

Simplified Student Visa Framework (SSVF) appraisal

ACPET Submission

November 2017

Introduction

Established in 1992, ACPET is the national industry association for private providers of tertiary education and training. ACPET members deliver a range of vocational education and training (VET), higher education (HE) and English language programs across all states and territories, as well as internationally.

ACPET's mission is to enhance quality, choice and innovation in Australian tertiary education and training. Its members include commercial and not-for-profit entities, community groups, industry providers and enterprise-based organisations. ACPET works with governments, industries and other stakeholders to ensure tertiary education and training services are well targeted, accessible and delivered to a high standard. Our priority is to ensure the very best outcomes for students, industry and the Australian economy.

ACPET welcomes the opportunity to consider DIBP's focus questions. Responses are concise, as requested. We welcome the chance to provide more detailed information as necessary.

Context for Submission

The recent environment for international education has been strong in terms of growth of international students, although uneven across sectors. Regulatory refinements to the ESOS framework, specifically updates to the National Code and ELICOS standards have been a long time in development. Although these have been recently finalised they are yet to be implemented.

The industry's efforts to diversify and embrace innovation via greater focus on transnational education, edu-tech and new product development have been limited, with greater assistance and encouragement needed if change is to be embraced.

ACPET members registered as CRICOS providers have provided valuable input to this submission. Their direct quotes are indicated throughout the document. Considered contributions have been made by ACPET's international education committee, via its nation-wide membership.

Key points

- Over time, the international education industry has taken on an increasing function of screening international students for genuine temporary entrant (GTE) status, taking resources away from their core business of high quality skilling and learning.
- If the industry retains this function, access to more sophisticated data analytics must be provided to improve decision making. It is not logical to disadvantage providers for making a different assessment of a student than a DIBP officer, who has greater information.
- The streamlined risk framework is conceptually sound yet widely misunderstood in its purpose. Its importance has been overstated, leading to it being perceived incorrectly as a quality and marketing tool, driving behaviours based on protection of risk ratings.
- Of great concern is a pervasive perception that students applying for VET courses are more likely to be refused a visa than HE applicants.
- Stability of the fundamental student visa policy elements is of utmost value to ACPET members.

Responses to focus questions

1. How well do you think the following features of the SSVF are working?

a) Single Student visa (Subclass 500)

The introduction of one subclass is well supported by ACPET and our members primarily because it is more easily understood by students.

While the creation of one student visa subclass doesn't remove any underlying complexity for providers, it does benefit prospective students as well as staff assisting students across multiple education sectors, by allowing simpler explanations and marketing messages.

Categorisation between Higher Education (HE) and Vocational Education and Training (VET) behind the student interface is essential for monitoring of trends and data. ACPET supports continuing this distinction.

b) Single Immigration risk framework – streamlined evidentiary requirements creating a more level playing field

ACPET agrees that the single immigration risk framework is an improvement over previous approaches. More providers have been given access to streamlined evidence requirements because of the broadening of participation beyond SVP providers, to the benefit of students and the international education industry. However, while it is a bigger, indications from the sector is that it is not a more level playing field.

Many negative perceptions of the risk framework appear to stem from a misunderstanding of its purpose and an over-reliance on it beyond its intended use.

The risk framework's binary output of a student's need to submit either more or less evidence of language and financial capacity, has been over-read and extrapolated into a quality measure by too many in the industry. This has led to competitiveness about of risk rating allocations, and use of ratings as a marketing tool.

A view exists that institutions able to afford detailed screening of a prospective student's likely 'genuineness' are advantaged with lower risk ratings. Coupled with misunderstandings about ratings measuring quality, many believe the framework to be unfair.

While the new risk framework is supported as an improvement overall, few ACPET members believe it has created a level playing field between differently resourced providers, or between HE and VET organisations (if that was a desired outcome) with many feeling that VET providers and non-university higher education providers are treated less favourably.

c) Mandatory online lodgement

Feedback on the move to online lodgement is overwhelmingly positive. Students expect this level of service, which offers a more favourable, modern impression of Australia as a study destination than previous paper based applications.

Some initial problems with students and agents not understanding the online system have, unsurprisingly, dissipated as all have adjusted to the change.

