



BRIEFING

Student Visa Processing March Update

Date:	28 March 2019	Priority:	Medium
Security classification:	In Confidence	Tracking number:	3020 18-19

Information for Minister(s)

Hon Iain Lees-Galloway
Minister of Immigration

Contact for telephone discussion (if required)

Name	Position	Telephone	1st contact
Jeannie Melville	Assistant General Manager, Visa Services	Privacy of natural persons	✓
Ross van der Schyff	General Manager, Visa Services		

The following departments/agencies have been consulted

Education New Zealand

- Minister's office to complete:**
- | | |
|---|--|
| <input type="checkbox"/> Approved | <input type="checkbox"/> Declined |
| <input type="checkbox"/> Noted | <input type="checkbox"/> Needs change |
| <input type="checkbox"/> Seen | <input type="checkbox"/> Overtaken by Events |
| <input type="checkbox"/> See Minister's Notes | <input type="checkbox"/> Withdrawn |

Comments

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Purpose

To provide an update on student visa processing [previous paper 2384 18-19 *Student Visa Processing* refers] with a focus on offshore student applications processed by Immigration New Zealand's Mumbai Office; and associated education sector feedback.

The paper also includes recent findings related to post study work rights policy changes.

Executive summary

Immigration New Zealand is currently receiving a lot of feedback and concerns from education stakeholders about student visa processing times. Low risk student visa processing is being completed within reasonable timeframes. Medium and high risk processing for offshore students has been delayed due to increased volumes from certain markets and changes in student profiles requiring more verification.

Immigration New Zealand is continuing to work with education stakeholders to improve the quality of student visa applications while maintaining the integrity of the immigration system.

Recommended action

The Ministry of Business, Innovation and Employment recommends that you:

- a **Note** that education sector stakeholders are concerned about the increase in processing times for student visa applications.

Noted

- b **Note** that over ninety-four per cent of low risk student visa applications are decided within thirty days

Noted

- c **Note** that Mumbai is undertaking robust verification on high risk applications following lessons learned during the financial fraud and English language issues of 2014-2016.

Noted

- d **Note** that since the change in post study work rights policy, INZ has seen an increase in high risk students applying for higher level courses of study.

Noted

- e **Note** that INZ previously advised applicants to submit their applications at least eight weeks before they needed their student visa. However, high risk student visa applications in the Mumbai office are on average taking longer than eight weeks to process.

Noted

f **Note** that INZ is improving processing capacity in the Mumbai office and working with stakeholders to improve the quality of student applications received.

Noted

g **Note** that Education New Zealand have sent a separate briefing to the Minister of Education about student visa processing.

Noted

h **Agree** to refer this briefing to the Minister of Education for his information.

Agree / Disagree



Ross van der Schyff
General Manager, Visa Services
Immigration New Zealand, MBIE

29/3/2019
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Hon Iain Lees-Galloway
Minister of Immigration

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Background

1. Immigration New Zealand (INZ) is currently experiencing high volumes of applications as it is the peak season for student visa applications which generally runs from late November to April.
2. In line with INZ's '*Striking the Balance*' strategy, INZ is prioritising low risk¹ applications. The aim to date has been to assess and decide low risk applications as soon as possible.
3. INZ advised the international education sector that applicants should apply for their visa at least eight weeks before their intended travel date (or course start date for those already in New Zealand). However, timeframes for processing high risk applications offshore have increased and they are taking longer than 8 weeks to process.
4. Feedback has been received from stakeholders that longer timeframes for visa processing is affecting their intakes and causing them to lose revenue.
5. INZ Mumbai processes the majority of offshore student visa applications. They also process Indian visitor visas and partnership applications from the subcontinent and Middle East.
6. Since October 2018, the volume of student visa applications received by the Mumbai office from the Indian subcontinent has been higher than forecasted and much of the increase is in the high risk² category.
7. The increase in volume of medium and high risk applications and prioritising the low risk applications has impacted processing times for medium and high risk student cohorts. Some providers will have been affected by this more than others due to their student recruitment and course offering.
8. Processing times on the INZ website are retrospective and based on decisions made in the last three months. Given INZ has prioritised low risk and is now able to focus more resources on assessing medium and high risk student applications which are older, the published processing times will likely increase further.

