Compliance Self-Assessment Report

Provider

Assessment Date: 30 December 2025

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Executive Summary

63%	18	48
Overall Compliance Score	Compliant Areas	Gaps Identified

AI Analysis

The provider has significant compliance gaps across several critical areas, including agent management, attendance monitoring, complaints handling, and student support. Many of these issues pose high or critical risks to the provider's ability to meet its regulatory obligations and support the welfare and outcomes of international students. Urgent action is required to address these deficiencies and ensure the provider is fully compliant with the ESOS National Code.

Priority Actions

1. Implement a comprehensive agent management system, including written agreements, due diligence checks, performance monitoring, and procedures for terminating non-compliant agents.
2. Establish a robust attendance monitoring system that meets all ESOS requirements, including minimum 80% attendance, systematic tracking, and timely intervention for at-risk students.
3. Revise the complaints and appeals process to ensure it is accessible, transparent, and adheres to principles of natural justice, with clear processes for external appeals.
4. Review and update all student support policies and procedures to ensure compliance with ESOS requirements, including orientation, pre-arrival information, welfare services, and critical incident response.
5. Conduct a full review of all policies, procedures, and documentation to identify and address any other compliance gaps, ensuring the provider can demonstrate ongoing financial viability and capacity to deliver courses.

Scores by Category

Category	Score	Status
Documentation	74%	Needs Attention
Student Support	50%	Critical
Attendance	39%	Critical
Progress	62%	Low
Refunds	86%	Compliant
Marketing	75%	Needs Attention

Category	Score	Status
Agents	64%	Low
Complaints	66%	Low
Governance	58%	Critical

Scores by ESOS Standard

Standard	Score	Status
ESOS S4.1	50%	Critical Gap
ESOS S4.2	60%	Non-Compliant
ESOS S4.3	70%	Needs Review
ESOS S4.4	50%	Critical Gap
ESOS S4.5	50%	Critical Gap
ESOS S8.4	0%	Critical Gap
ESOS S8.5	0%	Critical Gap
ESOS S8.6	50%	Critical Gap
ESOS S8.7	70%	Needs Review
ESOS S8.9	50%	Critical Gap
ESOS S10.1	100%	Compliant
ESOS S10.2	50%	Critical Gap
ESOS S10.3	50%	Critical Gap
ESOS S10.4	100%	Compliant
ESOS S10.5	50%	Critical Gap
ESOS S10.6	50%	Critical Gap
ESOS S10.7	60%	Non-Compliant
ESOS S10.8	50%	Critical Gap
ESOS S2.2	100%	Compliant
ESOS S2.1a	100%	Compliant
ESOS S2.1e	50%	Critical Gap

Standard	Score	Status
ESOS S2.1f	100%	Compliant
ESOS S11.1	50%	Critical Gap
ESOS S11.2	70%	Needs Review
ESOS S11.3	50%	Critical Gap
ESOS S11.4	100%	Compliant
ESOS S11.5	75%	Needs Review
ESOS S9.1	100%	Compliant
ESOS S9.7	50%	Critical Gap
ESOS S7.1	50%	Critical Gap
ESOS S7.2	0%	Critical Gap
ESOS S3.4	50%	Critical Gap
ESOS S1.1	40%	Critical Gap
ESOS S1.2	50%	Critical Gap
ESOS S1.4	100%	Compliant
ESOS S8.1	100%	Compliant
ESOS S8.2	70%	Needs Review
ESOS S8.3	70%	Needs Review
ESOS S8.8	50%	Critical Gap
ESOS S2.1g	100%	Compliant
ESOS S6.2	50%	Critical Gap
ESOS S6.1	50%	Critical Gap
ESOS S6.3	50%	Critical Gap
ESOS S6.8	50%	Critical Gap
ESOS S6.6	50%	Critical Gap
ESOS S6.7	50%	Critical Gap
ESOS S5.1	50%	Critical Gap

Compliance Gaps - Detailed Analysis

48 gap(s) identified requiring attention

1. Do you have written agreements with all education agents you engage?

Category: Agents | **Severity:** High | **Score:** 50% | **Answer:** partial

ESOS Reference: S4.1 | **Other References:** ESOS National Code S4.1

Requirement: Provider must enter into a written agreement with each education agent they engage.

