



Australian Government
Department of Education

ESOS Agency for Schools
Regulator Performance Framework
Annual Report 2018-19



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The document must be attributed as *ESOS Agency for Schools RPF Report 2018-19*

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Abbreviations

AISWA	Association of Independent Schools of Western Australia
ARC	Annual Registration Charge
ASQA	Australian Skills Quality Authority
CoE	Confirmation of Enrolment
CRICOS	Commonwealth Register of Institutions and Courses for Overseas Students
DSA	Designated State Authority (for schools, including territory agencies)
ELICOS	English Language Intensive Courses for Overseas Students
EMC	Entry to Market Charge
ESOS Act	<i>Education Services for Overseas Students Act 2000</i>
ESOS Agencies	Secretary of the department (for school providers); ASQA (for VET and ELICOS providers); and TEQSA (for higher education and foundation program providers)
ESOS Regulations	<i>Education Services for Overseas Students Regulations 2019</i>
ESOS Charges Act	<i>Education Services for Overseas Students (Registration Charges) Act 1997</i>
Home Affairs	Australian Government Department of Home Affairs
KPI	Key Performance Indicator
National Code	<i>National Code of Practice for Providers of Education and Training to Overseas Students 2018</i>
PRISMS	Provider Registration and International Student Management System
Refund Specification	<i>Education Services for Overseas Students (Calculation of Refund) Specification 2014</i>
RPF	Regulator Performance Framework
SCV	Student Course Variation

State	State and Territory
TEQSA	Tertiary Education Quality and Standards Agency
The agency	The ESOS agency for approved school providers under the ESOS legislation, i.e. the Secretary, through the Quality Frameworks Branch, International Group
The department	Australian Government Department of Education
The Secretary	Secretary of the department
TPS	Tuition Protection Service
VET	Vocational Education and Training

Regulator Performance Framework

Annual Report 2018-19

Introduction

The Education Services for Overseas Students Act 2000 (ESOS Act) sets out the legal framework governing delivery of education to international students on a student visa in Australia. The Australian Government, through the Department of Education (the department), administers the ESOS Act and its associated instruments. The ESOS legislative framework governs:

- the registration process for education providers wishing to be approved to provide courses to international students on a student visa
- the obligations providers are required to meet
- regulatory enforcement and compliance arrangements and
- the operation of the Tuition Protection Service.

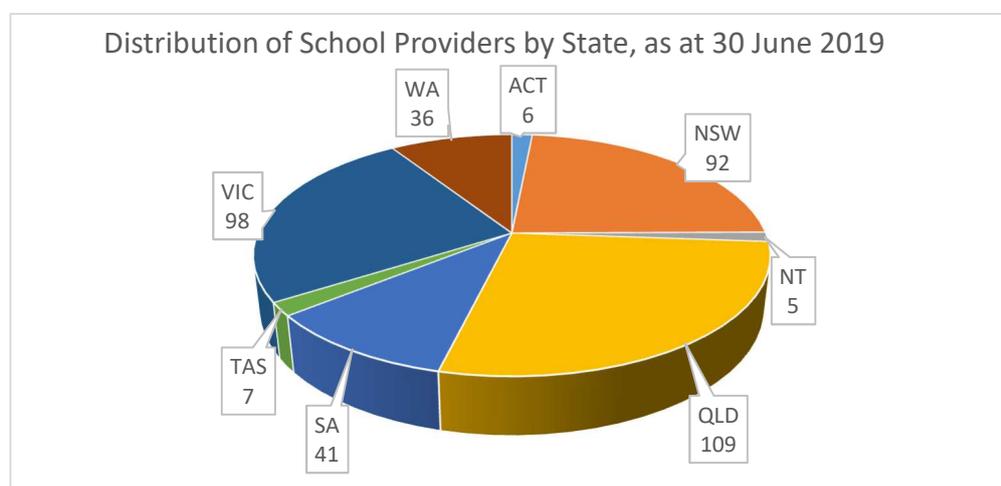
Under the ESOS Act, the Secretary of the department is the ESOS agency (the agency) for approved school providers that offer courses to international students.