Education Sector Engagement and Feedback

9. INZ has advised the sector that low risk and high value applications are being prioritised and that high risk applications are being queued. They have further been advised that school and university students have been prioritised.
10. INZ has been engaging regularly with providers and peak bodies and Education New Zealand (ENZ). Volume, timeliness and approval data is being sent fortnightly to peak bodies for dissemination to their members. Universities have been receiving the same data specific to their institutions in addition to what they are receiving through the peak sector body.
11. To date, INZ has not provided data to the sector specifically demonstrating that low risk applications have been completed in a faster timeframe or showing the increase in high risk applications received over the last few months. Recent engagement with stakeholders indicates that that the sector does not believe that INZ are processing low risk applications quickly.

¹ Low risk: applicants who (for example) are likely to be bona fide applicants, have sufficient funds for their studies and maintenance and have a lower risk of providing fraudulent documentation.

² High risk: applicants who (for example) demonstrate risk indicators for potential fraudulent documentation, future exploitation and insufficient documentation to meet immigration instructions.

12. Low risk applications are being processed within a reasonable timeframe both offshore and onshore:
 - Low risk school students – 83.5 per cent are processed within 10 days and 97.5 per cent within 30 days.
 - Low risk Private Training Establishment (PTE) students - 89.7 per cent are processed within 10 days and 99.1 per cent within 30 days.
 - Low risk Polytechnic (ITP) students – 70.4 per cent are processed within 10 days and 94.6 per cent within 30 days.
 - Low risk university students – 63.4 per cent are processed within 10 days and 95.4 per cent within 30 days.
13. Education providers and their representative bodies have been raising concerns regarding the timeliness of student visa processing with INZ, ENZ and Ministers. They have reported suffering significant financial losses and a corresponding impact on resources and staffing. Providers have notified INZ that they are having to shift or cancel programme start dates because visas have yet to be decided.
14. Feedback has been received that students are withdrawing from their study plans because they are concerned that they will not receive a visa in time to travel and commence study. INZ data does not support this. For the period of November 2017 – 23 March 2018, 210 offshore student visa applications were withdrawn by the student or agent before a decision was made. For the period November 2018 – 23 March 2019, 238 offshore student visa applications were withdrawn. If providers have data on students who have not proceeded with enrolment this data has not been provided to INZ.
15. INZ has also engaged directly with some providers on steps they can take to assist in smoothing visa processing. This includes advice that the ability to decide applications quickly relies on applicants and providers providing the right information and submitting their application well in advance of intended start or travel dates.

INZ Global Student Visa Processing

16. In the previous paper we advised that INZ has consolidated the majority of student visa processing into three offices. Student Visas are now processed mainly in three INZ offices – Palmerston North, Mumbai and Beijing.³ We have also moved some application cohorts between these offices where capacity allows (See **Annex A** for current processing breakdown).
17. Information on which student visa applications the Mumbai, Beijing and Palmerston North offices are processing and details on their current volumes by risk level is included in **Annex A** and further processing statistics are attached for your reference as **Annex B**.
18. The Beijing and Palmerston North offices are considered to be operating within acceptable allocation timeframes for all risk levels. The Mumbai office is not considered to be operating within acceptable allocation timeframes for medium and high risk applications but is for low risk.

INZ Mumbai

19. In keeping with 'Striking the Balance' principles, Mumbai has a robust approach to verification. This has evolved and improved based on the many lessons learnt during the financial fraud and English language issues of 2014-2016. There is a high emphasis on

³ INZ's Manila Office continues to process visa applications from the Philippines, and the Pacific offices continue to process applications from the Pacific.

interviewing due to the veracity of documentation that is provided, and the fact that many documents provided can't be verified independently.

20. Mumbai has prioritised processing of university students and low risk school students, followed by students studying bachelor degree or above at ITPs and PTEs.
21. Students studying sub-degree programmes⁴ generally present a profile that requires a higher risk and greater verification. These applications are queued, and assessed in date order, once the priority queues have been assessed (a number of complaints from PTEs and ITPs concern sub degree application processing times or assessments).
22. Mumbai office has experienced a variety of factors which have affected their ability to process the volume of work they have on hand. This includes:
 - More than forty per cent growth in Indian student applications over the peak period. Much of this increase has been in the high risk category. This requires additional verification and thorough assessment.
 - The majority of high risk applicants from the Indian subcontinent require interviews.
 - Only 50 per cent of the Indian student visa applications are being submitted via Immigration Online⁵. This significantly impacts on the ability of the office to process the applications quickly.
 - Adverse student profile and market changes detailed below.

