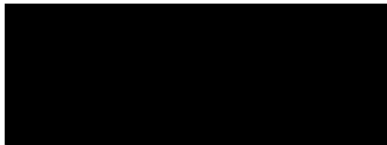




12 MAR 2019



Dear 

Thank you for your email of 6 February 2019 to the Ministry of Education requesting the following information:

1. *a copy of the nomination made by the Ministry of Education for the occupation of early childhood teacher to be added to the Essential Skills in Demand List, and*
2. *a copy of the submission made by the Ministry of Education to MBIE in response to the MBIE's preliminary indicator evidence report sept 2018 Early Childhood (Pre-primary school) Teacher (241111) .*
3. *a copy of memos, reports and background papers prepared by Ministry of Education staff and any submitted to it by any organisation or individual, that helped to inform or were related to the Ministry's nomination for ECE teachers to be added to the ESID list or to the Ministry's submission to MBIE on this matter.*

Your request has been considered under the Official Information Act 1982 (the Act).

In relation to points one and two of your request, I am providing you with copies of the Order Nomination Form (ONF) and the Submission Form (attached as **Appendices A** and **B**). I am withholding some information under section 9(2)(a) of the Act to protect the privacy of natural persons. I have identified no public interest considerations sufficient to outweigh the need to withhold this information at this time.

In relation to point three, the Ministry would not normally engage external parties to write memos, reports or background papers for the submission process. Ministry staff made use of existing information that had been published on Education Counts in preparing the ONF and Submission Form. This information is publicly available here:

- <https://www.educationcounts.govt.nz/statistics/early-childhood-education>
- <https://www.educationcounts.govt.nz/statistics/tertiary-education/initial-teacher-education-statistics>

Following a thorough search of the Ministry's records, we were unable to find any memos, reports or background papers prepared by the Ministry, or submitted to the Ministry from any external organisations or individuals, that helped to inform, or were related to, our nomination for early childhood education teachers to be added to the Essential Skills in Demand list or to our submission to the Ministry of Business, Innovation and Employment on this matter. Therefore, I am refusing this part of your request under section 18(e) of the Act as reasonable efforts have been made to determine whether the requested information exists, and despite reasonable efforts to locate it, it cannot be found.

Please note, the Ministry now proactively publishes OIA responses on our website. As such, we may publish this response on our website after five working days. Your name and contact details will be removed.

Thank you again for your email. You have the right to ask an Ombudsman to review this decision. You can do this by writing to info@ombudsman.parliament.nz or Office of the Ombudsman, PO Box 10152, Wellington 6143.

Yours sincerely



Ellen MacGregor-Reid
Deputy Secretary
Early Learning and Student Achievement

Appendix A



Ministry of Business,
Innovation & Employment

Review of Essential Skills in Demand Lists Occupation Nomination Form

All occupation nominations must be submitted using the attached form. The nominated occupation must have an occupation code which can be found from the Australian and New Zealand Standard Classification of Occupations (ANZSCO). You can link to ANZSCO information at www.immigration.govt.nz/anzsco.

Key dates

25 June 2018

Occupation nominations open

23 July 2018

Occupation nominations close at 5pm

Enquiries and nominations

All enquiries and occupation nominations should be directed to:

Email: shortages.review@mbie.govt.nz

Background

The Ministry of Business, Innovation and Employment (the Ministry) maintains the Essential Skills in Demand (ESID) Lists: the Immediate Skill Shortage List (ISSL) and the Long Term Skill Shortage List (LTSSL). Each list performs a particular immigration policy function, and potential migrants use both lists to help understand where opportunities for work lie in New Zealand.

You can check whether an occupation is on a shortage list, or can be classified as skilled under the Skilled Migrant Category, by using the [skill shortage list checker](#). This provides information and the requirements for each of the lists. Information on the review process can be found [here](#).

Please note: An Occupation Nomination process is not used for the Canterbury Skill Shortage List (CSSL), which was created to meet demands for the Canterbury rebuild and economic recovery following the earthquakes. The CSSL is reviewed about three times each year, and follows a different process for review.

Use of ESID lists in immigration

It is **not** necessary for an occupation to be listed on one of the ESID lists in order for a person to obtain a visa to work in that occupation. Employers may bring in migrant workers on temporary work visas under the [Essential Skills](#) work visa policy for occupations not listed on the ISSL or LTSSL, provided they demonstrate that suitable New Zealanders are not available. Other policies that may be used include [Approval in Principle](#), [Talent \(Accredited Employers\) Policy](#), and the [Skilled Migrant Category](#) for residence.

Employers wanting to recruit from overseas are encouraged to visit the Immigration New Zealand website <https://www.immigration.govt.nz/employ-migrants>.

Objectives of the Essential Skills in Demand Lists

The Essential Skills in Demand Lists aim to facilitate the entry of appropriately skilled migrants to fill skill shortages, and to reduce costs and time delays for employers seeking staff. However, this objective must be balanced by the need to ensure that there are no suitably skilled or qualified New Zealand citizens or resident workers available to undertake the work, and that the shortage is genuine.

In general, the government expects that New Zealand industry, employers and the education sector will work together to train or upskill New Zealand workers to fill roles created by turnover and/or by anticipated growth and to pay workers appropriately according to their skills. It views succession planning as part of core business.

However, the government also recognises there are circumstances where the supply of New Zealanders in a particular field may be limited in the short term while New Zealanders are being trained for these roles, or likely to continue to be limited in the longer term while core capacity is developed, or where there are global shortages. An example might be a new technological area where the number of New Zealanders trained in the area is still very

limited, or alternatively in an area of rapid growth where New Zealand based training cannot keep up with demand.

