# **Consultation on Proposed Guiding Principles to frame the State’s Economic Migration Policy**

## Introduction

The focus of the employment permits regime in recent years has been to ensure that the skills requirements of enterprise in the State can be met through economic migration where necessary. However, as the State approaches full employment, labour as well as skills needs are beginning to manifest.

As the economy improves, there are increasing calls to open up the employment permit regime to lower skilled workers in certain sectors/occupations such as agriculture and the care sector.

However, economic migration alone is not a sustainable long-term solution to skills and labour shortages and indeed can, in some circumstances, help to perpetuate those shortages in the economy. The development of particular skills in the resident labour force can depend upon a judicious deployment of economic migration as a supplementary rather than a primary source of those skills, and adjustments must be made with this in mind.

While there is some evidence of a tightening labour market in some sectors, the fact remains that there are 234,900 on the live register, and with a potential pool of 18 million unemployed in the EU 28, DBEI needs to be prudent in considering whether to open up the labour market to unskilled non-EEA workers on wage levels at or just above the national minimum wage.

In this context, it is timely to undertake a review of the economic migration policies underpinning the current employment permits system, to ensure they are fully supportive of Ireland’s emerging labour market needs, be they skills or labour shortages in certain sectors. For this reason, the current review is included in the Action Plan for Jobs 2018 (Action 36).

An Inter-Departmental Group has been established to oversee the review and it is made up of relevant Government Departments, namely the Departments of Public Expenditure and Reform; Justice and Equality; Housing Planning and Local Government; Agriculture, Food and the Marine; Health; Transport, Tourism and Sport; Education and Skills; Employment Affairs and Social Protection.

The following factors are in scope for this review:

* All sectors of the economy
* All employment permit schemes
* Economic and social goals
* Regulating demand using available labour market tools eg minimum remuneration thresholds, highly skilled and ineligible lists, and quotas
* International comparisons
* Proposal of changes that can be made:
	+ in the short term and within the existing legal framework;
	+ in the medium to longer term and which may require amendments to primary legislation
* Identification of appropriate performance indicators

## Public consultation

As part of this review process, the Department is seeking submissions from representative bodies, and interested parties. The submission process is an opportunity for stakeholders to provide additional information and potentially different perspectives on the nature and extent of skills and labour shortages and how they might be addressed.

A draft set of guiding principles for the State’s economic migration policy, designed to provide a context and framework within which decisions can be made and to provide a rationale for action taken has been developed to assist the process. These are set out in the following pages with questions to assist you in providing your feedback and comments.

Respondents are requested to make their submissions **by e-mail to** **empu@dbei.gov.ie**

The closing date for receipt of submissions is **5pm, Wednesday 18th April 2018.**

**When making your submission please provide the name of the individual, firm or organisation making the submission; contact details and briefly describe the main activity and characteristics of the organisation making the submission.**

## Publication of Submissions

The Department proposes to make public on its website all submissions received under this consultation.

However, should you wish to submit information that you consider commercially sensitive, please identify that information in your submission and give reasons for considering it commercially sensitive. The Department will consult with you regarding such information before making a decision to disclose it.

## Relevant provisions of Freedom of Information Act 2014

Attention is drawn to the fact that information provided to the Department may be disclosed in response to a request under the Freedom of Information Act 2014. Therefore, should it be considered that any information provided is commercially sensitive, please identify same, and specify the reason for its sensitivity. The Department will consult with interested parties making submissions regarding information identified by them as sensitive before making a decision on any Freedom of Information request. Any personal information, which you volunteer to this Department, will be treated with the highest standards of security and confidentiality, strictly in accordance with the Data Protection Acts 1988 and 2003.

# **Guiding Principles to frame the State’s Economic Migration Policy**

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| **The State’s Employment Permits System should help meet, in the short term, the sustainable demand for skills and labour in key growth sectors in the Irish economy without disrupting the Irish labour market.**  |

## Principle 1: EEA Preference

*Irish labour market policy should aim to ensure that general labour and skills needs are met from within the workforce of the EEA. This policy continues to reflect the need for a responsive educational system, a focus on lifelong learning, and the need to maximise the potential of EEA nationals to fill skills and labour deficits.*

In order to safeguard the employment opportunities of Irish/EEA nationals, restrictions exist on the granting of employment permits unless the employer can show at application stage that more than 50% of the total employees of the company are Irish/EEA nationals. The **50:50 Rule** requires that employers seeking to hire foreign nationals on an employment permit have at least 50% of their workforce from Ireland or the EEA. This policy underpins the Government’s employment creation objectives by requiring employers in the State to hire in a balanced manner from the local labour market.