Questions about unintended consequences relate to -

- Expectations that all online processes should be quicker and simpler, despite the accepted need for thoroughness in all visa applications
- Greater reliance on agents for non-English speakers or those with limited access to computers
- And alternatively, a greater number of confident students attempting online lodgement without agency assistance, making genuine errors which result in rejections that have negative impacts for students and providers

A further suggested enhancement of the system is to allow providers to see when a visa applicant or their agent lodges their documentation. At the moment, providers have no coverage on when this occurs, making it extremely difficult to track visa turnaround times, which in turn makes managing intakes very difficult.

ACPET applauds DIBP's implementation of this momentous change to online lodgement with little or no technical or service disruption. Providers value the improvement to processing, as well as the efficiency and professionalism it signals to the industry globally.

2. How well do you think the following operational aspects are working?

a) Immigration risk methodology used to calculate risk ratings for education providers and countries

Although a range of views exist amongst ACPET members, provider risk ratings are the most commonly criticized aspect of SSVF.

As mentioned, significant confusion about the risk methodology of providers relates to its purpose, but also the factors included in the calculation. The methodology is complex and difficult for staff at various levels to engage with and understand what business processes or risk management measures may improve or maintain their rating.

In broad terms, it is more accurate to view a visa rejection as the system functioning well, particularly when providers do not have the analytics and insights at the disposal of DIBP and are therefore supporting an application without access to all the available information.

It is suggested that DIBP establish a

- Fast, well-resourced referral service for providers to refer difficult cases for pre-application assessment
- Pilot project for DIBP assessors to work with providers to give early advice if an application is likely to be rejected, so that the COE can be withdrawn. This acknowledges that without access to greater analytical insights, any investment providers make in assessing genuineness of students will be lacking compared with DIBP's considerations. Providers would then be better supported in managing the risk they carry on behalf of the Government; and

- Process to review decisions that providers consider unfounded, to be reviewed on the basis of evidence supplied, by a central DIBP review team onshore. This would support a procedure that is currently subjective and opaque.

Other specific factors proposed to be treated differently include -

- Students applying for protection be removed from the methodology. No-one can foresee natural disasters and political changes which may subsequently lead to a protection visa application from a student.
- Students reported for not adhering to visa conditions due to excessive work, unsatisfactory academic progress, etc., should be removed from that provider's calculations. Providers ought to be encouraged, not punished, for reporting non-compliance with visa conditions. This, in turn, will demonstrate to students the ramifications of non-compliance and would result in a positive impact on adherence to visa conditions.
- Onshore visa approvals and refusals should be included to discourage the targeting of onshore applicants by unscrupulous colleges attempting to recruit already admitted students.

"This (provider risk methodology) is causing some frustration from our offshore education agents as it seems to favour providers who only recruit onshore (i.e providers promoting course hopping)"

Problems with onshore poaching persist, despite DIBP data showing decreases in student movement in the first six months of study.

- Quality of education delivery is problematic to include in a calculation of immigration risk, for immigration risk alone does not drive the desired behaviour of the industry. A more holistic management of risk would be valuable, but neither DIBP nor education regulators have the tools to independently verify quality, making this difficult to resolve.

How this relates to the propensity for risk ratings to be misinterpreted as quality measures requires further consideration.

- Questions have arisen about whether there is value in including in some way the data to be collected by DET on agent performance in immigration risk ratings for providers and/or countries.

ACPET requests a considered approach by DIBP, in partnership with international education peak bodies, to further building the GTE assessment capability of professionals in the international education sector.

This would assist providers to better judge the likely 'genuineness' of students, which assists DIBP effectively manage Australia's borders. Enhancing provider capability in this area and providing access to suitable information on which to base decisions supports the recruitment of genuine students – which is what providers want having invested so much to recruit them and which also meets the government's objectives of strong border protection measures.

At present the only differentiating factor afforded by DIBP, that is streamlined evidentiary requirements, becomes an inaccurate quality measure based on whether an education provider has an effective visa risk clearinghouse. This is clearly not core business for educators. Even for those who have built their visa assessment capabilities, having access to timely changes in market trends / behaviour would greatly assist them in their recruitment practices.

b) Provider access to Immigration risk rating report through ImmiAccount

ACPET members value provider risk rating reports provided by DIBP. Feedback is largely positive. The reports are considered easy to access and the frequency of release is helpful.

