

## BACKGROUND TO THE REVIEW<sup>1</sup>

In 2012, the demand driven funding system was introduced for public universities. Under this system, the Government funds Commonwealth supported places for all domestic undergraduate students accepted into a bachelor degree course (excluding medicine) at a public university.

These reforms, which were foreshadowed in 2009, have seen the number of Commonwealth supported places increase from around 469,000 in 2009 to an estimated 577,000 in 2013. It is critical that this expansion in Australian higher education:

- enhances the knowledge and capabilities of Australians; and
- delivers quality graduates who are able to contribute to their society and thrive in the global economy.

As Edwards & Radloff noted in their paper *Higher Education enrolment growth, change and the role of Private HEPS*<sup>2</sup> "The year 2009 is an important reference point in tracking enrolment change because this is the year in which the policy of demand driven funding was announced... This year marked the last year in which the previous 'status quo' in enrolments among public universities was in place. In the years following 2009, universities were given the opportunity to begin to prepare for the uncapped student demand-driven funding system which began in full in 2012. The 'preparation' for the full funding in 2012 was characterised by the softening of government caps or quotas on the number of students that each university could enroll, so in 2010 and 2011 universities received funding for each student enrolled up to 10 per cent above the cap applied by Government at the time. As documented elsewhere (Edwards, 2011c), many universities enrolled well above this limit, absorbing costs of having non-funded places but establishing a new student base in preparation for the introduction of full demand-driven funding in 2012."

The Minister for Education, the Hon Christopher Pyne MP, has commissioned the Hon David Kemp and Mr Andrew Norton to undertake a review of the demand driven system.

## SCOPE OF THE REVIEW

The review will examine the following aspects of the demand driven system:

1. the effectiveness of its implementation, including policies regarding the allocation of sub-bachelor and postgraduate places;
2. early evidence on the extent to which it is:
  - a. increasing participation;
  - b. improving access for students from low socio-economic status backgrounds and rural and regional communities;
  - c. meeting the skill needs in the economy;
3. extent to which the reforms have encouraged innovation, competition, diversity and greater responsiveness to student demand including development of new modes of delivery such as online learning;

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<sup>1</sup> <http://www.education.gov.au/review-demand-driven-funding-system>

<sup>2</sup> Edwards & Radloff, *Higher Education enrolment growth, change and the role of Private HEPS*, ACER and ACPET 2013, p 5

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4. whether there is evidence of any potential adverse impacts on the quality of teaching and of future graduates;
5. measures being taken by universities to ensure quality teaching is maintained and enhanced in the demand-driven system; and
6. whether less academically prepared students are receiving the support they need to complete the course of study to which they have been admitted.

The review will recommend possible areas for improvement to ensure that the system better meets its objectives, is efficient, is fiscally sustainable, and supports innovation and competition in education delivery.

### NAVITAS

Navitas Ltd is an Australian global education leader providing pre-university and university programs, English language courses, migrant education and settlement services, creative media education, student recruitment, professional development and corporate training services to more than 80,000 students across a network of over 110 colleges and campuses in 27 countries. Navitas listed on the Australian Securities Exchange (ASX) in 2004 and is now an S&P/ASX Top 100 Company, employing more than 5,500 staff globally.

Navitas believes an innovative, diverse, globally connected public and private education sector is critical to Australia's future prosperity, intellectual capital and social cohesion. Navitas also recommends that private education providers are integral to meeting the Government's objectives for a demand driven higher education system.

Navitas welcomes this opportunity to provide a submission to the Review.

### COMMENTARY

Over the past five years Government has pursued an 'expansion agenda' for higher education "in which two key targets recommended by the Bradley Review are paramount:

- that 40 per cent of 25-34 year olds will have a bachelor degree or above by 2025; and
- 20 per cent of undergraduate enrolments will be from low socioeconomic backgrounds by 2020."<sup>3</sup>

This has culminated in the introduction of a demand led funding model for higher education from January 2012, which has significantly increased the number of Australian students in higher education since 2009.

Given this policy change was targeted at publicly funded institutions, Navitas is not in a position to specifically respond to the aspects of the system and its outcomes as they impact the public universities.

However, as an organisation with a track record of 20 years of successfully preparing students whose backgrounds are likely to place them at a disadvantage in the Australian university system, Navitas believes it is in a position to comment on models that are responsive, flexible, innovative and deliver sustainable academic outcomes at lower cost.