The lists are reviewed every year to ensure they meet the needs of the changing labour market. An occupation may be considered for inclusion on the ISSL or LTSSL provided that:

- the skill level of the occupation is 1, 2 or 3 on the ANZSCO
- the skill shortage is genuine, non-seasonal in nature and industry-wide, e.g. it is not due to difficulties experienced by particular employers in recruiting or retaining New Zealanders because of unattractive working conditions
- there has been a demonstrated attempt to train and attract New Zealanders to available jobs
- terms and conditions in the New Zealand labour market are not undermined, including the training, education and development opportunities of New Zealanders
- the government's education, training, employment and economic development policies are supported
- prevailing and anticipated labour market conditions are taken into account (for example levels of unemployment), and
- there is a significant shortage of suitable New Zealand citizens or resident workers available to undertake the work, and the shortage may reasonably be met by migrants. (this is generally measured as at least 50 work visas per annum, for migrants in that occupation.)

The ESID lists are **not** designed to cater for lower skilled labour shortages or seasonal labour shortages. Nor are they intended to address recruitment and retention problems arising because the industry cannot, or does not, meet the terms and conditions necessary to recruit sufficient numbers of suitably qualified workers from within the New Zealand workforce.

The Immediate Skill Shortage List

The Immediate Skill Shortage List (ISSL) includes occupations where skilled workers are immediately required, either throughout New Zealand or in certain regions. It facilitates the approval of temporary work visa applications. If an applicant has an offer of employment and meets qualification and work experience requirements for an occupation that is included on the current ISSL, immigration officers will accept that no suitably qualified New Zealand citizens or residents are available.

The ISSL is grouped by the following regions:

- Auckland/Upper North Island
- Waikato/Bay of Plenty
- Central North Island (including Taranaki, Manawatu and Hawkes Bay)
- Wellington (including Wairarapa)
- Canterbury/Upper South Island
- Otago and Southland.

The Long Term Skill Shortage List

The Long Term Skill Shortage List (LTSSL) identifies those skilled occupations where there is an **absolute** (sustained and ongoing) shortage of workers both in New Zealand and globally.

People who gain employment in one of these occupations may be granted a work visa under the LTSSL Work to Residence Visa policy. They may apply for residence after two years provided they have remained working in a LTSSL occupation with a base salary of at least NZ\$45,000 and meet standard policy requirements.

Applicants for residence under the Skilled Migrant Category, who have an offer of employment or work experience in an area of absolute skill shortage on the LTSSL, can gain bonus points for their application for residence.

Released under the Official Information Act 1982

ESID review process

The process for reviewing the ESID lists is summarised below:

1) Call for Occupation Nominations

The Ministry calls for industry stakeholder proposals for occupations to be reviewed. Occupation Nominations must be made on the attached form and submitted to the Ministry by **5pm on 23 July 2018**.

2) Selection of occupations to be reviewed

The Ministry assesses the Occupation Nomination proposals and selects occupations to be reviewed. The Ministry may also identify occupations that it wishes to review as a result of its own intelligence gathering. As a general rule, occupations identified by industry stakeholders will take precedence, and the Ministry will provide the balance of occupations for review.

3) Publication of Preliminary Indicator Evidence Reports

The Ministry prepares a Preliminary Indicator Evidence Report (PIER) for each occupation selected for the review. The PIER collates relevant statistical data about the occupation and provides a **preliminary view** on the status of the occupation. The PIERs will be published on the Immigration New Zealand website **mid-August 2018**.

4) Call for submissions on occupations selected for review

Submissions will be sought from industry groups and others about the nature and extent of skill shortages in the occupations selected for review. A submission form will be available on the Ministry's website www.immigration.govt.nz by **3 September 2018**. The submission stage will conclude on **8 October 2018**.

5) Wider sector consultation on occupations

The Ministry will undertake any further follow-up with submitters, consultation with government agencies and industry, and additional data analysis that may be required to inform decisions on any changes to the ISSL and LTSSL. The consultation process will conclude **late January 2019**.

6) Decisions made and published

Where there is consensus that an immediate skill shortage exists, the Ministry will recommend that the occupation be added to the ISSL. Where there is a demonstrated absolute (sustained and ongoing) and global long term skill shortage, the Ministry will recommend that the occupation is added to the LTSSL. Occupations may be removed from a list where a shortage no longer exists. There may be cases where the Ministry does not consider changes to the lists to be the most appropriate response to the shortage, and may recommend an alternative solution.

It is expected that final decisions will be published on the Immigration New Zealand website **29 March 2019**.

The Occupation Nomination process

What is an Occupation Nomination for?

The Occupation Nomination process provides an opportunity for industry representatives to request a change to the ESID list status of an occupation.

The completion of an Occupation Nomination Form is the first step in requesting that an occupation be:

- added to one of the ESID lists, or
- removed from one of the ESID lists, or
- moved from one list to the other.

Please note: Occupations will not be considered for review unless an Occupation Nomination Form has been completed and submitted to the Ministry within the specified timeframe.

What initial criteria must be met?

Occupation Nominations will generally only be considered by the Ministry where:

- the occupation has an ANZSCO skill classification at level 1, 2 or 3, and has a specific, recognised qualification requirement, **and**
- the occupation has not been reviewed by the Ministry within the last review period ¹ (or, if it has, the submitter can demonstrate a **significant change** in labour market conditions that warrants a further review), **and**
- the Occupation Nomination has the support of at least one industry body or professional association (for example, an employers' group, trade union, or industry training body).

Information requirements

The Occupation Nomination process requires submitters to make a case for an occupation to be reviewed.

Occupation Nominations must **provide evidence** in support of the proposed change in ESID list status,

The Ministry will provide advice to assist groups to meet the required information standards. However, the tight timeframe for the review process means that the Ministry **will not** accept new or revised Occupation Nominations beyond the close-off date.

If the Occupation Nomination is successful, you will be required to provide additional information through the submission process. This information may add to the Occupation Nomination and/or respond to the Preliminary Indicator Evidence Report prepared by the Ministry.

¹ A list of occupations reviewed in the last review period is at the end of this form.

How will Occupation Nominations be assessed?

The Ministry will assess each Occupation Nomination received. Submissions must, in the first instance, meet the three initial criteria listed above.

Where the Occupation Nomination meets the initial criteria, the Ministry will collate relevant statistical data on the occupation, including:

- vacancy rates for the occupation
- estimated jobseekers available
- numbers of visa approvals in the last two years
- number of visa approvals as a percentage of total employed in the occupation, and
- employment growth in the occupation.