Suggestions for improvements were made, including for new functions which would enable –

- Linking from Immi accounts to providers' enrolment software
- An option of to and from date selection

As a related issue, some members felt country ratings should be published.

"Agents and students can quickly determine what risk ratings their countries and each provider is...I have seen tables developed quite quickly after each revision."

It would be beneficial if similar risk reports could be accessed, by providers, for countries, about which there is currently limited transparency. This would assist providers in making informed decisions on the countries from which to recruit students and to understand changes in markets over time.

c) The online tool that advises students what documentation they need to provide with their application

ACPET applauds the greater focus on informing students prior to application lodgement. Members report the tool is valuable to students and to staff or agents helping them, so is a welcome addition.

A small number of members suggest it might be able to be simplified further at its next revision, to reduce the number of steps to find the documentation requirements, or perhaps in a separate student visa portal for ease of access.

Some confusion is reported about documentary evidence required by some overseas posts being different to online requirements.

- d) Effectiveness of the Department’s engagement with the international education sector (student.visa.programme@border.gov.au mailbox, provider updates, regular teleconferences, meetings, etc.)

Providers appreciate the assistance provided by DIBP officers in responding to email enquiries. Extending this valued service to include a phone line for provider enquiries would be a welcome addition.

Guidance on the right area and staff to engage with on specific or more complex issues is suggested to help alleviate occasional inconsistency of advice.

Specific topic teleconferences or webinars, with accompanying written material, to help providers improve their approaches are highly valued. Requests for these to be more frequent are common and, for key topics, face-to-face contact is desired. Suggested topics include -

- how to read risk rating reports
- factors that help indicate the ‘genuine-ness’ of students
- recognising fraudulent documents
- comprehensive data analytics.

At a policy level, peak bodies get great value from EVCC meetings, such that smaller problem-solving forums in between the quarterly meetings would be also welcomed.

Staff changes at senior levels at DIBP understandably bring different approaches, but ACPET has welcomed and benefitted from the highly effective engagement of those who’ve formed sound stakeholder relationships.

3. What features of the SSVF require further improvement?

The gradual, but sustained, shifting of immigration risk from the Government to education providers remains concerning. This shift comes at great cost in terms of systems and resources to manage that risk. Education providers acknowledge it comes with the benefit of greater numbers of students entering Australia. However, it must be acknowledged that providers carry a high degree of public risk that is only partially offset by the benefit accruing to individual providers.

With this responsibility being delegated to providers, greater information must be provided. This means, having technology-enabled mechanisms in place so that all available data is accessible to all those who bear risk in the system. ACPET also proposes that trends in adverse GTE verification outcomes should be fed back to peak bodies and incorporated into DIBP’s education programs for providers.

The confusion about the purpose of risk ratings for streamlined evidentiary requirements may be alleviated by a simple change in terminology. Referring to the binary outcome of the risk framework as ‘LOW evidence required’ or ‘HIGH evidence required’ may help cement the true purpose of the framework, and dismiss it as the erroneous quality measure it has become.

4. What are the best three features of the SSVF that should be highlighted?

1. Online lodgement – the single most valuable improvement amongst SSVF changes, is the electronic lodgement of students’ applications. As a modern, more accessible method of early engagement with students, a positive impression is created. Sector stakeholders would appreciate advice on priorities for ongoing upgrade paths.
2. Clarity of documents and information required for students – improved transparency of the documentary evidence needed by students is of great assistance. While care needs to be taken because of the risk of non-genuine students abusing this information, further simplification is suggested.
3. Grant timeframes improved – while some providers feel processing times could be further enhanced, most are appreciative that service standards have improved in the majority of cases. This is a clear advantage for Australia over alternative study destinations.

5. What impact do you think the introduction of the SSVF has had on the recruitment of genuine international students?

While growth in genuine international student recruitment continues, it is difficult to assign a causal link to SSVF reforms. As a collection of changes, no one element stands out as improving the likely ‘genuineness’ of students.

Any increase in the recruitment of international students should be assessed in light of many other environmental factors, such as currency exchange rates and policies of competitor countries.