The 50:50 Ruleapplies in all situations except:

* In the case of a start-up company (i.e. a company registered with the Revenue Commissioners within the two years preceding the application) where an enterprise development agency recommends the granting of the employment permit *and* where the Minister is satisfied that to do so would help develop the potential for further employment. Often, start-up companies, including those arising by reason of FDI, will initially be comprised solely of foreign nationals from the company’s HQ sent to Ireland to set-up and establish operations.
* Where employers do not have any employees on the date of application and where the Minister is satisfied, that having regard to the employment in respect of which the application is made, the foreign national concerned will be and will remain the sole employee of the employer concerned eg a parent who employs a non-EEA carer who has a long history of caring for a child with special care needs. This waiver is limited to applications for a *Dependent/Partner/Spousal Employment Permit*, *General Employment Permit*, *Reactivation Employment Permit*, or *Sports & Cultural Employment Permit*.

The **Labour Market Needs Test (LMNT)** seeks to ensure that an offer of employment is first made to people already in the local and EEA labour markets before an application is made for an employment permit to employ a non-EEA national. This supports Government policy that those currently in the labour market, be they employed or unemployed, are the first cohort of people that employers should look to.

EU Regulations pertaining to freedom of movement of workers provide for priority for workers who are citizens of the EU. Accordingly, the 2006 Act as amended requires that the employer must advertise the vacancy:

* with the Department of Employment Affairs and Social Protection Employment Services/EURES employment network for at least 2 weeks (as per EU Regs) and
* in a national newspaper for at least 3 days and also
* in either a local newspaper or jobs website (separate to Department of Employment Affairs and Social Protection/EURES websites) for 3 days.

Regulations under the 2006 Act as amended require that the advertisement must include the following information:

* a description of the employment,
* the name of the employer,
* the minimum annual remuneration,
* the location/s of employment, and
* the hours of work.

It is recognised that the duration of the advertising period needs to provide for a meaningful LMNT while at the same time allowing sufficient time for job seekers to respond. Prior to 2012, the advertising period was 8 weeks. It was believed that the reduced advertising period to 2 weeks would strike the right balance

The 50:50 Rule and LMNT are key restrictions on the grant of an employment permit and are provided for in sections 10 and 10A of the 2006 Act as amended.

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| **Question 1****What are your views on the role, relevance and value of the 50:50 rule and LMNT and which are provided for in primary legislation?** |

## Principle 2: Labour Market Responsiveness

*At all stages of an economic cycle, it is imperative that every opportunity is afforded to Irish and other EEA nationals in the first instance, thus ensuring an uninterrupted flow of labour and skills from the domestic and EEA economies.*

It is generally recognised that migration alone should not be a sustainable long-term solution to skills and labour shortages and that indeed it can in some circumstances help to perpetuate such shortages in the economy. Many labour intensive sectors are heavily reliant on migrant labour due to the shortage of Irish/EEA persons willing to work in such environments particularly given the alternative employment opportunities available at a time of full employment; the terms and conditions attaching to such employments; and the relatively low wage cost associated with migrant workers. It is neither possible nor desirable, in the context of the available EEA labour market pool, to address retention issues in the State’s labour market through the deployment of the employment permits system.

Ireland’s unemployment rate of 6% (Feb 2018), brings the State closer to full employment. However, it remains the case that 234,900 (Feb 2018) are on the live register. In January 2018, Eurostat reported that:

* The average unemployment rate across the EU-28 was 7.3 % and in the euro area was 8.6 %;
* 17.931 million men and women in the EU-28, of whom 14.111 million were in the euro area were unemployed.

In Poland, Romania and Lithuania (the top 3 nationalities for non-Irish labour in the workplace, excluding the UK (Census 2016, CSO)), economic growth of 4.2, 5.7 and 3.8%, respectively, was observed in 2017, with corresponding unemployment rates of 5.0, 5.3 and 7.9% (DG ECFIN, EC).

The Department’s review of the highly skilled and ineligible lists is predicated on a formalised and evidence-based process:

* EGFSN/NSC National Skills Bulletin and Vacancy Overview Report
* Various EGFSN sectoral reports.
* Public consultation
* Engagement with Employer Engagement Services (D/EASP), Skills and Labour Market Research Unit (SLMRU in SOLAS), various Govt Departments and Skills & Education Policy Unit in DBEI.