The Ministry will decide whether to review an occupation based on an assessment of this data, together with the information/evidence provided through the Occupation Nomination process. Where neither the data analysis nor the evidence provided through the Occupation Nomination is sufficient to support a case for review, the occupation will not be included in the review. Also, there may be cases where the Ministry does not consider changes to the lists to be the most appropriate response to the shortage, and may recommend an alternative solution.

If the Ministry decides not to review an occupation, the submitter will be informed of the decision and the reasons for the decision.

Please note: Acceptance of an Occupation Nomination for review will not automatically lead to changes to the ESID list status of an occupation. This is the first step in the review process. At the submission stage other industry representatives may submit further evidence and the Ministry will consider all submissions alongside analysis of economic, labour market, training, immigration and other relevant data.

Occupation Nomination Form

Please complete this form if you would like to propose an amendment to either the Immediate Skill Shortage List or the Long Term Skill Shortage List.

You may propose the addition or removal of an occupation from one of the lists, or the transfer of an occupation from one list to the other.

You must complete a separate Occupation Nomination Form for each occupation you would like to have considered.

Please answer all questions. Incomplete submissions will not be processed.

Please note the answer fields will auto-extend to accommodate your responses. If you are providing documents, you may attach these separately.

Disclosure

Please note that if this Occupation Nomination is successful, the information provided may be made available to interested parties as part of the review. This is to promote maximum transparency and to encourage the exchange of information between all stakeholders who contribute to the review process. If the Occupation Nomination, or some of its content, is provided to others for the purposes of information sharing and/or consultation, personal contact details will be treated as confidential.

Information held by the Ministry, including the information provided in this form, is official information under the Official Information Act 1982. Accordingly, if a request is made for information under that Act, the Ministry may be required to release this information.

Occupational statistics collected during the course of the review may be used by the Ministry for other research purposes, but individual employers will not be identified.

All enquiries and occupation nominations should be directed to:

Email: shortages.review@mbie.govt.nz

1. Contact information

Who should the Ministry contact if more detail is required about your nomination?

Include name, job title, organisation, phone, email and postal addresses.

Di Davies

Senior Manager Education Workforce

Ministry of Education

di.davies@education.govt.nz

Work: [REDACTED]

Mobile: [REDACTED]

2. Disclosure

Please confirm that you have read and agree to the terms of the disclosure statement, below.

Disclosure statement:

- The information contained in this Occupation Nomination, or some of its content, may be provided to others for the purpose of information sharing and/or consultation. In this event, personal contact details (individual names, telephone numbers and email addresses) will be treated as confidential.
- The information provided in this form is official information under the Official Information Act 1982 and, accordingly, the Ministry may be required to release this information if a request is made under that Act.
- Occupational statistics collected during the course of the review may be used by the Ministry for other research purposes, but individuals and employers will not be identified.

☒ I have read and agree to the terms of this disclosure statement.

Name: Di Davies

3. Initial criteria for Occupation Nomination

An Occupation Nomination must meet three initial criteria in order to be considered by the Ministry of Business, Innovation and Employment:

- the occupation must have an ANZSCO skill level of 1, 2 or 3, and a specific, recognised qualification requirement, **and**
- the occupation must not have been reviewed by the Ministry within the last review period ² (or, if it has, the submitter must demonstrate a **significant change** in labour market conditions that warrants a further review), **and**
- the Occupation Nomination must have the support of at least one industry body or professional association.

If you are **not** preparing the Occupation Nomination on behalf of an industry body or professional association, a letter of support from an appropriate industry or professional body must be forwarded with this form.

Nomination details

3a) State the occupation name and ANZSCO 6 digit occupation code.

Ensure that the occupation appears on the Australian and New Zealand Standard Classification of Occupations (ANZSCO). If you cannot find a code for the occupation please contact Statistics New Zealand. The link to ANZSCO is www.immigration.govt.nz/anzsco

241111

Early Childhood (Pre-primary School) Teacher

241213

Primary School Teacher

241411

Secondary School Teacher

3b) Do you want to:

- ☒ add this occupation to a list (please state ISSL or LTSSL) -
- ☐ remove this occupation from a list
- ☐ move this occupation from one list to another (e.g. from the ISSL to the LTSSL)

Note: *It is not normally necessary to make a submission to add an occupation to the ISSL if it is already on the LTSSL. If an applicant produces an offer of employment in an occupation that is included on the current LTSSL, immigration officers will accept that no suitably qualified New Zealand citizens or residents are available, as if the occupation is on the ISSL.*

² A list of occupations reviewed in the last review period is attached to this form.

ESID review history

3c) Is the occupation currently on the Immediate Skill Shortage List or the Long Term Skill Shortage List? (This can be checked at <http://skillshortages.immigration.govt.nz/>).

☒ ISSL

☐ LTSSL

☐ Neither

3d) Was the occupation reviewed by the Ministry in 2017?

Refer to list of occupations at the end of this form.

☐ Yes

☒ No. Go to 3f

3e) Please describe why you consider that a further review of this occupation is necessary.

Ensure that your explanation clearly states how the current labour market conditions for the occupation differ from those at the last review (e.g. change in demand for labour as a result of a particular strategy or project). Why is the change significant?

Please note: Occupation Nominations will not be considered again where there is no significant change in labour market conditions for the occupation specified, or where explanations are generic, rather than specific.

Industry support

3f) Please provide details of the industry body or professional association(s) that support this Occupation Nomination.

Industry bodies and professional associations include employer groups, trade unions and industry training groups.

[Education Council](#)

[New Zealand Qualifications Authority](#)

[New Zealand Principals Federation](#)

[Secondary Principals Association of New Zealand](#)

[Auckland Secondary School Principals Association](#)

[Auckland Primary Principals Association](#)

You must attach a letter/s of support if you are NOT representing an industry body or a professional association.

3g) Please provide details of key stakeholders in this industry who may also have views about this occupation.