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<sup>3</sup> Edwards & Radloff, Higher Education enrolment growth, change and the role of Private HEPS, ACER and ACPET 2013, pages 2, 3.

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Navitas contends that there are significant benefits to Government and to the Australian economy in extending access of the demand driven system to private education providers. That in doing so the Government could more directly address issues such as;

- Increased participation;
- Improve both access and academic success for students from low socio-economic status backgrounds and rural and regional communities;
- Better meet the skill requirements of the economy and business;
- Deliver more innovative and flexible teaching models;
- Ensure high quality teaching and learning outcomes;
- Provide a more supportive learning structure for students less academically prepared.

### ROLE OF PRIVATE PROVIDERS

In its 2013 report Future Focus<sup>4</sup> the Australian Workforce Development Agency Australia spells out Australia's challenge "...to sustain this prosperity by developing the nation as a knowledge-intensive economy, growing our capacity for cutting-edge innovation and supporting productivity growth while also building our communities and supporting environmental sustainability."

By 2025, according to modelling developed by AWPA, Australia could be 2.8 million short of the number of higher-skilled qualifications that industry will demand<sup>5</sup>.

As Navitas outlined in its submission to the Australian Workforce and Productivity Agency in 2012 in response to AWPA's discussion paper **Future Focus - Australia's skills and workforce development needs: a discussion paper for the 2012 National Workforce Development Strategy** –

*"Australia is unlikely to meet the tertiary skill requirements that the national economy requires or even the stated qualification targets mentioned above unless the number and breadth of tertiary institutions and delivery options is increased. As in many other countries where the private sector plays a vital role in education provision (Japan, South Korea and Indonesia all are greater than 70% private<sup>6</sup>) Navitas contends that it is the private sector that can play an important and necessary role in meeting Australia's additional demand for tertiary qualifications. A priority of Government should therefore be directed toward creating a tertiary education framework that is supportive of high quality private education providers.*

*Greater diversity via additional private education providers should be an important policy initiative of government as private providers like Navitas offer some important advantages toward skilling Australia. Private providers are:*

- *More likely to respond to market signals in meeting the skill requirements of the market.*
- *Better able to move quickly to implement new courses and programs due to efficient teaching delivery models.*

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<sup>4</sup> Future Focus – National Workforce Development Strategy 2013, AWPA

<sup>5</sup> Future Focus – National Workforce Development Strategy 2013, AWPA

<sup>6</sup> *A New Dynamic: Private Higher Education*, UNESCO, 2009.

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- *Well positioned to provide excellent relationships with industry and therefore able to respond directly to industry demands. Industry often appreciates dealing with another for-profit entity.*
- *Efficient in their delivery of tertiary education due to a streamlined, customer focused approach to quality education delivery.*
- *Willing and have the capital to invest in flexible teaching models.*
- *More willing and able to introduce innovation into the education system, including partnering with public institutions. It was the innovation of the Navitas pathway model introduced in 1994 that has been the platform for the significant growth of international students in the higher education sector across Australia, a model that has now been widely copied. Likewise in the US it has been the private sector that was the early adopter of large scale online delivery.*
- *Able to offer government a lower cost tertiary education option.*

*The advantages that private education can provide to meeting the tertiary qualification needs of Australia are significant and can go a long way to meeting the supply side of the tertiary qualification shortfall. For this potential to be realised the government policy settings need to be altered to allow private education providers like Navitas to more actively contribute to the provision of tertiary education on a more equal footing. Currently organisations like Navitas are required to meet the quality requirements, which we are strong supporters of, however have government policy limitations impacting potential student demand.*

*Navitas has a proven track record of providing excellent, high quality tertiary qualifications to Australian students as well as providing lower SES groups with foundation skills that facilitate further study and workforce participation"<sup>7</sup>*

There has been considerable commentary on the impact of the demand driven system, particularly in relation to lower qualified academic entry and the cost benefit. It has been identified that there is a positive correlation between ATAR entry rank and retention and that for ATAR entry levels below 60 drop-out rates are around 33% or even higher. Navitas can claim retention rates of over 85% across all its pathway colleges and this is inclusive of domestic Australian students the majority of whom would be regarded as lower ATAR students (less than 60).

