

National Codes Annual Report

to the Department of Communities and
Local Government

2017

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Introduction and Background

This is the eleventh Annual Report to Communities and Local Government (CLG) on the operation and development of the ANUK/Unipol National Approved Codes for student accommodation controlled and managed by both educational establishments and private sector providers.

Previous annual reports have focused mainly on the ways in which the ANUK/Unipol Codes for Larger Developments were meeting with the objectives set out in the Government's consultation document concerning Approved Codes of Practice. These were that:

- the development of the Codes should be an on-going process
- an annual review would take place based upon regular monitoring of compliance with the Codes' terms
- the review and progress of the Codes will be guided by committees of management.

Although this eleventh report references these objectives, it also focuses on activities that have taken place during the course of the year (July 2016 to June 2017) in managing, developing and promoting the Codes. Also outlined are the benefits that have been derived from the self-regulation of this important sector of the student housing market including the fact that members of the Codes (who play an active part in their on-going development) have volunteered to meet higher than statutory standards *and* be accountable for their performance as a clear sign to student consumers that they are fully committed to provide the best service and standards possible.

An example of where the sector has demonstrated this commitment can be found in respect of fire safety matters, especially the quick response that members have made to issues arising from the Grenfell Tower fire. In response to the demand that all accommodation providers with high rise developments containing cladding have it tested, purpose built student accommodation providers were quick to do so. They also engaged with their local fire and rescue services, again as requested, to make sure that their fire risk assessments were robust and that their fire systems were more than adequate to deal with an emergency should one arise. The fact that not one building operated by a member of these Codes was subject to enforcement action as a result of investigations by the Fire and Rescue Services is an indication of the quality of the safety systems that have been installed within them.

Format of the Annual Report

The objectives set by the Government provide a framework when compiling an annual report and this report therefore includes the following sections:

- Membership Report 2016-2017, including details of all new members who have joined in the last year;
- Governance of the Codes, a report on who has been involved in the decision making process and what changes, if any, have been made to the operations of the Codes;
- Joint Codes Conference Report;
- Meeting the Challenges of the Eleventh Year;
- Assessment and Verification Procedures, focusing especially on the number of visits completed and the outcomes from these;
- Complaints and Tribunal Procedures, including the number of complaints received and how they were dealt with;
- Website Visits and Online Training Course, a new section providing some insights into the usage being made of the National Codes website;
- Conclusion – including a list of challenges for the twelfth year of operations.

Simon Kemp
National Codes Administrator

Section 1: Membership Report 2016 - 2017

As of the 30th June 2017 there were a total of **271,402** bed spaces accredited under both the ANUK/Unipol National Codes, an increase on the numbers reported in the last edition of the report of 8%. The majority of these bed spaces fall within the Code for Non-Educational Establishments, and the percentage ratio of bed spaces between the two Codes is 87:13.

The total number of private providers and educational establishments signed-up to both of the ANUK/Unipol Codes was 157. 110 of these were members of the Code for Non-Educational Establishments, with 47 belonged to the Code for Educational Establishments. During the course of 2016/17 visits were undertaken to 89 out of these 157 members (57%), so just over a half of the entire membership received at least one verification visit.

The total bed space numbers registered under the Educational Establishment Code was 35,318, a decrease of 204 on the figure for the end of June 2015. This is mainly due to losses of bed spaces at a few of the universities.

As for the number of bed spaces covered by the Code for Non-Educational Establishments, the total was 236,084 - up by 19,907 on the figure for the end of June 2016 (an increase of 9.2%). This increase was due to a combination of the acceptance of new members and also the addition of developments and bed spaces by existing members; more of the latter than of the former. However, this increase masks some fluctuation in overall bed space numbers registered under this Code as a result of the on-going churn in operational management of developments.

There was a net increase of ten providers signed-up to these Codes between start of July 2016 and the end of June 2017 (a 6.8% increase), which has resulted from a number of smaller new private providers joining. However, in addition to new members joining, there has also been a loss of some previous members (of both Codes), the details of which can be seen in Table 1. In addition, a number of management platforms have changed their names during the course of 2016 - 2017 (see Table 2).

Table 1: New Members and Withdrawals/Removals from Membership in 2016-2017

New Members	Members Withdrawn/Removed
Campbell Property	Mohammed Aslam (withdrawn)
Chapter Living	Hult International Business School (withdrawn)
Cityheart Living (Scotland) Limited	Anne Staley Design (withdrawn)
Condor Properties	TigerLime Limited (withdrawn)
Dwell Student Living	Urban Student Life (removed)
The East Cliffe Project LLP	
Galbraith Estates	
Hello Student Management Ltd	
Purple Frog Group	
Student Beehive	
Student Letting Company	
Student Living by Sodexo	
Trent Pads	
Uni2rent Ltd	
Unity Lettings	

Table 2: Changes of Management Platform Names in 2016-2017

Previous Name	New Name
Touchstone CPS	Abodus
South Street IM Ltd	Digs Student
Student Housing Company	Global Student Accommodation
Victoria Hall	Host Student
IQ Letting Property Partnership	IQ Student Accommodation Services Ltd
Prodigy Living	See above
Independent Student Living	Nido Collection
Viridian Housing	Optivo
Spectrum Housing Group	Sovereign Housing Association

It is likely that future increases in membership will come mainly from smaller providers, many of whom are looking to offer well managed, but lower cost, accommodation than their larger competitors can; this assumption is supported by the evidence from the list of providers that the National Codes Administrator is currently dealing with applications from where, out of the eight providers concerned, the largest has 400 bed spaces and the smallest 54. Should all of these new applicants be accepted into membership this would add an additional 1,562 bed spaces.

The last few years have witnessed a relatively high turn-over in the operational management of developments, either between existing members or involving new applicants for membership. As it has been agreed that developments undergoing such changes of management platform cannot be accredited under this Code until a re-verification visit has taken place (which in turn requires the new platform to be operating the site), the bed spaces concerned 'fall out' of the overall total of registered bed spaces until the visit has occurred and the verifier has recommended that the development be re-registered. As of the end of June 2017, a total of 7,041 bed spaces were not included in the totals due to this reason, more than twice the numbers reported in 2016.

In addition, and as a result of a decision by the Committee of Management that the National Codes Administrator actively monitors the number of additional bed spaces to be added by members as a result of them bringing new sites into operation, it can be reported that from September 2017 at least another 14,845 bed spaces will be added once all of the new sites have been registered.

Analysis of the geographical spread of developments belonging to the Codes reveals that 86 different locations in the UK had at least one building signed-up to either Code, a net increase on 2015-2016 of five. Most of these are in England (71), but eight are in Scotland, six in Wales and one was in the North of Ireland.

In terms of the number of buildings accredited under the two Codes, the total stood at 1,826 - a net increase of 145 on the figures reported in 2016.