Prejudice investigation

market changes

23. Traditionally in the Indian student market, many students from Prejudice investigation are considered high risk.
24. Marketing has traditionally been driven by education agents based in Prejudice investigation who, along with many of the providers they represent, have been volume-driven rather than quality-focused. INZ has been very open with the education sector over the years regarding the profile of these areas.
25. Prior to the November 2018 post study work visa (PSWV) changes, much of the volume from Prejudice investigation could be seen in the level 4-6 programmes. Between November 2017 and February 2018, only 451 applications from Prejudice investigation were received for Level 8 programmes and 288 for level 9 programmes.
26. However, post November 2018, we have seen an increase in the volume of applicants from Prejudice investigation applying for higher level programmes, which is consistent with the greater PSWV rights available for graduates of degree or above. These have required greater verification.
27. Between November 2018 and February 2019, 530 applications were received for level 8 applications; and 525 for level 9 programmes, such as Masters.⁶ The most significant growth can be seen in students applying for Masters of Management.
28. Additional growth from Indian applicants more generally intending bachelor degree study has been noted, and is discussed below.

Credit Recognition and Transfer - Post Study Work Rights

29. As previously advised, officials have received numerous enquiries regarding recognising previous learning for credit following the implementation of changes to post-study work rights

⁴ Sub-degree are non-degree level 7 qualifications and below – such as Diplomas or certificates. Graduate diplomas are also non-degree level 7 qualifications.

⁵ In contrast, approximately 87 per cent of Chinese student visa applications are submitted online.

⁶ Masters students are eligible to bring their partner on an open work visa and any dependents are domestic for compulsory education.

in November 2018.⁷ Commonly there are two primary approaches, credit recognition and transfer (CRT) and recognition of previous learning (RPL).

30. Specifically the enquiries have focused on whether international students can receive CRT for foreign qualifications or prior study as equivalent to the first two years of a three year degree programme. This would allow students to enrol into the final year of a degree programme, which, if completed, would entitle them to three years of open post-study work rights.⁸
31. There is currently no restriction in place for how much CRT or RPL an education provider can accept towards a programme of study. However some tertiary education providers do state the maximum amount of credit they will grant a learner, e.g. 50 per cent of the programme. CRT/RPL is generally sought at the point of application or enrolment so the learner's programme can be adjusted accordingly.
32. The immediate risk is that the foreign education may be fraudulent. It will also be difficult for the education provider to verify whether the previous learning is genuine.
33. In late November 2018 and again in February 2019, INZ advised the Institutes of Technology and Polytechnics International (ITPI) peak body of the risks associated with permitting CRT or RPL into bachelor degrees. INZ understood that the ITPs were not interested in permitting CRT or RPL, given the risks outlined.
34. However, analysis of the student visa applications received offshore between November 2018 and February 2019 was undertaken to gauge the extent that this pathway is being utilised following the changes to post-study work rights. The results show that a number of applications are of concern and warrant further investigation to determine the veracity of prior learning being claimed.
35. Between November 2018 and February 2019 the number of offshore student visa applications increased by 9 per cent compared to the same period in 2017/2018. Most of this growth was in the ITP sector, which saw a 31 per cent increase in applications, followed by universities at 8 per cent. PTEs were static.
36. Of the ITP increase, there was growth at all levels of study, but particularly for level 7, 8 and 9 programmes (25 per cent, 24 per cent and 169 per cent respectively).
37. Particular attention was given to bachelor degrees. Prejudice commercial position had the most significant increase in visa applications for Bachelor's Degree study – an increase of 86 applications. Most of this growth was in Prejudice commercial position. The number of applications for this programme grew from 8 applications to 88 applications, of which 75 were from Indian nationals. Thirty nine of the 75 applications were lodged using Immigration Online which means that documents can be analysed more easily and these were analysed as a sample. Of the 39 online applications from Indian students, 36 showed that CRT or RPL from between 1 – 2 years had been granted by Prejudice commercial position. This is potentially concerning, given the concerns that INZ had articulated to the ITP sector regarding prior study from complex markets and the difficulty in verification.
38. Other ITPs also showed some evidence of RPL/CRT. This issue is currently under consideration and INZ has a number of actions underway to more fully explore the issue and engage agencies such as the New Zealand Qualifications Authority, which INZ has been keeping informed.