Recent support for the benefits of pathway programs, specifically in relation to lower ATAR students was presented by Sue Willis and Catharine Burnheim of Monash University who observed that the money being spent on enrolling more low-ATAR students into degrees would be better spent on pathway programs and vocational education and training. Data show that low-ATAR students, who are selected on the basis of their performance in pathway programs, perform strongly and in a wider range of fields than they would otherwise be able to access:

*"Admitting under-prepared students with low ATARs not only increases their risk of non-completion, it restricts their choices. Lower ATAR students admitted directly to bachelor degrees are being selected on the basis of their current preparation, rather than their potential for university study, while graduates of pathway programs have a chance to*

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<sup>7</sup> Navitas submission to AWPA in response to discussion paper Future Focus - Australia's skills and workforce development needs: a discussion paper for the 2012 National Workforce Development Strategy, July 2012.

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prepare for a wider range of disciplines, and demonstrate their aptitude for tertiary study.”<sup>8</sup>

Accordingly, Navitas would maintain that the pathway model has significant advantages in a demand driven model specifically as it relates to low SES and low-ATAR students. It can not only deliver higher retention rates, it can do so at a much improved cost to benefit ratio. Given the significant public funds at stake there is a compelling argument, supported by demonstrable positive outcomes for a shift in policy that includes private provider pathway programs such as those successfully delivered by Navitas.

### **INNOVATIVE, FLEXIBLE AND SUPPORTIVE TEACHING AND LEARNING ENVIRONMENTS**

In many ways the issues identified on page 3 are not dissimilar to the difficulties faced by international students some 25 years ago as Australia commenced its successful expansion of international higher education. The reality of the public universities of that period is that they were designed to deliver a high quality education to a narrow social demographic. The consequence was high attrition rates for international students. The ‘pathway’ model that evolved in late 1980’s/1990’s was developed to address this issue of attrition. While Navitas was not the first to develop the pathway model<sup>9</sup>, it created a paradigm shift by initiating public/private partnerships in higher education through the delivery of a private (for profit) program on the grounds of public universities. This innovative model tailored a learning solution that enhanced the student transition, cultural and social integration, and academic support. So successful was this model that it was one of the cornerstones for Australia becoming the most successful per capita international higher education destination in the world; the foundation of a \$14.5 billion export industry. Currently one in eight higher education international students comes through a Navitas college<sup>10</sup>.

### **THE NAVITAS MODEL**

The origin of the Navitas university pathway model began with the establishment of the Perth Institute of Business and Technology (PIBT) in 1994. While the private sector had assumed a more significant role in international education within Australia at that time, PIBT heralded a new era of pathway colleges and extended public-private relationships beyond that established previously. There were a number of features of the model that made it innovative, mutually beneficial for all stakeholders, and enduring over time.

First, operation and program delivery were embedded in the campus of a partner university, using the university’s physical resources, offering a university teaching and learning environment and on-campus social experience. A royalty arrangement was entered into which reflected rent, use of the university name (and related profile) and perhaps most importantly the university’s intellectual property to form accredited awards which mirrored the first year of the university’s degree, albeit delivered in a more supportive environment.

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<sup>8</sup> “Competing tensions of 40 vs 20” by: Catherine Burnheim, Sue Willis |From: The Australian |August 10, 2013

<sup>9</sup> Wood, J C, Bringing in the Privates: The Role of Private Providers and Public/Private Partnerships, in Ed Davies, D and Mackintosh, B (2011) Making a Difference – Australian International Education, UNSW Press.

<sup>10</sup> Based on AEI Statistics [www.aei.gov.au](http://www.aei.gov.au)

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Starting with a Diploma of Business and a Diploma of Computing and IT, successful completion guaranteed articulation to second year of the Partner

University degree. Pedagogically, the model was predicated on the acceptance of students with lower academic entry requirements than for direct university entry but with the clear expectation of achieving academic outcomes comparable to those of direct entrants at exit from the program.

The model provided a 'second chance' to students who had not performed to their potential in the final years of secondary schooling and would be considered at risk by the university.

However Navitas has demonstrated over two decades that a low tertiary entry or ATAR score does not prevent domestic students from succeeding in a higher education program with the right level of support.

Quality assurance was provided under the imprimatur of the university founded on active engagement of the partner in academic quality assurance.

The model offered a more personalised and supportive approach to teaching and learning than would be found in first year of a traditional university environment. It focussed on the individual and the development of independent learning, offering additional teaching time, early intervention strategies and a range of support systems.

Structurally, the most innovative dimension that provided a strong rationale for flexibility in entry levels was the introduction of trimester system involving three semesters per year. This was much more efficient than the two semester model,

allowing students to spread their program over three semesters, giving more time per course, and still completing within the calendar year. Academically stronger students could complete the Diploma in just eight months, greatly reducing the completion time and associated cost of living expenses for international students.