The agency's responsibilities and powers under the ESOS Act are undertaken and exercised by the department's Quality Frameworks Branch of the International Group.

As at 30 June 2019, 394 school providers were registered on the *Commonwealth Register of Institutions and Courses for Overseas Students* (CRICOS). These 394 school providers had in total around 1093 locations and 1055 courses with an overall student capacity of 86,525. Their distribution by state is given in the *Chart 1*. There were 12 School sector providers whose registration was cancelled in 2018-19. They had all requested voluntarily cancellation.

Please note that education departments in each state and territory are systems providers – as a result, they have one registration but may include many schools.

Chart 1 – Distribution of School Providers by State as at 30 June 2019



Of the total 394 providers, 15 also delivered courses in higher education and/or VET sectors. These 15 providers referred to as dual or multi sector providers, were also regulated by other ESOS agencies, i.e. the Tertiary Education Quality and Standards Agency (TEQSA) and/or the Australian Skills Quality Authority (ASQA).

This report is a formal self-assessment report by the agency against the *ESOS Regulator (Schools) RPF Metrics*, which is found at *Appendix 1*, it is also available at www.internationaleducation.gov.au.

Summary of Performance

In 2018-19, the agency met the objectives against the following *Regulator Performance Framework* key performance indicators:

1. Regulators do not unnecessarily impede the efficient operation of regulated entities
2. Communication with regulated entities is clear, targeted and effective
3. Actions undertaken by regulators are proportionate to the regulatory risk being managed
4. Compliance and monitoring approaches are streamlined and coordinated
5. Regulators are open and transparent in their dealings with regulated entities
6. Regulators actively contribute to the continuous improvement of regulatory frameworks.

Activities performed by the agency included:

- a teleconference with Designated State Authorities (DSAs)
- 57 CRICOS registration renewals and 5 new registrations (an increase of 16 per cent on 2017-18)
- provided a hotline telephone service for information and guidance about ESOS compliance and CRICOS registration requirements and processes and
- created self-help guides for providers identified in PRISMS as medium and high risk during the renewal process
- maintained responsive PRISMS and ESOS helpdesk functions
- outreach at all major conferences
- education agent data tools, including for schools

The agency also performed the following functions in relation to all registered CRICOS providers (not just the schools sector):

- collected Entry to Market Charges (EMC) from 281 providers (which includes 80 newly registered) and initial TPS levies
- managed debt collection processes for 37 providers who failed to pay the second or third EMCs by the due date
- maintained and updated CRICOS and relevant pages on www.internationaleducation.gov.au

Table 1 Number of New Registrations and Renewals of School Providers 2018-19

<i>State</i>	<i>New Registrations</i>	<i>Renewals</i>
ACT	0	0
NSW	3	10
NT	0	0
QLD	4	38
SA	1	0
TAS	0	1
VIC	0	2
WA	1	6
ALL	9	57

Detailed Report

Deliverables of the agency are self-assessed according to evidence collected against the *ESOS Regulator (Schools) RPF Metrics* (see *Appendix 1*) and described as follows.

KPI 1 - Regulators do not unnecessarily impede the efficient operation of regulated entities

The agency's mandate is to ensure all CRICOS registered school providers meet the standards as prescribed by Part B of the *National Code of Practice for Providers of Education and Training to Overseas Students 2018* (the National Code) and fully comply with the requirements of the ESOS Act.

The agency's information requests are tailored to minimise any impact on providers, and are only made when necessary to secure regulatory objectives. For instance, when processing registration renewal requests, the agency only requires further information or action from providers where both the number and proportion of possible breaches identified were significant (i.e. above the thresholds determined by the agency). For the cases where there were a small number of minor issues identified, the agency sends detailed and informative emails targeted to those issues. The agency employs a number of proactive and reactive strategies to detect and rectify potential non-compliance by providers. Desktop audits are only carried out during the renewal process with providers whose number and proportion of issues identified were above specific thresholds determined by the agency.

