Recommendation 26: Increase capability to conduct stratified random fingerprint capture and matching at the border.

Actions that would deliver on this recommendation include:

1. Develop and implement a stratified random fingerprint verification program including sample sizes and population, staff training, standard operating procedures and a reporting mechanism to measure effectiveness.
2. Develop and implement a public advertising campaign to strengthen the deterrent effect of the fingerprint verification activity.
3. Purchase of additional mobile fingerprint verification devices.
4. Consider impact on resources to ensure effective implementation of this strategy.

While the offshore biometrics collection program is being rolled out, the Department should also increase checks against biographic data available through traveller passports (names, date of birth, nationality) for higher risk nationalities and visa streams not currently captured by the biometrics collection program. Although the assurance level based on biographic attributes is lower than a biometric match, exchange of biographic information with M5 countries may provide indicators that could identify criminals who have not travelled under an alias.

Recommendation 27: Verify biographic data with M5 partners for higher risk nationalities and visa streams not currently captured by the offshore biometrics collection program.

Actions that would deliver on this recommendation include:

1. Enter into arrangements with M5 countries to exchange information based on biographic (names, date of birth, nationality) match.

The Department's ImmiAccount system gives the public access to many of the Department's online services. ImmiAccounts can be created for individuals or organisations, and visa applicants can apply online for most visas using the ImmiAccount system.

While online services are important in today's digital economy, ImmiAccount has no identification requirements for the end user (no authentication of the person using the system). This allows anyone to set up a new ImmiAccount and lodge a large number of applications on behalf of others, either unidentified or without their knowledge.

The Department's integrity teams are seeing that bad actors are creating multiple ImmiAccounts, and using these to lodge a large number of visa applications in order to test the parameters of the Department's risk systems. Through these lodgements, they are developing a sophisticated understanding of Australia's visa risk settings and what will or will not trigger closer examination by visa processing officers.

The ImmiAccount registration process is being strengthened to incorporate two factor authentication for individuals. Two factor authentication needs to be extended to all ImmiAccount users, including RMAs and lawyers, in order to restrict the ability of bad actors to lodge a high volume of applications using fake emails and/or client details, and to obstruct their ability to understand how to exploit Australia's visa risk settings.

Increased monitoring and response is also needed to any misuse of the platform by organised crime groups and other unscrupulous professional facilitators including RMAs, lawyers, education agents and education providers.

Recommendation 28: Strengthen identity verification requirements in ImmiAccount.

Actions that would deliver on this recommendation include:

1. Two factor authentication for the end user to be introduced for all ImmiAccount users including individuals, RMAs and lawyers.

Finding 6: Protracted processing times for some visa subclasses and merits review processes are motivating abuse of Australia's visa system

Case Study No. 1 – Part 3: Key facilitator of a human trafficking syndicate operating in the sex industry

The former temporary migrant discussed in Case Study No. 1 – Parts 1 and 2 resided lawfully in Australia on several different visas, with work rights, for almost eight years.

A combination of lengthy visa processing times for certain visas, and protracted merits review, enabled him to exploit Australia's visa system by applying for a number of different visas, one after the other. This method allowed him to remain in Australia with work rights from December 2014 to November 2022 while his visa applications and merits review were being decided.

[source: Department of Home Affairs]

Figure 1 – An example of how Australia's visa system can be exploited by bad actors:

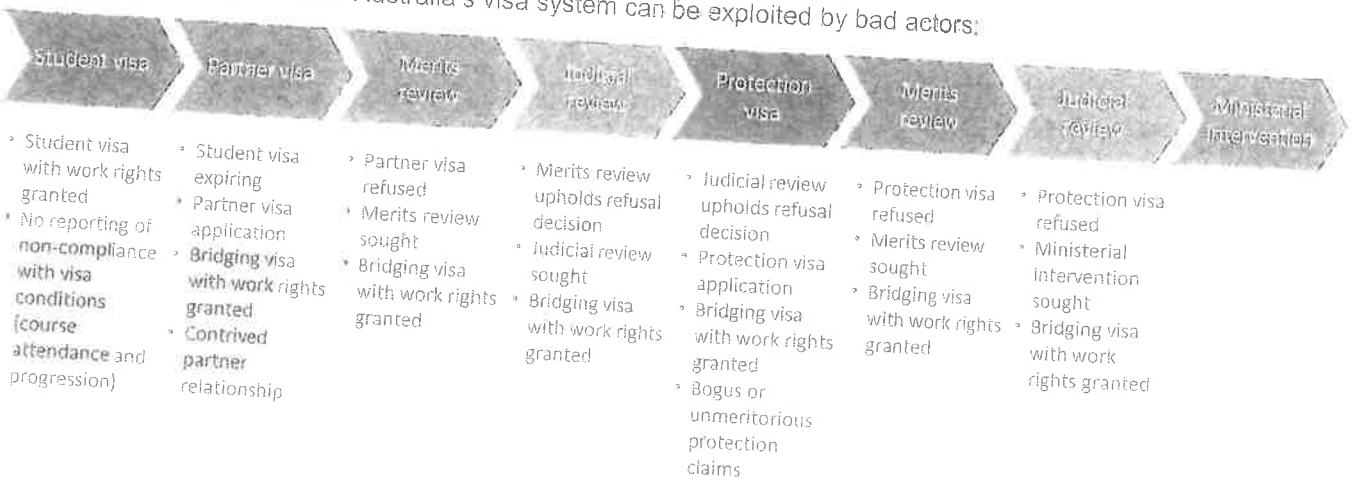


Table 2 – With current median processing times, **cumulatively**, the above example would add up to almost a decade:

Decision	Current median processing time [62]	Responsible agency
Student visa	49 days	Department of Home Affairs
Partner visa	8 months	Department of Home Affairs
Onshore protection visa	2 years, 3 months	Department of Home Affairs
Migration review	2 years	Administrative Appeals Tribunal
Refugee review	2 years, 2 months	Administrative Appeals Tribunal
Judicial review	6-12 months	Federal Court

Visa processing and review timeframes for onshore protection visa applications are particularly high. This is motivating bad actors to take advantage by lodging increasing numbers of non-genuine applications for protection. This has a spiralling effect, with the increasing volumes flowing into the system creating larger backlogs, longer processing times, and unnecessary delays for people in genuine need of protection.