For example, government agencies, training organisations, unions, industry bodies, registration bodies and employer groups. Please provide the name and email address of each contact person.

Education Council
Education Personnel
Oasis Education
Auckland Primary Principals Association
Auckland Secondary Principals Association
New Zealand Education Institute
Post Primary Teachers Association
Secondary Principals Association of New Zealand
New Zealand Qualifications Authority
New Zealand's Principals Association
Early Childhood Council

Skills and qualifications

3h) What are the qualification and work experience requirements for the occupation in shortage? (i.e. what qualifications and experience are required to work in the occupation? Please note any applicable registration requirements).

e.g. Bachelor of Engineering (NZQF Level 7) and a minimum of three years' relevant post-qualification work experience

A recognised Initial Teacher Education qualification through the New Zealand Qualification Authority and Teacher Registration or the ability to gain Teacher Registration with the New Zealand Education Council.

4. Case for review

You are required to make a case for an occupation to be reviewed.

Please outline why you think the occupation should be reviewed. List the **key points** and provide any relevant supporting evidence (additional material may be attached).

If the Occupation Nomination is successful, you may be required to provide additional information to support your case and/or to respond to the PIER prepared by the Ministry, through the submission process.

Proposal

4a) **ISSL only** - Does your proposal relate to the whole of New Zealand or only some regions?

Please tick all that apply.

Certain regions only:

- ☐ Auckland/Upper North Island
- ☐ Waikato/Bay of Plenty
- ☐ Central North Island (including Taranaki, Manawatu and Hawkes Bay)
- ☐ Wellington (including Wairarapa)
- ☐ Canterbury/Upper South Island
- ☐ Otago and Southland

Or:

- ☒ **All of New Zealand**

4b) Give reasons for your proposal:

Describe the nature of the issue – list the key points. For example, please provide details of any change in demand for this occupation, the availability of New Zealanders to fill positions, and training available (both on the job and through education providers).

Why is there a shortage or no longer a shortage?

There is increasing pressure on teacher supply in certain locations, subjects and parts of the sector. This includes the Auckland region and subjects like te reo Māori, the sciences, technology and mathematics.

Ministry data shows that advertised teaching vacancies have lifted significantly in recent years (outlined in the table below), while the number of teaching graduates has fallen. In 2017, the total number of annual vacancies reached the highest levels recorded.

This lift in primary and secondary teaching vacancies is being driven by student roll growth as a mini-population boom moves through the schooling sector. In addition, the increasing diversity and complexity of teaching contexts are exacerbating pressures on teacher supply.

Advertised teacher vacancies

Year	Primary	Secondary
------	---------	-----------

2015	6048	3963
------	------	------

2016	6515	4528
------	------	------

2017	7351	4544
------	------	------

Data sourced from the Ministry's Education Gazette

Advertised ECE Vacancies

2015	2301
------	------

2016	2868
------	------

2017	3670
------	------

Data sourced from the Ministry's Education Gazette

Education Recruitment Agents contracted to the Ministry report increased difficulty filling vacancies for schools and early learning services that seek their assistance.

In December 2017, Cabinet agreed to implement a comprehensive teacher supply programme. That package was targeted at the immediate and urgent pressures that principals are facing in recruiting the staff they need for the 2018 and 2019 school years, particularly in Auckland. These initiatives were extended in the May 2018 Budget.

Te Kura provides support for schools under the emergency staffing programme when schools have a teacher shortage. Currently almost 500 students are registered to receive this service due to unfilled teacher vacancies.

More than 180 teachers have been brought in from overseas have been brought in from overseas to fill vacancies not able to be filled from within the New Zealand market in the last 12 months.

Qualified overseas teachers will be a significant source of supply for schools until graduate teacher numbers return to levels that make a more substantial contribution to meet sector demand.

.

The Occupation Nomination is unlikely to succeed if no supporting evidence is provided.

4c) Please detail your supporting evidence below. (supporting material may be attached).

Evidence is required to demonstrate that the issues outlined above can be substantiated. Evidence may be gathered in a range of ways, for example through industry surveys, feedback collated from industry bodies or employers, and data collated from administrative records. In each case it will be important to demonstrate that the 'issue' has some breadth i.e. that it relates to an occupation as a whole, rather than to one or two employers, or a small group.

The Ministry will provide evidence to support this nomination that includes:

- analysis of total teacher vacancies advertised in the Education Gazette and Trade Me
- projected student/teacher numbers to 2030 from a demand-supply model (currently under development before discussion/approval from the Minister and sector groups)
- results of the Auckland Principals Survey to gather staffing issues ahead of the 2019 school year.

Note that sector groups and organisations conduct their own surveys of teacher supply and will be able to provide their results. We understand that Te Rito Maioha has prepared a separate proposal to have early childhood teaching included on the Immediate Skills in Demand List.

Occupations will not be reviewed unless the Ministry is assured that there will be a reasonable evidence base to support the review process.

4d) Are you aware of, or will you be able to collate, evidence and provide it within the timeframe for submissions (by **8 October 2018**)?

☒ Yes – please detail below

☐ No

Please provide full details of:

- a) *the proposed process* - demand and supply model completed and approved, Auckland Principal Survey completed, and further analysis of teacher vacancies
- b) *the timeframes over which you will be collecting evidence* - by the end of September 2018.
- c) *the nature of the information you are seeking* - workforce data and analytics.

Released under the Official Information Act 1982

Next steps

The Ministry will assess all Occupation Nominations received within the set timeframe (i.e. by **5pm on 23 July 2018**). Results of the assessment process will be communicated to your key contact person listed above in August 2018.

Where an occupation has been accepted for review, the Ministry will advise your contact person of the outcome and prepare a Preliminary Indicator Evidence Report (PIER), which will be published on its website in August 2018.

Where an Occupation Nomination does not meet the required standard, the Ministry will write to the contact person explaining the reasons for the decision.

The formal submission process is expected to begin on **3 September 2018**. You will be required to make a full submission in support of the case that you have put forward and/or in response to the PIER report.

The Ministry would like to thank you for contributing to this review.