Additionally, the agency implemented continuous improvement strategies to reduce the costs of compliance for CRICOS registered school providers. In 2018-19, the agency:

- reviewed and simplified its risk assessment and communication processes for CRICOS registration renewals (as a result, it reduced the number of requests for additional information from providers, which shortened the renewal assessment turn-around time).
- enhanced the *Provider Registration and International Students Management System* (PRISMS) by having enabled providers to bulk-upload some student data via PRISMS.
- further refined registration processes and reporting requirements.

The agency continued to regularly communicate with providers via PRISMS news items and feedback processes to identify new areas for improvement. Stakeholders were able to provide feedback on the ESOS web page, through the hotline telephone service, and via email correspondence as required.

KPI 2 – Communication with regulated entities is clear, targeted and effective

The agency considers the provision of targeted communication with providers and other stakeholders as a significant risk mitigation control. In 2018-19, the agency communicated with school providers on topics, such as CRICOS registration, renewals, fees, charges, PRISMS, ESOS compliance and legislative changes.

The agency took the following action to ensure effective communication with school providers:

- updated contacts of DSAs on the CRICOS website
- reviewed relevant templates for case managers to ensure consistency, accuracy and effectiveness in their dealings with school providers.

The agency used quality assurance mechanisms, such as feedback from DSAs and providers, to identify areas for improvement and ensured up to date, clear, accessible and concise information provision through media appropriate to the target audience. Guidance material and information were made accessible to providers through a number of mechanisms including the following:

- Australian Education International website
<https://internationaleducation.gov.au/Pages/default.aspx>
- ESOS Compliance Mailbox: esoscomplianceandregistration@education.gov.au
- Emails to providers directly during the renewal process
- Compliance Hotline telephone number: 1300 615 262
- ARC Hotline: 1300 793 993 (January – April each year within Australia)

Fifty seven providers came up for registration renewal in 2018-19 compared with 41 in 2017-18. The renewal requests were processed within the three week turn-around timeframe.

KPI 3 – Actions undertaken by regulators are proportionate to the regulatory risk being managed

The agency took a risk-based and proportionate approach to regulation to ensure that it could direct limited resources to areas of higher risk and appropriately prioritise its regulatory focus, and in turn achieved the objects of the ESOS legislation.

To determine a targeted and proportionate level of action the agency conducted careful and thorough analyses of the following:

- Risk Matrix data available from PRISMS, including:
 - reporting volumes, timeliness and accuracy against section 19(1) of the ESOS Act
 - ARC or TPS levy payment details
 - composition and proportion of overseas students
 - number of approved welfare arrangements for students under 18 years of age

- previous desktop analyses
- referrals from DSAs
- referrals from the Tuition Protection Service
- referrals from the Overseas Students Ombudsman
- media coverage
- serious complaints/allegations received by the agency.

The agency reviewed the results of the PRISMS Risk Matrix data on a quarterly basis.

ESOS compliance monitoring through desktop analysis over the last twelve months shows that some of the schools have the following common queries:

- delays in reporting student course variations as required by section 19(1) of the ESOS Act
- inaccurate course cost or duration information reported to the Secretary

The above is currently being addressed at renewal and as part of the planned release of non-compliance data to providers to self-manage risk.

It is the agency's policy to take enforcement action when providers are found to:

- have seriously breached the provisions of the ESOS Act that are regarded as offences
- have breached in a large scale (e.g. in breach of most of the 11 Standards of the National Code) and
- have systematic and on-going non-compliance issues (i.e. repeated failure to meet the obligations under the ESOS legislation and repeated failure to rectify breaches).

KPI 4 - Compliance and monitoring approaches are streamlined and coordinated

The agency is engaged in a collaborative approach to monitoring and compliance. The agency engaged with DSAs and other ESOS agencies including TEQSA and ASQA to ensure compliance activities are streamlined, consistent and coordinated.

