

DATED: November 26, 2018
TO: the Hon. Wayne Caines, JP, MP – Minister of National Security

PROPOSED CONCEPT FOR WORK PERMIT REFORM

The underlying recommendation is predicated upon employers being required to follow the new process and being held accountable for the career development of Bermudian workers, without exception.

1. Employers would request and receive a set number of work permits that are required to support their business. This annual request would be reviewed semi-annually to ensure the efficacy of the ask. The request must meet a reasonableness test in relationship to prior/existing work permits received and the organisation's current business strategy.
2. Employers would be required to submit a plan for the career development of Bermudians throughout their organisation, with emphasis on:
 - a. those positions for which work permits have been used;
 - b. upward mobility to positions of management responsibility;
 - c. upward mobility for senior technical roles; and
 - d. career planning for C-suite roles.

Given the potential additional cost and challenges for small businesses that do not have robust HR departments, consideration must be given on how to include small businesses in this approach.

3. The submitted plans would be assessed by experienced Organisational Development experts, supported by select Ministry personnel.
4. Failure to fulfill the aforementioned conditions and to record progress would result in meaningful penalties to ensure accountability.
5. The implementation of this proposal provides an opportunity to review and rationalise the fee structure for work permits. The current pricing structure does not present a discernible pattern and the marketplace may be willing to pay for less bureaucracy.
6. Those businesses that do not have in-house human resource personnel capable of producing the required plan as outlined in element #2 would be directed to secure this support from an approved list of service providers.
7. Plan Assessments would be calendarised to optimise the Immigration Department's workload.

8. It is recommended that a pilot project be undertaken with a large employer to affirm the proposal.
9. Automation of the Department of Immigration is an imperative. The technology solution must be fully integrated and available 24/7.