⁷ MoI weekly report 23 January 2019 and 14 February 2019.

⁸ The duration requirement under PSWV for degree or above is that the student must have studied towards that qualification for at least 30 weeks.

39. You will receive further information on this issue in April including a report on volumes and details on the further investigation being undertaken.

Prejudice investigation *financial irregularities*

40. Following the transfer of **Prejudice investigation** student processing to Mumbai in **Prejudice investigation**, verification methods employed by Mumbai office discovered instances of suspected fraudulent financial documentation being submitted in student visa applications.
41. The issue presents as multiple and unrelated clients submitting bank account statements in their own name but which have previously been submitted by other visa applicants. **Prejudice investigation** **Prejudice investigation** have been found to be linked to this issue and **Prejudice investigation** of which at least **Prejudice investigation**.
42. The investigation is ongoing, with a further report expected on this by May 2019. In the interim, **Prejudice investigation** student visa applications are taking longer to process than they would have taken at the same time last year, as INZ thoroughly assesses and verifies the applications. In 2018 INZ received **Prejudice invest** offshore student visa applications from **Prejudice investigation** nationals⁹.

Next Steps

43. INZ is not satisfied with the current timeframe to allocate medium-high risk student applications in the Mumbai office and has taken steps to address delays, including:
- Recruitment for additional immigration officers in Mumbai.
 - Increasing workforce productivity by running overtime during the peak period.
 - Managing incoming workflow across the student processing offices.
 - Comprehensive checklist for agents and students lodging applications to ensure that applications are complete and supporting documentation is useful.
 - Continuing to calibrate processing across all three offices and using the Risk and Verification network to ensure risks from other offshore markets are being identified and managed appropriately.
44. INZ recognises that the delay in processing high risk applications will be impacting education providers but does not intend on reducing verification of evidence or removing the need to translate documents. INZ is committed to ensuring student visa outcomes are of a high quality and do not pose a risk to New Zealand.
45. INZ and ENZ are developing a communication plan to ensure that messaging to the sector is clear and that all relevant parties are informed about the realities of the INZ operating environment and INZ's approach to low risk and high risk applications. A key focus will be how education providers can assist in maintaining the integrity of the immigration system by encouraging providers to recruit students who have a better chance of meeting immigration requirements.
46. Universities New Zealand and INZ are meeting in April to evaluate the peak and determine what improvements can be made for the future including how to ensure applicants provide all the information necessary to make a decision. It is a model that INZ intends to replicate with other peak bodies.

⁹ Students without genuine and stable funds are more likely to breach the conditions of their visa; for example by working when they are not entitled to or working longer than permitted. Additionally, students without sufficient financial means (and with possible debt at home that they used to finance international study), means that these students are more vulnerable to exploitation.

Annexes

Annex A: Student Visa Processing Office Information

Annex B: Student Visa Processing Statistics

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Annex A: Student Visa Processing Office Information

47. While each office is responsible for either offshore or onshore student visa processing, currently INZ is utilising its complete network to shift low risk and priority applications where appropriate. The table below shows the current situation:

Office Location	Student Application Cohorts Processed
Mumbai	Main offshore student processing site Currently processing: All Indian subcontinent (excluding Pakistan) All African countries High risk applications from: Americas, South East Asia and Europe
Beijing	Offshore students from: China Japan South Korea (+ currently processing onshore Chinese students to assist Palmerston North)
Palmerston North	Main onshore student processing site And Offshore students from: Pakistan Americas (Low risk) Europe (Low risk) South East Asia (Low risk)

48. Detailed student visa processing data, including volume and timeliness, is attached for your reference as Annex A, however some high level findings are reported below.

