

REGISTRAR'S 2009 CONSULTATION ON CPD SUMMARY OF RESPONSES

Earlier this year the Registrar consulted on proposals relating to continuing professional development for licensed immigration advisers. [The consultation document is on the Authority's website.](#) This is a summary of the responses to that consultation.

The purpose of the consultation was to seek feedback on the Registrar's plans to implement a structured continuing professional development (CPD) programme for licensed immigration advisers in New Zealand including specific proposals relating to minimum hours, types of learning accrediting education providers. The Registrar published the consultation document on the Authority's website and invited submissions from immigration advisers, persons interested in becoming accredited providers and consumers using immigration advisers.

Submissions closed on 19 January 2009. 26 people and organisations made a submission. 20 were submitters were licensed advisers or applicants for a licence and 6 were education providers. 20 submissions were from persons or organisations based in New Zealand.

The Registrar's guidance on competency standard 7 and the current requirements for CPD are published on the Authority's website. The Registrar will take the responses to this consultation into account when implementing a structured CPD programme.

General response

The overall response to the Registrar's proposals was enthusiastic and encouraging. 100% of respondents were either broadly or fully in support of the registrar's proposals and the majority agreed that the proposed implementation timetable is workable.

Aligning CPD with the Competency Standards

Advisers were supportive of proposals to align CPD with competency standards.

Dealing with barriers to participation

The consultation document sought information from respondents about barriers to participation in CPD. These are typically access, time and cost.

All respondents felt strongly that CPD should be available online. One respondent noted that "*this type of learning would not suit everyone and there may well be a lot of advisers that would not undertake [online*

study] but the option needs to be there to cater for those who need the flexibility"

All advisers accepted that CPD is part of the cost of doing business but that cost should not become a barrier to participation. One respondent said that the cost issue *"is likely to be a topic for ongoing and lively discussion. The view that should be taken is one of value for money. The key is for CPD to be more about adding value and opportunity to advisers business rather than having to accrue brownie points for ..renewal."*

Respondents identified other barriers to entry that the Authority would need to try and address: language, culture and unavailability of suitable learning.

When asked about what they would expect of employers, 94% of respondents believed that their employers should support CPD, either directly or indirectly. Generally advisers expected their employers to contribute towards the costs of CPD of their employees.

Making CPD work for licensed immigration advisers

How many hours and how many points?

Most advisers who responded to the consultation had spent 20 hours or more on their professional development in the last year. The majority of respondents agreed with the Registrar's proposal to require a minimum of 20 hours CPD during a licensing year. Many commented that it would be important for the Registrar to clearly define what constitutes an "hour" of CPD or how many points would be allocated for each activity.

Who is entitled to attend CPD activities?

Almost everyone agreed that CPD activities should be open to anyone and not restricted to only licensed immigration advisers. Some submitters believe that licensed advisers should be given priority attendance. One person submitted that *"allowing those who are not licensed immigration advisers to attend CPD activities is an excellent way of increasing competition amongst providers, ensuring that the work is accessible to a range of people and ensuring that ultimately all those who provide advice have an up to date professional outlook on their work. It can also assist with networking and building a community of expertise."*

Accommodating different learning styles

A well designed CPD programme should be flexible enough that participants can earn points from a variety of different types of activities but structured enough so that CPD is adding real value to participants and to the profession.

Almost all advisers agreed that the programme should accommodate different learning styles, but there were a lot of comments on the details of how that could be achieved. The submissions reflected two broad themes: That the points/hours weighting should be fair and that the points/hours weighing should be transparent.

Mandatory and optional activities

Most respondents felt that some CPD activities should be compulsory, particularly ethics and professional conduct, the Code of Conduct, and activities relating to keeping knowledge up to date.

96% of respondents would prioritise topics on Immigration Law and Policy when planning CPD. 61% of respondents would prioritise topics related to conducting business ethically, professionally and responsibly when planning CPD.

Earning points all in one hit

90% of respondents agreed with the Registrar's proposal to prohibit earning required CPD points all in "one hit."

Dealing with breaks in practice

When asked how the Registrar should take into account breaks in practice, respondents generally believed that advisers should be able to take a break in practice as long as they completed extra CPD to catch up. They want to balance quality and development of the profession with cost and time constraints.

Evidence of attendance

The Registrar proposed to managed CPD records through a unique login web portal on the Authority's website.

All submitters agreed that CPD records should be managed through an online adviser/provider interface and that this would be an important part of the CPD programme.

Building a community of practice of Immigration Advisers

The Registrar proposes to actively encourage and facilitate the development of a community of practice.

This proposal was very positively received. Many respondents commented on the importance of networking in a profession. 85% of licensed advisers/applicants would like opportunities to network with lawyers, Citizens Advice Bureaux staff and others providing immigration advice.

Most respondents hope that a community of immigration advisers would emerge, and believed it was important to foster a community of professionals and build relationships between immigration professionals.

Generally respondents wanted to work closely with industry experts and thought an important issue was communication between different parties in the industry. Many respondents also suggested social activities, seminars and workshops, and discussion forums would be a desirable opportunity for immigration advisers to network.

Getting the right CPD providers

A structured programme of continuing professional development activities is only as good as the CPD providers and the activities they deliver.

Accreditation of CPD providers

There are several ways to manage provider accreditation. The right approach should strike a balance between facilitating competition and regulating for quality.

The majority of respondents agreed that the Authority should accredit education providers to deliver CPD to regulate the quality of CPD education and help advisers make the most of CPD opportunities.

The Office of the Information Services in the UK noted that it may be possible to rely on accreditation by other professional bodies that accredit providers.

Almost all respondents considered that the Registrar should accredit multiple providers of CPD rather than only one provider. Views were divided on the extent to which the Registrar should let the market determine the mix of activities on offer. One respondent suggested starting with Option 2 (the Authority restricting delivery to certain activities) until the regulatory licensing environment is well established and then lifting any restrictions to allow the market to determine the mix of activities on offer.

Almost all respondents want the Registrar to accredit providers for a two year period. The OISC noted that 2 years "*appears to be a reasonable period as it is long enough to allow the provider to run a suitable number of events and allow the Authority to evaluate some,. Any longer and there is a chance that quality may slip and not be noticed.*"

Several providers noted that the New Zealand market is small and that therefore providers need as much flexibility as possible when designing and delivering CPD. Further engagement with CPD providers would be required before implementing proposals because of the small number of submitters.