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| **Question 2.1****An improving domestic and EEA labour market has an impact on job seekers choices. What are your views on making the employment permit regime less restrictive where the labour market is tightening or at full employment?** |
| **Question 2.2****While EU-level analysis shows that Ireland is ahead of most EU member states in terms of linking market intelligence to labour migration policy, can the review of lists process described above be improved upon? How?** |
| **Question 2.3****Should a business case for removing an employment from the ineligible list require that evidence must be provided by the relevant lead Department of efforts by the sector to (a) develop industry led models for improving the skills and productivity of the workforce; (b) to maximise opportunities for unemployed people; and (c) to address attraction and retention issues?** |

## Principle 3: Skills shortage

*Ireland continues to experience skills shortages in certain key areas as evidenced in research conducted by the Expert Group on Future Skills Needs (EGFSN) and the National Skills Council. The employment permit regime is part of the response to addressing those skills deficits which exist and are likely to continue into the medium term, but is not a substitute or pretext for avoiding the challenge of up-skilling our resident workforce. Nevertheless, it is recognised that Ireland has to compete with other countries for economic migrants, particularly at the high end of the skills continuum. Certain skills, such as those required in the high – tech sectors are in demand globally. Therefore, there continues to be a need to supplement Ireland’s skills stock through employment permits and to ensure that Ireland’s employment permits system is geared towards attracting such skills.*

The employment permits system is designed to contribute to the positioning of Ireland as a locus with a highly skilled and highly remunerated workforce, employed by cutting edge enterprises. Retaining relevance in the fast moving, globalised and technically innovative enterprise environment of the 21st century requires not only the fostering of indigenous talent but the ability to attract the innovators and the experienced from elsewhere to deepen the skills pool here, with the knock-on effect that will have on the scale and the reach of enterprise located in Ireland.

Key amongst the employment permit schemes is the *Critical Skills Employment Permit* *(CSEP)* which seeks to attract highly skilled non-EEA workers in occupations where there are acknowledged skills shortages, often on a global scale. The *CSEP* does this by waiving a number of the requirements otherwise applying to the issue of employment permits, and by providing a route to immediate family unification, fast-track residency and the availability of employment permits to spouses, dependants or partners where this might be required. The advantages such an employment permit confers on its holder are commensurate with the contribution such personnel can make to the development of the enterprises for which they choose to work, a benefit that ultimately feeds more broadly into our economy, through the dissemination of expertise among colleagues and through enterprise growth.

The minimum annual threshold for an employment permit should remain as neutral as possible in terms of wage effects. It should fulfil its function as a proxy for skills and a guarantee for sufficient resources. It should encourage the development of particular skills in the resident labour pool and is not set at a level that seems attractive on a cost basis for employers to hire non-EEA nationals at salary levels below the annual average salary.

At €30,000, the minimum annual threshold for an employment permit has fallen substantially behind the 2016 average annual earnings of €36,919. This undermines the intention that the threshold remains as neutral as possible in terms of wage effects. It also ceases to fulfil its function as a proxy for skills and a guarantee for sufficient resources. Without this alignment, there is a risk that the development of particular skills in the resident labour pool may be discouraged, if it seems attractive on a cost basis for employers to hire non-EEA nationals at salary levels below the annual average salary.

Despite being such a valuable employment permit, the *CSEP €*30,000 minimum annual remuneration threshold is set at the same level as that of the *General Employment Permit* which is designed to deal with a general pool of labour/skills shortages in the State. This is currently under review and may be increased incrementally to align with annual average earnings.

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| **Question 3.1****This principle is primarily focused on the *Critical Skills Employment Permit* which is designed to attract highly skilled and experienced personnel who can seamlessly fill short term skills gaps in the domestic labour market. Do you have you any observations on this principle, permit type and remuneration threshold?** |

## Principle 4: Sector preferences

*Preference should be given to those employers and sectors best positioned to grow Ireland’s economy i.e. employers capable of achieving a net national benefit to Ireland through innovation, exports or inward investments.*

The employment permits system currently operates at occupational level with all employments organised using the Standard Occupational Classification system (SOC 2010), a system which classifies workers into occupational categories.

