Findings

#### 2005 intent

3. The IPB has performed well in terms of risk management - since the establishment of the policy provisions and IPB no further concerns have arisen in relation to international reputation. In terms of its primary mandate (managing reputational risk to New Zealand), it has been successful.
4. An audit of the IPB in 2013 found that the 'quality of the decision making is high and is appropriate to the risk and complexity of the applications processed in the branch'. However the quality check process (Q3) which is based on following immigration instructions, shows most other branches to be outperforming the IPB. However, it is noted that the Q3 criteria does not accommodate risk assessment functions that are specific to the IPB branch.

#### Effectiveness and efficiency

5. Three inter-related problems with the processes and operating model have arisen.

*Processing is slow in comparison to other INZ offices*

6. Currently all offshore applications and onshore residence applications from a list of countries are transferred to the IPB for processing. Maintaining a high level of customer service has been problematic for IPB since its establishment, particularly around timeliness. This is caused

by applications having to be physically being transported to New Zealand and backlogs being not able to be transferred to another branch. These time delays have subsequently disadvantaged anybody applying from the countries on the IPB list, making the selection of these countries more prominent and resulting in political repercussions.

<sup>s92g1</sup>  
Nationality-based selection criteria is : - applications are referred unnecessarily

7. Nationality is a useful factor for identifying risk. But using an applicant's nationality only as the basis for referral is inefficient, as it results in applications that pose no risk being caught up in the back logs. Of applications referred, since the IPB's establishment, only a tiny proportion have been declined on the basis of risk to New Zealand's reputation (see table below).

Year	Decisions	Declined under A5.45
05/06	6113	22
06/07	6016	26
07/08	4659	25
08/09	3759	20
09/10	3390	23
10/11	3803	23
11/12	3286	34
12/13	3643	23

8. Currently, around 10% of the applications assessed at the IPB are excluded from being of reputational concern based on age and gender alone. Of the remaining 90%, only a small proportion are referred by the IPB to the ) for a thorough risk assessment. (The IPB use country profiles which are developed and reviewed by the to screen for applications that need a thorough risk assessment).
9. 15 percent of risk unacceptable applicants (excluding applicants from the Refugee Quota Branch) have come from branches other than the IPB illustrating that the criteria for referral to the IPB are outdated. The has begun developing referral profiles for non-IPB countries to counteract the inflexibility of the referral criteria.

*Process for reviewing the country list is too inflexible*

10.

**Fit for purpose**

11. The status quo will soon no longer be fit for purpose, because IGMS will render redundant the rather "country list" approach that is currently in use.

<sup>s92g1</sup> while maintaining total consistency across INZ offices.

[s6(c)]

Draft

12. While the [redacted] develops and reviews specific country profiles,

[s6(c)]

### Proposed approach

Retain a (smaller) centralised reputational and risk management function

13. [redacted]

[redacted]

[redacted]

SGa

[s6(e)]

Change the application referral model

15. In place of the current 'country list' approach

SGa

[s6(c)]

[redacted]

Draft

[s6(c)]

- 18. Adopting this process would see a significant drop in the number of applications being processed by the IPB (and consequentially, more in the rest of INZ's global network).

S6a S6c

[s6(c)]

	2011 / 12	2012 / 13
Cases transferred to IPB	3,286	3,647
Cases referred to	340	374
Declines for risk to NZ's international reputation	15	11

- 19. Using the existing S6c as a basis for comparison, there could be a roughly 90% reduction in the IPB's caseload. Some of this volume drop would be compensated for by

S6a S6c

- 20. The process for removing the country-wide referral system and replacing it with for nationals of those countries would be iterative. This will have several advantages.

- 'Big bang' impacts on the IPB would be lessened. Some of the likely head count reduction could be managed through attrition (potentially a good proportion given the IPB's relatively high staff turnover).
- It would give time to socialise and get agreement on the S6c with our partner agencies.
- It would ensure that learnings can be captured and utilised in the transition process.

- 21.

S6a

[s6(c)]



**An incremental approach to the transition is preferable**

22. The process for rolling them out would need to be carefully managed to ensure an appropriate balance between potentially competing priorities:
- managing branch impacts (i.e. smoothing out volume drops in the IPB so that attrition can be used to minimise any need for redundancies)
  - ensuring partner agencies are on board with the proposed referral profiles, and
  - addressing foreign relations priorities.
23. Rather than develop an extensive and predetermined roadmap for Cabinet agreement, a more flexible approach would be to plan and implement the transition iteratively over the course of 2014. The risk with seeking Cabinet agreement to a transition roadmap is that it will delay the required decisions and will require advance decisions to be made that subsequently do not keep pace with changes on the ground.