The introduction of SVP and SSVF has certainly led to the sector being more selective of who they are recruiting. The focus on student genuineness by institutions as a result of SVP and SSVF is having a positive impact on visa outcomes and the propensity of students to succeed and excel.

However, ACPET members continue to raise the concern that DIBP are refusing visa applications from students they have assessed as genuine.

The main issue in determining ‘genuineness’ relates to a migration aspiration. How this can be more accurately assessed or whether visitors with a genuine desire for study AND a possible interest in future migration can be admitted to Australia remains a difficult and contentious issue.

6. What impact has the SSVF had on education providers' processes for enrolling students?

It is evident that many ACPET members operating in international education consider that assessing GTE is too resource and time intensive.

Applicants for enrolment must be considered more individually with extra procedures implemented to screen the applicant's genuineness and to review and monitor the agent's performance.

Some feel unscrupulous providers are encouraged to market to onshore students to avoid this.

"Some providers have made a conscious decision to not recruit offshore and only seek visa renewals onshore."

For those who were SVP providers, processes have not changed significantly, rather being subject to greater refinement and continuous improvement.

7. Do you think the SSVF policy settings are having a positive effect on the competitiveness of Australia's international education sector?

Positive operational elements of SSVF, such as online lodgement and improved transparency about required documentation have had a positive impact. However, these are overshadowed by visa policy changes being frequently perceived as tightening of entry requirements and signalling a less welcoming environment for students and/or visitors.

Stability of policy rates most highly with international education providers, as ongoing change has proved discouraging to students.

"Ever changing visa requirements without warnings have a negative effect"

Policy reform is often misunderstood and misrepresented, with competitor countries gaining advantage, as Australia's inconsistency is highlighted yet again.

"The problem is that SSVF is one of a range of changes in VET & HE. All changes confuse the market and disadvantage us internationally. Stop fiddling with the VET policies, implement some coherent HE policies then let the market settle down!"

No definitive data appears available to indicate that SSVF is a more competitive framework in comparison to its predecessors or, most importantly, in comparison to other countries.

Indeed, some detailed data analysis of the type proposed at [Attachment A](#) would also add to understanding the true nature and characteristics of Australia's international education market and the actual impact of SSVF.

8. To what extent do you think the SSVF is a sustainable framework going into the future?

Comments from members about sustainability of SSVF are mostly positive, with the clear proviso being the need for stability, clarity of information and transparency of decision making. Concerns about ways to ensure regional distribution of students are also highlighted.

Suggestions include that DIBP needs

- Adequate resources to cope with increasing demand
- Authoritative, clear and transparent communication

“With the...myriad of information available online from unauthorised sources, information has to be provided on DIBP website...with absolute clarity/transparency. This...protects the student from unscrupulous or "dodgy" education providers and migration agents”

- Processes to aid consistency in decision making

“While the model is theoretically sound, in reality we continue to see inconsistencies in DIBP decision making”

- To consider ways to encourage students to choose areas outside of Sydney and Melbourne as alternative destinations. This will aid sustainability in the long term, with amore even distribution of arrivals, less stress on infrastructure and greater diversity of student experience.

“I see SSVF....being sustainable for continued growth in the main centres, but regional locations will not show the levels of growth they need to become education centres and take pressure off capital city infrastructure”.

The student visa program should foster accessibility and certainty for international students. Constant changes to the system should be discouraged to alleviate this uncertainty. Any further changes to student visas should be minimal.

Government and the education sector must continue to work together to ensure that both our industry and visa integrity is not undermined.

“A welcoming and stable stance on student visas and their requirements is the most sustainable framework going forward.”

9. Have you identified any emerging integrity issues since the introduction of SSVF? If so, what are they?

While no specific student or provider driven integrity issues have been identified by ACPET, the following related issues are highlighted:

- Apparent inconsistency in decision making by DIBP officers is raised often with examples cited of students in very similar situations being subject to different outcomes.
- The need for an appeal mechanism to be introduced in restricted circumstances.

“Since providers now do....work for DIBP; they should have access to appeal rights for their applicants in cases where DIBP made an error (which does happen)”.

- A lack of sufficient enforcement by regulators is sometimes raised as being more problematic than policy or regulation.

“There are still ‘dodgy’ operators out there. The problem is enforcement; the regulations are not the problem.”