In 2018-19, the agency exercised their powers under the ESOS Act to monitor the level of compliance during renewal of CRICOS registration with the legislative requirements through desk audits for 57 CRICOS registered school providers. This included a small number of providers who also provided higher education or VET sector courses.

In 2018-19, the agency further streamlined its compliance and monitoring approaches by ceasing resource-intensive site visits to focus its approach on renewal desk audits. This further reduced the regulatory burden on providers, the Designated State Authorities and the National Regulators.

KPI 5 – Regulators are open and transparent in their dealings with regulated entities

The agency made on-going efforts to ensure its processes in dealing with school providers were open and transparent.

If potential non-compliance issues are identified during a desk audit at the time of renewal, these are brought to the attention of the provider and an opportunity is given to address any potential or alleged breaches

KPI 6 – Regulators actively contribute to the continuous improvement of regulatory frameworks

The agency maintained cooperative and collaborative relationships with all stakeholders to promote trust and improve the efficiency and effectiveness of the regulatory framework. It maintained an open, friendly and professional relationship with all relevant regulators on a regular basis.

The desk audit process was also streamlined so that providers are able to generate their own reports in PRISMS to track their progress. The ESOS Agency provided step by step instructions to assist providers to generate these reports to check compliance against the five risk factors of concern.

The agency regularly shared feedback from stakeholders about consultations, legislative requirements and regulators' performance with relevant colleagues within the department to improve the operation of the regulatory framework and administrative processes.

CONCLUSION

As illustrated in *Appendix 2*, the agency delivered and achieved most stated objectives against the *ESOS Regulator (Schools) RPF Metrics*.

The agency will continue:

- strengthening education activities through producing quality compliance guidance, education materials and written materials at www.internationaleducation.gov.au
- conducting targeted and focused compliance activities based on thorough analyses of risk data available to the agency, to ensure that school providers of concern are closely monitored within resource constraints
- enhancing intergovernmental relations through stakeholder engagement to achieve a coordinated approach in compliance
- improving regulatory processes to meet the requirements of the *Regulator Performance Framework*, and ensure that its regulatory processes are fair, transparent, effective and efficient as per the *ESOS Regulator (Schools) RPF Metrics*.

ACKNOWLEDGEMENT

This report was prepared by the agency which operates out of the Quality Frameworks Branch of the International Education Group in the Australian Government Department of Education.

The agency acknowledges the endorsements and/or input given by the following key stakeholders.

Enquiries about this report may be forwarded to esoscomplianceandregistration@education.gov.au

SOURCES OF DATA

Data used in this report came from PRISMS.

KEY STAKEHOLDERS

Before its release, this report was forwarded to the following organisations:

DSA - AUSTRALIAN CAPITAL TERRITORY

Ms Lynda Tooth, Senior Director, Non-government Education, ACT Education Directorate

DSA - NEW SOUTH WALES

Ms Anne Keenan, Director, School Registration and Accreditation
NSW Education Standards Authority

DSA - NORTHERN TERRITORY

Ms Debra Liddiard-Taruminggi, Director, International Education & Non-Government Schools, NT
Department of Education

DSA - QUEENSLAND

Ms Vanessa Fensom, Manager, International Quality (Schools) Registration Services (International, Non-State and Home Education), QLD Department of Education and Training

DSA - SOUTH AUSTRALIA

Ms Lynette Bellwood, Senior Advisor Schools Registration, Education Standards Board

DSA - TASMANIA

Ms Katrina Beams, Executive Officer, Tasmanian Assessment, Standards and Certification

DSA - VICTORIA

Mr Gary Bourton, Manager School Projects, Victorian Registration and Qualifications Authority

