



Consultation on immigration settings for international students

Submission document

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Submission by:



Submitter information

We are submitting as a:
<input checked="" type="checkbox"/> Education provider <input type="checkbox"/> University <input checked="" type="checkbox"/> Private Training Establishment <input type="checkbox"/> Institute of Technology and Polytechnic <input type="checkbox"/> English language provider <input type="checkbox"/> Other
If you would like to provide your contact details please fill in the below. MBIE may contact you if we need further clarification on any of your answers.
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About us

Te Rito Maioha Early Childhood New Zealand is a national mainstream bicultural tertiary provider and membership organisation that promotes high-quality early childhood education (ECE) through initial teacher education, professional learning and development, advocacy and membership services.



We are a registered Private Training Establishment (PTE) offering a range of qualifications both nationally and internationally. We are one of New Zealand's top providers of initial teacher education for ECE teachers (rated Category One in the annual External Evaluation Review), accredited and approved by NZQA to deliver undergraduate, graduate and postgraduate qualifications in early childhood teacher education and leadership.

We are a leader in bicultural initial teacher education and a champion for bicultural understanding and practice; this is evident in the content and design of our programmes.

We are committed to high-quality early childhood education and care for every New Zealand child. This has been our purpose for more than 55 years since our formation in 1963, originally as Te Tari Puna Ora o Aotearoa/New Zealand Childcare Association.

As a membership organisation, we advocate on behalf of ECE services and the teachers who provide education and care to thousands of infants, toddlers and young children. Our members are drawn from a diverse range of community-based and privately-owned education and care services, home-based services and kindergartens.

Settings for post-study work rights for international students

Proposal One: to remove employer assisted post-study work rights visa

1. Do you support the proposal to remove employer assisted post-study work visas?

Yes

We support this proposal because we consider it important to take all necessary steps to stop the exploitation of overseas students and new qualified migrant workers by dishonest employers, providers and agents, and to repair any damage to New Zealand's reputation overseas that may have resulted from instances of exploitation.

2. What impacts do you think the proposed change will have on you or your organisation?

None. We do not broker workplace opportunities for our international graduating students.

Proposal Two: to provide a one-year open post-study work visa for non-degree level 7 or below

3. Do you support the proposal to provide a one year open post-study work visa for non-degree level 7 or below?

Yes – with provisos

We support the proposal in general terms for programmes that will not directly contribute to skills needs in New Zealand and/or for programmes that do not require prior level 7 qualifications. However, we contend that there should be exemptions or nuancing in the policy, or the ability to apply for exemptions, especially for study towards professions such as healthcare and education.

We consider there needs to be clear definition of “non-degree” (see also our comments to Proposal Four below).

By way of example, one of our key programmes is a Graduate Diploma in Teaching (ECE). This is an intensive one-year, full-time (our programme is 150 credits, which exceeds the 120-credit full-time threshold) level 7 programme, including 13 hours per week of work experience in an early childhood education (ECE) centre. The entry requirements to the Graduate Diploma are rigorous, and, as a minimum, students must have completed a degree (in Education or another discipline). The Education Council of Aotearoa New Zealand is responsible for the standards for qualifications that lead to teacher registration. It recognises as equivalent the Graduate Diploma in Teaching (ECE) and the three-year Bachelor of Teaching (ECE). (Refer appended document.) Upon completion, graduates of both programmes can apply for teacher registration and provisional certification, and are ready for employment. Full teacher certification takes at least two years to achieve. The Education Council does not support differentiated employment pathways for initial teacher education graduates, which this proposal would ultimately impose if implemented as a blanket policy.

4. What impacts do you think the proposed change will have on you or your organisation?

The impact would be that some international students who complete the Graduate Diploma in Teaching (ECE), and meet all other requirements, would not then be entitled to work in New Zealand, despite them being highly desirable skilled migrants who could assist in remedying the significant teacher shortages in New Zealand. It could make our Graduate Diploma in Teaching (ECE), and that of other providers, less attractive to overseas students.