**Benefits and risks of the proposed approach**

24. The benefits of the proposed approach are:
- INZ continues to manage reputational risk as government requires it to do (i.e. no change to the actual policy governing reputational risk)
  - enhanced foreign relations (no more untargeted profiling purely based on nationality)
  - significant cost savings for INZ (up to a 90% reduction in IPB decisions, which are much more expensive than standard decisions), and
  - faster service for up to 90% of the existing IPB client group (IPB decisions take longer).
25. Risks of the proposed approach are:
- misplaced perceptions that INZ is stepping back from its mandate to ensure that visa applications from persons posing reputational risk to New Zealand are identified and well managed
  - uncertainty about the timing of the transition, impact on branch volumes and final cost savings (because the operational planning would be iterative rather than fully detailed in advance), and

[s6(c)]

26. These risks are manageable. Perception risks can be managed by robust communications. The flipside of operational and timing uncertainties is flexibility, which will be important in assisting with managing the staffing considerations involved.

**Next steps**

27. The Minister of Immigration is intended to take a paper to Cabinet this year that outlines a future direction for how INZ manages security and reputational risk. The optimum timing for this is mid-November. Meeting this timetable will require the following steps:
- in-principle ILT agreement to the preferred approach - September
  - partner agency agreement – early October

- brief the Minister of Immigration (with probable referral to the Minister of Foreign Affairs and the Prime Minister) – mid October
- prepare and consult on cabinet paper – late October
- Cabinet processes – November
- Implementation – January 2014 onwards.

Note: Implementation would include full consultation with IPB staff if relevant, (e.g. if it was determined that the operational implications flowing from the wider policy/strategy changes require significant change to existing functions or accountabilities of any IPB roles).

28. If you agree, therefore, the next step is to socialise this proposal with our domestic partner agencies, before briefing the Minister of Immigration.

#### Recommendations

29. I recommend that you:
- a. agree to the proposed approach to reform of the way that INZ manages security and reputational risk, and
  - b. agree that this proposal be socialised with our domestic partner agencies.

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**ILT MEMORANDUM - DRAFT**

<b>To:</b>	<b>Immigration Leadership Team</b>
<b>From:</b>	Rob Stevens, General Manager - Service Support
<b>Date:</b>	
<b>Subject:</b>	<b>Terms of Reference for the Review of the Immigration Profiling Branch and associated risk management functions</b>
<b>Purpose</b>	To provide a Terms of Reference to review how INZ manages immigration security and reputational risks. This will include investigating whether there are better ways of delivering the functions currently performed by the Immigration Profiling Branch.

**The status quo**

1. Immigration risk is managed through all parts of Immigration New Zealand (INZ). Security and reputational risks, however, are primarily managed through the Immigration Profiling Branch (IPB) 569
2. The IPB was established in 2005 following the naming in Parliament of two Iraqi nationals who were identified as having an association with Saddam Hussein. Allowing such individuals to enter New Zealand was deemed to pose a risk to New Zealand's international reputation.
3. Since the IPB was set up, further work has been added to its brief and it is now responsible for determining applications involving as well as 569  
assessing counter proliferation risks 56c

**Global Service Delivery Model**

4. The Global Service Delivery Model consultation document recommended that the work of the IPB be carried out by INZ processing hubs. Following consideration of staff feedback, the final decision was to retain a specialist office in Wellington for immigration profiling for the time being. 569
5. Further options were also identified as needing to be explored (e.g. possible relocation of the IPB 56a). A decision was taken to appoint a fixed term immigration manager role to oversee the branch pending, further work on options for its future.

## Immigration Global Management System

6. The Immigration Global Management System (IGMS) will bring significant changes to the INZ operating model, some of which may render aspects of current business design redundant.

[s6(c)]

## Problem Definition

7. Currently all applications from identified high risk countries are referred to the IPB for processing. Referral of applications by countries is not a sophisticated method of determining reputational risk and has resulted in:
  - large backlogs of applications
  - problematic timeliness standards
  - potentially overly intrusive screening of low risk applications

### *Application backlogs*

8. When the IPB was established, it was directed to review the last two years of applications from high risk countries as well as deal with all categories of incoming high risk applications. This meant that before staff had been trained and started processing, there were already significant backlogs. These continued to grow as the scope and complexity of the IPB's work grew. The branch has therefore never been without a backlog since its inception.

### *Timeliness Standards*

9. The complexity of the current application process can lead to significant delays. For example applicants from identified high risk countries are required to send their original documentation, including passports, to a New Zealand office. The application is then processed; the necessary checks are undertaken and in some instances an interview takes place at a designated offshore post. Further assessments are undertaken if certain risk factors are triggered.