Released under the Official Information Act 1982

OCCUPATIONS REVIEWED BY THE MINISTRY IN 2017

- Accountant
- Anaesthetist
- Cardiac Physiologist
- Cardiologist
- Carpenter
- Chemical Engineer
- Dental Technician
- Dentist
- Fibrous Plasterer
- Forest Scientist
- Hair or Beauty Salon Manager
- Hairdresser
- Joiner
- Materials Engineer
- Medical Laboratory Technician (Phlebotomy and Histology Technicians)
- Metal Casting Trades Worker (Foundry Moulder)
- Midwife
- Motor Mechanic (General)
- Motorcycle Mechanic
- Ophthalmologist
- Other Sports Coach or Instructor
- Panelbeater/ Collision Repair Technician
- Pathologist
- Petroleum Engineer
- Pharmacy Technician
- Poultry Farmer
- Registered Nurse (Aged Care)
- Registered Nurse (Mental Health)
- Renal Medicine Specialist
- Resident Medical Officer
- Roof Plumber
- Roof Tiler
- Solid Plasterer
- Vehicle Painter/ Automotive Refinish Technician

Appendix B



Ministry of Business,
Innovation & Employment

Review of Essential Skills in Demand Lists Submission Form

The Ministry of Business, Innovation and Employment (MBIE) has selected occupations to be reviewed on the basis of an Occupation Nomination process. MBIE is now seeking wider submissions on these occupations.

Submissions will only be accepted in relation to the selected occupations. Please refer to the list of occupations being reviewed, in the appendix to this form.

When completing this submission form, please refer to the Preliminary Indicator Evidence Report (PIER) for the relevant occupation. PIERs for each of the occupations under review are on the Immigration New Zealand website <https://www.immigration.govt.nz/about-us/policy-and-law/how-the-immigration-system-operates/skill-shortage-lists/current-skill-shortage-review>

Key dates

8 October 2018	Submissions open
9 November 2018	Submissions close

Enquiries and submissions

All enquiries and submissions should be directed to:

Email: shortages.review@mbie.govt.nz

**Review of Essential Skills in Demand Lists
Submission Form
Essential Skills in Demand Review
Submission Form**

Please complete this form if you would like to make a submission on one of the occupations currently being reviewed by the Ministry of Business, Innovation and Employment. The list of occupations under review is attached as an appendix to this form.

Please complete a separate submission form for each occupation.

Information provided by stakeholders forms a critical part of the review process and complements the statistical data in the Provisional Indicator Evidence Reports (PIERs).

Please answer all questions. Incomplete submissions may not be considered

Please note that the boxes will auto-extend to accommodate your responses. You may wish to attach supporting documents in addition to the information supplied in this form.

Disclosure

Please note that the information provided in this submission will be made available to interested parties on request. This is to promote maximum transparency and to encourage the exchange of information between all stakeholders who contribute to the review process. If the submission, or some of its content, is provided to others for the purposes of information sharing and/or consultation, personal contact details will be treated as confidential.

Information held by the Ministry, including the information provided in this form, is official information under the Official Information Act 1982. Accordingly, if a request is made for information under that Act, the Ministry may be required to release this information.

Occupational statistics collected during the course of the review may be used by the Ministry for other research purposes, but individual employers will not be identified.

Enquiries and submissions

All enquiries and submissions should be directed to:

Email: shortages.review@mbie.govt.nz

**Review of Essential Skills in Demand Lists
Submission Form**

1. Background and contact information

1a) Who is this submission on behalf of?

Provide name of organisation

Ministry of Education

1b) Contact details

Include name, position, phone, email and postal addresses

Rebecca Brew-Harper
Programme Manager Education Workforce
Ministry of Education
PO Box 1666
Wellington 6140

DX Number: SR51201

Phone: [REDACTED]

Email: Rebecca.BrewHarper@education.govt.nz

1c) Disclosure

Please confirm that you have read and agree to the terms of the disclosure statement below.

Disclosure statement:

- The information contained in this submission, or some of its content, may be provided to others for the purpose of information sharing and /or consultation. If this is the case, personal contact details (individual names, telephone numbers and email addresses) will be treated as confidential.
- The information provided in this form is official information under the Official Information Act 1982 and, accordingly, the Ministry of Business, Innovation and Employment may be required to release this information if a request is made under that Act.
- Occupational statistics collected during the course of the review may be used by the Ministry of Business, Innovation and Employment for other research purposes, but individual employers will not be identified.

☒ I have read and agree to the terms of this disclosure statement.

Name: Rebecca Brew-Harper

**Review of Essential Skills in Demand Lists
Submission Form**

1d) Briefly describe the main activity and characteristics of the organisation making the submission

If a firm, please describe main business activity and number of employees; if another organisation, please describe your organisation's purpose, functions and membership size.

If you are making this submission as an individual, please briefly indicate your interest in the occupation your submission relates to.

The Ministry of Education is the Government's lead advisor on the education system, shaping direction for education agencies and providers and contributing to the Government's goals for education.

We employ over 2,900 people in full-time equivalent roles (as at 30 June 2018) who work from 41 locations around New Zealand and we also provide staffing allowances to Schools nationwide so they can employ teachers to teach students the National Curriculum. The National Curriculum was taught in over 2,500 schools by approximately 70,000 teachers (of which 21,056 were early childhood education teachers) for the year ended 30 June 2018.

The Ministry also licenses Early Childhood Education (ECE) services (approximately 4,600) which employ around 30,000 ECE teaching staff. In addition, the Ministry part-funds ECE services through a bulk funding scheme.

Our purpose is to shape an education system that delivers equitable and excellent outcomes.

More information can be found on the Ministry's website www.education.govt.nz

2. What occupation does this submission refer to?

Occupation job title and ANZSCO code

Please give the job title and 6-digit ANZSCO code (refer to the relevant PIER).

241111 Early Childhood (Pre-primary School) Teacher

3. What ESID list status do you think this occupation should have?

3a) What ESID list status do you propose this occupation should have?