Table 3 identifies the 10 locations that had the most bed spaces covered by the two Codes, along with the number of developments being operated under them.

TABLE 3: Top Ten Locations with Student Developments Covered by the Two ANUK/Unipol Codes

Position	Location	Total Number of Bed Spaces	Total Number of Developments
1	London	46,183	165
2	Leeds	18,722	89
3	Cambridge	18,231	742
4	Nottingham	17,204	63
5	Liverpool	13,673	50
6	Newcastle	12,094	37
7	Sheffield	11,919	38
8	Manchester	11,758	34
9	Birmingham	10,506	31
10	Leicester	8,474	35

London continued to have the greatest number of registered bed spaces under the Codes and both the number of bed spaces and developments increased in size. The same was true for every city apart from Leeds, which registered a decrease in both bed spaces and developments in comparison with the previous year. Although the same ten locations appeared in this table in the 2016 edition of this report, the relative positions of some changed; Newcastle rose from tenth to sixth, nudging Sheffield down a place to seventh, whilst Birmingham was overtaken by Manchester and Leicester was squeezed down into tenth.

The differences between the 157 members of the Codes in terms of the number of bed spaces that they were operating is shown in Tables 4 and 5, which reveal who the top and bottom ten providers were in respect of bed spaces as well as the number of developments that they were operating.

Table 4: Largest Members (by bed spaces covered) in the Two ANUK/Unipol Codes

Position	Provider	Total Number of Bed Spaces Operated	Total Number of Developments
1	UNITE	45,543	127
2	Liberty Living	23,125	52
3	IQ Student	18,072	40
4	Fresh Student Living	15,961	53
5	CRM	15,025	62
6	Derwent Students	14,674	40
7	Campus Living Villages	11,387	18
8	Homes for Students	9,647	40
9	Global Student Accommodation	6,281	16
10	Sanctuary Students	5,753	21

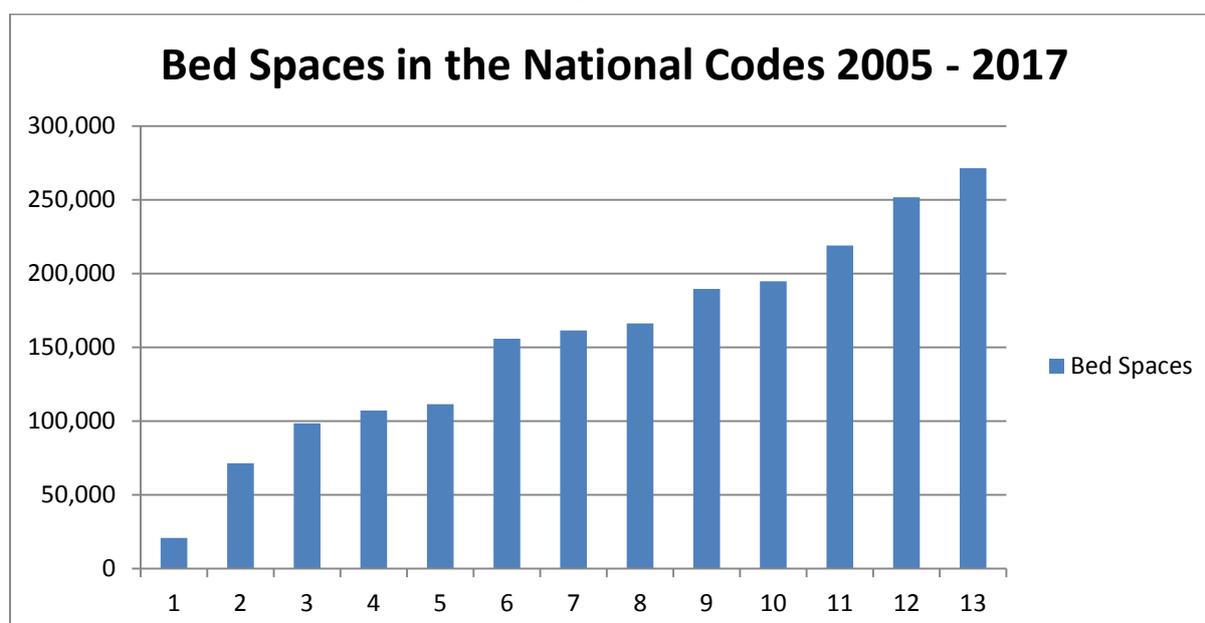
The most significant finding from Table 4 is that all of the providers named belonged to the Code for Non-Educational Establishments. The closest member of the other Code to the top ten was the University of Leeds, who were in thirteenth with 4,976 bed spaces.

Table 5: Smallest Members (by bed spaces covered) in the Two ANUK/Unipol Codes

Position	Provider	Total Number of Bed Spaces Operated	Total Number of Developments
147	Unity Lettings	52	1
148	Ashwell House	50	1
149	Hillcroft College	49	2
150	Trent Pads	46	1
151	Carr Mills (D&B Property Management)	44	7
152	SCIO	40	1
153	Student Living	35	1
154	Congregational Federation	33	1
155	Baaz Properties	27	1
156	Vafai Trust	19	1