56a

[s6(c)]

## Scope

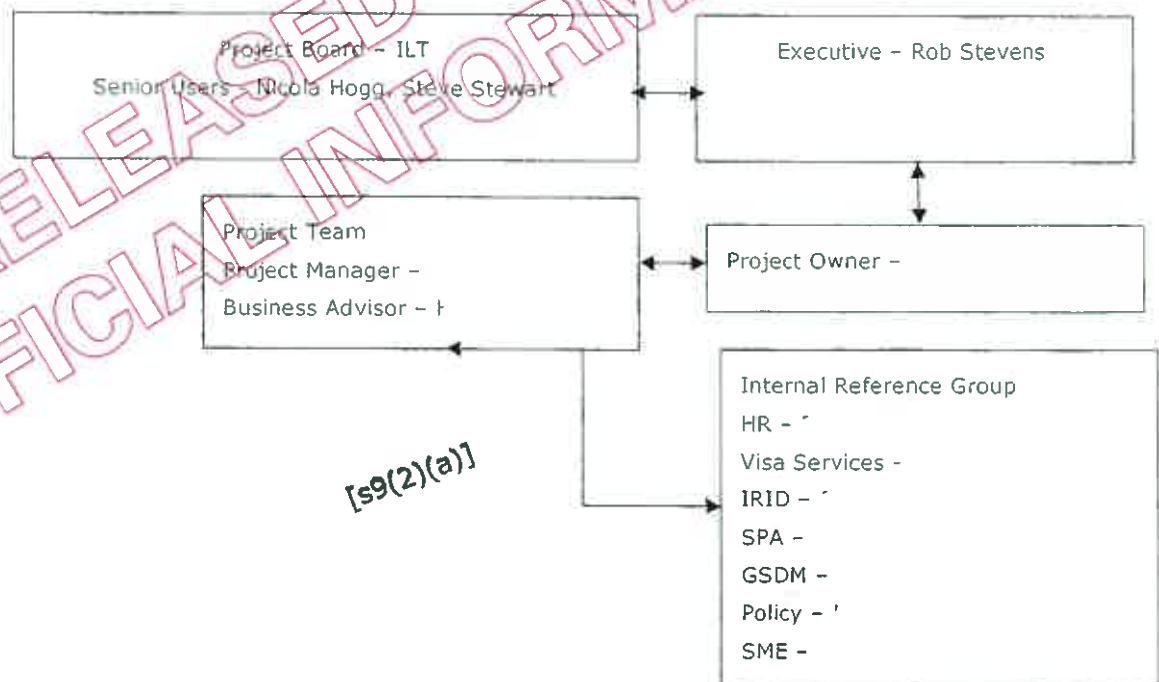
12. The project is limited to investigating whether there are better ways of managing immigration security and reputational risks than offered by status quo organisational structure and business process, with a particular focus on:
  - establishing a system that avoids unacceptable backlogs or bottlenecks

Draft

- improving timeliness standards
  - improving customer service, including by reducing security screening requirements where these prove to be unnecessarily onerous or intrusive.
13. This will include investigating whether there are better ways of delivering the functions currently performed by the IPB. The scope does not include, however, any purview over the operational management of the IPB.

**Governance and Resources**

14. As this review impacts across INZ and externally, Service Support will lead and coordinate it in close consultation with the relevant areas of the business. Consultation in the first instance will be limited to ILT members before further discussion with the reference group. Consultation with external stakeholders will be limited to the Ministry of Foreign Affairs and Trade and the New Zealand Security Intelligence Service. If a Cabinet paper is required, consultation will be in line with Cabinet Office guidelines.
15. The following diagram illustrates the proposed Governance Structure. All decisions relating to recommendations will be made by ILT in prior consultation with the Senior Users. As General Manager of Service Support, Rob Stevens will be the Executive. An internal reference group will help inform the review and drive its progress. All staff involved in the project will need the appropriate security clearances.



16. The General Manager - Service Support will lead the development of this work and will require the following resources
- 0.5 Principal Advisor to the General Manager
  - 0.25 Human Resource Assistance
  - 0.25 Business Advisor
  - access to subject matter experts through the Internal Reference Group.

*Draft*

**Timeline**

17. The timeline is relatively tight, as it needs to conform to GSDM processes (the IPB will have a manager appointed for a 12 month fixed term in June 2013).