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| **Question 4.1****Should the employment permits system give preference to sectors, occupations or occupations within sectors?** |
| **Question 4.2****Should submissions for removal of occupations from the ineligible list include uptodate CSO data on GDP and employment growth for relevant sectors?** |
| **Question 4.3****Can you recommend any other verifiable data/evidence?** |
| **Question 4.4****Work is being led by DBEI to ensure sectors for future growth potential can be identified and anticipated. How do we factor some level of future proofing to ensure the regime can remain relevant in the fast moving, globalised and technically innovative enterprise environment?** |

## Principle 5: Balanced approach to innovation and labour market

*Economic migrants bring new ideas and different perspectives, helping organisations to innovate, for example through developing and adapting technology, and encouraging the adoption of more efficient processes and strategies. However, where access to a low-skilled immigrant workforce is not managed, employers may be deterred from investing in skills and technology to innovate and improve productivity such as fruit picking automation (Australia) and hotel self check-in machines (Sweden). It is important that a balance is achieved between the need for industry to innovate and invest in new processes to reduce dependence on low skilled labour, and ensuring that labour shortages do not result in lost commercial opportunities and value added.*

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| **Question 5.1** **How can we ensure judicious use of the employment permit regime in respect of low skilled workers? For example, where employments are removed from the ineligible list should they be subject to a maximum quota? If yes, what factors should be taken into account in determining an appropriate quota on an evidential basis?** |
| **Question 5.2** **While a short-term gap may need to be met, what about the longer-term impact in cyclical sectors? Should time limits be applied in respect of permits granted to low skilled workers?** |

## Principle 6: Net contributor

*Employment permit holders should result in a positive net contribution to the Irish economy and as such should have the financial capacity to support themselves and their immediate families without recourse to State resources.*

### Definition of remuneration

The definition of remuneration is set out in primary legislation. In the case of the *Critical Skills Employment Permit* and *General Employment Permit* the remuneration is comprised of basic salary, plus payment for health insurance and which is an optional add on to basic salary.

In the case of *Contract for Services* and *Intra Company Transfer Employment Permits*, it is comprised of basic salary set at a minimum of NMW, plus optional payments for health insurance and payment for or the monetary value of board and/or accommodation. Regardless of whether or not payments for health insurance and/or payment for board and accommodation are included in the remuneration package to achieve the minimum remuneration threshold, the employer is legally obliged to ensure they have made appropriate arrangements to provide accommodation and/or board and health insurance for the permit holder

The definition of remuneration is designed to provide adequate safeguards to prevent abuse of the regime eg prevent unscrupulous employers relying on theoretical (but unobtainable) bonuses in reaching the minimum remuneration thresholds. It also ensures that where a permit holder remains in the employment of an employer outside the State *(Contract for Services EP* and *Intra-Company Transfer EP*), the basic salary element achieves the sub-threshold of NMW for the duration of stay in the State and that the permit holder is then adequately provided for in terms of board, accommodation and health insurance, thereby ensuring s/he is not a potential drain on the State's resources. It is also designed to provide clarity and certainty for all employers, but in particular those in the *Intra-Company Transfer* and *Contract for Services* situations, in respect of the remuneration requirements applying to the employment permit regime.

### Economically-focussed permit types

The level of remuneration for economically-focussed employment permits - *Critical Skills Employment Permit, General Employment Permit, Intra-Company Transfer Employment Permit* and *Contract for Services Employment Permit* - should reflect the potential for social impact and cost resulting from economic migration and be sufficient to cater for the policy of family re-unification in certain circumstances.

The *Critical Skills Employment Permit (CSEP)* is designed to attract highly skilled third country nationals into the Irish labour market with the aim of encouraging them to take up permanent residence in the State. It has many benefits such as immediate family reunification and family members resident in the State are eligible to seek any employment and consequently apply for a *Dependant/Partner/Spouse Employment Permit* which is currently issued free of charge.  In addition, after just two years, *CSEP* holders may apply to INIS for permission to reside and work without the requirement for an employment permit. Remuneration thresholds are currently €30k for occupations on the highly skilled list with degree and €60k for an eligible occupation (not limited to highly skilled list) and with an appropriate level of relevant experience without the need for a degree.