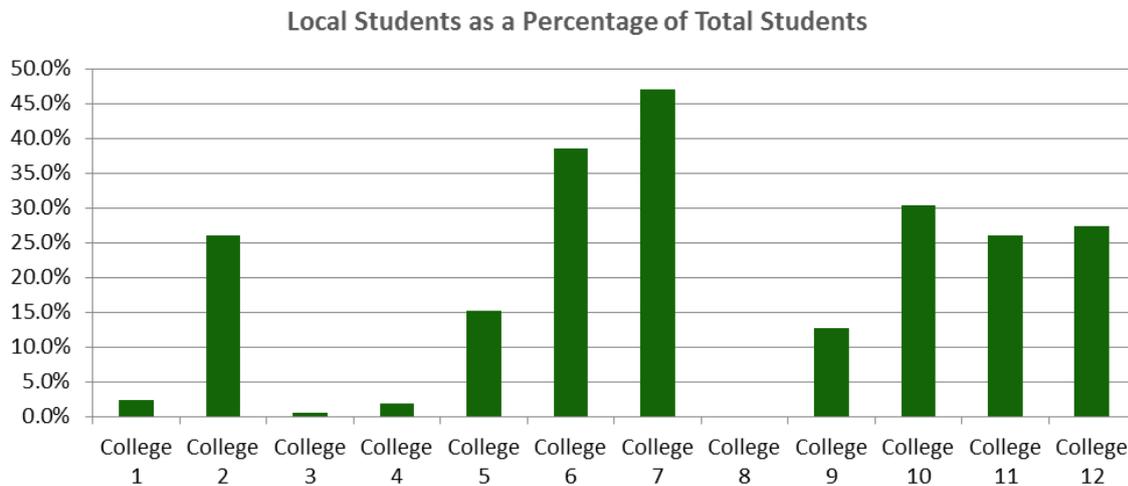
English language proficiency requirements for international students were also lower than for direct entry, where the rationale was relevance of the academic program in facilitating progress, again assisted by the trimester system.

### **EVOLUTION OF THE NAVITAS PATHWAY MODEL**

During the past decade the Navitas pathway model has evolved. In addition to the over 20,000 international students a year undertaking study in a Navitas pathway college, there are now have nearly 2,000 domestic student enrolments in Australian colleges.

At **College F** approximately 30% of the 400 Australian domestic students are classified as low SES students. The students perform as well as their international counterparts and when they articulate to University Partner F they continue to succeed as rates equivalent to direct entry students. That is, despite entering tertiary education with both social and educational disadvantage, these students succeed with their tertiary studies as well as those who enter without such disadvantage.

The table below shows the percentage of students enrolled in pathway programs in 2012/13 that were domestic students.



### STUDENT PROGRESSION AND RETENTION

A recent report, *Higher Education enrolment growth, change and the role of Private HEPS*<sup>11</sup>, commissioned by the Australian Council of Private Education and Training, maps the change in higher education enrolments in the period from 2009 to 2012 and posits the potential role of non-university higher education providers could play in the expanding enrolments and widening access.

The data indicate the increase in university attainment rates of bachelor degree or above has not necessarily come from domestic higher education output but more probably from a strong skilled migration program and international students. It suggests that with the slowing of the rate of growth in applications for university in recent years the 40% attainment target through expansion of university domestic higher education places will not be attained unless there is expanded provision by private providers, perhaps through CSP, and an expansion of the demand-driven funding system to private and TAFE providers.

The report suggests that the modes of provision used by private providers may be more conducive to benefiting under-represented groups.<sup>12</sup>

This accords with the data gathered on Navitas pathway students in relation to their progression, retention and academic performance.

Tracer studies conducted by Partner Universities demonstrate that Navitas pathway students do as well as if not better than international students directly recruited and in a number of colleges Navitas students on average achieve higher scores than the average partner university student<sup>13</sup>.

<sup>11</sup> Edwards & Radloff, *Higher Education enrolment growth, change and the role of Private HEPS*, ACER and ACPET 2013

<sup>12</sup> Edwards, Coates & Radloff, *Delivering Quality Higher Education: understanding the standards, processes and practices used by private providers*, ACER and ACPET, 2009.

<sup>13</sup> Refer Appendix A.

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Further, data demonstrates that a student’s socio-economic status does not determine their success or failure at university provided that they receive the targeted support providers such as Navitas are able to provide.