Finding: The provider does not have written agreements with all education agents, which poses a high risk of non-compliance with ESOS National Code Standard 4.1.
Recommendation: Implement a system to ensure the provider has a written agreement in place with each education agent it engages, as required by ESOS National Code Standard 4.1.

2. Do you conduct due diligence to ensure agents have appropriate knowledge and training?

Category: Agents | **Severity:** High | **Score:** 60% | **Answer:** Basic background checks conducted

ESOS Reference: S4.2 | **Other References:** ESOS National Code S4.2

Requirement: Provider must take reasonable steps to ensure education agents have appropriate knowledge and training.

Finding: The provider only conducts basic background checks on education agents, which does not meet the requirement under ESOS National Code Standard 4.2 to take reasonable steps to ensure agents have appropriate knowledge and training.
Recommendation: Develop and implement a due diligence process to assess the knowledge and training of all education agents, as required by ESOS National Code Standard 4.2.

3. Do you ensure agents comply with marketing requirements?

Category: Agents | **Severity:** High | **Score:** 70% | **Answer:** Periodic review of agent materials

ESOS Reference: S4.3 | **Other References:** ESOS National Code S4.3

Requirement: Provider must ensure agents comply with requirements for marketing information and practices.

4. Do you have procedures for terminating or suspending agents engaged in misconduct?

Category: Agents | **Severity:** Medium | **Score:** 50% | **Answer:** partial

ESOS Reference: S4.4 | **Other References:** ESOS National Code S4.4

Requirement: Provider must have procedures for terminating or suspending agents engaged in misconduct.

5. Do you publish a list of your education agents on your website?

Category: Agents | **Severity:** Medium | **Score:** 50% | **Answer:** partial

ESOS Reference: S4.5 | **Other References:** ESOS National Code S4.5

Requirement: Provider must publish a list of their education agents on their website.

6. Do you track student outcomes by agent for quality monitoring?

Category: Agents | **Severity:** Medium | **Score:** 60% | **Answer:** Basic tracking of enrolments and completions

Requirement: Agent performance tracking helps identify quality issues.

7. Do you systematically monitor student attendance?

Category: Attendance | **Severity:** Critical | **Score:** 0% | **Answer:** No systematic monitoring

ESOS Reference: S8.4 | **Other References:** ESOS National Code S8.4

Requirement: Provider must have a documented attendance policy for courses where attendance is a requirement.

Finding: The provider does not have a systematic process for monitoring student attendance, which is a critical compliance gap under ESOS National Code Standards 8.4, 8.5, and 8.6.
Recommendation: Establish a comprehensive attendance monitoring system that meets all ESOS requirements, including a minimum 80% attendance policy, accurate record-keeping, and timely intervention for at-risk students.

8. Does your attendance policy state a minimum attendance requirement of 80%?

Category: Attendance | **Severity:** Critical | **Score:** 0% | **Answer:** no

ESOS Reference: S8.5 | **Other References:** ESOS National Code S8.5

Requirement: Attendance policy must state the minimum attendance requirement (typically 80%).

9. Do you maintain accurate attendance records for all students?

Category: Attendance | **Severity:** Critical | **Score:** 50% | **Answer:** Manual records updated weekly

ESOS Reference: S8.6 | **Other References:** ESOS National Code S8.6

Requirement: Provider must maintain accurate attendance records for all students.

10. Do you intervene when students are at risk of not meeting attendance requirements?

Category: Attendance | **Severity:** Critical | **Score:** 70% | **Answer:** Warning letters and counselling offered

ESOS Reference: S8.7 | **Other References:** ESOS National Code S8.7

Requirement: Provider must intervene when students are at risk of not meeting attendance requirements.

