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DOIA 2324-1325

Tēnā koe Immigration Lawyers New Zealand

Thank you for your email of 14 December 2023 to the Ministry of Business, Innovation and Employment requesting, under the Official Information Act 1982, the following:

*My understanding is that INZ maintains a Microsoft Word version of the immigration instructions and all they have to do really is to print the documents as PDF. The practice of making available the immigration operational manual in PDF format has continued for at least for 13 years, as I still have my 2010 version, and as far as I can ascertain, the downloadable links were live at least until March 2023. To that end I would like to request the following information:*

- 1. What was the standard operating procedure for publishing the manual in PDF, prior to making the decision to stop providing the manual in PDF files. I do not believe that an officer would have been required to convert each page of the online version to PDF. All PDF versions in my possession show that they were converted from Microsoft Word documents. Further, each PDF files have a table of contents that have clickable links allowing me to jump to the relevant heading when clicked - which would not be possible if the online version was converted to PDF.*
- 2. Which department was responsible for publishing the manual in PDF?*
- 3. What was the frequency of the production (update) and publication of the manual in PDF for each year for the last five years (excluding Internal Amendment Circulars, Policy Amendment Circulars, VisaPaks)*
- 4. Who was involved in the decision-making process for deciding to stop producing the manual in PDF files?*
- 5. What did the decision-making process involve? Please provide relevant information, documents, communication records, etc.*
- 6. Was there a cost benefit analysis? If so, please provide relevant details.*

## **Our Response**

Questions 1-3. The primary mechanism for accessing the full set of immigration instructions is the online Operational Manual, which is publicly available at [www.immigration.govt.nz/opsmanual](http://www.immigration.govt.nz/opsmanual). Content in the online Operational Manual is collated and published using a system called AuthorIT. A secondary function of this publishing is the ability to produce text and PDF versions of the full set of immigration instructions.

Due to compatibility issues with the software and platform used for AuthorIT, it became problematic to create a text document version of the instructions each time it changed. As a consequence, the PDF versions of the instructions become out of date. The PDF versions were available prior to the end of April 2023, but these were notably out of date. A decision was made to prioritise the online version and as such there is no current PDF version of the manual.

The INZ Operational Policy team was responsible for publishing the Operational Manual and updating any downloadable files. This team updates the Operational Manual each time an amendment circular is distributed.

Prior to 2020, a smaller number of amendment circulars were distributed each year and the PDFs were updated each time the online Operational Manual was updated. Since 2020, a large volume of changes to immigration instructions have been made. For example, 74 amendment circulars were sent out in 2022 and 15 had already been sent out by the end of April 2023. The large volume of changes to immigration instructions and the online operational manual, combined with software compatibility issues, meant that the PDF version of the operational manual were not updated as frequently.

Questions 4-6. The INZ Operational Policy and Digital Channels teams were involved in the decision to stop publishing the manual in PDF format. A number of discussions were held between the two teams, where the Digital Channels team noted that the page views for the pdf files had been low. Please refer to the Appendix for records of these discussions and note duplicated email chains have been removed and some information has been marked as out of scope. The main consideration was ensuring that accurate and up to date information remains available to customers. This is achieved by distributing amendment circulars when immigration instructions change and updating the online, searchable version of the Operational Manual that is publicly available on the INZ website. Removing the PDF version of the immigration instructions avoids duplication of information and enables us to focus resources on keeping the online Operational Manual as up to date as possible. No specific cost-benefit analysis was undertaken given the very low usage of the PDF versions and the fact that they were already out of date at the time they were removed from the website.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or freephone 0800 802 602.

If you wish to discuss any aspect of your request or this response, please contact [inzoias@mbie.govt.nz](mailto:inzoias@mbie.govt.nz).

Nāku noa, nā



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