Beijing Office

49. Beijing Office has 352 student visa applications on hand, as at 27 March 2019
50. The Beijing office is considered to be in flow, with approximately 28 applications unallocated all of which are less than 3 days old. Eighty per cent of applications decided in March were less than 20 days old.
51. The below table shows applications on hand in the Beijing office by days on hand and risk level:

		Number of Applications On Hand	
		Low Risk	Medium and High Risk
Days On Hand	0-15 Days	11	241
	16-30 Days	3	44
	31-60 Days	3	33
	Over 60 Days	1	16

Palmerston North Office

52. Palmerston North Office has 3,244 student visa applications on hand, as at 27 March 2019
53. The Palmerston North office is considered to be in flow, with approximately 874 applications unallocated all of which are less than 30 days old. Eighty per cent of applications decided in March were less than 15 days old.
54. The below table shows applications on hand in the Palmerston North office by days on hand and risk level:

		Number of Applications On Hand	
		Low Risk	Medium and High Risk
Days On Hand	0-15 Days	502	1,905
	16-30 Days	154	456
	31-60 Days	31	117
	Over 60 Days	5	74

Mumbai Office

55. Mumbai Office has 3,653 student visa applications on hand, as at 27 March 2019
56. The Mumbai is not considered to be in flow. Mumbai office has more than 1,560 applications unallocated with the oldest of these more than 90 days old. Eighty per cent of applications decided in March were less than 88 days old.
57. The below table shows applications on hand in the Mumbai office by days on hand and risk level:

		Number of Applications On Hand	
		Low Risk	Medium and High Risk
Days On Hand	0-15 Days	4	736
	16-30 Days	0	475
	31-60 Days	1	1,018
	Over 60 Days	3	1,416

Annex A: Student Visa Processing Statistics

Accepted Volumes

Table 1: Accepted student visa applications tendered offshore.

Provider Type	Accepted 2017	Accepted 2018	Accepted 2019 (to 25 Mar)
Schools	7,597	7,857	1,525
Institutes of Technology and Polytechnics	8,687	8,832	2,722
Private Training Establishments	15,723	14,810	3,477
Universities	13,595	14,501	4,052
(not recorded)	616	620	331
Total	46,218	46,620	12,107

Decision Volumes

Table 2: Decided student visa applications tendered offshore.

Provider Type	Decided 2017		Decided 2018		Decided 2019 (to 25 Mar)	
	Total Decided	Approval Rate	Total Decided	Approval Rate	Total Decided	Approval Rate
Schools	7,277	96.2%	7,223	96.4%	2,012	97.0%
Institutes of Technology and Polytechnics	8,395	76.6%	7,895	79.8%	2,187	80.0%
Private Training Establishments	15,470	76.5%	13,974	81.0%	3,209	81.9%
Universities	12,988	95.1%	13,409	94.6%	4,780	95.4%
(not recorded)	300	63.0%	278	72.3%	62	67.7%
Total	44,440	85.1%	42,879	87.6%	12,250	89.3%

Processing Times

Table 3: Time to decide student visa applications tendered offshore.

Provider Type	Decided 2017			Decided 2018			Decided 2019 (to 25 Mar)		
	Decided Within 10 Days	Decided Within 30 Days	Decided Within 60 Days	Decided Within 10 Days	Decided Within 30 Days	Decided Within 60 Days	Decided Within 10 Days	Decided Within 30 Days	Decided Within 60 Days
Schools	73.4%	96.5%	99.4%	73.4%	96.0%	99.4%	56.8%	86.8%	97.5%
Institutes of Technology and Polytechnics	41.7%	83.3%	97.0%	39.3%	86.0%	97.7%	24.5%	43.0%	68.5%
Private Training Establishments	46.8%	83.3%	96.8%	49.1%	88.5%	97.9%	31.6%	61.6%	85.0%
Universities	63.8%	92.2%	97.5%	62.5%	91.6%	97.3%	46.4%	85.9%	96.4%

Table 4: Time to decide student visa applications tendered offshore during peak months

Provider Type	Decided 1 Nov 2017 – 20 Mar 2018			Decided 1 Nov 2018 – 25 Mar 2019		
	Decided Within 10 Days	Decided Within 30 Days	Decided Within 60 Days	Decided Within 10 Days	Decided Within 30 Days	Decided Within 60 Days
Schools	74.4%	96.7%	99.6%	68.7%	92.5%	98.6%
Institutes of Technology and Polytechnics	28.0%	90.2%	98.0%	25.9%	50.0%	77.8%
Private Training Establishments	41.4%	90.0%	97.4%	33.2%	65.5%	89.4%
Universities	58.7%	92.6%	97.9%	50.5%	88.0%	97.0%

Table 5: Time to decide school student visa applications tendered offshore by triage level