11. Do you provide 20 working days notice before reporting students for attendance breaches?

Category: Attendance | **Severity:** Critical | **Score:** 50% | **Answer:** partial

ESOS Reference: S8.9 | **Other References:** ESOS National Code S8.9

Requirement: Provider must notify student of intention to report and allow 20 working days to access complaints and appeals.

12. How quickly do you identify students falling below attendance requirements?

Category: Attendance | **Severity:** High | **Score:** 75% | **Answer:** Within 2 weeks

Requirement: Early identification enables timely intervention and support.

13. Can students access your complaints and appeals process at no cost?

Category: Complaints | **Severity:** Critical | **Score:** 50% | **Answer:** partial

ESOS Reference: S10.2 | **Other References:** ESOS National Code S10.2

Requirement: Provider must ensure students have access to the complaints and appeals process at no cost.

Finding: The provider's complaints and appeals process is not fully accessible, as students may be required to pay to access the process, which does not meet the requirements of ESOS National Code Standard 10.2.
Recommendation: Revise the complaints and appeals process to ensure students can access it at no cost, as required by ESOS National Code Standard 10.2.

14. Do you acknowledge receipt of complaints and appeals in writing?
Category: Complaints | **Severity:** High | **Score:** 50% | **Answer:** partial
ESOS Reference: S10.3 | **Other References:** ESOS National Code S10.3
Requirement: Provider must acknowledge receipt of complaints and appeals in writing.

15. Do you inform students of their right to external appeals through the Overseas Students Ombudsman?
Category: Complaints | **Severity:** Critical | **Score:** 50% | **Answer:** partial
ESOS Reference: S10.5 | **Other References:** ESOS National Code S10.5
Requirement: Provider must inform students of their right to access external appeals through the Overseas Students Ombudsman.

16. Do you maintain student enrolment during internal appeals for provider-initiated actions?
Category: Complaints | **Severity:** Critical | **Score:** 50% | **Answer:** partial
ESOS Reference: S10.6 | **Other References:** ESOS National Code S10.6
Requirement: Provider must maintain student enrolment during internal appeals process for provider-initiated actions.

17. Do you keep records of all complaints and appeals and their outcomes?
Category: Complaints | **Severity:** High | **Score:** 60% | **Answer:** Records kept but not systematically tracked
ESOS Reference: S10.7 | **Other References:** ESOS National Code S10.7
Requirement: Provider must keep records of all complaints and appeals and their outcomes.

18. Are your complaints and appeals processes based on principles of natural justice?
Category: Complaints | **Severity:** High | **Score:** 50% | **Answer:** partial
ESOS Reference: S10.8 | **Other References:** ESOS National Code S10.8
Requirement: Complaints and appeals processes must be based on principles of natural justice.

19. Are your complaints and appeals processes based on principles of natural justice?
Category: Complaints | **Severity:** High | **Score:** 50% | **Answer:** partial
ESOS Reference: S10.8 | **Other References:** ESOS National Code S10.8
Requirement: Complaints and appeals processes must be based on principles of natural justice.

20. Does your written agreement clearly state total tuition fees and payment terms?
Category: Documentation | **Severity:** Critical | **Score:** 50% | **Answer:** partial
ESOS Reference: S2.1e | **Other References:** ESOS National Code S2.1e
Requirement: Written agreement must state total tuition fees payable for the course and payment terms, including deposits required.

21. How do you maintain student records and documentation?
Category: Documentation | **Severity:** Medium | **Score:** 50% | **Answer:** Mix of digital and paper records
Requirement: Maintain comprehensive, accessible records for all students with appropriate retention periods.

22. How do you maintain student records and documentation?

Category: Documentation | **Severity:** Medium | **Score:** 50% | **Answer:** Mix of digital and paper records

Requirement: Maintain comprehensive, accessible records for all students with appropriate retention periods.

23. Do you have a documented process for notifying the ESOS agency of changes to your registration?

Category: Documentation | **Severity:** Critical | **Score:** 50% | **Answer:** partial

ESOS Reference: S11.1 | **Other References:** ESOS National Code S11.1

Requirement: Provider must notify the ESOS agency of any changes that may affect their registration.