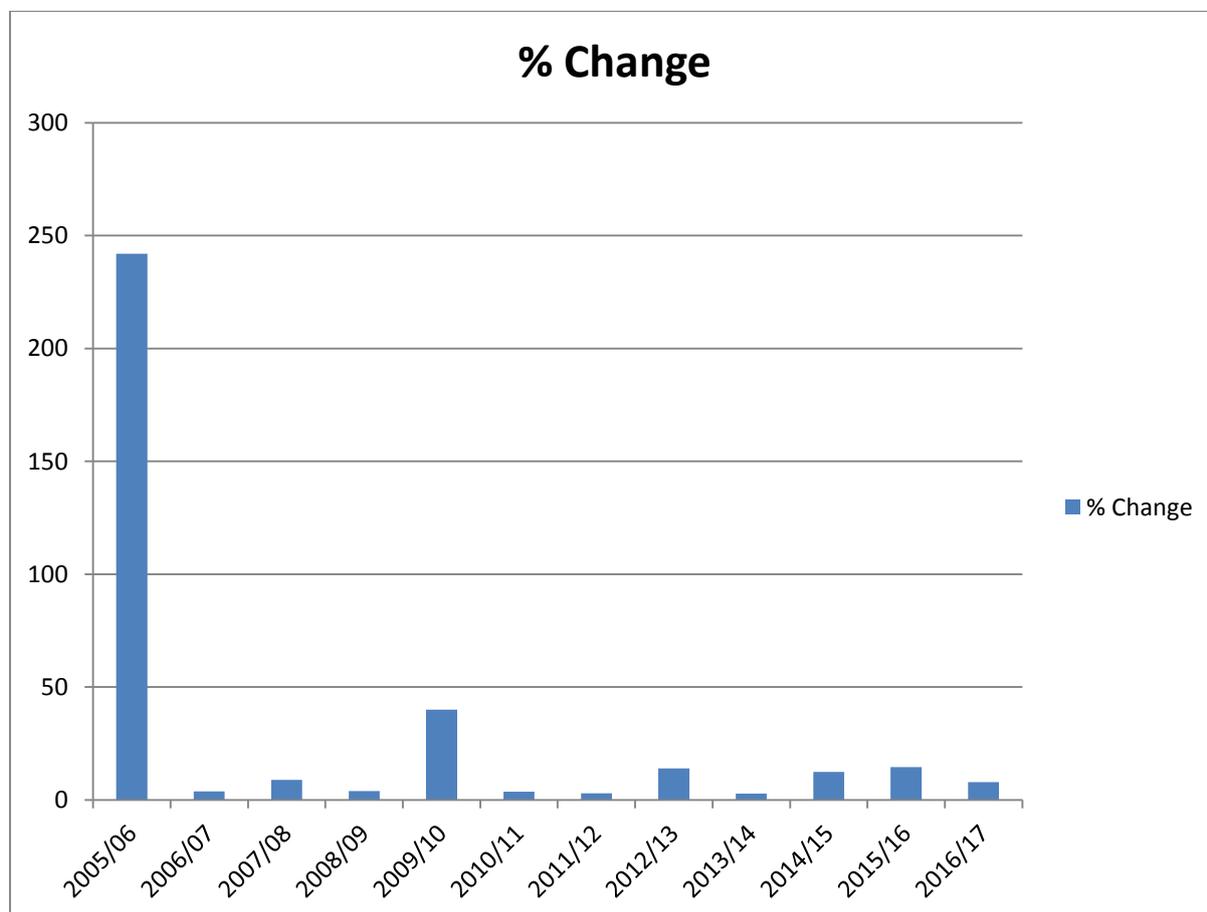
There were two members of the Educational Establishments Code in the bottom ten, along with two religious-based charitable organisations belonging to the other Code. Three of the six commercial suppliers listed in Table 5 operate in Nottingham (Trent Pads, Student Living, and Congregational Federation).

GRAPH 1: Number of Bed Spaces Covered by the ANUK/Unipol Codes - 2005 to 2017



Graph 1 depicts the increase in the number of bed spaces covered by both Codes since 2005, when the Codes were first launched. The numbers have increased year on year in a more or less steady manner, especially since the large increases in both 2007 and 2010, until they are now close to the 300,000 figure.

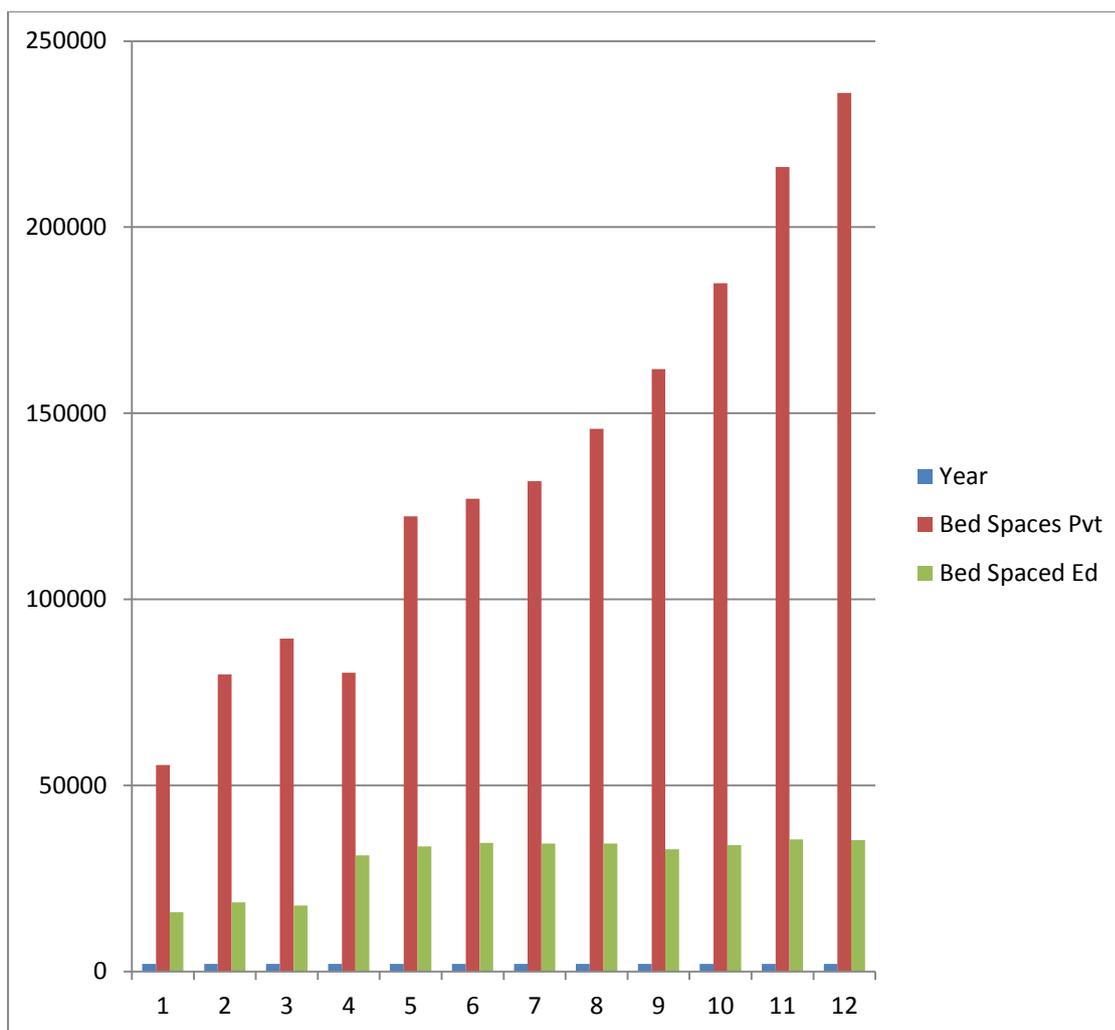
GRAPH 2: Percentage Increases in Bed Space Numbers - 2005 - 2006 to 2016 - 2017



Graph 2 reveals the large percentage increase that occurred in bed space numbers between the first year of the Codes in 2005 and the following year. In number terms that increase exceeded 50,000 and it remains the most substantial rise in the history of the Codes. With hindsight it could be argued that the rapid expansion then was the indicator that the PSBA sector would be a success, although few probably suspected that it would grow to the size it has over a relatively short space of time.

Whilst it is also clear from Graph 2 that similar percentage rises to that first year were not likely to re-occur again, the addition of the Cambridge Colleges into membership in 2009/10 is clearly reflected, as are the other double digit increases that occurred in 2012 - 2013, 2014 - 2015 and 2015 - 2016.