Department of Home Affairs, December 2022, 'Visa processing times'
Administrative Appeals Tribunal, September 2022, 'Annual Report 2021-22'
Parliament of Australia, November 2022, 'Question on notice no. 180'
Federal Court of Australia, September 2022, 'Annual Report 2021-22'

In the last five years, the Department's average processing times for onshore protection visas from lodgement to primary decision have varied from 11 months, to two years and six months. For the same period, the number of onshore protection visa decisions finalised has remained fairly stable at around 15,000 annually.[33]

Table 3 – Onshore protection visa processing times:

Program year	Average number of days to primary decision
2017–18	933
2018–19	334
2019–20	508
2020–21	727
2021–22	841

Table 4 – Onshore protection visa, decisions finalised:

Program year	Onshore protection visa decisions
2017–18	14,925
2018–19	14,700
2019–20	16,853
2020–21	14,249
2021–22	15,726

The AAT conducts independent merits review of administrative decisions made under Commonwealth laws including the Migration Act.[34] Merits review of an administrative decision involves considering afresh the facts, law and policy relating to that decision. The largest caseload in the AAT's Migration and Refugee Division is reviews of decisions to refuse or cancel refugee (protection) visas. The AAT has unsustainable growing backlogs that are impacting its caseload performance, particularly for protection visa cases.

On 30 June 2017 the AAT's on hand protection visa caseload was 8,370. By 30 June 2022, the on hand protection visa caseload had grown by 340 percent to 37,025. Processing times for the review of protection visa refusal or cancellation decisions have also increased significantly. In 2016–17, the median time to finalise the review of such a decision was 10 months. In 2021–22, the median time to finalise the review of a protection visa decision was over two years and two months.

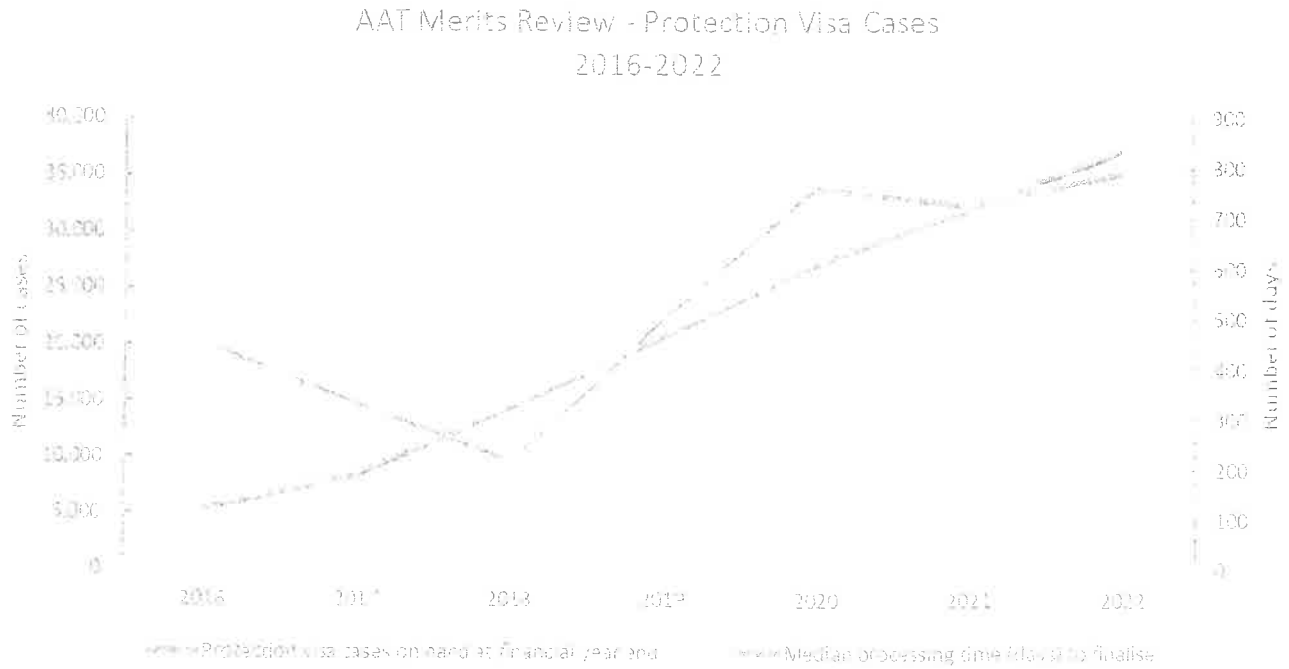
The significant majority of applicants are found not to engage (meet) Australia's protection obligations. In 2021–22, delegates of the Minister refused 89 percent of applications for onshore protection visas. For the same period, where merits review was sought, the AAT only varied, remitted or set aside seven percent of protection visa decisions.

The volume of unmeritorious and non-genuine onshore protection claims needs to be reduced. This will allow Australia to focus on engaging with genuine refugees and those who meet Australia's complementary protection obligations.

[33] Parliament of Australia, November 2022, 'Question on notice no. 180'

[34] On 16 December 2022, the Australian Government announced that the AAT will be abolished and replaced with a new federal administrative review body. The AAT will continue operating until the new federal administrative review body is established. Once the new body is established, any remaining cases will transition to the new body.