- | | |
|--|--|
| <input type="checkbox"/> Retain on the ISSL | <input type="checkbox"/> Retain on the LTSSL |
| <input checked="" type="checkbox"/> Add to the ISSL | <input type="checkbox"/> Add to the LTSSL |
| <input type="checkbox"/> Remove from the ISSL | <input type="checkbox"/> Remove from the LTSSL |
| <input type="checkbox"/> Transfer from ISSL to LTSSL | <input type="checkbox"/> Transfer from LTSSL to ISSL |

3b) Does your proposal relate to the whole of New Zealand or only some regions? (ISSL only)

Please tick all that apply:

- ☐ **Certain regions only:**
- ☐ Auckland/Upper North Island

**Review of Essential Skills in Demand Lists
Submission Form**

- ☐ Waikato/Bay of Plenty
- ☐ Central North Island (including Taranaki, Manawatu and Hawkes Bay)
- ☐ Wellington (including Wairarapa)
- ☐ Canterbury/Upper South Island (including Westland)
- ☐ Otago/Southland

OR

☒ **All of New Zealand**

3c) Give your reasons for the proposed change to the ESID lists

Please summarise the major reasons for your proposal.

Note: If you have already provided an Occupation Nomination to the Ministry, you may wish to copy the information provided in response to Question 4(b) on the Occupation Nomination form.

In recognition of the supply issues we are facing, Cabinet agreed in December 2017 to implement a comprehensive teacher supply programme. This package of initiatives that we believe will increase the supply of teachers for the 2019 school year is already underway.

There are also both medium term initiatives under development and a long term workforce strategy programme in place to increase the supply of teachers' looking out beyond 2019.

These initiatives were extended in the May 2018 Budget. Census data tell us that while the number of qualified teachers has increased since 2014, the percentage of qualified teachers has decreased from 74.6% in 2014 to 68% in 2018. This indicates that we need to further boost supply for 2019.

Of those initial initiatives, the Tertiary Education Refresh subsidy can be utilised by Early Childhood Education Teachers and Early Childhood Education Teachers are a target audience of our marketing campaigns.

To meet the short and medium term demand, our overseas recruitment targets will need to continue to ensure we have enough teachers to meet this demand.

4. Information and data relevant to the review

We would particularly like to receive information that provides more detail in relation to the indicators reported in the PIER. **Please refer to the relevant PIER when completing this section.**

It is important that the information that you provide is as specific and robust as possible. Please provide details about the source of your information, how many employers or individuals it represents, and when the information was obtained.

As a general guide, the Ministry is looking for evidence that has a **reasonable breadth of coverage** across the industry (i.e. represents the views or situation of a reasonable proportion of employers and/or employees and/or trainers or other stakeholders); and is **specific** (i.e. clearly stated facts in relation to the occupation). Independent industry surveys prepared by reputable agencies are usually the most compelling evidence.

Evidence should be **able to be substantiated** in some way, for example sourced to a survey, administrative data, or employer/employee feedback.

Information that does not meet these standards may not be sufficient to support a submission.

**Review of Essential Skills in Demand Lists
Submission Form**

Additional material may be attached in separate documents, if necessary. Where you are appending detailed reports or other information please cite these under the relevant headings below.

4a) Skill level

Please note any comments that you wish to make on the skill section of the relevant PIER.

We confirm that qualification and experience requirements mentioned in the Early Childhood (pre-primary) Teacher PIER is correct.

The Early Childhood Education sector is made up of community and private providers that operate independently; therefore, the Ministry has no sector wide data on annual mean salaries.

4b) Scale

Please provide any information that may be relevant concerning the 'scale' of the occupation. This could include information on the total number of people employed in this occupation in New Zealand, or the number of work visas your organisation or its members have sought in the last year.

Please note any other comments that you wish to make on the scale section of the relevant PIER.

Our records show that the headcount number of Qualified Early Childhood Education Teachers is 21,056 and Unqualified Early Childhood Teachers is 9,618 as at 31 December 2017.

4c) Shortage

Please refer to the 'Shortage' section of the relevant PIER. We are interested in your response to the information provided, as well as any additional information (such as industry surveys and reports) you can provide.

Describe and provide any additional evidence you have on the question of shortage.

*For example, if you consider that **there is an occupational shortage**:*

- evidence of difficulties employers are having recruiting staff (depending on the occupation, difficulty for a single employer is unlikely to be sufficient)*
- estimated apprentice or graduate trainee numbers and the number of workers leaving or retiring from the industry, and reasons for leaving*
- forecasts and reports on the growth of the occupation/industry.*

*Alternatively, if you consider that **there is not an occupational shortage**:*

- evidence of suitably trained people available (or soon to be available) to work in the occupation*
- forecasts and reports on the growth of the occupation/industry.*

We are hearing concerns from providers about the length of time it is taking some providers to fill ECE teacher vacancies, particularly in Auckland. Census data tells us that while the number of qualified teachers has increased since 2014, the percentage of qualified teachers has decreased from 74.6% in 2014 to 68% in 2018.

Since ECE providers are not required to advertise vacancies in the Education Gazette as schools are, and they use independent payroll providers, the Ministry has had no sector-wide data on ECE demand and supply.

**Review of Essential Skills in Demand Lists
Submission Form**

However, funding data shows an emerging shortage in Auckland. In addition, the early learning strategic plan which is currently being developed may include recommendations for quality improvements that, although planned to be implemented in a stepped way, will require substantial increases in qualified teacher numbers over the next 10 years.

The table¹ below show Early Childhood Education gazette vacancies over the past 5 years:

year	vacancies
2013	1708
2014	1976
2015	2301
2016	2868
2017	3670
increase	114.87%

Education Recruitment Agents contracted to the Ministry report increased difficulty filling vacancies for early learning services that seek their assistance.

5. Other factors relevant to determining whether a change to the ESID lists is appropriate

In addition to the evidence of shortage, an important aspect of the review process is to consider whether there are other factors that make it appropriate to add or remove an occupation from the lists. These factors may not be included in the PIER assessment, partly because the range of potential factors is broad, and often-robust quantitative measures are not nationally available.