GRAPH 3: Comparative Bed Space Coverage by Code - 2006 to 2017



Graph 3 shows the relative size of the two Codes in bed space numbers and serves to highlight the comparative changes in membership of the two Codes since 2006 - when the Code for Educational Establishments was first approved by the Government. The overwhelming dominance of the private sector is demonstrated clearly in this graph, and with a likely additional 22,000 bed spaces to be added by private providers at some point during the 2017 - 2018 period, that Code alone will be close to the total number of bed spaces being operated under the UUK Code.

Section 2: Governance of the Codes

Committee of Management

The Committee of Management (CoM), which is comprised of all the Codes' key stakeholders, continues to provide a forum for members where information, good practice and any concerns can be raised in a mutually helpful and co-operative environment. The CoM also sets the fees to join the Codes and approves an annual budget for their operation. Fees are therefore set by those who pay them.

The CoM met on two occasions between July 2016 and the end of June 2017 - November 10th, 2016 and March 6th 2017 - the minutes of which are available from the National Codes website. A third meeting was scheduled in for July 2017 and it is likely that a summer meeting of the CoM will become a regular feature from 2017 onwards.

Attendance at meetings since the change to two a year from three has increased. Prior to 2016 the average number attending was 19, but since then it has risen to 24.

The CoM will next meet on Thursday 16th November 2017, at the British Library in London, and then again on Monday 5th March 2018 at Unipol in Leeds. Should a third meeting be required then this will take place on Wednesday 18th July, 2018, at a venue to be determined.

Just as significant churn has occurred in the operation of developments accredited under the Codes, the same is true with membership of the CoM. Between July 2016 and the end of June 2017 the following changes occurred:

- Mark Allen retired from UPP and Bob Mayho from the Chartered Institute of Environmental Health. The CoM expressed its thanks to them both for their contributions to the development of the Codes;
- Shelly Asquith's term of office as Vice President (Welfare) at NUS came to an end;
- Both Alan Baser and Trevor Wills resigned as the representative of Universities UK;
- Alene Campbell and Brian Welsh secured new roles within Sanctuary Students and The Student Housing Company which meant that they were no longer responsible for the student side of their operations;
- Sheldon Ferguson moved to a different section within DCLG;
- Ian Fletcher decided not to seek re-appointment for a further three year period as Chair, and the CoM also thanked him for his considerable contributions to the work of the Codes during his time in post;
- Amelia Frith left her post at the Mansion Group and therefore ceased to be eligible to be a co-opted member of the CoM;

- Hassan Khalil, Steve McDonough and Paul Watson requested that they be replaced as the representatives of the University of Hertfordshire, Derwent Students and Liberty Living, respectively;
- Fleur Priest -Stephens took maternity leave from NUS, but is expected to return in the autumn of 2017;
- Hugh McLean and Terry Waide were deemed to be no longer eligible for membership as the representatives of the Welsh Government and Northern Ireland Housing Executive (respectively), as the CoM agreed to consider how best to engage with other national governments in the future.

The following have joined the CoM:

- Tony Allen (Global Student Accommodation), awarded an automatic place as the provider is operating more than 3,000 bed spaces;
- Michael Ball (Universities UK), as the current Chair of the UUK Code Sector Advisory Group he was nominated to the CoM by UUK;
- Clint Bartman (Hello Student), representing this new member of the Codes who operate more than 3,000 bed spaces and therefore are entitled to a place on the CoM;
- Stephen Battersby (Chair), replacing Ian Fletcher for the next three year period. Prior to this Stephen was a member of the verification team;
- Richard Bolger (Student Living at Sodexo), also representing a new member that is operating 3,000 or more bed spaces;
- Cynthia Brathwaite (DCLG), replacing Sheldon Ferguson as the department's representative;
- Mark Davies (Derwent Students), nominated as the new representative for this member;
- Nicola Dean (Co-Opted), appointed due to the vacancy left by her former colleague from the Mansion Group, Amelia Frith;
- Paul Hardy (Sanctuary Students), nominated as the new representative for this member;
- Diane Kendrick (University of Hertfordshire), also nominated as the new representative for this member;
- Izzy Lenger (NUS), replacing Shelly Asquith as Vice President (Welfare);
- Paul Milner (UPP), nominated as the new representative for this member;
- Clare Ody (Liberty Living), also nominated as the new representative of this member;
- Phoebe Rountree (Vice Chair), appointed as the very first Vice Chair of the CoM, a post created not only to assist the newly appointed Chair to juggle his existing commitments, but also to cement ties with the British Property Federation (for whom Phoebe works), which the CoM has found to be very beneficial ;
- Rebecca Young (NUS), who is covering the period of Fleur Priest-Stephen's maternity leave.

Current Members of the CoM:

Tariq Akbar (Downing Students)	Laura Bryant (Chapter Living)	Paul Hardy (Sanctuary Students)	Clare Ody (Liberty Living)
Tony Allen (Global Student Accommodation)	Karen Burke (Association for Student Residential Accommodation)	Linh Hawke (Co-Opted)	Rachel Ramella (Homes for Students)
Andy Attewell (Host Students)	Bryan Carroll (Conference of University Business Officers)	Allan Hilton (Co-Opted)	Ian Robertson (Unipol)
Michael Ball (UniversitiesUK)	Linda Cobb (Accreditation Network UK)	Jo Hynes (University of Leeds)	Phoebe Rountree (Deputy Chair)
Clint Bartman (Hello Student)	Jane Crouch (Fresh Student Living)	Paddy Jackman (Chair of the Audit Panel)	Paul Rowlinson (IQ Student Accommodation)
Stephen Battersby (Chair)	Cheryl Darnell (Association of Colleges)	Victoria Johnson (Co-Opted)	Faye Sherrington (Association of Managers of Student Services in Higher Education)
Alan Blackmore (Collegiate AC)	Mark Davies (Derwent Students)	Diane Kendrick (University of Hertfordshire)	Richard Stott (Co-Opted)
Martin Blakey (Unipol)	Nicola Dean (Co-Opted)	Izzy Lenga (National Union of Students)	Keith White (CRM Students)
Richard Bolger (Student Living at Sodexo)	Wendy Evans (Cambridge Colleges)	Paul Milner (Universities Partnership Programme)	Rebecca Young (National Union of Students)
Cynthia Brathwaite (Department of Communities and Local Government)	Simon Griffiths (UNITE)	Robert Moyle (Campus Living Villages UK)	

The Codes' Consortium

Ownership of the Codes rests with a body called the Codes' Consortium, which consists of representatives of the three organisations which first devised the Codes - The Accreditation Network UK (ANUK); The National Union of Students (NUS); and Unipol Student Homes. All proposed alterations to the content of the Codes, as well as the procedures that govern their operation, have to be endorsed by this body.