The *General Employment Permit (GEP)* provides for shorter term employment contracts and, subject to a LMNT to establish that there are no viable local or EEA applicants for the employment, for occupations that are not on the ineligible list of occupations for an employment permit. Such permit holders are eligible to sponsor family reunification after 12 months. Non-EEA nationals who have held valid *GEPs* for 5 years or more consecutively and have been working lawfully during that time may apply to INIS for permission to reside and work without the requirement for an employment permit. The thresholds of €30,000 is generally applied with the following exceptions: €27,500 for meat boners, and €27,000 for recent graduates and customer service/sale roles with non-EEA languages

The *Contract for Services Employment Permit* *(CfS EP)* and *Intra Company Transfer Employment Permit (Intra CT EP)* provide for the temporary transfer to the State of non-EEA employees of a foreign employer and they do not accrue rights for long term residency purposes. To achieve a minimum remuneration threshold of €40,000 for an *Intra CT EP* or *CfS EP*, or €30,000 in the case of an *Intra-CT (trainee) EP*, basic salary must comprise at least NMW, as the first component of the remuneration package. In addition, the following components may be added to bring the proposed remuneration to the appropriate employment permit threshold:

* Board and accommodation or its monetary value, and
* Health insurance payments made to a health insurer registered with the Health Insurance Authority on its Register of Health Benefits Undertakings under section 14 Health Insurance Act 1994 orwhat the Minister is satisfied is equivalent.

These permits have complex remuneration arrangements and the maximum timeframe for these permits is 5 years.

### Ancillary permit types

There are a number of ancillary types of employment permits that are designed for purposes which are not, strictly speaking, economic purposes.  The purposes served are educational, cultural, or humanitarian; as such, the presence in the State of such permit holders serves a social rather than an economic function and to a large degree, this off-sets the economic cost that may be associated with their presence. In addition to these permit types is the *Dependent/Partner/Spouse Employment Permit*, which is designed to attract highly skilled foreign nationals to work in the State by enabling their immediate family members to take up employment. The lower remuneration of NMW associated with this employment permit type is set in the context of a dual income household.

These ancillary types of permits represent a relatively small proportion of total permits granted:

* *Dependant/Partner/Spouse Employment Permit -* The rationale for this type of employment permit is that in order to attract foreign nationals to apply for the *Critical Skills Employment Permit* or to encourage third country researchers to carry out research in the State under Council Directive 2005/71/EC, provision has to be made for their families where appropriate.
* *Reactivation Employment Permit -* This employment permit provides for those foreign nationals who entered the labour market on a valid permit but who have subsequently fallen out of the system for a variety of reasons including redundancies and exploitation. The primary objective is to regularise the situation of such previous permit holders - such persons are unlikely to be in highly paid occupations.
* *Sports & Cultural Employment Permit -* This employment permit provides predominantly for sports professionals. The minimum remuneration threshold is currently set at NMW, but most employments achieve a higher remuneration.
* *Internship Employment Permit -* This employment permit provides for student internship programmes for the purpose of gaining work experience in employments on the highly skilled occupations list. It is a one-year, non-renewable permit.
* *Exchange Agreement Employment Permit -* This employment permit provides for reciprocal international arrangements where opportunities are afforded to Irish nationals in exchange for opportunities afforded to foreign nationals e.g. trade agreements which include labour transfers, exchange agreements concerning researchers or student work experience, etc. It is a one-year, non-renewable employment permit.

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| **Question 6.1** **What are your views on the remuneration as provided for in law?**  |
| **Question 6.2** **Do you have any views on these permit types, in particular the timeframe for which these permits can issue and the remuneration thresholds?** |
| **Question 6.3** **What should the minimum threshold for low skilled workers in occupations removed from the ineligible list be set at?**  |
| **Question 6.4****How do we mitigate against unnecessary shocks to the labour market or deflationary pressure on wages?**  |
| **Question 6.5****Low wage jobs may yield income below threshold for social transfers eg medical card, rent supplement, FIS (from 2018, Working Family Payment), and local authority housing. Should the remuneration threshold be set at a level which ensures the migrant can meet their (and family) basic social care needs without recourse to the State’s resources?**  |
| **Question 6.6****How can we ensure that a lower threshold would be deployed only in circumstances where there is evidence of a labour shortage? Should the negotiation of the grant of employment permits at a lower remuneration threshold be led by representatives of the State that have expertise in the specific sector?** |

## Principle 7: Employment rights

*Migrant workers are a vulnerable class of people. Language difficulties, cultural differences, and lack of social networks can disadvantage migrants and increase the potential for abuse by unscrupulous employers. Ireland has a very thorough employment rights legal framework. Careful consideration is given to the potential for abuse and many of the criteria in evaluating employment permits applications focus on the bona-fides of the employer and the protection of the permit holder.*