However, those directly involved in an occupation or industry often hold valuable quantitative and qualitative information relevant to the decision-making process. It is therefore important that you provide appropriate information in the following three areas: Labour market conditions, Training and industry initiatives and Wider economic factors.

Please provide specific details and the source of your information (e.g. independent report, survey, study, administrative data, collated feedback).

5a) Labour market conditions

The Ministry must be satisfied that the industry has a commitment to the provisions of New Zealand employment legislation available to workers. It is important that the hiring of overseas workers is not being used as a strategy to keep wages or terms and conditions of employment to a minimum.

i. Provide information on **wage ranges** applicable to this occupation

Early Childhood – State Sector Employees

The employment terms and conditions for Kindergarten Teachers and Te Kura Early Childhood Teachers are each covered by a collective agreement or an IEA promulgated by the Secretary for Education.

The starting step that a teacher is placed on (which could be the entry step, the maximum step, or any of the steps in between) will depend on their qualifications and experience, and is assessed by the Salary Assessment Unit (for Te Kura) or by the employing Kindergarten Association (for kindergarten teachers).

The starting step provides the base salary, however allowances may be paid on top of the base salary to form their total remuneration. If the teacher is not at the maximum step they

¹ Sourced from The Education Gazette

Review of Essential Skills in Demand Lists Submission Form

would be entitled to (based in their qualifications and experience), they can progress up the salary scale provided their employer attests that they continue to meet the applicable professional standards.

The minimum salary rate for trained teachers is \$36,692 per annum (step 1 of the base scale) and the maximum salary rate (step 12 of the base scale) is \$75,949 per annum.

Note: Head Teachers (the professional leader of a kindergarten) and Senior Teachers (employed to provide professional support and guidance and/or management and administrative roles for a Kindergarten Association) have separate salary scales.

Early Childhood – Private Sector Employees

There are a range of employment terms and conditions, some of them are collective agreements others will be individual employment agreements.

The Ministry of Education, in its ECE Funding Handbook, sets the required minimum salary rates for certificated teachers employed by education and care services (where an ECE service pays all primary and ECE qualified and certificated teachers at least the minimum salary rate they can receive higher levels of funding).

Currently the minimum salary rates range from \$41,067 per annum to \$46,368 per annum depending on the teacher's qualification category.

- ii. Provide brief information on **terms and conditions of employment** applicable to this occupation (e.g. working hours, employee benefits)

The terms and conditions for State Sector ECE teachers can be found here:

<http://education.govt.nz/school/working-in-a-school/teachers/>

There are allowances available for Kindergarten and Te Kura ECE teachers that are payable on top of base salary. These allowances are allocated by the employer and generally recognise additional responsibilities (eg a Kindergarten teacher responsible for a provisionally registered teacher may receive an allowance of \$600 per annum).

- iii. You may also wish to provide information on the following, if relevant:

- information on trends in work hours in response to growing shortages
- the breadth and scale of shortage, and whether some regions are facing shortages, while others are not (and why this is the case)
- whether there are barriers such as transport, childcare, or work hours, which employers could address to make working in the occupation more attractive to suitably skilled people?

The Early Childhood Education sector is made up of community and private providers that operate independently; therefore the Ministry does not currently have an equivalent assessment of anticipated future demand and supply for the Early Childhood Education workforce.

5b) Training and industry initiatives

The Ministry **must** be satisfied that the industry has a commitment to fully utilising the domestic labour market before the industry considers employing overseas workers.

Your submission **must** include information on the following:

- demonstrated industry commitment to training, and
- industry initiatives to enhance domestic recruitment.

**Review of Essential Skills in Demand Lists
Submission Form**

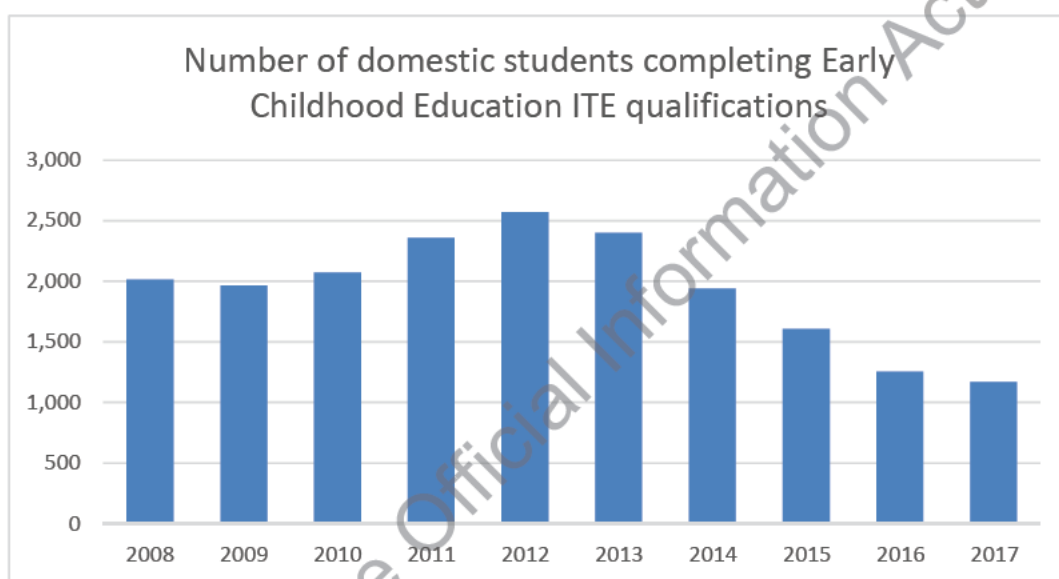
- i. *What steps are being taken by the industry and employers to address this shortage? In the short-term? In the long-term?*

This may include data on trends in firm/industry investments in training, information on trainee numbers and people who are currently nearing completion of qualifications.