<b>Task</b>	<b>Completed by</b>
ILT Sign off to Terms of Reference and establishment of a project group	End March 2013
Draft up key messages and communication plan	Mid April
Consult Terms of Reference with Minister of Immigration, and draft up key holding messages	Mid April
Development of design principles / criteria for assessment	End April
Development of options for a recommended approach for ILT	End June 2013
Business process mapping for new approach	End July 2013
Development of a business case – including a cost benefit analysis and identification of resources required	End September 2013
Development of further high level communication plan	End September
Cabinet paper development and consideration	October 2013
Consultation document	November 2013
Decision document	January 2013

**Risks**

<b>Risk</b>	<b>Mitigation</b>
Resourcing pressures hinder progress	There is very limited scope for internal reprioritisation in Service Support. If this becomes an issue, it may be necessary to contract in external support.
Internal disagreement	Escalation to Senior Users
External agency pushback on change proposals	To be managed, if necessary, through ministerial consultation.
Media leaks	Comms plan to be developed by early April

Staff uncertainty / morale impacts	Comms plan to be developed by early April
Ministers prefer no change	Close ministerial consultation throughout the process. Also, recognition throughout the review that an 'enhanced status quo' is a live option.

**Recommendations**

- 18. It is recommended that you **agree** to the proposed scope, governance and timelines of the review of the processes and organisational structure INZ has adopted to manage immigration security and reputational risk.

Rob Stevens  
General Manager  
Service Support

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# Bullet Points – Review of the Immigration Profiling Branch

## BACKGROUND

- The IPB was established in May 2005 as a result of concerns raised publicly over former high ranking Iraqi government officials in New Zealand. This was considered to be a risk to New Zealand's international reputation.
- The IPB processes applications from countries identified as high risk. At the time of its establishment it was considered that defining risk by countries was the most appropriate mechanism.
- All applications from a list of countries are referred and assessed by the IPB as well as counter proliferation applications from countries.

[s6(c)] §6a

## HOW ARE APPLICATIONS PROCESSED?

- Applicants from high risk countries are required to send their visa applications to their local offshore branch. A visa applicant cannot send their application directly to the IPB.
- The offshore branch refers the application to the IPB together with all original documentation (including passports).
- An assessment is undertaken at the IPB as to whether the visa applicant fits a particular risk profile.

[s6(c)]

- §6a
- Significant delays can be experienced as a result of the process of sending the physical application to and from New Zealand.

## PROCESSING NUMBERS

- Up to May 2013 – 34,320 applications decided (7,731 declines not all for unacceptable risk, more so for doubtful bona fides).
- 2,318 referrals for assessment to the [s6(c)]
- 100 of these referrals were deemed to be of unacceptable risk made up of 40 counter proliferation cases, 46 temporary applications and 14 residence applications.
- An additional 89 unacceptable risk applications were referred from other branches 72 from the Refugee Quota Branch and 17 from other offshore branches. Branches may refer applications (not on the country list) directly to the IPB if they consider there are reputational risk issues. [s6(c)]
- The cost per application for running the IPB is approximately \$600.00 as opposed to approximately \$120.00 on average across other branches.

## THE REVIEW WILL COVER

- The extent Cabinet's original intent has been met.
- Whether the current model is still "fit-for-purpose".
- The cost and impacts, alternative options/models that may offer a more effective and/or more efficient way of achieving Cabinet's intent.



### Time Line for the Review of the IPB

7 February	Request sent for a meeting with Nigel to discuss the review of IPB and its focus
4 <sup>th</sup> March	Memo drafted to Nigel to discuss draft IPB ToR / Coversheet completed (Pat does not keep copies)
18 <sup>th</sup> March	Draft ToR sent out to leadership team seeking comment
19 <sup>th</sup> March	Rob Stevens meets with Nicola Hogg and Steve Stuart
21 March	Comments received by Steve McGill
22 <sup>nd</sup> March	Comments received by Catriona McKay
10 <sup>th</sup> April	ToR recirculated taking in to account ILT comments
11 <sup>th</sup> April	Email received from Steve Stuart re Big P / little P. Advised that the majority of work is around how we manage operational risk and organisational structure. Policy wanted us to take the lead
22 April	Draft ToR sent to MEAT for comment
1 May	Email to Rob advising on discussion with Nigel in the lift. He wanted a copy of the draft paper to the MOI. Advised that we are awaiting MFATs comments and I would follow them up today and forward him a draft of the paper
1 May	Email received from Policy about a meeting between Ministers McCully and Woodhouse to discuss a number of topics including the list of IPB countries
3 May	Redrafted paper taking into account a) proposed meeting of the 7 <sup>th</sup> of May b) comments received from MFAT and ILT colleagues.  Paper sent down to Nigel under cover note for sign off (attached)
6 May	Email sent to MFAT that the paper is unlikely to be sent over in time for the meeting and that we would not send them a final copy of the paper until it has been signed out by our Dep Sec.
8 May	Confirmed with Ministers office that no other brief received except for that provided by Policy

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