DSA - WESTERN AUSTRALIA

Ms Lisa Rodgers, Director-General, Department of Education

THE INDEPENDENT SCHOOLS COUNCIL OF AUSTRALIA

Ms Caroline Miller, Director Policy and Research

AUSTRALIAN GOVERNMENT SCHOOLS INTERNATIONAL

Ms Elizabeth Webber, Chair

NATIONAL CATHOLIC EDUCATION COMMISSION

Jactina Collins, A/g Executive Director

Appendix 1 ESOS Regulator (Schools) RPF Metrics

KPI 1 – REGULATORS DO NOT UNNECESSARILY IMPEDE THE EFFICIENT OPERATION OF REGULATED ENTITIES		
Measure	Output/activity-based evidence	Self-assessment methodology (evidence to be collected)
<p>1.1 ESOS Regulator (for Schools) demonstrates an understanding of the operating environment of the industry or organisation, or the circumstances of individuals and the current and emerging issues that affect the sector.</p>	<p>1.1.1 Maintain a knowledge base of providers their environment and issues impacting them.</p> <p>1.1.2 Mechanisms are in place for regular communication with CRICOS-registered schools, designated state authorities (DSAs) and other relevant regulators to share knowledge and understanding of current and emerging issues.</p>	<ul style="list-style-type: none"> • Maintain and update providers’ profiles annually. • Undertake regular environmental scanning at least annually by staff (including review of international best practice.) • Regularly meet with State/Territory DSAs (before or after compliance monitoring visits) • Share information with all relevant stakeholders where possible (including meetings with the multi-sector working group)
<p>1.2 ESOS Regulator (for Schools) takes actions to minimise the potential for unintended negative impacts of regulatory activities on regulated entities or affected supplier industries and supply chains.</p>	<p>1.2.1 Conduct workshops with providers that give information on legislative requirements and opportunities for feedback from the sector on regulatory impacts.</p> <p>1.2.2 Apply a risk based scaled approach to non-compliance issues as appropriate to minimise potential for unintended negative impacts of regulatory activities.</p>	<ul style="list-style-type: none"> • Deliver workshops across all States and Territories every 2 years • Record feedback and address all issues identified • Look at providing workshop component online for providers in regional areas to access • Regularly examine approaches taken to identify and ensure rectification of non-compliance issues
<p>1.3 ESOS Regulator (for Schools) implements continuous improvement strategies to reduce the costs of compliance for those they regulate.</p>	<p>1.3.1 Implement streamlined registration processes, application forms and reporting requirements.</p> <p>1.3.2 Use feedback processes to identify and implement new areas for improvement.</p>	<ul style="list-style-type: none"> • Report on system/process improvements and reductions in time and costs for providers

KPI 2 – COMMUNICATION WITH REGULATED ENTITIES IS CLEAR, TARGETED AND EFFECTIVE

Measure	Output/activity-based evidence	Self-assessment methodology (evidence to be collected)
2.1 ESOS Regulator (for Schools) provides guidance and information that is up to date, clear, accessible and concise through media appropriate to the target audience.	<p>2.1.1 Guidance material and information is accessible to providers through a number of mechanisms including: website, mailbox, induction manual, national code compliance FAQs.</p> <p>2.1.2 Seek feedback from stakeholders on guidance and advice provided.</p>	<ul style="list-style-type: none"> • Seek feedback about information, guidance and advice given to the providers via <ul style="list-style-type: none"> - help desks (and Call Centre), - workshops, - internationaleducation.gov.au website, and - other educational materials on ESOS or CRICOS prepared by the ESOS Regulator (for Schools)
2.2 ESOS Regulator (for Schools) considers the impact on regulated entities and engages with industry groups and representatives of the affected stakeholders before changing policies, practices or service standards.	2.2.1 Consult peak bodies / providers about proposed changes to legislation, the National Code and reporting processes.	<ul style="list-style-type: none"> • Record consultation activities and outcomes
2.3 ESOS Regulator (for Schools)'s decisions and advice are provided in a timely manner, clearly articulating expectations and the underlying reasons for decisions.	<p>2.3.1 Finalise registration and renewal processes in a timely manner.</p> <p>2.3.2 Provide detailed explanations for rejections.</p>	<ul style="list-style-type: none"> • Complete registration/renewal process within an average timeframe of 3 weeks • Notify providers when a recommendation from a DSA is received by the department and provide detailed explanations for rejections
2.4 ESOS Regulators' (for Schools) advice is consistent and supports predictable outcomes.	2.4.1 Staff interacting with providers only use approved procedures	<ul style="list-style-type: none"> • Review and update Call Centre scripts and templates in a timely manner • All compliance case managers apply relevant procedures and templates consistently and correctly.