Data analysis that should inform the Education Visa Consultative Committee review of 12 months operation of the Simplified Student Visa Framework

Data analysis to inform review of the SSVF

There are a series of key questions that should be considered to inform the review of 12 months of the operation of the Simplified Student Visa Framework (SSVF). Thorough, open and transparent analysis is required to understand the impact current visa settings are having on the international education market in Australia. The questions and the underlying data needed to undertake the analysis are detailed below.

1. What are the key characteristics of the student visa program now (end program year 2016-17) and how does it compare to the following:

- The previous 'high watermark' for Australian international education in 2010 (end of program year 2010-11) and the student visa program operated under the Assessment Level framework; and
- End of program year 2014-15, as it was in March and November 2014 that two previous visa policy reforms were made: Streamlined Visa Processing (SVP) was extended to 19 non-university higher education providers and simplification of the student visa assessment levels; and then SVP was extended to all non-university higher education and vocational providers that offer advanced diplomas; and
- End of program year 2015-16, as it was the year prior to the introduction of SSVF.

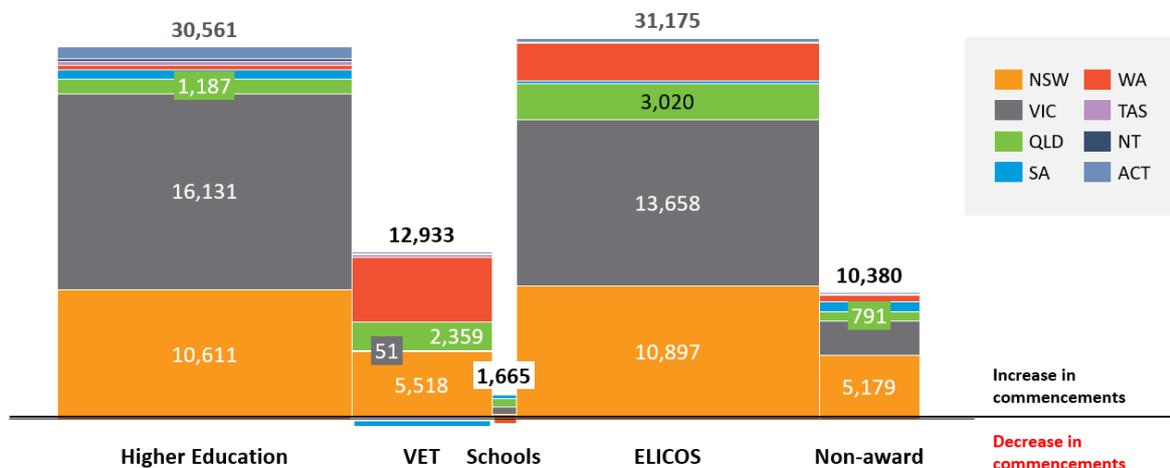
This set of analysis goes to the diversity and sustainability of the sector. By looking at the extent to which there are marked changes in the make-up of the program at each point in time, we are able to reflect on the policy settings and program implementation guidance that was in place to draw conclusions about aspects of the program that work well and those that may require some adjustment.

The analysis that would illuminate this question would be:

- What has been the change (how many more or less) in state/territory distribution of visa grants by sector:
 - Between 2010-11 and 2016-17; and
 - Between 2014-15 and 2016-17; and
 - Between 2015-16 and 2016-17.

Raw data in tables should be provided for all data queries, however the chart below is a model for how to present each year's comparison, but obviously it would be charting the change in visa grants.

Change in International student commencements by sector and state, between 2010 and 2016