Table 5 – AAT protection visa caseloads and processing times:



To address the volume of onshore protection claims, and within the context that the significant majority of applicants are found not to engage Australia's protection obligations, claims for protection should be required to be made through a lawful provider of immigration assistance – specifically, an RMA or lawyer.[35]

Lawyers are regulated by the relevant state and territory law societies. RMAs are regulated by the OMARA within the Department. RMAs must follow a code of conduct and meet occupational competency standards. They must keep their immigration knowledge up to date, and are well placed to understand whether an applicant will engage Australia's protection obligations. In lodging an onshore protection visa on behalf of their client, a lawful provider of immigration assistance should be required to attest that the onshore protection claim has merit and is based on genuine claimant's evidence.

Mandating submission of onshore protection claims through a lawful provider of immigration assistance is reliant on strengthening the regulation of RMAs, as described in Finding 2, and will then reduce the number of unmeritorious and non-genuine claims, reduce the backlogs and therefore the Department's visa processing times, and free up departmental and AAT staff to focus on genuine claims for protection.

Recommendation 29: Applications for protection visa subclass 866 must be made through a lawful provider of immigration assistance.

Actions that would deliver on this recommendation include:

1. Update Australia's protection visa policy, and make necessary legislative changes.
2. Update the RMA code of conduct to reflect the duty to attest that the onshore protection claim has merit.
3. Use the CPD framework to build understanding amongst RMAs regarding the attestation.
4. Work with RMAs and state and territory law societies and regulators to understand the new policy position, and requirements.

[35] [illegible] Giving immigrat[illegible] in Australia

Most lawful providers of immigration assistance charge a fee for the service they provide. Australia is a party to the 1951 *Convention relating to the Status of Refugees* (the Convention) and its 1967 *Protocol Relating to the Status of Refugees*. Under the Convention, while fees may be charged, such fees should be moderate and commensurate with those charged to nationals for similar services. As this may be challenging to define, the fee a lawful provider of immigration assistance can charge to lodge an onshore protection visa application should be regulated. If the cost to engage a RMA, even with regulation is considered a barrier, the Government may also consider subsidising the fee payable to RMAs.

Recommendation 30: The fee a lawful provider of immigration assistance can charge to lodge an onshore protection visa subclass 866 should be regulated.

Actions that would deliver on this recommendation include:

1. Update the RMA code of conduct as required.
2. Work with RMAs and state and territory law society regulators to understand the new policy position, and requirements.

Consideration should also be given to whether the Canadian approach to refugee claims processing would more quickly identify onshore protection visa applicants who do not pass the character test as set out in section 501 of the Migration Act, and result in fewer unmeritorious and non-genuine claims clogging the Department and the AAT.

Canada's ineligibility grounds are laid out in the *Immigration and Refugee Protection Act 2001*. If a claim is found to be ineligible, the individual cannot have their claim heard by Canada's independent administrative tribunal, the Immigration and Refugee Board.

Canada's ineligibility assessment process verifies the identity of the refugee protection claimant via biometrics collection and initiates security screening of the refugee claimant at the earliest possible stage of the program. In 2022, approximately five percent of claims made in Canada were found ineligible. Inadmissibility grounds include criminality, serious criminality and organised criminality.

For Australia, by moving the character test earlier in the visa assessment process, based on 2021–22 lodgements, this would potentially identify around 530 onshore protection visa applicants, who could be filtered out of the visa assessment process more quickly.

Recommendation 31: Undertake a review of the Canadian approach to refugee claims processing, particularly the ineligibility assessment process, to determine whether there may be benefit in adopting this approach in Australia.

Actions that would deliver on this recommendation include:

1. Engage with Immigration and Citizenship Canada regarding its ineligibility assessment process.

The AAT currently undertakes a full merits review for all visa streams. This involves a hearing of each case, with facts considered *de novo* or 'afresh' at the time of the merits review, including new information that was not available at the time of the original decision. Tourists holidaying in Australia, or students studying a course in Australia are provided the same full review as Australian citizens and those who are, or seeking to become, a permanent resident of Australia. The review process should be proportional.

Certainly those seeking protection, and those seeking to become a permanent resident through a family, work or other stream should be afforded a full review. For visit / tourism and study streams, however, the review process should be quick and efficient. The faster the merits review process is, the less incentive there is for bad actors to exploit the system. For visit / tourism and study streams, a merits review should be conducted 'on the papers' without a hearing, and within a set period of time. New information should only be considered in exceptional circumstances.

Recommendation 32: For visit / tourism and study streams, merits review should be conducted 'on the papers' without a hearing, and within a set period of time. New information should only be considered in exceptional circumstances.

Actions that would deliver on this recommendation include:

1. Amendments to the Migration Act as required.
2. Update the Minister's directions to Tribunal members.

Notwithstanding the effect of the above recommendations, the ever growing and significant AAT on hand caseload for protection and other visa decisions warrants the review of resourcing levels, case management, and the introduction of efficiency performance measures for the new federal administrative review body.

Recommendation 33: Improved efficiency to be a key focus in the establishment of the new federal administrative review body.

Actions that would deliver on this recommendation include:

1. Determine appropriate resourcing levels, including use of surge resources.
2. Consider appropriate case management systems and case management innovations, including methods of triage, and alternate dispute resolution.
3. Determine appropriate performance measures to drive efficiency.

Finding 7: The Department's Integrity and Professional Standards Framework should be strengthened to prevent risks presented by staff corruption, fraud and other unlawful activities

Case Study No. 5: Locally engaged employees in South Africa granting Australian visa applications in exchange for money

The Australian Commission for Law Enforcement Integrity's (ACLEI) Operation Embla considered allegations that two locally engaged employees at the Australian High Commission in Pretoria, South Africa were engaging in corrupt conduct by improperly granting Australian visa applications in exchange for money.