Previously it was felt that the Consortium should only meet as and when it was necessary, i.e. following the completion of a review of the content of one of the Codes, but in 2015 - 2016 it was decided that an annual gathering would be beneficial - the first of which was held in August 2015, at Unipol Student Homes in Leeds.

Since then the Consortium has met on two further occasions - 22nd September 2016 (by phone) and 17th February 2017 (face to face) - and agreed (amongst other things) to:

- Appoint a Vice Chair of the CoM for the first time;
- Actively lobby Government to make a case for ALL operators of purpose-built student accommodation (PBSA) that are members of an 'Approved' Code to be 'excepted from the definition of an HMO for licensing purposes;
- Recommend that verification visits are undertaken routinely to all newly-built developments before they can be accredited;
- Clarify the powers of the Audit Panel in relation to the Tribunal in cases of membership being suspended;
- Agree the destination of the series of location-wide verification visits for both 2017 and 2018;
- Ratify amendments to the content of the draft verification report template

In addition, and following the Grenfell Tower fire in June 2017, the Consortium discussed how best members should respond to the fire safety challenges that were being posed in the wake of that incident for high-rise buildings, and proposals for action were prepared for discussion at the CoM meeting scheduled to take place in July 2017.

Current Members of the Consortium

ANUK	NUS	UNIPOL
Linda Cobb (Decent and Safe Homes)	Izz Lenga (VP Welfare)	Martin Blakey (Chief Executive)
Phoebe Rountree (British Property Federation)	Rebecca Young (Policy Officer Welfare & Community)	Ian Robertson (Board Member)

Section 3: Joint Codes Conferences Report

The seventh Joint Codes Conference took place on November 11th, at the Wellcome Collection in Central London, and was attended by 120 delegates and speakers. All delegates were invited to complete an evaluation form and the average of the evaluation ratings for the event are shown below in Tables 6 and 7 (1 equals excellent, 2 equals very good; 3 equals good; 4 equals average. 5 equals poor).

Table 6 - General Ratings

Heading	Average Rating
Whole conference	1.8
Relevance to delegates' needs	1.9
Venue rooms	1.7
Location of Venue	1.4
Food	1.9
Unipol administration before the event	1.5
Unipol administration during the event	1.5
Overall Average	1.67

Apart from the usual excellent ratings for the work of the Unipol Training and Events Office, the location of the venue scored significantly well amongst delegates. All of the other headings were rated as excellent, the first time that has happened since the event has been running.

Table 7 - Session Ratings

Session Title	Average Rating for Presentation	Average Rating for Relevance
An Introduction to the Three Codes of Practice for New Delegates	2.1	2.0
Changes to the Way the National Codes Complaints are Recorded and Progressed	2.4	2.4
Revisions of the UUK Code and Launch of the Online Training Course	1.8	1.6
Engaging with Students	2.1	2.3
Student Media and Student Accommodation: Uses and Abuses	1.9	2.1
Understanding and Applying the HHSRS	2.1	2.1
The Future of HE and the Likely Impact on Accommodation Needs	1.7	1.8
Sharing Best Practice - Discussion Group	1.8	1.9
Sharing Best Practice - Feedback	2.2	2.1
Developments with the Codes and Plans for the Year Ahead	2.8	2.8

The scores for the presentations indicate that delegates felt these were generally either very good or excellent and, with three of the ten sessions receiving excellent ratings for both the way in which they were presented as well as the relevance of the topic to the delegates. Eleven of the participants made use of the 'Further Comments' section on the evaluation form, and from what they wrote it would appear that most felt the event was a great success:

- Thank you, really enjoyed it
- Super conference again, group feedback sessions are always positive
- Fantastic venue
- As a brand newcomer to this industry and sector I found the conference incredibly helpful with my understanding of student accommodation. Thank you
- Another interesting and informative course. Thank you.
- Unclear over which parallel sessions I was allocated to
- The change to parallel sessions with plenary sessions in the afternoon worked really well.
- An informative day. Many thanks to all involved.
- Really enjoyed today, very useful. The engaging with students session was my highlight and got me thinking about how we allocate rooms
- Not all topics were as advertised. There was too little time for sessions, all overran
- Event venue was perfect

In terms of how this event compares (in evaluation terms) with the previous conferences, Tables 8 and 9 reveal the ratings for the aspects it is possible to show comparisons with.

Table 8 - Average Ratings for General Aspects by Conference and Year

Aspect	2nd Joint (2011)	3rd Joint (2012)	4th Joint (2013)	5th Joint (2014)	6th Joint (2015)	7th Joint (2016)
Overall Rating	2.50	2.21	2.14	2.23	1.8	1.8
Overall Relevance	2.20	2.51	2.30	NA	2.0	1.9
Rating of Venue	2.90	2.62	1.88	1.66	2.0	1.7
Location of Venue	2.20	2.05	1.69	1.35	1.7	1.4
Rating for Food	2.80	2.71	2.30	1.97	2.50	1.9

Table 8 would appear to confirm the view that the 2016 event was the most successful in terms of the relevance ratings, as well as for venue, location and food, and it was on a par with the 2015 event for the overall rating. The only possible conclusion is that these ratings will be very difficult to better when it comes to the 8th Joint Codes Conference in 2017.

Table 9 - Average Combined Scores for Different Sessions at the Last Six Joint Conferences

Year	Presentation Rating	Relevance Rating
2011	2.60	2.42
2012	2.62	2.57
2013	2.22	2.34
2014	2.64	NA
2015	2.35	2.02
2016	2.09	2.11

Although the findings in Table 9 in relation to ratings of the presentations given at the 2016 event indicate the highest level of satisfaction ever for the event, those for the relevance of the sessions slipped marginally behind those awarded for the previous year.

Finally, the evaluation forms used at the 2016 event asked two further questions which had previously not been included: 1) Did you feel that the subject matter, as advertised, was fully covered?; and 2) Did you have a specific reason for attending this conference?

In terms of question 1, 44 out of the 46 delegates who answered it replied 'yes'. One replied 'no' and one person felt only parts of it had been fully covered.