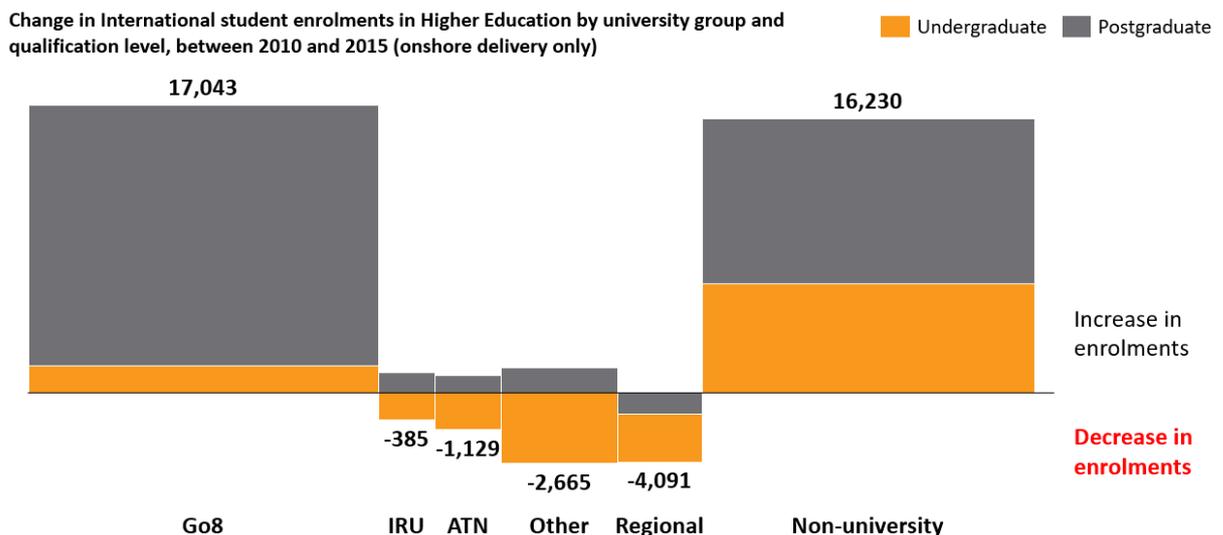


Note: Column width is based on change in total enrolments from 2010 to 2016.

Source: Austrade (AEI) (2016) 'International Education Student Data'

- What has been the change (how many more or less) in sector distribution of visa grants:
 - Between 2010-11 and 2016-17; and
 - Between 2014-15 and 2016-17; and
 - Between 2015-16 and 2016-17.
- What has been the change (how many more or less) in higher education and postgraduate research visa grants by key provider groups [use individual provider data to aggregate up for the following groups: Group of Eight (Go8); Innovation Research Universities (IRU); Australian Technology Network (ATN); Regional Universities Network (RUN); other non-aligned universities; and Non-University Higher Education Providers (NUHEPs)]:
 - Between 2010-11 and 2016-17; and
 - Between 2014-15 and 2016-17; and
 - Between 2015-16 and 2016-17.

The chart below is a model for how to present each year's comparison, but obviously it would be charting the change in visa grants.



Note: undergraduate and postgraduate enrolment share based on enrolment figures for onshore and offshore delivery. Column width is based on change in total enrolments from 2010 to 2016. Source: Department of Education and Training (2016) [uCube](#)

- What has been the change (how many more or less) in vocational education and training visa grants by public and private providers [use individual provider data to aggregate up for the following groups: TAFEs; and private Registered Training Organisations (RTOs)]:
 - Between 2010-11 and 2016-17; and
 - Between 2014-15 and 2016-17; and
 - Between 2015-16 and 2016-17.
- What has been the change (how many more or less) in standalone ELICOS visa grants by public and private providers (use individual provider data to aggregate up for the following groups: Public Universities and TAFEs; and private ELICOS):
 - Between 2010-11 and 2016-17; and
 - Between 2014-15 and 2016-17; and
 - Between 2015-16 and 2016-17.

- What has been the change (how many more or less) in schools visa grants by government and non-government schools (use individual provider data to aggregate up):
 - Between 2010-11 and 2016-17; and
 - Between 2014-15 and 2016-17; and
 - Between 2015-16 and 2016-17.

- What has been the change (how many more or less) in Non-Award visa grants by public and private providers (use individual provider data to aggregate up):
 - Between 2010-11 and 2016-17; and
 - Between 2014-15 and 2016-17; and
 - Between 2015-16 and 2016-17.

- What has been the change (how many more or less) in Foreign and Defence visa grants by education sector (HE, HE research, VET, ELICOS):
 - Between 2010-11 and 2016-17; and
 - Between 2014-15 and 2016-17; and
 - Between 2015-16 and 2016-17.