Results from Navitas Pathway **College E** demonstrate that a low ATAR does not prevent domestic students from succeeding in a Higher Education program with the right level of support. These results were moderated by the university.

ID	Course	Credits	ATAR	Average
Student A	Bioscience	8		68.25
Student B	Bioscience	8	64	72
Student C	Bioscience	8		67
Student D	Bioscience	8	50	64.4
Student E	Business	8	46	59.8
Student F	Bioscience	8	56	65.4
Student G	Bioscience	8	58	63.6
Student H	Business	8		62
Student I	Business	8	54	64.6
Student J	Bioscience	8	63	74.1
Student K	Business	8		71.25
Student L	Business	8		64.75
Student M	Bioscience	8	54	78.4
Student N	Bioscience	8		66.6
Student O	Bioscience	8		79.3
Student P	Business	8	49	75.6
Student Q	Business	8		82
Student R	Bioscience	8		59.1
Student S	Business	8	46	73.5
Student T	Bioscience	8		80
Student U	Business	8		56.8
Student V	Business	8		64.6
Student W	Business	8	48	60.25
Student X	Bioscience	8		59.6
Student Y	Bioscience	8	85.6	76.5
Student Z	Business	8		65.75

*Note 1: Students without ATAR entered via mature age or other non-standard entry arrangements*

*Note 2: Average result for students with ATAR = 69.01, average for non-ATAR students = 67.6*

### QUALITY ASSURANCE AND IMPROVEMENT

Whilst Navitas strongly contends that there is an important role to play for the private sector in a demand driven higher education system, this should be based upon a demonstrable capability to achieve outstanding outcomes for students and value for money for taxpayers.

Accordingly, Navitas recognises that all higher education providers, both public and private should continually meet and exceed quality and regulatory requirements.

Navitas has had nearly 20 years of continuous improvement. This ability to keep raising the bar is strengthened by our unique position of 32 colleges in 7 countries. We have experience in a variety of educational systems across most academic disciplines. So committed to this process of continuous improvement in student outcomes and the student experience, it is built into our organisational performance management framework (the Balanced Scorecard) and reported throughout all layers of management up to the Navitas Board. A summary of outcomes from recent Teaching & Learning reports is included as **Appendix A**.

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### SUMMARY

A significant policy shift has been the Government's introduction of a demand driven funding model for higher education from January 2012. Navitas believes that this model should be extended to allow student choice to include undertaking a government supported higher education qualification with a private provider.

Under the current policy framework the Government is faced with a stark choice of either allowing unlimited growth of the publicly funded system, which arguably may simply not be affordable. Alternatively, falling significantly short of the government set targets for tertiary qualifications. Rather than rely on the significant public investment required to support the current model the Government could facilitate increased capacity by establishing a policy framework that incentivises private providers to contribute to the provision of educational offerings. Elements of contestability should be applied to university funding in areas where there is failure to deliver required outcomes in the public system or the outcomes are not being delivered in a cost effective manner.

Initiatives that would support increased capacity provision by the private sector include:

- Unify the Higher Education Loan Program (HELP) from the current FEE – HELP and HECS – HELP to a single HELP scheme available to all students on the same financial terms.
- Extend the unified HELP scheme available to all accredited education providers on a consistent basis; that is both private and publicly funded institutions.
- Allow for Commonwealth Supported Places to be made available to private providers who operate compliant with the quality standards established by TEQSA.

Navitas believes that the initiatives outlined above would provide important growth in capacity for the Australian higher education system as well as underpinning improved diversity. The flow-on effects have the potential not only to address the skills requirements of the Australian workforce, but would assist in greater accessibility for key target groups such as low SES, improving social mobility, workforce participation and productivity and capacity for innovation.

Submitted by Navitas Limited and authorised by Navitas CEO, Rod Jones.

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## APPENDIX A:

The University Programs Division (UPD) of Navitas conducts both external and internal academic benchmarking exercises. External benchmarking involves comparing key academic performance indicators across Navitas UPD colleges. Internal benchmarking (or Self-Analysis) takes place between the individual colleges and their Partner Universities within the academic governance structures which are in place. Internal benchmarking relies heavily on the close collaboration between the individual college and their partner university to ensure the accurate tracking of student performance and academic quality.

UPD colleges also identify key performance indicators that may be college specific and which provide data for self-analysis in continuous improvement processes. As part of the production of an annual teaching and learning report external benchmarking is conducted and analysed through regional and divisional benchmarking. The analysis is presented to all College Directors and recommendations for continuous improvement are discussed from an operational and strategic perspective.