Finding: The provider does not have a documented process for notifying the ESOS agency of changes to its registration, which is a critical compliance gap under ESOS National Code Standard 11.1.
Recommendation: Develop and implement a documented process to notify the ESOS agency of any changes that may affect the provider's registration, as required by ESOS National Code Standard 11.1.

24. Do you have sufficient resources to deliver courses to all accepted students?

Category: Governance | **Severity:** Critical | **Score:** 70% | **Answer:** Resources adequate for current students

ESOS Reference: S11.2 | **Other References:** ESOS National Code S11.2

Requirement: Provider must have sufficient resources to deliver courses to all accepted students.

25. Can you demonstrate ongoing financial viability and capacity?

Category: Governance | **Severity:** Critical | **Score:** 50% | **Answer:** partial

ESOS Reference: S11.3 | **Other References:** ESOS National Code S11.3

Requirement: Provider must demonstrate ongoing financial viability and capacity.

26. Do you have appropriate facilities and equipment for course delivery?

Category: Governance | **Severity:** High | **Score:** 75% | **Answer:** Facilities meet requirements

ESOS Reference: S11.5 | **Other References:** ESOS National Code S11.5

Requirement: Provider must have appropriate facilities and equipment for course delivery.

27. Do you report deferral, suspension, or cancellation to PRISMS within required timeframes?

Category: Governance | **Severity:** Critical | **Score:** 50% | **Answer:** partial

ESOS Reference: S9.7 | **Other References:** ESOS National Code S9.7

Requirement: Provider must report DSC to PRISMS within required timeframes.

28. Do you have policies preventing active recruitment of students within 6 months of their principal course commencing?

Category: Governance | **Severity:** Critical | **Score:** 50% | **Answer:** partial

ESOS Reference: S7.1 | **Other References:** ESOS National Code S7.1

Requirement: Provider must not actively recruit a student within 6 months of their principal course commencing.

29. Do you assess transfer requests within a reasonable timeframe?

Category: Governance | **Severity:** High | **Score:** 0% | **Answer:** No defined timeframe

ESOS Reference: S7.2 | **Other References:** ESOS National Code S7.2

Requirement: Provider must assess transfer requests within a reasonable timeframe.

30. Do you assess transfer requests within a reasonable timeframe?

Category: Governance | **Severity:** High | **Score:** 0% | **Answer:** No defined timeframe

ESOS Reference: S7.2 | **Other References:** ESOS National Code S7.2

Requirement: Provider must assess transfer requests within a reasonable timeframe.

31. Do you create CoEs through PRISMS and report changes as required?

Category: Governance | **Severity:** Critical | **Score:** 50% | **Answer:** partial

ESOS Reference: S3.4 | **Other References:** ESOS National Code S3.4

Requirement: Provider must create the CoE through PRISMS and report any changes as required.

32. Is your marketing information accurate and free from false or misleading claims?

Category: Marketing | **Severity:** High | **Score:** 40% | **Answer:** Some review process exists

ESOS Reference: S1.1 | **Other References:** ESOS National Code S1.1

Requirement: Marketing must not be false or misleading, including through exaggeration, inappropriate comparisons or misleading emphasis.

33. Does all marketing material display your CRICOS registration name, provider code, and course codes?

Category: Marketing | **Severity:** Critical | **Score:** 50% | **Answer:** partial

ESOS Reference: S1.2 | **Other References:** ESOS National Code S1.2

Requirement: Marketing information must include the provider CRICOS registration name and code and the CRICOS course code for each course.

34. Do you clearly articulate course progress requirements to students?

Category: Progress | **Severity:** High | **Score:** 70% | **Answer:** Requirements explained at orientation

ESOS Reference: S8.2 | **Other References:** ESOS National Code S8.2

Requirement: Provider must clearly articulate course progress requirements to students.