- What has been the change (how many more or less) in visa grants from Australia's top 15 source countries (using data from Visa Programme report 31 December 2016), in order: China; India; Brazil; Nepal; South Korea; Thailand; Vietnam; Malaysia; Colombia; Indonesia; USA; Hong Kong (SAR); Taiwan; Japan; and Pakistan:
 - Between 2010-11 and 2016-17; and
 - Between 2014-15 and 2016-17; and
 - Between 2015-16 and 2016-17.

- What has been the change in the visa rejection rate (applications divided by grants) from Australia's top 15 source countries (using data from Visa Programme report 31 December 2016), in order: China; India; Brazil; Nepal; South Korea; Thailand; Vietnam; Malaysia; Colombia; Indonesia; USA; Hong Kong (SAR); Taiwan; Japan; and Pakistan:
 - Between 2010-11 and 2016-17; and
 - Between 2014-15 and 2016-17; and
 - Between 2015-16 and 2016-17.

- What has been the change in the visa rejection rate (applications divided by grants) from Australia's top 15 source countries (using data from Visa Programme report 31 December 2016), in order: China; India; Brazil; Nepal; South Korea; Thailand; Vietnam; Malaysia; Colombia; Indonesia; USA; Hong Kong (SAR); Taiwan; Japan; and Pakistan by sector (Foreign Affairs or Defence; Higher Education; Independent ELICOS; Non-Award; Postgraduate Research; Schools; and VET):
 - Between 2010-11 and 2016-17; and
 - Between 2014-15 and 2016-17; and
 - Between 2015-16 and 2016-17.

That is, for each of the top 15 source countries, what was the change in the visa rejection rate for each sector between: 2010-11 and 2016-17; between 2014-15 and 2016-17; and 2015-16 and 2016-17.

- What has been the change in the main reasons for visa rejections by sector:
 - Between 2010-11 and 2016-17; and
 - Between 2014-15 and 2016-17; and
 - Between 2015-16 and 2016-17.

- What has been the change in the main reasons for visa rejections from Australia's top 15 source countries (using data from Visa Programme report 31 December 2016), in

- order: China; India; Brazil; Nepal; South Korea; Thailand; Vietnam; Malaysia; Colombia; Indonesia; USA; Hong Kong (SAR); Taiwan; Japan; and Pakistan:
- Between 2010-11 and 2016-17; and
 - Between 2014-15 and 2016-17; and
 - Between 2015-16 and 2016-17.

2. How well is the student visa program operating now (end program year 2016-17) and how does it compare to the following:

- *The previous 'high watermark' for Australian international education in 2010 (end of program year 2010-11) and the student visa program operated under the Assessment Level framework; and*
- *End of program year 2014-15, as it was in March and November 2014 that two previous visa policy reforms were made: Streamlined Visa Processing (SVP) was extended to 19 non-university higher education providers and simplification of the student visa assessment levels; and then SVP was extended to all non-university higher education and vocational providers that offer advanced diplomas; and*
- *End of program year 2015-16, as it was the year prior to the introduction of SSVF.*

This set of analysis goes to the effectiveness and efficiency of the student visa program in delivering on its dual purpose to ensure the recruitment of genuine international students while supporting the competitiveness of Australia's international education sector. Again, by looking at the extent to which there are marked changes in the operational metrics of the program at each point in time, we are able to reflect on the policy settings and program implementation guidance that was in place to draw conclusions about aspects of the program that work well and those that may require some adjustment.

The analysis that would illuminate this question would include:

Processing times

- What was the average, median and range of visa processing times for the whole student visa program in program years:
 - 2010-11;
 - 2014-15;
 - 2015-16; and
 - 2016-17.
- What was the average, median and range of visa processing times for each sector (Foreign Affairs or Defence; Higher Education; Independent ELICOS; Non-Award; Postgraduate Research; Schools; and VET) in the program years:
 - 2010-11;
 - 2014-15;
 - 2015-16; and
 - 2016-17.
- What was the average, median and range of visa processing times for Higher Education and Postgraduate Research sectors by key provider groups [use individual provider data to aggregate up for the following groups: Group of Eight (Go8); Innovation Research Universities (IRU); Australian Technology Network (ATN); Regional Universities Network (RUN); other non-aligned universities; and Non-University Higher Education Providers (NUHEPs)] in the program years:
 - 2010-11;
 - 2014-15;
 - 2015-16; and
 - 2016-17.
- What was the average, median and range of visa processing times for vocational education and training by public and private providers [use individual provider data to aggregate up for the following groups: TAFEs; and private Registered Training Organisations (RTOs)] in the program years:
 - 2010-11;