Officer G joined Pretoria Post in 2008, and worked across the visitor, student, and permanent visa teams. The corruption issue was identified by the Principal Migration Officer Integrity at Nairobi Post following analysis of Officer G's processing of student visa applications after being reassigned to permanent visas. A review of their activity in visa processing systems suggested they were continuing to facilitate student visa grants through a colleague, Officer H.

Officer H also commenced employment at Pretoria Post in 2008. Suspicion of Officer H arose as a result of processing student visa applications accessed by Officer G in visa processing systems without an apparent work purpose.

The Integrity Commissioner found that one of the locally engaged employees had engaged in corrupt conduct within the meaning of the *Law Enforcement Integrity Commissioner Act 2006* (LEIC Act).

[source: ACLEI]

This Rapid Review into the Exploitation of Australia's Visa System, found no instances of staff corruption, fraud and other unlawful activities, however there is a risk that departmental staff could engage in corrupt conduct, and misuse their trusted access to abuse Australia's visa system.

The Department's Integrity and Professional Standards Frameworks are designed to prevent risks of departmental staff corruption, fraud, inappropriate behaviours, and other unlawful and serious criminal activities.

The Professional Standards Framework is an overarching framework including the Australian Public Service (APS) Code of Conduct, the APS Values, APS Employment Principles and Secretary Directions and Determinations. The Directions and Determinations include the requirement for all staff to hold and maintain both an Employment Suitability Clearance, and an Australian Government Security Vetting Agency (AGSVA) minimum BASELINE clearance.

The Integrity Framework is a component of the Professional Standards Framework, which outlines obligations and requirements through policies that cover:

- employment suitability screening
- reporting declarable associations and changes in personal circumstances
- drug and alcohol testing
- mandatory reporting of serious misconduct, corrupt conduct or criminal activity
- Conflicts of Interest
- Code of Conduct investigations, and
- social media use, including not identifying themselves online as working for the Department, and behaving online in a manner that upholds the APS Employment Principles and Values.

The integrity framework also covers integrity testing, which is a method the Department may use to investigate allegations and circumstances where staff are suspected of corrupt conduct. This occurs alongside other procedures to determine whether an employee or former employee of the Department has breached the APS Code of Conduct and if so, what sanction is to be imposed.

The Department also delivers a continuous integrity awareness program, publishing integrity outcomes that highlight the consequences of inappropriate behaviour, and encouraging a pro-integrity culture to support staff in keeping their integrity knowledge up-to-date so they can meet their obligations and responsibilities effectively. Reporting of suspected corruption or integrity concerns can be made anonymously.

A significant risk relates to visa processing officers 'cherry picking' or selecting which visa applications they process. Because migration and citizenship processing systems are around 30 years old, controls that supplement staff obligations under the integrity framework have been built around the system.

For example, staff are unable to select which visa applications they process. Instead, a 'pick next' function is built into the system, as are access controls to ensure that each user has access only to the system/s that are required for their job function. If a staff member breaches access controls or 'pick next' arrangements, they will be identified and asked to explain, and further investigations activity may be undertaken.

'Reach back' by former departmental staff who no longer work for the Department is also a significant risk related to visa processing. Former departmental staff may reach back into their known contacts in the Department, seeking information or favourable outcomes. The practice is most prevalent in the offshore environment, but instances are also known to have occurred onshore. The Department assesses all integrity referrals and allegations where staff are suspected of corrupt conduct, following the appropriate notification to, and treatment advice by, the Integrity Commissioner.

With regard to visa processing, unauthorised access is also considered a significant risk. For the most part, instances have been found to have been a matter of curiosity, but cases of serious misconduct and corruption have also been identified. ACLEI provides independent assurance to the Australian Government that Commonwealth law enforcement agencies and their staff act with integrity.

Under the LEIC Act, the Department is required to notify the Integrity Commissioner of any potential corrupt conduct by departmental officers. The Integrity Commissioner will then determine the extent of ACLEI's involvement in investigating the allegations.

The ACLEI Vulnerabilities Brief presents an overview of the corruption vulnerabilities identified between July 2021 and June 2022 from finalised investigations under the LEIC Act and related prosecutions.[36] The brief notes that an investigation related to unauthorised access to information identified that training and repeated in-built prompting within systems had been disregarded, demonstrating that education and awareness is often not sufficient to prevent corruption and that it must also be partnered with appropriate oversight and audit controls.

The Department has an 'active detection program', although the integrity checks are not live or automated. The detection program involves batch integrity checks of staff who have potentially accessed departmental migration and citizenship processing system/s without authorisation or a need to know. The batches are manually prepared based on known staff associations and social connections. They are not, for example, able to run continuously, or to carry out a broad sweep of departmental systems to identify instances of potential misuse.

System improvements are needed to facilitate 'live' checking of unauthorised access, and to reduce the manual preparation required, the manual checking of data that is returned, and manual assessment of risk that currently occurs.

Recommendation 34: Increase proactive integrity detection programs to identify staff involved in corruption, fraud, inappropriate behaviours, and other unlawful and serious criminal activities.

Actions that would deliver on this recommendation include:

1. System improvements to reduce manual nature of current integrity detection programs.

---

[36] [illegible] 2022, 'Corruption vulnerabilities brief 2021-22'

Context - statistics

Permanent and temporary visa activity [37]

Visa applications finalised comprises Granted, Refused and Withdrawn outcomes. Visa applications granted is a sub-set of visa applications finalised.