14 out of the 44 delegates who replied to question 2 responded 'no', but of the 30 who replied 'yes', 29 actually gave a reason for being there. These are all listed below:

- I am new to student accommodation and have never attended before and know little about the topics discussed (Accommodation Officer, Charity);
- New to the role so good to gain knowledge which will assist me in my role and detailing with accommodation (Accommodation Officer, Institutional Provider);
- To keep up to date with Code and knowledge (Director, Institutional Provider);
- UUK training module and networking (Director, Institutional Provider);
- I am a contactor and investor in PBSA and want to understand the issues affecting our customers in the sector. A learning experience (Head of Department, Private Provider);
- Revision of UUK Code (Director, Institutional Provider);
- UUK Code member (Housing Management Staff, Institutional Provider);
- Trends and issues in the sector (Senior Manager, Housing Association);
- To become more informed and aware of what ANUK representation really means (Housing Management Staff, Institutional Provider);
- Networking opportunities, shared knowledge. Only/best opportunities to get working peers together (other, other);
- To meet other colleagues, to share best practice and to keep up to date with industry trends (Housing Management Staff, Institutional Provider);
- Topics very relevant (Director, Institutional Provider);
- I was interested in the topics and wanted to increase my awareness in these fields as well as networking (Director, Private Provider);
- Audit coming up and networking (Housing Management Staff, Institutional Provider);
- Update re Code (Accommodation Officer, Institutional Provider);
- I am responsible for running/overseeing my institution's provision of accommodation and adherence to Codes (Accommodation Officer, Institutional Provider);
- To understand more about accommodation issues in the sector (Head of Department, Institutional Provider);
- Learn more and network (Housing Management Staff, Institutional Provider);
- UUK Audit in Jan 2017 (Housing Management Staff, Institutional Provider);
- Audit due next year (Accommodation Officer, Institutional Provider);

- To understand policy updates/changes and to re-acquaint myself with trends and issues (Elected Officer, Institutional Provider);
- Member of CoM (Director, Private Provider);
- Networking, specific knowledge and ideas sharing (Director, Private Provider);
- Annual update (Accommodation Officer, Institutional Provider);
- Evidence gathering for audit (Accommodation Officer, Institutional Provider);
- To keep me up to date on the current trends, improve social media and engagement practices (Student Sales Administrator, Private Provider);
- To improve services (Other, Private Provider);
- Newness to my role (Housing Management Staff, Private Provider);
- Update on the UUK Code and networking (Housing Management Staff, Institutional Provider)

Section 4: Meeting the Challenges of the Eleventh Year

The last annual report set a number of challenges for the eleventh full year of the Codes' operation. These were:

- Completion of a new database for the Codes giving the buildings accredited, the number of bed spaces operated, details of the people responsible for day to day management and moving to a paperless system for verification reports and responses;
- Standardising the approach taken by verifiers during the course of undertaking visits - based on best practice identified from observing such visits - as well as the content of the reports and the ways in which they are accessed online;
- Identifying ways of continuing to raise the profile of the Codes, both amongst members as well as students and their parents;
- Completion of the review of the online training course;
- Ensuring that the online Self-Assessment Questionnaires for both Codes are relevant to the content of those Codes and that any errors or typos have been eradicated;
- Completion of new SAQs for all members of the Codes who last completed one in 2013 and 2014;
- Starting the process of reviewing the content of the Code for Educational Establishments, with the aim of implementing the revised Code from September 1st 2018;
- Implementing a review of the design and content of the website, with a target launch date of January 2018.

All of these objectives were either achieved, or are in the process of being so, but it may be helpful to provide some more detail on each of these areas of work.

Completion of the Database

Work on a new database encompassing all of the different Codes that Unipol Student Homes administers, including the ANUK/Unipol National Codes, was completed during the 2016 - 2017 period. In addition to recording all of the developments that members of the Codes are operating, as well as the number of bed spaces contained within them, the database is designed to store information about the height of each development. However, as previously members have not been required to submit such information when completing their property schedules, this form will be re-designed for the beginning of the next year membership period, commencing in 2018.

The new database also contains a feature for the recording of complaints that are made in respect of all of the Codes, allowing details of which provider and development the complaint is being made about to be noted, as well as what aspect/s of the Codes the complaint relates to. The database further allows for the status of complaints to be tracked, from the initial enquiry stage through to the outcomes from a referral to the Tribunal.

In the sense that accommodation providers are able to access and respond to their verification visit reports online the system is 'paperless', and the reports are also provided electronically to all parties they are of relevance to - including the Audit Panel. However, the National Codes Administrator continues to maintain files with paper copies of all reports completed by verifiers, which are retained for a period of three years.

Standardising the Approach Taken to Verification Visits

Since the appointment of the current Chair of the Audit Panel, Paddy Jackman, considerable attention has been given to ways of standardising the approach taken to the processes through which verification visits are undertaken as well as the way the outcomes from them are reported. This work has continued during the 2016/17 period in the following ways:

- Each meeting of the Audit Panel included an agenda item entitled moderation. This entailed a discussion of one or more different aspects of the Codes, with the intention of getting verifiers to agree a standardised approach to the assessment of them. The topics chosen included Unfair Contract Terms, Disaster and Emergency Management Plans, Waste Management Plans, Kitchen Facilities, and Deposit Protection;
- A review of the relevance of the current version of the draft verification report (the document sent to all providers following a visit) was undertaken and discussed at a number of Audit Panel meetings, before a final version was produced for sign-off by the Codes Consortium;
- At the April 2017 meeting of the Audit Panel it was agreed that for the 2017 - 2018 visits programme members of the verification team would be paired with each other for certain visits - based on their complementary skill sets - with the intention of members benefitting from the different ways in which each of them (coming from different backgrounds) approaches a visit. This procedure will also be incorporated into the 2018 series of location-wide visits, with verifiers working in pairs.

Raising the Profile of the Codes

A one-day event for staff working within developments that were either currently accredited under the Codes, or where the provider had applied to become a member, was held in March 2017 in London. The course, which had been modified slightly from previous versions of it, was well received and it will be offered again to members on one or two occasions during 2017 - 2018.

Unipol Student Homes has recently employed staff whose role it is to improve the marketing of all aspects of the charity's work, but especially via social media. The National Codes is likely to benefit from these appointments as they will assist with the better targeting of the key message that students benefit significantly from renting only from accommodation providers that are members of Codes, and that this in turn gives parents some peace of mind.

In addition to raising the profile of the Codes with members and those with a direct interest in the accommodation that they are providing, the response to the Grenfell Tower fire tragedy by those

working within the PBSA sector as a whole has allowed the Codes to work closely with Government departments to help co-ordinate efforts to ensure that members of the Codes have undertaken the necessary safety checks that will mean they are able to demonstrate how robust their systems are.

Completing the Review of the Online Training Course

Although the work of up-dating the training course so that it reflects the changes made to the Code for Non-Educational Establishments in 2016 was completed in the late summer of the same year, additional up-dates are still required to the videos in-bedded within some of the modules, graphics that appear alongside the text and the multiple-choice questions that appear at the end of relevant modules.

Given that the Code for Educational Establishments is in the process of being reviewed (and this is not expected to have been completed until early 2018), it is likely that additional work on the training course will be delayed until then - especially as the National Codes' website is also undergoing changes that may have implications for the location of the online course in the future.

Reviewing the Self-Assessment Questionnaires (SAQs)

As with the online training course, the work reviewing the content of the SAQs relating to the Code for Non-Educational Establishments was completed in the summer of 2016. A similar review of the SAQ covering the other Code will occur as soon as the revisions to the content of that Code have been finalised.