- 2014-15;
 - 2015-16; and
 - 2016-17.
- What was the average, median and range of visa processing times for standalone ELICOS by public and private providers (use individual provider data to aggregate up for the following groups: Public Universities and TAFEs; and private ELICOS):
 - 2010-11;
 - 2014-15;
 - 2015-16; and
 - 2016-17.
 - What was the average, median and range of visa processing times for schools sector by government and non-government schools (use individual provider data to aggregate up):
 - 2010-11;
 - 2014-15;
 - 2015-16; and
 - 2016-17.
 - What was the average, median and range of visa processing times for Non-Award sector by public and private providers (use individual provider data to aggregate up):
 - 2010-11;
 - 2014-15;
 - 2015-16; and
 - 2016-17.
 - What was the average, median and range of visa processing times for Foreign Affairs or Defence by education sector (HE, HE research, VET, ELICOS):
 - 2010-11;
 - 2014-15;
 - 2015-16; and
 - 2016-17.
 - What was the average, median and range of visa processing times for Australia's top 15 source countries (using data from Visa Programme report 31 December 2016), China; India; Brazil; Nepal; South Korea; Thailand; Vietnam; Malaysia; Colombia; Indonesia; USA; Hong Kong (SAR); Taiwan; Japan; and Pakistan:
 - 2010-11;
 - 2014-15;
 - 2015-16; and
 - 2016-17.
 - What was the average, median and range of visa processing times for Australia's top 15 source countries (using data from Visa Programme report 31 December 2016), China; India; Brazil; Nepal; South Korea; Thailand; Vietnam; Malaysia; Colombia; Indonesia; USA; Hong Kong (SAR); Taiwan; Japan; and Pakistan by sector (Foreign Affairs or Defence; Higher Education; Independent ELICOS; Non-Award; Postgraduate Research; Schools; and VET):
 - 2010-11;
 - 2014-15;
 - 2015-16; and
 - 2016-17.

That is, for each of the top 15 source countries, what was the average, median and range of visa processing times by sector for 2010-11; 2014-15; 2015-16; and 2016-17.

Onshore Visa Cancellations

- What was the total number of onshore visa cancellations by Australia's top 15 source countries (using data from Visa Programme report 31 December 2016), China; India;

Brazil; Nepal; South Korea; Thailand; Vietnam; Malaysia; Colombia; Indonesia; USA; Hong Kong (SAR); Taiwan; Japan; and Pakistan:

- 2010-11;
 - 2014-15;
 - 2015-16; and
 - 2016-17.
- What was the number of onshore visa cancellations for Australia's top 15 source countries (using data from Visa Programme report 31 December 2016), China; India; Brazil; Nepal; South Korea; Thailand; Vietnam; Malaysia; Colombia; Indonesia; USA; Hong Kong (SAR); Taiwan; Japan; and Pakistan by sector (Foreign Affairs or Defence; Higher Education; Independent ELICOS; Non-Award; Postgraduate Research; Schools; and VET):
 - 2010-11;
 - 2014-15;
 - 2015-16; and
 - 2016-17.

That is, for each of the top 15 source countries, what was the number of onshore visa cancellations by sector for 2010-11; 2014-15; 2015-16; and 2016-17.

Provider transfers

- What was the number of onshore provider transfers by sector – that is the sector the student is transferring from and to - for Australia's top 15 source countries (using data from Visa Programme report 31 December 2016), China; India; Brazil; Nepal; South Korea; Thailand; Vietnam; Malaysia; Colombia; Indonesia; USA; Hong Kong (SAR); Taiwan; Japan; and Pakistan by sector (Foreign Affairs or Defence; Higher Education; Independent ELICOS; Non-Award; Postgraduate Research; Schools; and VET):
 - 2010-11;
 - 2014-15;
 - 2015-16; and
 - 2016-17.

That is, for each of the top 15 source countries, what was the number of onshore provider transfers by sector – the sector the student is transferring from and to – for 2010-11; 2014-15; 2015-16; and 2016-17.