	Decided 1 Nov 2017 – 25 Mar 2018						Decided 1 Nov 2018 – 25 Mar 2019					
	Decided Within 10 Days		Decided Within 30 Days		Decided Within 60 Days		Decided Within 10 Days		Decided Within 30 Days		Decided Within 60 Days	
	# of Applications	%	# of Applications	%	# of Applications	%	# of Applications	%	# of Applications	%	# of Applications	%
Low Risk	2,088	87.7%	259	98.6%	28	99.8%	933	83.5%	157	97.5%	20	99.3%
Medium Risk	887	57.1%	596	95.4%	63	99.5%	2,041	65.9%	849	93.3%	194	99.5%
High Risk	36	31.3%	51	75.7%	25	97.4%	33	20.8%	35	42.8%	39	75.5%

Table 5a: Top 3 Highest Volume Nationalities by triage level for school student visas decided in FY18/19

Risk Level	Nationality 1	Nationality 2	Nationality 3
Low Risk			
Medium Risk			
High Risk			

Table 6: Time to decide ITP student visa applications tendered offshore by triage level

	Decided 1 Nov 2017 – 25 Mar 2018						Decided 1 Nov 2018 – 25 Mar 2019					
	Decided Within 10 Days		Decided Within 30 Days		Decided Within 60 Days		Decided Within 10 Days		Decided Within 30 Days		Decided Within 60 Days	
	# of Applications	%	# of Applications	%	# of Applications	%	# of Applications	%	# of Applications	%	# of Applications	%
Low Risk	319	78.0%	77	96.8%	10	99.3%	143	70.4%	49	94.6%	8	98.5%
Medium Risk	507	28.7%	1,115	91.8%	124	98.8%	605	36.4%	464	64.8%	333	84.4%
High Risk	167	12.1%	1,020	86.2%	142	96.5%	106	7.4%	279	26.9%	578	67.3%

Table 6a: Top 3 Highest Volume Nationalities by triage level for ITP student visas decided in FY18/19

Risk Level	Nationality 1	Nationality 2	Nationality 3
Low Risk			
Medium Risk			
High Risk			

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Table 7: Time to decide PTE student visa applications tendered offshore by triage level

	Decided 1 Nov 2017 – 25 Mar 2018						Decided 1 Nov 2018 – 25 Mar 2019					
	Decided Within 10 Days		Decided Within 30 Days		Decided Within 60 Days		Decided Within 10 Days		Decided Within 30 Days		Decided Within 60 Days	
	# of Applications	%	# of Applications	%	# of Applications	%	# of Applications	%	# of Applications	%	# of Applications	%
Low Risk	778	86.6%	105	98.7%	11	99.9%	305	89.7%	32	99.1%	3	100%
Medium Risk	1166	45.5%	1199	92.3%	149	98.1%	1208	38.1%	1154	74.6%	610	93.8%
High Risk	502	20.5%	1572	84.5%	275	95.7%	177	11.2%	454	40.0%	602	78.2%

Table 7a: Top 3 Highest Volume Nationalities by triage level for PTE student visas decided in FY18/19

Risk Level	Nationality 1	Nationality 2	Nationality 3
Low Risk			
Medium Risk			
High Risk			

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Table 8: Time to decide university student visa applications tendered offshore by triage level

	Decided 1 Nov 2017 – 25 Mar 2018						Decided 1 Nov 2018 – 25 Mar 2019					
	Decided Within 10 Days		Decided Within 30 Days		Decided Within 60 Days		Decided Within 10 Days		Decided Within 30 Days		Decided Within 60 Days	
	# of Applications	%	# of Applications	%	# of Applications	%	# of Applications	%	# of Applications	%	# of Applications	%
Low Risk	1727	70.6%	622	96.1%	75	99.1%	1103	63.4%	556	95.4%	65	99.1%
Medium Risk	2028	55.4%	1405	93.6%	174	98.5%	2468	51.9%	1802	89.7%	406	98.3%
High Risk	278	36.2%	310	76.5%	114	91.3%	215	21.4%	459	67.2%	130	87.0%

Table 8a: Top 3 Highest Volume Nationalities by triage level for university student visas decided in FY18/19

Risk Level	Nationality 1	Nationality 2	Nationality 3
Low Risk			
Medium Risk			
High Risk			