KPI 3 – ACTIONS UNDERTAKEN BY REGULATORS ARE PROPORTIONATE TO THE REGULATORY RISK BEING MANAGED

Measure	Output/activity-based evidence	Self-assessment methodology (evidence to be collected)
<p>3.1 ESOS Regulator (for Schools) applies a risk-based, proportionate approach to compliance obligations, engagement and regulatory enforcement actions.</p>	<p>3.1.1 Implement internal procedures for selecting providers for desktop audits and visits based on risk assessments.</p>	<ul style="list-style-type: none"> • Release bulk uploading functions in the past year and reduce costs as a result
<p>3.2 ESOS Regulator (for Schools)'s preferred approach to regulatory risk is regularly reassessed. Strategies, activities and enforcement actions are amended to reflect changing priorities that result from new and evolving regulatory threats, without diminishing regulatory certainty or impact.</p>	<p>3.2.1 Regularly review and update the PRISMS Risk Matrix.</p>	<ul style="list-style-type: none"> • Annually review of risk data (risk matrix). • Review internal process on a biannually.
<p>3.3 ESOS Regulator (for Schools) recognises the compliance record of CRICOS registered schools, including using earned autonomy where this is appropriate. All available and relevant data on compliance, including evidence of relevant external verification is considered.</p>	<p>3.3.1 Recognise the compliance record of providers and consider all available data/evidence when assessing risks.</p>	<ul style="list-style-type: none"> • Compare risk factors for a provider over a specified historical period • Exchange information with State/Territory DSAs regularly re providers of concern and providers with best practice

KPI 4 – COMPLIANCE AND MONITORING APPROACHES ARE STREAMLINED AND COORDINATED

Measure	Output/activity-based evidence	Self-assessment methodology (evidence to be collected)
4.1 ESOS Regulator (for Schools)'s information requests are tailored, and only made when necessary to secure regulatory objectives, and only in a way that minimises impact.	<p>4.1.1 Tailor requests for information and only make requests when necessary.</p> <p>4.1.2 Improve support to providers' compliance through education and discussion of identified issues</p>	<ul style="list-style-type: none"> Only request for information in relation to high risk factors, and focus on providers with serious compliance issues Share quarterly PRISMS Risk Matrix information with relevant regulators (i.e. DSAs) when it becomes available
4.2 ESOS Regulator (for Schools)'s frequency of information collection is minimised and coordinated with similar processes including those of other regulators so that, as far as possible, similar information is only requested once.	4.2.1 Conduct its compliance monitoring visits in conjunction with State DSAs, and also invite ASQA and/or TEQSA if the regulated entity is a dual or multi sector provider.	<ul style="list-style-type: none"> Have meetings/teleconferences with DSAs and ASQA (and/or TEQSA for multi-sector providers) before any monitoring visits to ensure a streamlined approach Share relevant information with Home Affairs where possible
4.3 ESOS Regulator (for Schools) base monitoring and inspection approaches on risk and, where possible, take into account the circumstance and operational needs of the regulated entity.	4.4.1 Only visit or desk top audit providers identified as having serious (or large number or proportion of) non-compliance issues; or in response to referrals received from other relevant regulators.	<ul style="list-style-type: none"> Liaise with State/Territory DSAs and peak bodies on a regular basis Have a multi-sector working group meeting at least once a year – to review multi-sector providers' compliance and monitoring approaches.