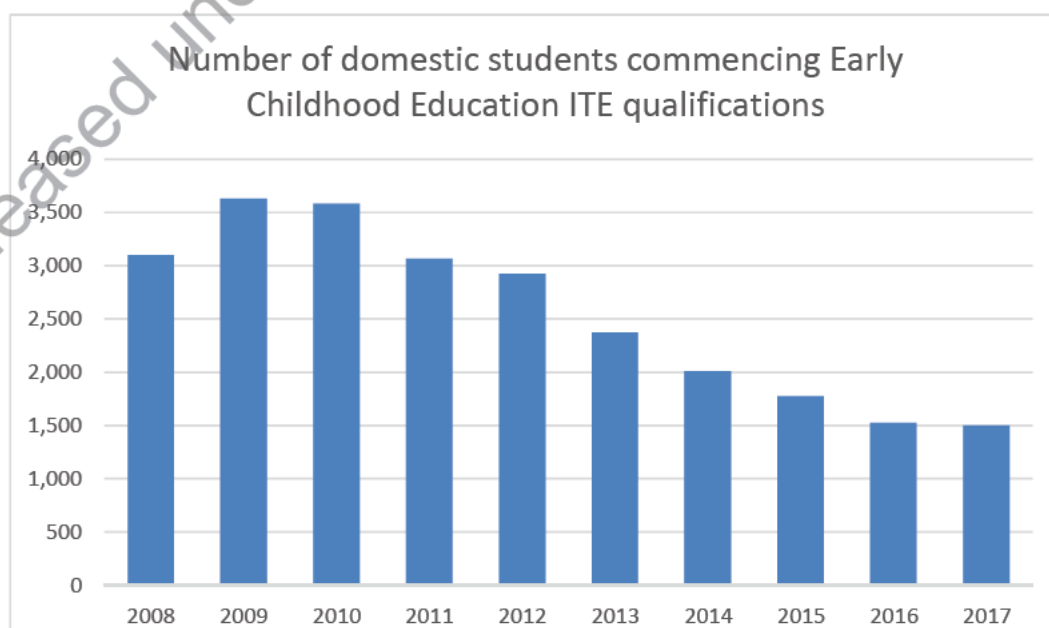
The Ministry is committed to working with the sector and education providers to attract more people to the teaching profession and to retain the teaching workforce that currently exists.

Initial Teacher Education

The graph below shows the trend in completion rates for ITE qualifications. The number of domestic students completing a qualification that can lead to being able to teach in the early childhood sector has been declining since 2012. This decline could be attributed to Government changes in funding rates, reduction in funding band and discontinuation of some Early Childhood Education scholarships.



The number of domestic students commencing a qualification that can lead to being able to teach in the early childhood sector has been declining since 2009. However, the number of starters in 2017 was only slightly lower than in 2016, suggesting the rate of decline is slowing.



Review of Essential Skills in Demand Lists Submission Form

ii. *What strategies are in place to recruit New Zealanders?*

Include examples of training and industry initiatives.

The Education Sector maintains a strong focus on recruiting from within New Zealand wherever possible, our Teacher Supply Package targets 4 distinct audiences for recruitment:

- Returning teachers (encouraging trained and experienced teachers who have left the teaching workforce to return to the classroom)
- New Zealand trained teachers currently overseas (encouraging our teachers to return to teaching in New Zealand)
- Teaching graduates (encouraging graduates of initial teacher education to pursue teaching careers)
- Overseas trained teachers (encouraging overseas teachers to consider teaching in New Zealand over other jurisdictions)

Since September 2018, The Ministry has run 2 recruitment campaigns (Become a Teacher and Bring a Kiwi Home) both locally and internationally specifically aimed at New Zealand Trained Teachers and to attract New Zealanders with a degree in another field to the teaching profession.

We also undertook a highly targeted email campaign, which were sent to trained teachers who are not currently in the workforce (approx. 6,000 teachers in total). The email promotes the free TER and leverages key messages and visuals from the 'become a teacher' campaign.

To date stats show an increase of 'Returning teacher' application form views from a monthly average of 50 to 402. Over 10% of this traffic have completed the form and applied for support under the Job Find assistance programme.

The Ministry also administers the TeachNZ scholarships to provide financial support for people to enter initial teacher education in early childhood, primary and secondary sectors.

iii. *Does your industry have an agreed skills plan? (i.e. a plan for upskilling the current workforce and/or potential workforce)?*

If yes, describe the expected outcomes of the plan (or attach a copy).

- What are the **goals** of the plan?
- What **processes** are in place to achieve the goals?
- What are the **timeframes** for the goals?

*If your industry does not have an agreed skills plan, what plans are in place to develop one?
Within what timeframe?*

Early Learning Strategic Plan

The Early Learning Strategic plan which is currently being developed may include recommendations for quality improvements that, although planned to be implemented in a stepped way, will require substantial increases in qualified teacher numbers over the next 10 years.

The development of the plan is being led by the Ministerial Advisory Group (MAG) and Sector Reference Group (RG) and was supported by the Ministry of Education. Their work will draw on the findings of the Education Summits and the national conversation on education, as well as other work being undertaken in the education portfolio.

**Review of Essential Skills in Demand Lists
Submission Form**

Early Childhood Education Scholarships

The TeachNZ scholarships provide financial support for people to enter initial teacher education, there are two scholarships available specifically for the Early Childhood Education sector:

- **Early Childhood Education - Undergraduate and Graduate**
The ECE scholarships are for those who would like to train as early childhood teachers and who have experience working with either Māori or Pacific communities.
- **Early Childhood Education - Māori and Pacific Languages**
The ECE scholarships are for those who would like to train as early childhood teachers and who have experience working with either Māori or Pacific communities.

5c) Wider economic factors

Wider economic factors may have an influence on occupational shortages. Is there anything else that you would like to comment on?

For example, are there reasons associated with productivity, innovation or competitiveness that you think the Ministry should take into consideration? Please provide evidence.

We have not to date undertaken analysis of the economic or behavioural drivers of teacher supply, nor the relation of exits and entries into the teaching sector with the nation's overall economic conditions. We have noted this publically as a desirable future development of our Teacher Demand and Supply Planning Tool.

The Ministry of Business, Innovation and Employment would like to thank you for contributing to the review.