The key academic indicators for the UPD colleges are:

- Pass rates
- Retention rates
- Progression rates
- Outcomes of student and graduate satisfaction surveys
- UPD graduate outcomes at the Partner University

Each of the indicators outlined above are subsequently used to benchmark progress in delivering the highest quality learning experience for students. During the past 4 years benchmarking studies have consistently demonstrated the following:

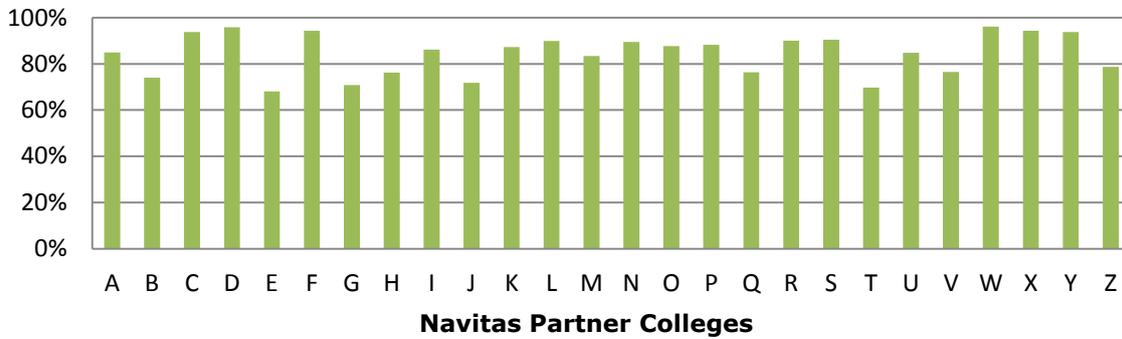
- The average pass rate for pre-university programs across UPD maintained at over 80%.
- Retention rates which have averaged over 85% for all programs.
- In Global student surveys 85% of respondents rated the quality of teaching in the colleges as either 'excellent' or 'good' Across the Division.
- 95% of all pathway students progressed to their respective pathway universities upon graduation from their diploma program.
- Critically, tracer studies conducted by Partner Universities demonstrate that Navitas pathway students do as well as if not better than international students directly recruited.

### DIPLOMA PASS RATES

Pass rates are calculated by summing the total number of attempts by students at a course and the number of students that pass the course. Navitas looks to capture the pass rates of students across all colleges for each program level and for particular disciplines.

See below a global snapshot of Navitas college pass rates in a standard sample year (2012).

### Diploma Pass Rates - 2012



In the sample year, the pass rate average for diploma programs (i.e., first year equivalent) was 82% across the UPD colleges.

The UK and Canadian colleges also produced exceptional results, with pass rate averaging 89.1% and 88.6% respectively.

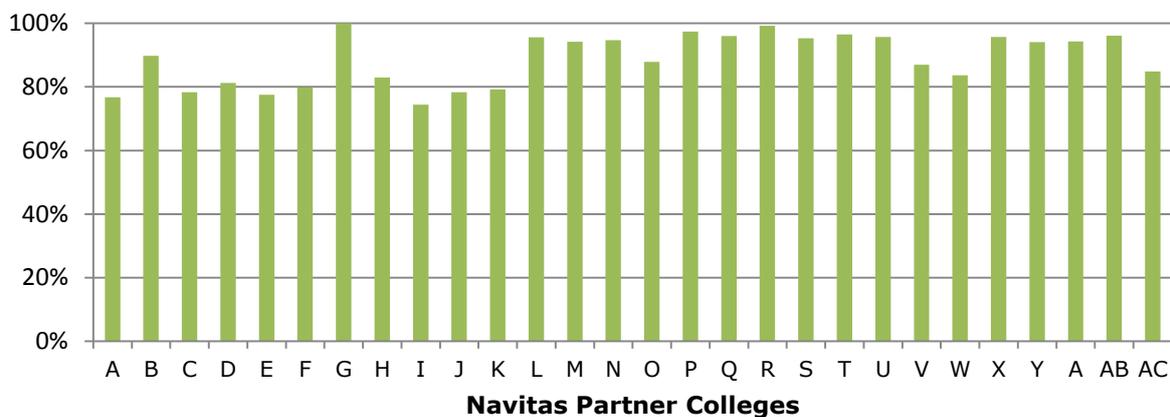
### RETENTION

Retention rates are one of the key metrics Navitas uses to track student satisfaction and quality of teaching in our colleges and managed campuses. Retention rates are the percentage of students who continue on to study from the previous semester, excluding those students who have graduated or are on a leave of absence.