Completion of New SAQs by Members Who Had Not Done so For 3 Years

All members of the Codes who had not submitted an SAQ since 2013 were required to complete a new one before any verification visit could be made to one of their sites. In addition, where visits were necessary to providers who had completed a revised SAQ between the end of 2013 and the summer of 2016, those members were required also to submit an up-dated SAQ.

As of the end of June 2017 almost two thirds of members had submitted a revised SAQ. Out of the remaining third of members, about two thirds of these are scheduled for a visit during the 2017 - 2018 period which means that they will be required to submit revised SAQs as part of that process.

Review of the Code for Educational Establishments

Under the terms of the Codes being awarded 'Approved' status, the content of each is subject to a review once every five years. The Code for Educational Establishments last underwent a review in 2012/13, and is therefore due another.

A working group has been set up to complete this task, the membership of which is as follows:

Andy Attewell (Host Student)

Cheryl Bowran (Cambridge Colleges)

Bryan Carroll (CUBO)
Wendy Evans (Cambridge Colleges)
Jo Hynes (University of Leeds)
Victoria Johnson (Leeds Beckett University)
Jamie Leggett (University of the Arts, London)
Ian Robertson (Chair)
Paul Rowlinson (IQ Student Accommodation)
Einaita Sohal (ASRA)
Shirley Surtees (Cambridge Colleges)

It is scheduled to meet on three occasions: September and December 2017, and then for a final time in February 2018. It is anticipated that the National Codes Committee of Management will discuss the final draft of the revised Code when it meets in early March 2018 and that the Codes Consortium will approve this in time for it to become operational from September 2018.

Reviewing the Design and Content of the National Codes Website

In the late spring of 2017 an application was made for a grant for the re-development of the National Codes website from a project set up by the Charities Commission. Having successfully negotiated the hurdles of the bidding process associated with that project, work will begin on a new website in October 2017, and the final version should be complete by the start of 2018.

Additional Achievements of the Eleventh Year

As well as meeting the challenges set for the eleventh year, some other successes are worth reporting.

Late and Refurbished Buildings Protocol

Following the outcome of the last meeting of the National Codes Tribunal, which determined a member from the Codes should be expelled as a result of their failure to deal adequately with problems that had arisen because the building was not ready for occupation at the start of the tenancy, some members expressed concerns at the implications similar difficulties might have for providers who act as managing agents. They expressed the view that such members currently have no involvement with the development or construction of the buildings they are engaged to manage, yet could be held responsible under the Codes should a building not be operational in time for tenants to move into or where only parts of the accommodation is available at that time.

It was agreed that a working group be set up to discuss how members who might find themselves having to manage late new or refurbished buildings could deal with these and protect themselves against claims from tenants where the failings were not due to that member's actions. A meeting was held in late April 2017 and it was proposed that managing agents should require both the developers and contractors to report to them at given points prior to the start of the tenancy whether or not the

building/s would be complete on time. Where such confirmation was NOT given, then it was further agreed that the managing agents should be able to inform the developer/contractor that they would cease taking any further bookings. In addition, the managing agent was charged with the responsibility of notifying all incoming tenants of any likely delays and of the implications that these (if any) would have on the tenants.

The protocol was scheduled for discussion at the July 2017 meeting of the CoM, with a recommendation that it be adopted subject to a review in 12 months' time.

New Development Visits

At the Committee of Management meeting held in November 2016 it was proposed that before members could have any newly built developments registered under the Codes, they should be subject to a brief verification visit, for which a fee would be charged. This proposal was a response to the perception that the sector was experiencing significantly high levels of disruption to tenants as a result of late running, newly built, developments.

At the same meeting it was agreed that all members should notify the National Codes Administrator, by the end of December each year, of any intentions to bring online new developments for the forthcoming academic year and (if so), how many bed spaces would be added as a result.

Following on from the decisions taken at that meeting, by the end of June 2017 the NCA had been notified that around 50 new developments were scheduled to become operational from September 2017, adding a little over 14,000 bed spaces. Arrangements are being made to ensure that all of the new developments are visited before Christmas 2017.

Mandatory HMO Licensing Exemption for the Purpose-Built Student Accommodation Sector

In response to the Government's consultation on extending mandatory HMO licensing, issued in October 2016, the ANUK/Unipol National Codes - following discussion with members of the Code for Non-Educational Establishments - included within its submission a plea for some consideration to be given to exempt from the definition of an HMO for licensing purposes all PBSA accommodation, but only where it was being operated by a provider who was a member of an 'Approved' Code.

Working in conjunction with a lobbying company, the ANUK/Unipol National Codes sent an explanatory leaflet to all members of the House of Commons and the House of Lords, setting out the reasons why such a change was justified. It also acquired legal advice on whether this could be accomplished without the need for primary legislation to be enacted.

Although the calling of the snap General Election in April 2017 made it impossible to progress this campaign, it is likely that the matter will be raised again with Government during the 2017- 2018 period.

Section 5 – Assessment and Verification Procedures

Verification Visits and Re-Visits

Two rounds of verification visits were completed during the course of the 2016 - 2017 period. Between July and the end of December 2016 a total of 72 verification visits or re-visits had occurred (31 more than during the same period in 2015), whilst between January and the end of June 2017 a further 86 were conducted (eight less than the same period in 2016) [NB: this figure does not include those visits undertaken as part of the location-wide series of visits that were conducted in May 2017].

As can be seen from Table 10 (below), the trend for an increased number of visits undertaken continued in 2016 - 2017. Whilst the growth in visit numbers year on year cannot be said to be uniform, ranging as they do from between 3% to 56%, the average annual increase in workload for the verification team since 2008/09 has been 19%.

The reason why the number of visits in the July to December 2016 period was greater than before is due to the fact that the majority of the cyclical re-visits to the individual Cambridge colleges took place then, something that is reflected clearly in Table 11. Significantly, when a similar expansion in visits last occurred during this period in 2013 - 2014 it was due to this same reason.

Table 10: Verification Visits Undertaken Since the Introduction of a Two-Round System

Year	July - Dec	Jan - June	Totals
2008 - 2009	16	27	43
2009 - 2010	21	27	48
2010 - 2011	32	30	62
2011 - 2012	42	22	64
2012 - 2013	28	49	77
2013 - 2014	62	58	120
2014 - 2015	50	81	131
2015 - 2016	41	94	135
2016 - 2017	72	86	158

Table 11 details the different types of verification visit that were undertaken in the 2016 - 2017 period.