35. Do you have documented intervention strategies for students at academic risk?

Category: Progress | **Severity:** Critical | **Score:** 70% | **Answer:** Standard support and tutoring offered

ESOS Reference: S8.3 | **Other References:** ESOS National Code S8.3

Requirement: Provider must implement an intervention strategy for students identified as at risk of not meeting progress requirements.

36. Do you report to the Department of Home Affairs when students do not meet course requirements?

Category: Progress | **Severity:** Critical | **Score:** 50% | **Answer:** partial

ESOS Reference: S8.8 | **Other References:** ESOS National Code S8.8

Requirement: Provider must report to Department of Home Affairs if student is not meeting course requirements.

37. How often do you assess student academic progress?
Category: Progress | **Severity:** High | **Score:** 40% | **Answer:** Mid-course and end of course only
Requirement: Regular progress assessment enables early intervention.

38. Do you keep evidence of compassionate and compelling decisions?
Category: Progress | **Severity:** High | **Score:** 30% | **Answer:** Informal records only
Requirement: Policy must include provision for deferral on compassionate or compelling grounds with evidence.

39. Do you refund non-tuition fees in visa refusal cases?
Category: Refunds | **Severity:** Critical | **Score:** 50% | **Answer:** partial
Requirement: Section 47E requires refund of non-tuition fees within 4 weeks of visa refusal.

40. How do you handle refunds when students withdraw before course starts?
Category: Refunds | **Severity:** High | **Score:** 60% | **Answer:** Policy exists but processing sometimes delayed
Requirement: Clear refund policy for student-initiated withdrawals required.

41. Do you provide an orientation program for new students?
Category: Student Support | **Severity:** High | **Score:** 50% | **Answer:** Basic orientation materials provided
ESOS Reference: S6.2 | **Other References:** ESOS National Code S6.2
Requirement: Provider must give students an age and culturally appropriate orientation program.

42. Do you provide pre-arrival information and support to accepted students?
Category: Student Support | **Severity:** Medium | **Score:** 50% | **Answer:** partial
ESOS Reference: S6.1 | **Other References:** ESOS National Code S6.1
Requirement: Provider must offer students assistance to adjust to study and life in Australia prior to arrival.

43. Do you provide students with access to welfare services, emergency assistance, and health services?
Category: Student Support | **Severity:** High | **Score:** 50% | **Answer:** partial
ESOS Reference: S6.3 | **Other References:** ESOS National Code S6.3
Requirement: Provider must give students information about and access to welfare services, emergency assistance, and health services.

44. Do you have a documented critical incident policy with emergency response procedures?
Category: Student Support | **Severity:** Critical | **Score:** 50% | **Answer:** partial
ESOS Reference: S6.8 | **Other References:** ESOS National Code S6.8
Requirement: Provider must have and implement a documented critical incident policy with procedures for emergency responses.

45. Do you inform students about visa conditions relating to course progress and attendance?
Category: Student Support | **Severity:** Critical | **Score:** 50% | **Answer:** partial
ESOS Reference: S6.6 | **Other References:** ESOS National Code S6.6
Requirement: Provider must provide information about student visa conditions relating to course progress and attendance.

46. Do you provide students with contact details for student support services staff?
Category: Student Support | **Severity:** Medium | **Score:** 50% | **Answer:** partial
ESOS Reference: S6.7 | **Other References:** ESOS National Code S6.7
Requirement: Provider must provide details of the student support services staff member.

47. Do you have documented policies for accommodation, support, and welfare of students under 18?
Category: Student Support | **Severity:** Critical | **Score:** 50% | **Answer:** partial
ESOS Reference: S5.1 | **Other References:** ESOS National Code S5.1
Requirement: Provider must have documented policies for accommodation, support, and welfare of students under 18.

48. Do you have documented policies for accommodation, support, and welfare of students under 18?
Category: Student Support | **Severity:** Critical | **Score:** 50% | **Answer:** partial
ESOS Reference: S5.1 | **Other References:** ESOS National Code S5.1
Requirement: Provider must have documented policies for accommodation, support, and welfare of students under 18.