This metric is analysed in two main dimensions: by academic level (e.g. pre-university, diploma programs) and program stream (e.g. Business, IT).

The average retention rate across the UPD colleges for a representative year (2012) year was 85%.

### Retention : Diploma Programs - 2012

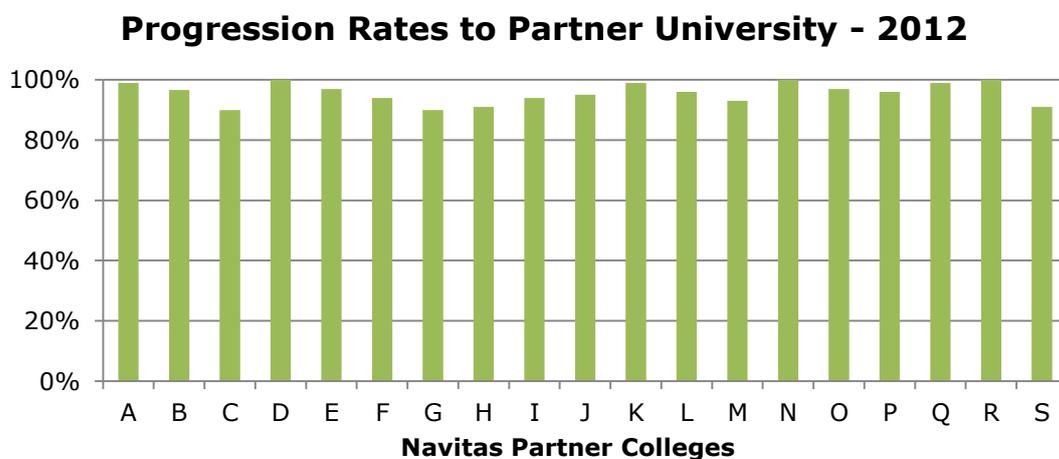


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### PROGRESSION RATES

Progression rates refer to the number of pathway college graduates who were eligible to progress to the partner university and who did choose to progress to the partner university.

Navitas colleges are reliant on the partner university to assist in the provision of this data, but where they were able to report (as in the chart below), the results are exceptional. The average progression rate across the colleges increased marginally to 95% this year, up from 94% in 2012. All colleges achieved progression rates of higher than 90%, with the Australian colleges averaging 93% progression.



Navitas treats progression to the partner university as a key indicator of both how students have performed during their time at Navitas and how effective we have been in developing an affinity among students for our partner universities. High progression rates remain indicative of the key Navitas-partner proposition, to successfully prepare students for a pathway into a full university degree.

### TRACER STUDIES

When students graduate from UPD pathway colleges and progress to their respective degrees at the partner universities it is vital for the universities to continue tracking college graduates' academic progress at the undergraduate level. Critically, the pathway college value proposition would be significantly weakened if students did not continue successfully through their university studies. Tracer studies continue to be conducted to detail how well students from Navitas pathway colleges perform after they have progressed to our partner universities.

See below are representative examples of three UPD colleges, here denoted as College A, B and C.

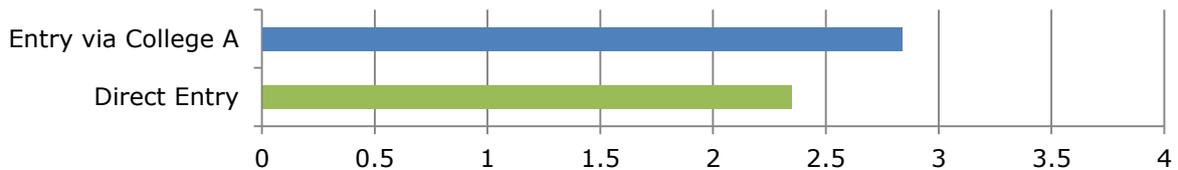
### COLLEGE A

As seen below, students that enter the partner University via the Navitas UPD College are more likely to be in academic 'Good Standing' during their studies when compared to both direct entry internationals and domestic students studying in second year and beyond. This is a reflection of the college's ability to provide a strong academic and social foundation for the students, ensuring that they continue to be successful throughout the remainder of their studies.

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This trend is supported in our sample data, where College A students achieved significantly higher average GPAs (M= 2.84) than international students who enter University partner B directly (M= 2.35).