The employment permits system ensures that the employment rights of migrants are observed and criteria are aimed at ensuring that migrant employees are treated in line with Irish labour laws and is operated with the following safeguards for non-EEA workers:

* the foreign national receives the original employment permit and the employer gets a copy;
* employers are prohibited from making deductions from the remuneration of employment permit holders in respect of their employment permits; neither may an employer hold any personal document of the employment permit holder.
* a job offer must come from a bona-fide employer registered with the Revenue Commissioners and, where applicable, the Companies Registration Office/Register of Friendly Societies;
* the employment must achieve a minimum remuneration threshold;
* the 50:50 Rule ensures that no more than half of the employees of an enterprise seeking to hire a foreign national on the basis of an employment permit should be non-EEA nationals, to increase the likelihood that the employees in an enterprise where non-EEA nationals are to be employed have a measure of familiarity with normal employment practices in Ireland;
* the *Reactivation Employment Permit* scheme is available for those foreign nationals who originally entered the labour market legally on an employment permit but who fell out of the system;
* holders of a *Critical Skills Employment Permit* or a *General Employment Permit* who have been made redundant may apply for the same job with a different employer, even where the job is no longer on the highly skilled list or is now ineligible;
* employment permit holders may change employer within 12 months where in circumstances, such as redundancy, or where circumstances (unforeseen at time of application) arise in the employment that fundamentally change the employment relationship (eg. the employer plans to change the location of the business to a site a significant distance from its current location, or the hours that the permit holder work are being significantly changed, or significant changes are being made to the nature of the work that they are required to do).
* employment permit holders may change employer after 12 months provided the new employer fulfils all conditions attached to employing a non-EEA national.
* the Workplace Relations Commission has powers of enforcement under the Employment Permits Acts. Workplace Relations Commission’s investigation and enforcement powers work to discourage abuses of the employment permits system by unscrupulous employers.  All employment in Ireland is subject to the provisions of employment law with the protections that entails for employees, and in addition to these provisions, employers are subject to fines of up to €250,000, or a prison term of up to 10 years’ duration, where they are found to be in breach of the Employment Permits Acts.

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| **Question 7.1****Do you have any views on the arrangements in place to protect the employment rights of employment permit holders?** |

## **Principle 8: Legislative framework and process**

*The employment permits regime should be administratively effective and efficient, have a clear legislative basis, and be sufficiently flexible to react quickly to changes in the labour market.*

The 2006 Act as amended deals with an area of regulation where the needs of the economy interact with the needs of particular individuals. As a consequence, it has extensive underpinning both at the level of primary legislation and in Regulations. The 2006 Act also provides a degree of flexibility to deal with changing labour market and economic development needs which often require rapid response through the twice-yearly review of the Employment Permits Regulations.

The employment permit system is continuously evolving to better fit the needs of employers and the foreign nationals who choose to work here, with a well-established Trusted Partner registration scheme to support companies who are frequent applicants for employment permits, and an online application system, which streamlines the application process and greatly simplifies the process for applicants.

While the 2006 Act as amended provides flexibility (principally through the Regulations), many of the operational aspects of the employment permits regime are codified in primary legislation eg the LMNT mode (eg newspapers are mandatory) and the remuneration definition. This extensive underpinning in the Act has led to inflexibilities in addressing some operational issues arising due to a changing enterprise environment, for example advertising.

In support of the Department’s objective to improve service to businesses, the Employment Permits Online System (EPOS), which was launched in September 2016, was firmly established during 2017 as a preferred method of submitting applications for employment permits. It provides an intuitive, user friendly facility to submit online permit applications, supporting documents and secure online fee payment service. The system has supported faster turnaround of applications by removing the requirement for applicants to fill out application forms by hand and reducing errors and rejected applications. Currently, over 95% of employment permit applications received are being submitted online.

Further service enhancements are planned to make additional associated application forms available for submission online. Work is underway to allow requests for reviews of refusal decisions and requests for Stamp 4 support letters to be submitted online.

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| **Question 8.1** **What is your view and would you recommend amendments to the 2006 Act as amended to provide for more flexibility in the medium-longer term?** |
| **Question 8.2** **Do you have any views on the EPOS and any recommendations to improve?** |

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| When making your submission please provide the following information:Name of individual, firm or organisationContact detailsBriefly describe the main activity and characteristics of the organisation making the submission.  |

**Economic Migration Policy Unit**

**3rd April 2018**