KPI 5 – REGULATORS ARE OPEN AND TRANSPARENT IN THEIR DEALINGS WITH REGULATED ENTITIES

Measure	Output/activity-based evidence	Self-assessment methodology (evidence to be collected)
5.1 ESOS Regulator (for Schools)'s riskbased framework is publicly available in a format which is current, clear and accessible.	5.1.1 Publish the risk-based framework on the Internet by 1 July 2015	<ul style="list-style-type: none"> Make the information available on the internationaleducation.gov.au website Update the information in a timely manner to reflect legislative or administrative changes Develop a streamlined information webpage relating to CRICOS registration, renewal, fees and compliance for schools
5.2 ESOS Regulators' (for Schools) performance measurement results are published in a timely manner to ensure accountability to the public.	5.2.1 Relevant measurement results against the KPIs for each financial year would be made publicly available as soon as practicable after each financial year	<ul style="list-style-type: none"> Publish the performance results on the internationaleducation.gov.au website annually and in a timely manner

KPI 6 – REGULATORS ACTIVELY CONTRIBUTE TO THE CONTINUOUS IMPROVEMENT OF REGULATORY FRAMEWORKS

Measure	Output/activity-based evidence	Self-assessment methodology (evidence to be collected)
6.1 ESOS Regulator (for Schools) establishes cooperative and collaborative relationships with stakeholders to promote trust and improve the efficiency and effectiveness of the regulatory framework.	6.1.1 Have an open, friendly and professional relationship and liaise with all relevant regulators on a regular basis. 6.1.2 Create a growth of awareness among providers regarding compliance with the ESOS legislative framework	<ul style="list-style-type: none"> Have meetings/teleconferences with all relevant regulators prior to any visits Increase the number of joint visits The majority of schools have decreased risk scores compared to the previous year Release relevant information on the Internet Have joint workshops on ESOS compliance as planned
6.2 ESOS Regulator (for Schools) engages stakeholders in the development of options to reduce compliance costs (which could include industry self-regulation, changes to the overarching regulatory framework, or other strategies to streamline monitoring and compliance approaches).	6.2.1 Liaise with stakeholders to avoid duplication of RFIs (requests for information) and coordinate joint visits/workshops	<ul style="list-style-type: none"> Visit all States and/or provide workshop presentations in all States within 2 years Receive positive feedback from providers about the consultations and the compliance approaches Aim to have a multi-sector regulators working group face-to-face meeting at least once a year
6.3 ESOS Regulator (for Schools) regularly shares feedback from stakeholders about consultations, legislative requirements and regulators' performance with policy departments to improve the operation of the regulatory framework and administrative processes.	6.3.1 Liaise regularly with the ESOS policy and legislation section of the department and provide feedback.	<ul style="list-style-type: none"> Liaise with policy area on a regular basis regarding feedback from providers.

REGULATED ENTITIES	KPI5 – REGULATORS ARE OPEN AND TRANSPARENT IN THEIR DEALINGS WITH	Planned	Actual	REGULATORY FRAMEWORKS	KPI6- REGULATORS ACTIVELY CONTRIBUTE TO THE CONTINUOUS IMPROVEMENT OF	Planned	Actual		
		1	Make info about CRICOS and ESOS available on the internationaleducation.gov.au website				1	Liaise with policy area on a regular basis regarding feedback from providers	
		2	Update the info about CRICOS and ESOS in a timely manner to reflect legislative or administrative changes				2	Have joint workshops on ESOS compliance as planned	
		3	Develop a streamlined info webpage relating to CRICOS registration, renewal, fees and compliance for schools				3	Visit all states within 2 years	
		4	Publish performance results on the internationaleducation.gov.au website annually and in a timely manner				4	Receive positive feedback from providers about the consultations and the compliance approaches	
							5	Increase the number of joint visits	
			6	The majority of schools have decreased risk scores compared to the previous year					

LEGEND	
	Fully Actioned
	Partially Actioned
	Not yet Actioned