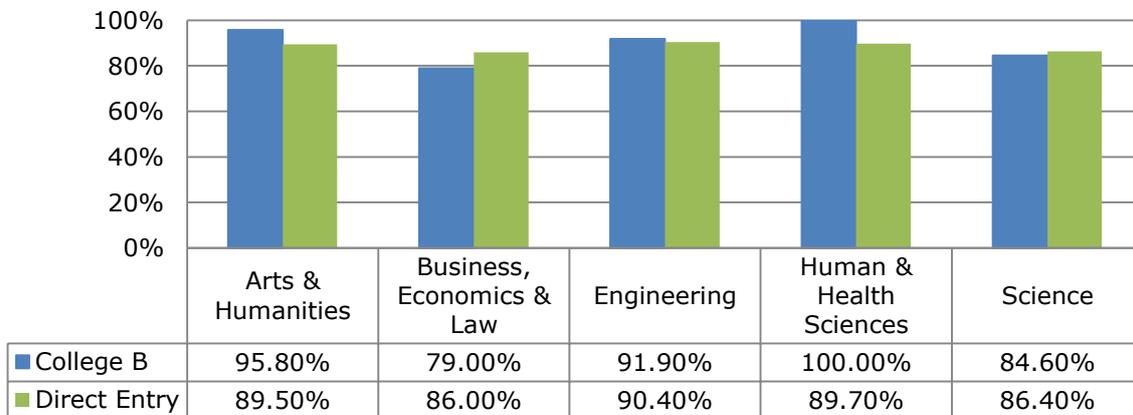
**GPA Comparison: College A and University Partner A**



### COLLEGE B

In College B pass rates for former College B students compare favourably with other international students enrolled directly at the partner University; with particularly strong outcomes being seen in Human & Health Sciences and Arts & Humanities.

**College B and University Partner B - Course Pass Rates**

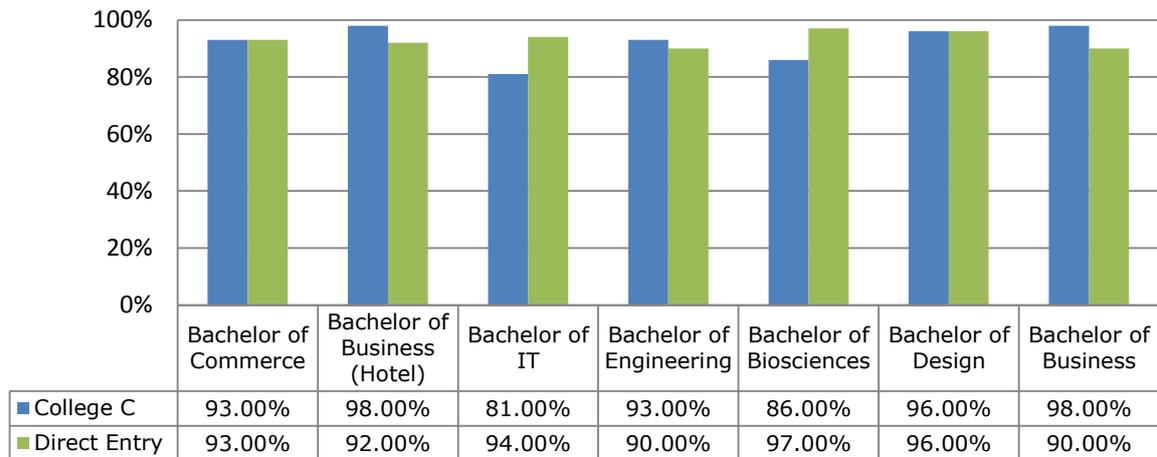


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### COLLEGE C

Navitas students who have progressed to University partner C are also passing at levels comparable with their direct entry counterparts. Students studying the Bachelor of Business and the specialisation in Hotel Management have done exceptionally well, with pass rates of 98%.

**College C and University Partner C - Course Pass Rates**



### STUDENT SATISFACTION SURVEYS

Navitas UPD also uses independent Surveys to gauge the satisfaction of students with our teaching and learning. In 2013, 85% of respondents rated the quality of teaching in the colleges as either 'excellent' or 'good'. Only 2% indicated that the quality of teaching was 'poor' or 'very poor'. Individual comments are also used to provide valuable feedback from students to our colleges, as are further sections on the customer service experience and academic learning environment.

**Overall, how do you rate the quality of teaching?**

