

# Reconnecting New Zealand Incident Management Team

## DECISION MEMO

<b>Initiative Title</b>	Visa Transfers
<b>Initiative #</b>	PRO20
<b>Submitted By</b>	Simon Cook
<b>Date of Submission</b>	22/11/2022
<b>Decision By</b>	Richard Owen

### 1. Problem and Summary

#### A. Problem Statement (*What is the issue we are solving*)

##### Clients requiring a visa transfer to a new passport

1. Visas are linked to a client's passport or certificate of identity. When a client obtains a new passport, they will need to transfer any valid visa to the new passport before the visa can be used to travel.
2. This applies regardless of whether the holder has a physical label (a physical endorsement of their visa in their passport) or not (in which case, they'll have been sent an "eVisa" to "evidence" their visa, if necessary).

##### Types of visa "transfers"

3. There are currently four processes that fall within the *Application for Transfer or Confirmation of a Visa* form (INZ 1023) processed by NaDO. Although these are not all strictly transfers, they are generally referred to under the same overarching header.

Transferring a visa to a new passport	Currently process to transfer a visa to a new passport is the same as any other new application in AMS, even though this is not defined as an application under the Immigration Act. However, as visas can be issued beyond the expiry date of a passport in some cases (PRV, RV and WV issued for more than 24 months) and people can lose/have passports stolen, many visa transfers are simply an update of personal information – in this case, a passport number.
Applying for the "balance" of a visa to be applied to a new passport	These visa transfers that are requesting the "balance" of a visa, where instructions do not allow a visa to be issued past the expiry date of a passport (WV less than 24 months, SV, VW). While these are referred to as transfers, they are required to be treated as new applications, and required to be decided by a designated Immigration Officer.
Requesting a confirmation of NZ immigration status	This process is for those who require evidence of their Immigration status, including Australian citizens and permanent residents who need to provide evidence of their NZ status but do not need it to be an endorsement in their passport (that is, are happy to be sent an eVisa to evidence their status).

Application for confirmation of immigration status with a visa label to be placed in a passport

It is the right of a visa holder to apply for confirmation of visa status by way of a label in a passport, or transfer of an existing label to a new passport under current regulations.

**The problem faced is as follows:**

4. INZ currently has a large volume of visa transfer requests on hand, from people with temporary [entry class] visas, resident, and permanent resident visas. There are approximately 8000 un-lodged paper transfer applications on hand with NaDO. We are currently receiving about 1500 per week.
5. Due to this currently being a paper product, this volume of files takes up a large amount of physical space and requires applications to be manually lodged in AMS before being actioned.
6. There are currently 22 Support Officer (SO) FTEs working full time on the visa transfer process; however, as a third of these SOs are currently in training, decisions are not currently matching the inflows.
7. This product generates a large amount of noise, as it is often linked to client's wanting to travel in the short-term future. NADO receives around 30-40 escalations per day, which requires 2 FTEs (of the 22FTE) to focus solely on actioning these escalation requests and returning original passports. Because of the paper nature of the product, the escalation process requires a SO to manually search through thousands of applications to locate the application and allocate it for urgent processing.
8. The majority of this work does not generate any revenue for INZ. If a client requests a physical visa label, there is a fee attached to this process; however, if an eVisa transfer is requested there is no fee payable. NADO estimates around 40% are requesting a physical label.
9. This product has the highest paper inflows for any INZ product.
10. NADO, ICC and the CFT are significantly impacted by the high inflows, low resourcing and noise surrounding this product.
11. Due to the current on hand numbers, INZ is not meeting the stated timeframes on our website.
12. A Mi-Process request has been submitted (28/09/2022) by NADO for the creation of an online/Plone form for the transfer process (CR01815).
13. The Mi-Process request contains data from the Enterprise Reporting Portal in relation to volumes of applications processed each month over the past three years.

s9(2)(h)

15. However, to remove the right of a visa holder to apply for confirmation of visa status by way of a label in a passport, or transfer of an existing label to a new passport would need a regulation change; as regulation 32 of the Immigration (Visa, Entry Permission, and Related Matters) Regulations 2010 currently give a person the legal ability to apply for a physical visa label to be placed in their passport (reg 32(1)(a)), or an existing endorsement transferred into their new passport (reg 32(1)(b)).

16. While INZ do not require a label in passports, it is known that some foreign border agencies or airlines still prefer to see physical labels in passports before allowing traveller to embark, and any change in this space should take into account the international context in which we operate.