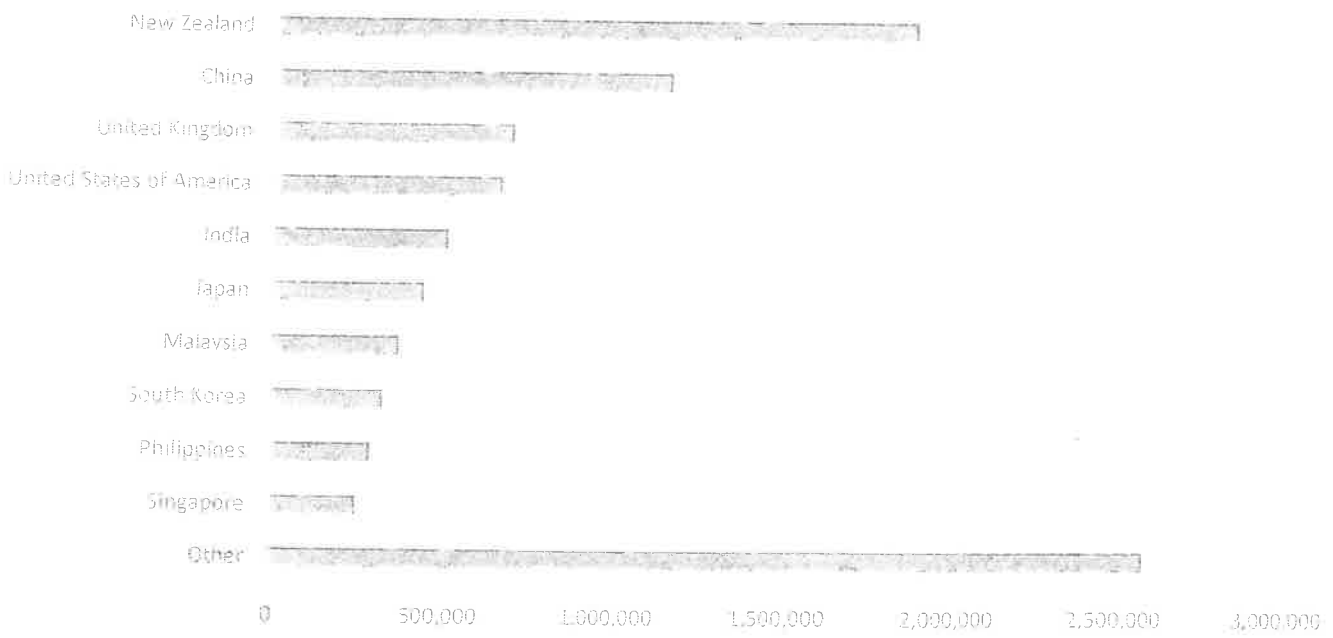
Table 6 – Visa applications finalised:

Visa Division	Visa Category	Financial Year										
		2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
Permanent	Skilled (Permanent)	159,006	162,476	164,335	152,271	152,704	149,405	144,351	140,202	126,549	99,703	104,379
	Family	129,267	137,656	129,031	128,231	121,521	125,037	128,147	128,835	131,203	144,747	129,533
	Other permanent	86,640	95,886	111,216	125,452	137,678	156,454	156,365	185,000	148,797	72,907	141,531
Permanent total		375,512	396,018	405,082	405,954	412,103	430,896	429,063	454,037	406,459	316,357	375,443
Temporary	Skilled (Temporary)	131,069	125,879	109,440	102,019	93,316	97,725	74,807	93,585	58,584	48,054	68,430
	Student	284,524	282,399	319,010	331,453	348,189	379,466	422,960	457,443	378,853	257,689	306,382
	Visitor	3,666,963	3,852,248	4,106,377	4,442,565	4,956,520	5,515,312	5,871,034	5,972,193	4,320,474	246,532	1,232,017
	Working Holiday Maker	226,368	263,108	240,498	230,036	218,225	215,483	214,796	214,890	152,251	11,378	102,704
	Other temporary	2,046,344	2,112,421	2,216,247	2,284,409	2,353,115	2,458,063	2,421,948	2,464,963	1,000,470	530,203	769,686
Temporary total		6,356,765	6,645,055	6,991,572	7,371,982	7,969,365	8,666,059	9,006,445	9,202,883	6,910,632	1,092,256	2,474,519
Grand Total		6,732,278	7,041,073	7,400,654	7,777,936	8,381,466	9,096,955	9,435,478	9,656,920	7,211,091	1,407,213	2,849,962

Table 7 – Visa applications granted:

Visa Division	Visa Category	Financial Year										
		2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
Permanent	Skilled (Permanent)	138,029	137,920	141,237	140,167	142,148	135,503	121,314	117,528	105,665	92,124	94,720
	Family	116,246	122,063	112,943	109,592	103,104	106,006	107,665	109,685	113,476	129,738	115,867
	Other permanent	85,267	94,555	109,545	123,505	136,019	154,414	155,681	183,506	147,058	72,130	140,352
Permanent total		340,442	354,538	363,725	373,264	381,269	396,323	384,840	410,719	366,199	293,992	351,339
Temporary	Skilled (Temporary)	125,075	126,061	98,571	96,084	85,611	87,580	64,170	81,975	65,060	43,195	61,867
	Student	253,296	259,321	292,063	299,540	310,345	343,035	378,292	405,742	340,152	232,750	263,737
	Visitor	3,558,483	3,750,840	3,990,248	4,308,107	4,799,173	5,245,584	5,639,187	5,686,318	4,056,803	167,578	131,390
	Working Holiday Maker	222,992	258,248	239,592	226,812	214,583	211,011	210,456	209,036	149,249	39,586	97,359
	Other temporary	2,028,181	2,093,083	2,200,312	2,250,027	2,338,375	2,431,309	2,401,863	2,435,796	1,378,398	310,801	741,854
Temporary total		6,188,017	6,487,553	6,820,786	7,180,570	7,748,587	8,418,619	8,694,048	8,818,837	6,477,462	993,708	2,296,327
Grand Total		6,528,459	6,842,191	7,184,511	7,553,834	8,129,856	8,814,942	9,078,688	9,229,556	6,843,661	1,287,700	2,648,166