Proposal Three: to provide a three-year open work visa post-study for degree level 7 or above

5. Do you support the proposal to provide a three year open work visa post-study for degree level 7 or above?

Yes

This works well for degree programmes for initial teacher education, as the graduating student can use the period of the open work visa to work and gain their teacher registration and practising certificate. This will positively contribute to the increasing the pool of qualified ECE teachers, and to the ECE sector's desire for a diverse and qualified workforce to meet the needs of their diverse services and communities in New Zealand.

6. What impacts do you think the proposed change will have on you or your organisation?

We think the impact on us will be limited because we would expect that most international students would want to return home with their qualifications. However, this may provide an opportunity to attract more international students to study, work and live in New Zealand, in relation to the teaching profession.

Proposal Four: to require students studying at non-degree level 7 (such as graduate diplomas) to study in New Zealand for at least two years to be entitled to post-study work visas

7. Do you support the proposal to require students studying at non-degree level 7 (such as graduate diplomas) to study in New Zealand for at least two years to be entitled to post-study work visas?

No – not entirely

We believe that in some cases (ie, for some programmes of study) this policy proposal would be appropriate. See our comments to Proposal Two. However, we consider this proposal needs even more nuancing to allow for initial teacher education, especially for the Graduate Diploma pathway, for which the two-year study duration requirement would be problematic. Our Graduate Diploma programme is an intensive one-year, full-time programme of study (150 credits). Under this proposal, graduates of the programme would not be able to stay in New Zealand on completion, because their course of study would not have satisfied the duration requirement. We would like to either see an exemption built into the policy, or some kind of acceptable workaround; for example, could the teacher registration and certification process that follows the Graduate Diploma in Teaching qualification be officially required as an adjunct to the Graduate Diploma for immigration purposes?

8. What impacts do you think the proposed change will have on you or your organisation?

If this proposal comes in without nuancing or exemptions, the Graduate Diploma in Teaching (ECE), as well as primary and secondary Graduate Diploma programmes, won't meet the two-year study duration requirements, and would likely make taking the programme unviable for international students. This could potentially prevent skilled immigrants with an existing level 7 degree from coming to New Zealand, as they would not be entitled to work post-study, which could have a knock-on effect for teacher supply.

Implementation

9. If changes are made to the settings for international students, do you think that students with current visas should be exempt from the changes (i.e. still be entitled to post-study visas that were anticipated when they got their first student visa)?

Yes

We support exempting current students because it seems unfair to change the rules partway through their course of study or visa period. In the majority of cases, the students have come to New Zealand in good faith, and subsequent changes to our policy settings should not negatively impact them. Existing students should have the conditions on which they entered the country honoured. However, if the changes are to their benefit, then existing students should be allowed to positively apply for consideration for an “upgrade” to their visa.

10. If the proposals above are agreed, how long do you think would be needed to accommodate these changes?

We don't have a firm position on this. Immediately is fine, as long as the exemption for existing students applies. As a general note, the clear communication of any changes to immigration settings will be a vital part of every agent's and provider's marketing strategy, so changes will need to be managed and communicated widely in a timely way.

Other comments

11. Do you have any other comments on these proposals?

Yes.

We would like MBIE to work closely with the key education agencies to ensure New Zealand's education workforce issues are prioritised and are not negatively affected by changes to immigration policy. We have serious teacher supply issues in the ECE and compulsory education sectors, so it is vital we can attract overseas students and/or qualified teachers to undertake the New Zealand requirements, and on completion remain in New Zealand to work in the ECE sector (including adding ECE teachers to the skills shortage lists, to reflect the chronic teacher shortage).

Eligibility of students' partners and children to work and study in New Zealand

Proposal Five: change the requirements for a 'Partner of a Student' work visa to require the international student partner studying at Level 8 or 9 to be studying in an area specified on the Long Term Skill Shortage List

12. Do you support the proposal to change the requirements for a 'Partner of a Student' work visa?

Yes

This proposal makes the requirements consistent with level 7 and other groups of visa holders, and recognises skills shortages. But we must ensure the skilled shortages list is always up to date.

13. What impacts do you think the proposed change will have on you or your organisation?

We offer qualifications at level 8 and level 9, and think it vital that ECE teachers are added to the Long Terms Skill Shortage List.

14. Do you have any other comments on these proposals?

No