## **B. Proposed Solution(s)** *(Summary of the initiative being proposed)*

17. It is proposed to take a multi-phase approach to reduce the visa transfer burden that INZ currently face.

1. In the short term, transfer the current paper form (INZ 1023) online

# 9(2)(g)(i)

### **Phase 1**

#### **Online form (platform to be confirmed)**

With urgency, move the current application from a 100% paper-based process, to one that is online first hybrid, with an option for a hard copy process

18. Within the current regulations, we are not only required to provide a service for labels, but also required to allow for customers to access this service through a hard copy form. The process for any requested hard copy forms would remain unchanged.
19. To deter the use of paper forms in the short term, it is proposed to update the website to make an online process more appealing and easier to access than the hard copy counterpart.
20. The overall process is yet to be designed but should involve:
  1. removing the mailing address for NaDO from our website and adding a step to access the form, e.g., "If you wish to access a paper form for this application, click here",
  2. Ensure that our website content is clear that a label is not required by INZ to travel to NZ,
  3. Where someone is submitting a request for a label to be added to the passport, provide the details of how to submit their passport after payment is received. Along with submission details an AMS reference that will allow us to match the passport to the application quickly within NaDO should be provided.
21. Moving the transfer requests online would reduce the mail received for transfers and would eliminate lodgement steps in NaDO, by incorporating a payment facility online.
22. An online form will remove the need for offshore clients to apply through their nearest VAC. Currently NADO receives 30-100 VAC Digital applications a day for offshore clients. These applications require lodgement and then processing steps. Online will remove the need for resource in this space as well as a reliance on a VAC to upload an application again, improving the overall customer experience and processing timeframe.
23. Clients also benefit from an online process as there would be no VAC receiving and processing fees.
24. Considerations around online:
  1. DDI are currently investigating which platform will be best to host an online form. Early indications are that Power Apps may be suitable, but further work is required to confirm.
  2. While Plone was suggested initially, this product is nearing end of life, and another platform may provide a more enduring solution.

# 9(2)(g)(i)

## C. Decisions Requested ('Endorse' or 'Approve' only – no 'Note')

30. **Endorse** the direction of travel, moving paper form INZ 1023 from an exclusively paper-based process, to an online first, hybrid model
31. **Endorse** that IMT pass this approach to the Operational Policy team within INZ to implement and manage going forward as a part of their BAU function.
32. **Approve** work to commence on *Phase 1* of this memo being initiated with priority noting that a platform, and therefore cost and timeframe for delivery, is yet to be confirmed for this work
  1. As there is no SOW from DXC yet, it is proposed this approval covers work up to \$90K, (being the projected courier cost savings). Any quoted costs above this would require reapproval.



## 2. Initiative and Impacts

### A. Objectives/Benefits *(What will be achieved by this initiative, e.g. time savings – give data)*

#### Phase 1

33. Upon moving most of the work online, it is expected that NaDO will be able to reallocate approximately 8-10FTE away from transfers work, based on the lodgement in AMS being automatically completed. Initially, these staff would be tasked to clear the residual backlog of applications (noting there are some tactical initiatives underway to make a start on this).
34. The benefits of putting this form online, include the ability for staff to work more flexibly, simplifying allocation of work, escalation management and reporting. It may also help reduce the overall risks associated with the existing process in terms of security of the payment portal and if we see a corresponding reduction in the number of physical passports received.
35. An online experience will improve efficiency and allow for better tracking of requests, improving the overall customer experience and helping the ICC to provide more clarity to customers.

### B. System Impacts *(What other impacts will/may this create across the system– e.g. ICC calls)*

39. NADO, ICC and the CFT are significantly impacted by the high inflows, low resourcing and noise surrounding this product.
40. Due to the current on hand numbers, INZ is not meeting the stated timeframes on our website.
41. There is no visibility of paper applications for ICC, clients or NaDO when there are these large processing delays.

### C. Risks *(Identified risks and any mitigations, i.e. additional reporting/checks)*

#### Current Risks

#### s9(2)(h)

43. COVID-19 and the Level 4 lockdowns highlighted the reputational risk INZ could be put under in relation to paper-based products and our inability to process these when INZ staff were not allowed to enter INZ offices during these lockdown periods. This risk extends to a BCP risk, should NaDO ever be closed.
44. There are physical and information security risks relating to holding physical passports
45. There is risk associated with holding credit card data on file and what this means from a PCI-DSS perspective (adds additional storage / security requirements etc.).

#### Risks of Implementing the initiative

#### 9(2)(g)(i)

# 9(2)(g)(i)

48. Without a confirmed platform, there are risks to both delivery timeframe and costs of the solution. While the costs are likely to be offset by reduced courier costs 9(2)(g)(i)

9(2)(g)(i) and reduced FTE costs, it is not difficult to project the financial viability in the short term.

49. Delivery of any online solution will require on external vendors to deliver, meaning we may have less influence on delivery timeframe than an in-house solution

# 9(2)(g)(i)

## D. Implementation Time (Time implications – give data)

51. An approximate minimum timeframe of 3 months was given for the development, testing and deployment of a new online form, although this is purely an estimate until such time as we have completed the business requirements, and the platform is confirmed.

