16 March 2012

Ms Lisa Curtin  
Department of Immigration and Citizenship  
Student Policy Projects  
PO Box 25  
Belconnen ACT 2616  
Email: Student.Policy.Projects@immi.gov.au

Response to the Review of the Student Visa Assessment Level Framework

Dear Ms Curtin

The Group of Eight (Go8) wishes to endorse the large majority of the submission prepared by Universities Australia in response to the Review of the Student Visa Assessment Level Framework.

The Go8 agrees that the new formula for a provider based risk assessment should rely on a balance between quantitative and qualitative measures with appropriate weighting applied.

The Go8 supports UA's proposal to remove the current risk criterion "rate at which visa holders apply for certain other permanent visas" because it applies penalties for behaviour that is not illegal, is not related to visa compliance and over which no higher education provider has influence.

The Go8 also supports UA's recommendation to add "rate of course completion" to the list of quantitative criteria.

However the Go8 differs slightly from UA in additionally supporting the use of an indicator such as "successful progression in the student's first year of study".

“Successful progression” in a student’s first year of study is an outcome that is directly related to high entry standards, a robust application process and academic and other support for students in their first crucial year of tertiary study.

“Successful completion” is an indicator which measures overall educational outcomes in line with the importance of supporting the student. Both of these measures cover what institutions should be undertaking to ensure positive student visa outcomes.

The Go8 also believes that higher education providers have no direct or effective influence over negative outcomes such as a student overstaying their visa. This indicator is inappropriate and should be removed from the risk assessment process.
As such the Go8’s main recommendation is that the specific risk criteria used to determine the quantitative portion of the Assessment Level set out in the table below should be considered.

<table>
<thead>
<tr>
<th>Rate of applications refused due to fraud</th>
<th>40%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rate of applications refused due to other reasons</td>
<td>15%</td>
</tr>
<tr>
<td>Rate of visa cancellation</td>
<td>15%</td>
</tr>
<tr>
<td>Course completion rate</td>
<td>15%</td>
</tr>
<tr>
<td>Successful progression from first to second year of study</td>
<td>15%</td>
</tr>
</tbody>
</table>

Once again the Go8 agrees with UA that modelling should be undertaken by DIAC and extensive consultation with the sector should occur before the above solution is adopted.

The Go8 would welcome the opportunity to engage with the Department and supports UA’s proposal for DIAC to host a series of workshops for all the peak bodies with direct relevance to this review.

Yours faithfully

Michael Gallagher
Executive Director