Table 8 – Visa applications granted in 2018–19 [38] top ten by citizenship:

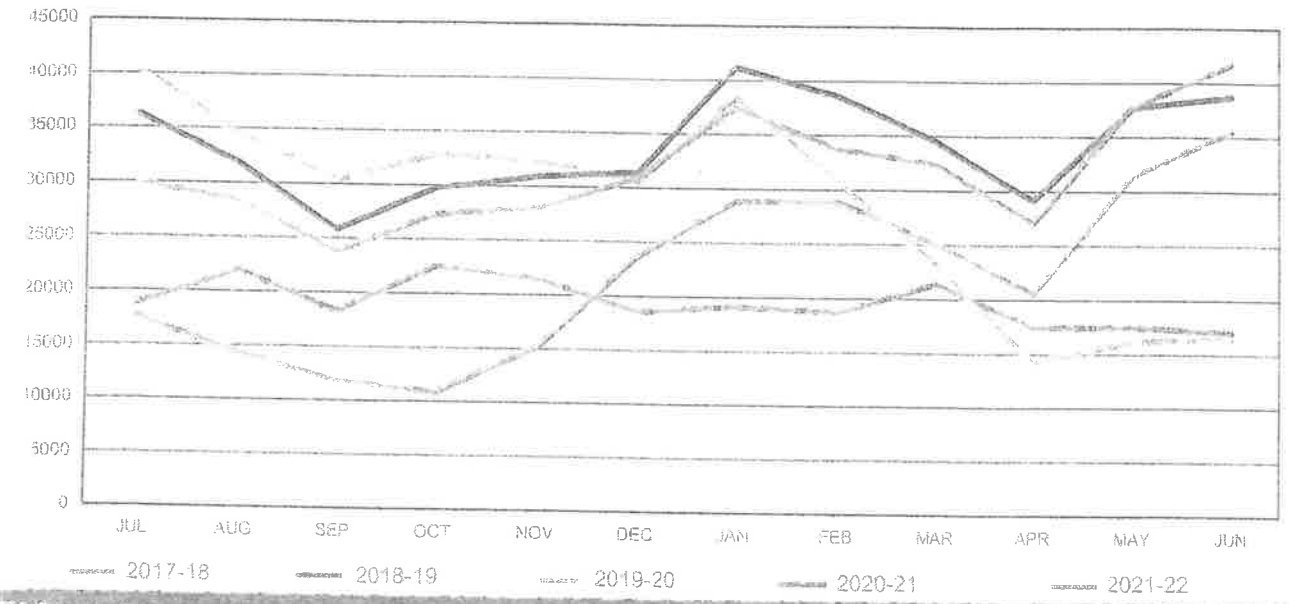


[37] Department of Home Affairs, accessed March 2023, 'BP0001 Global Permanent and Temporary visa activity'

[38] The COVID-19 pandemic significantly impacted traveller arrivals into Australia from 2019-2022; 2018-19 provides the most useful measure for this purpose

Student visa program [39]

Table 9 – Number of student visa applications granted by month - previous five financial years:



FY Granted	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Total
2017-18	29,909	28,385	23,754	27,323	28,045	30,925	37,401	33,744	32,384	27,032	37,696	41,694	378,292
2018-19	36,252	31,832	25,772	29,726	30,919	31,446	41,171	38,604	34,514	29,116	37,659	38,731	405,742
2019-20	40,436	34,518	30,360	32,811	32,293	30,555	38,413	30,771	23,102	14,199	16,206	16,488	340,152
2020-21	18,842	21,961	18,262	22,487	21,433	18,561	19,135	18,663	21,380	17,469	17,510	17,047	232,750
2021-22	17,614	14,339	11,972	10,859	15,178	23,692	28,829	28,854	25,040	20,542	31,358	35,460	263,737

[39] Department of Home Affairs, 30 June 2019, 'Student visa and Temporary Graduate visa program report'

Table 10 – Number of student visa applications granted in 2018–19 financial year by citizenship country, comparison with same period in previous year:

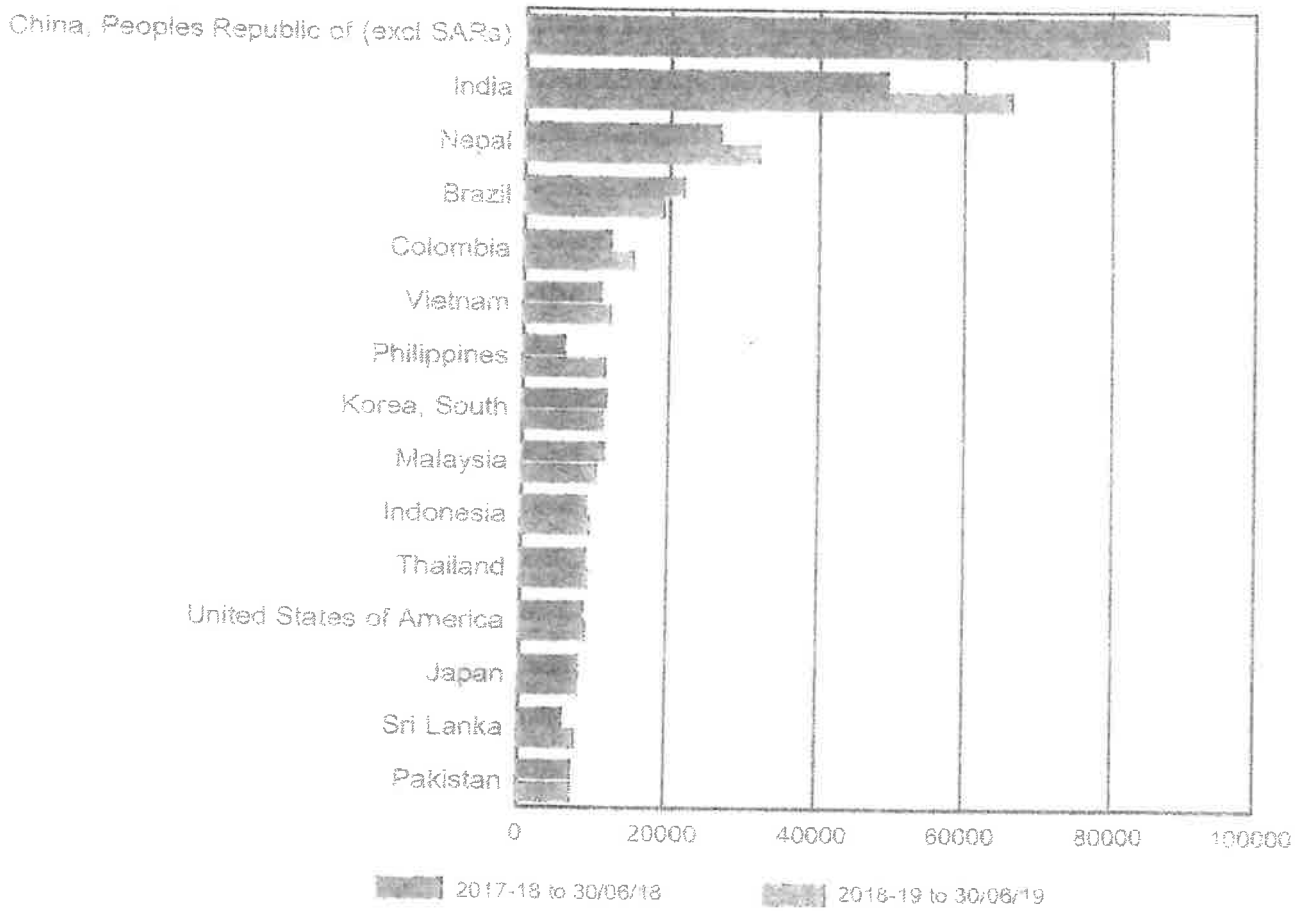


Table 11 – Number of student visa applications granted by Sector in 2018–19 financial year:

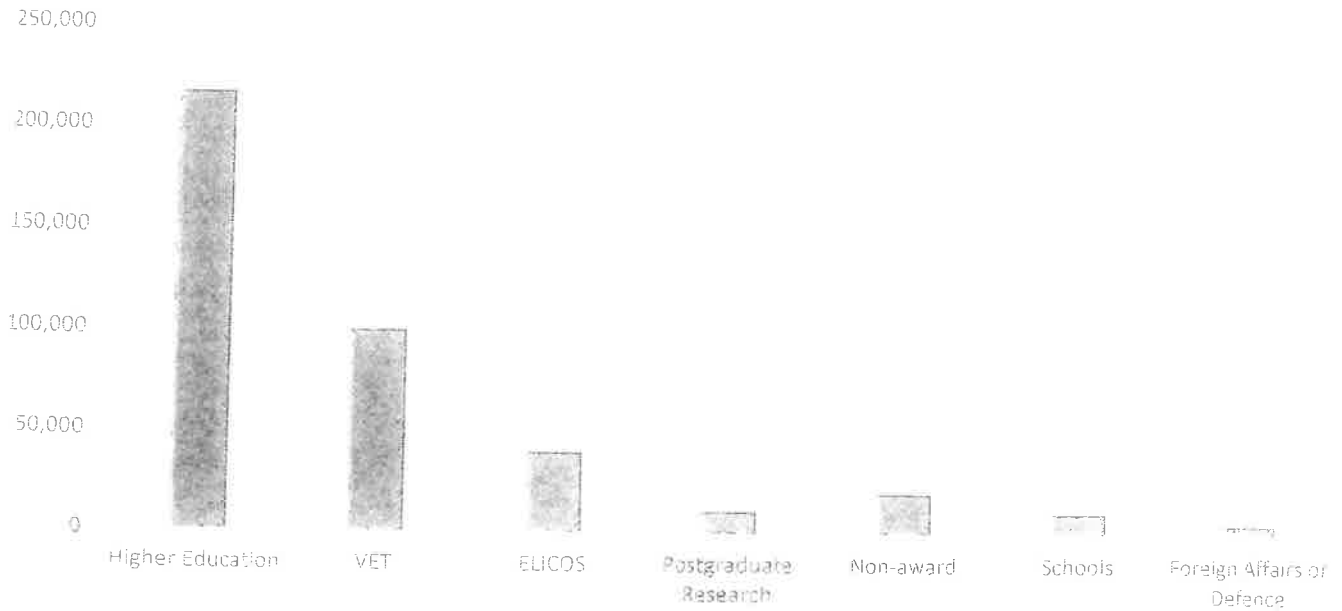
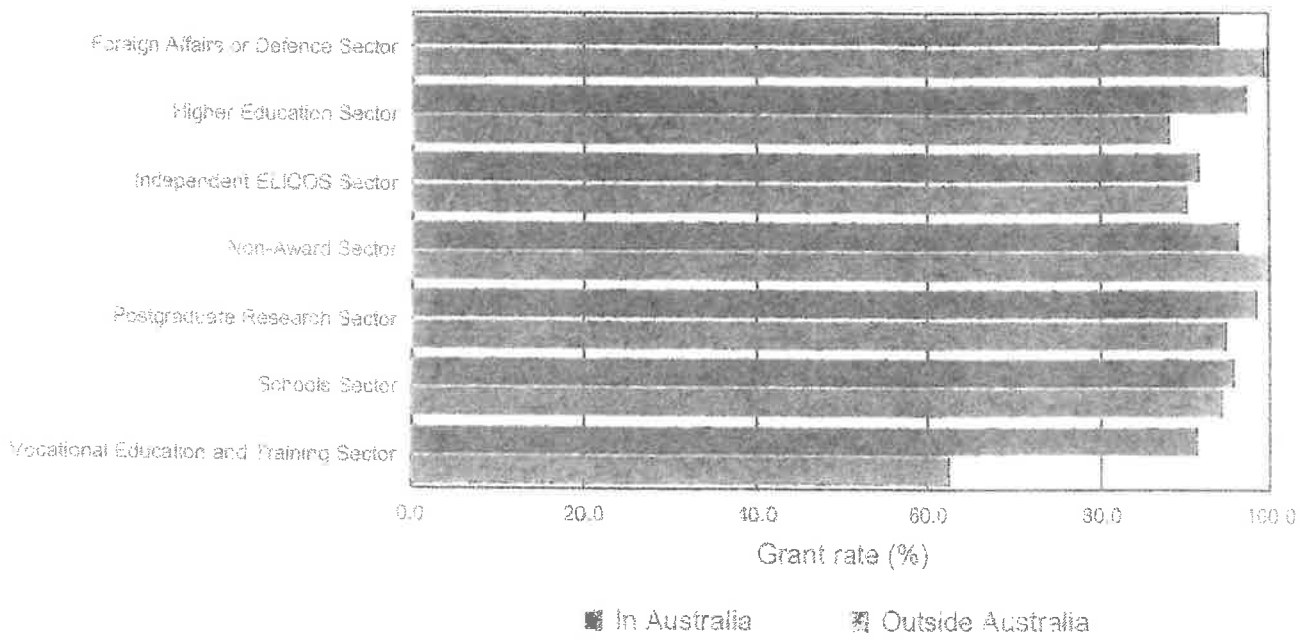