52. Development and testing times depend on the level of integration/information that is required to be passed from the form to AMS, and the number of upload field or conditional questions i.e., the more scenarios, the more testing required.

# 9(2)(g)(i)

## E. Finance (Funding implications and source (if agreed) – to be endorsed by Finance)

54. Costs of this initiative are unable to be confirmed by the vendor until business requirements are confirmed. Estimates are that the vendor SOW will be at least \$50k.

55. The costs of implementation of this initiative are expected to be offset by the savings achieved through both FTE and Courier savings.

56. The initial estimate of 8 FTE savings represents approximately \$450K annually in released Support Officer resource for reallocation across other visa products.

57. The total courier cost for NaDO over the 12 months ending 31 October 2022 was \$197,061, made up of 50,309 individual courier items.

58. Within this total courier spend, it is difficult to account for the individual transfers costs given the way the data is recorded. Instead below figures are based on the proportion of courier costs that can be attributed to transfers making assumptions on the proportion of the 65,804 transfer applications received that contain a passport requiring NaDO to return.

59. Depending on the point in time, it is generally thought that between 30% and 40% of applications received contain a passport requiring returning, the figures are based upon the extremes of these ranges.

Transfer apps received requiring courier (%)	25%	35%	45%
Transfer apps requiring courier	16451	23031	29612
Proportion of courier that are transfers (%)	32.70%	45.78%	58.86%
Annual (est.) spend on courier for transfers	\$64,439	\$90,214	\$115,990

60. Based on the above figures, it is recommended we apply a cost ceiling on \$90k to this work, with reapproval required if costs are estimated to exceed this.



## 9(2)(g)(i)

62. Although there are likely to be ongoing support/maintenance costs associated with a move online, these are expected to be minimal and would be covered by the ongoing courier savings or absorbed into existing support agreements.

### F. Resources *(Other resource requirements including people, and source if known)*

63. Phase 1 will require a minimum
1. DDI Business Analyst (Lynn Court)
  2. Operational Policy SME, TBC
  3. NaDO SME (Penny Blackbourn/Anjali Shee)
  4. DXC resource, TBC through SOW
  5. INZ Comms (Sophie Keogh)
  6. Further resources as required, e.g., testers will be confirmed once platform is confirmed

## 3. Consultation and Communications

### A. Implications for Specific Groups *(Note potential impacts where applicable, or N/A)*

#### Te Tiriti o Waitangi (partnership, participation, protection)

1. N/A

#### Immigration NZ Customers

2. Faster processing times; greater transparency and visibility in the process
3. Streamlined online process

#### Migrant Communities

3. As above as these are our INZ customers

#### Gender

4. N/A

#### Diversity and Inclusion

5. N/A

### B. Stakeholders Consulted *(State any feedback or endorsement)*

64. NaDO (Kara Eskerie, Penny Blackbourn, Kim D'Souza)
65. Legal (Fraser Richards, Louisa Coxon)
66. Operational Policy (Alejandra Mercado, Kathy Tait, Nicola Wright)
67. Border (Peter Elms)
68. Operations Support (Faith Talamaivao)
69. Immigration Contact Centre (Nelofar Ghumkhor, Kate Sneyd)
70. Assurance (Zoe Goodall)
71. DDI (Jane McCord, Lynn Court, Sinziana Ciubotaru)
72. Policy (Steven Sue)
73. Enablement (Stephen Dunstan)
74. Finance (Aaron Hayne)

### C. Stakeholders TO BE advised *(Stakeholders to engage with post-decision, for implementation)*

- 75.
1. Minister of Immigration and Associate Minister of Immigration
  2. External - Current applicants, Licensed Immigration Advisers, migrant communities
  3. Internal – Immigration Officers, NaDO and Contact Centre
  4. VFS - VACs

**D. Communications and Engagement Requirements** (key points to aid comms plan development)

74. Communications plan will be required
1. Key messages on changes, both internal and external
  2. Guide to how to use the new process for ICC
  3. Web content, Q&A and pro-comms emails to current applicants, LIAs, migrant communities

**4. Implementation Requirements**

**A. Tasks** (List tasks needed to implement this initiative and who will do them)

75. Business Requirements for online form to be written, including confirmation of platform to be utilised
76. Resources sourced for developing/testing the form and integration to AMS, likely DXC
- 9(2)(g)(i)
78. Comms plan to be developed, currently underway with INZ Comms
79. Training to NaDO as required, Kim D'Souza can be a point of contact for any NaDO requirements

**B. Coordination Requirements** (Synchronisation required with the wider system (if any))

**5. Decision Record**

**Decision**

~~APPROVED / DECLINED / FURTHER WORK REQUESTED~~

**Explanation** (Explanation of factors considered to get to decision or what further work is requested)

Approved. Please proceed to Phase I via Op. Policy.

**Signature and Date**

Richard Owens Date:  
Incident Controller

29/11/22

R. OWEN, Incident Controller.