Table 12 – Grant rate of student visa applications decided in the three month period between 1 April 2019 and 30 June 2019 by sector and client location:



Onshore humanitarian program [40]

Protection visa figures relating to 2018–19 financial year.

Table 13 – Protection visa lodgements by citizenship (top 10):

Country of citizenship	2017–18	2018–19
Malaysia	9,319	8,013
China, (PRC)	9,315	4,872
India	1,529	1,864
Thailand	846	1,319
Fiji	354	980
Vietnam	764	782
Indonesia	515	672
Pakistan	589	508
Philippines	237	487
Taiwan	323	478
Other	4,140	4,591
Total	**27,931**	**24,566**

[40] Department of Home Affairs, 30 June 2019 'Onshore Humanitarian program 2018-19'

Table 14 – Grant and grant rates by citizenship (top 10):

Country of citizenship	2018–19	Grant rate
Iran	285	79%
Iraq	271	71%
Pakistan	172	41%
Turkey	125	73%
Malaysia	103	1%
Libya	92	93%
China, (PRC)	90	4%
Syrian Arab Republic	54	90%
Afghanistan	48	83%
India	36	8%
Other	374	...
Total	**1,650**	**11%**

Department of Home Affairs permanent and temporary visa processing times [41]

Median visa processing times is the most accurate way to show the amount of time it is taking most visa applications to be finalised. 50 percentile is the processing time in which 50 percent of visas are finalised.

Table 15 – Processing times, 50 percentile (median):

Visa Program	Visa Category	Financial year 2006-07	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18
Permanent	Skilled (Permanent)	6 Months	5 Months	4 Months	4 Months	4 Months	5 Months	6 Months	7 Months	6 Months	6 Months	6 Months	6 Months
Temporary	Skilled (Temporary)	16 Days	16 Days	34 Days	22 Days	36 Days	41 Days	70 Days	32 Days	14 Days	70 Days	56 Days	56 Days
	Student	17 Days	14 Days	15 Days	14 Days	15 Days	17 Days	16 Days	14 Days	25 Days	63 Days	40 Days	40 Days
	Visitor	<1 Day	<1 Day	<1 Day	<1 Day	<1 Day	<1 Day	<1 Day	<1 Day	<1 Day	3 Months	3 Days	3 Days
	Working Holiday Maker	<1 Day	1 Day	1 Day	<1 Day	<1 Day	<1 Day	<1 Day	<1 Day	2 Days	43 Days	4 Days	4 Days

[41] Processing times are aggregate calculations for the program

Methodology

To identify and understand the issues, the Rapid Review Lead consulted widely with relevant stakeholders, including private and public sector organisations.

The Rapid Review Lead had regard to the findings of previous and ongoing reviews and inquiries (including Parliamentary Inquiries) and regulatory approaches in relevant overseas jurisdictions to identify recommendations or insights that may be applicable in the Australia context.

The Rapid Review Lead reported to the Minister for Home Affairs and the Minister for Immigration, Citizenship and Multicultural Affairs on a regular basis and, through the Minister, to other Ministers.

The Rapid Review Lead consulted with the following stakeholders:

Stakeholder consultation:
Academic, University of Technology Sydney
Attorney General's Department
Australian Border Force
Australian Competition and Consumer Commission
Australian Criminal Intelligence Commission
Australian Federal Police
Australian Transaction Reports and Analysis Centre
Australian Skills Quality Authority
Australian Taxation Office
Commonwealth Director of Public Prosecutions
Department of Education
Department of Employment Workplace Relations
Department of Home Affairs
Department of Prime Minister and Cabinet
Fair Work Ombudsman
Immigration, Refugees and Citizenship Canada
International Education Association of Australia
New South Wales Police
New Zealand Ministry of Business, Innovation and Employment
Queensland Police

Stakeholder consultation:

South Australia Police

VET Assess

Victoria Police