TABLE 11: Visits by Type, July 2016 to end of June 2017

Category	Number of Visits July- Dec 2016	Number of Visits Jan-June 2017	Totals
New Applicant	8	11	19
Existing Member	9	20	29
Cyclical Revisit	34	11	45
Change of Operational Management	19	43	62
New Development	0	1	1
Complaint	1	0	1
1st revisit	1	0	1
2nd revisit	0	0	0
Totals	72	86	158

All new applicants for membership continue to be subject to a verification visit before they can be regarded as being accredited under the relevant Code, with visits taking place within two months of the application being made. In 2015 - 2016 a total of just nine visits were undertaken to new applicants, but in 2016 - 2017 it more than doubled to 19, much more in line with the 21 undertaken in 2014 - 2015.

Existing members with a medium to large portfolio of student developments are subject to annual verification visits, usually to sites which have not previously been subject to a visit. A total of 24 such visits occurred in 2015 - 2016, but this increased slightly to 29 in 2016 - 2017 - although this was less than the 37 that had occurred in 2014 - 2015. The likely reason for the rise in numbers in 2016/17 is that several existing members had increased the size of their portfolios since 2015 - 2016, making more such visits necessary.

The number of cyclical revisits carried out in 2016 - 2017 - visits scheduled as part of the three year cycle that all members are subject to - reflects the number of providers who were either first granted membership in 2013 - 2014, or who were last subject to a visit in that period and who remained in membership. The most significant reason for the increase in the number of such visits in 2016 - 2017 was the fact that the Cambridge Colleges became due for their three yearly visits, beginning in 2016, which explains why so many such visits were carried out in that July to December 2016 period.

In circumstances where an existing member takes over the operational management of a development that was previously managed by another member of the Codes, arrangements are made

to verify that development as a matter of course, regardless of whether the development was recently verified under the previous provider. Table 11 reveals that although the degree of 'churn' that is taking place within the sector remains significant, three fewer such visits took place in 2016 - 2017 than had occurred in the previous period, however, this was still greater than the numbers completed in 2014 - 2015.

Table 11 also includes the new category of 'new development', one which has been created in response to the decision taken by the Codes Consortium that all new buildings should be subject to a verification visit before they can be registered under the relevant operational platform. It is intended that such visits should focus on just a few aspects related to the condition of the building at the point it is occupied and the levels of tenant satisfaction with it at the time the visit takes place. The majority of such visits will occur during the July to December period, although occasionally (as was the case here), and where the development is occupied before the usual autumn start dates, they may happen earlier.

The Audit Panel agreed, in the light of a discussion relating to the frequency of complaints made about the same building operated by a member, that where either three or more complaints were received about the same building during the course of an academic year, OR a complainant alleged that a significant breach of health and safety has been identified at a given site, that development should be visited to ensure that the matters identified within the complaint have been addressed. The one visit that falls within this category was triggered as a result of claims that the development lacked necessary fire separation, which came to light following a decision of the local Fire and Rescue service to force the development to be closed. As a result of the visit the provider had their membership suspended for a period of time, although this was later lifted.

Decisions about whether it is necessary for a member or applicant to be re-visited following the initial verification visit are determined by the verifier concerned, in consultation with the Audit Panel and the National Codes Administrator. Only in situations where action points are identified during a verification visit would it be necessary to consider such a revisit and, even then, the verifier may deem it appropriate for the provider concerned to offer documentary evidence that the points have been addressed, rather than there being a need for the verifier to check this in person. However, verifiers are charged with ensuring that action points have been addressed within their given timescales and they can determine how soon after the original visit any re-inspection should occur. The fact that only one such visit is shown in Table 11 for the period from the start of July 2016 to the end of June 2017 suggests such situations remain rare.

As in all previous years since the introduction of the verification procedures, visits took place to providers belonging to both of the ANUK/Unipol Codes during 2016 - 2017. However, the main focus of these was on the Code for Non-Educational Establishments - as can be seen from Table 12 below.

Table 12: Number of Visits Undertaken by Code and Category, July 2016 to June 2017

Non-Educational Code Category	Number of Visits	Educational Code Category	Number of Visits
New Applicant	18	New Applicant	1
Existing Member	29	Existing Member	0
Cyclical Revisit	18	Cyclical Revisit	27
Change of Operational Management	62	Change of Operational Management	0
New Development	1	New Development	0
Complaints	1	Complaints	0
1st Revisit	1	1st Revisit	0
2nd Revisit	0	2nd Revisit	0
Totals	130	Totals	28

Despite the clear disparity between the Codes in terms of visits, the 28 undertaken to members of the Code for Educational Establishments means that 60% of the total membership of that Code received a visit in 2016 - 2017. This compares with 54% for members of the other Code.

Location-Wide Verification Visits

The National Codes Consortium, which determines both the content of the Codes and the procedures that govern their operations, decided when it met in January 2016 that verifiers should be required annually to undertake a series of visits to developments belonging to ALL members that are located in one town/city (to be specified by the Consortium), at the same time. The purpose of such visits is to assess general levels of compliance as well as to assist the verifiers to moderate their approach to the undertaking of such visits.

The Consortium took this decision on the basis of evidence from an initial location-based series of visits that were undertaken to developments in Bradford, which occurred in the late spring of 2014. This exercise was welcomed by both the providers concerned, who because all sites were being looked at on the same day did not feel as if they were being singled out, as well as the verification team.

In total there have been three sets of location wide visits undertaken by verifiers since that initial exercise (see Table13), and on each occasion at least one development operated by members of the Codes in those locations has been subject to a visit by one or more members of the verification team.

Table 13: Destination and Extent of Location-Wide Visits

Year	Location	Percentage of Members Visited	Percentage of Developments in that Location Inspected
2014	Bradford	100	100
2016	Liverpool	100	29
2017	Newcastle	100	45

The original visits in Bradford were conducted on the same day, but because there were at that time just 10 developments in the whole of the city it was possible for the team of verifiers to inspect them all. Two years later, in Liverpool (and even with the addition of more verifiers and another day), it was not logistically possible to visit all 56 developments, therefore a selection was made of one per member with a contingency of a visit to another of their sites in the city on the second day should it be required. In 2017, whilst verifiers were able to inspect a greater percentage of the 38 developments operating at that time in Newcastle over the two day period allocated, it was not feasible to cover everything.

Sheffield is the selected location for the 2018 visits and the Audit Panel will finalise the arrangements for these when it meets in January of that year. However, containing as it currently does 42 developments accredited under the Code, the two-day exercise is once again unlikely to be able to inspect everything. It is therefore more likely that the approach will be for verifiers to visit a site being operated by each of the 16 individual members, with an option of triggering visits to other developments at a later date if significant non-compliance is identified.

Verification Visit Outcomes

The next issue that needs to be reported on is the outcomes that have arisen from the completion of these verification visits, especially the extent to which they indicate adequate levels of compliance with the Codes.

When a verifier completes their draft report following a visit they make clear whether or not any actions will be required by the provider concerned in order for them to be regarded as being fully compliant with the Code. Where NO actions whatsoever are identified, the National Codes Administrator keeps a record of this and (on behalf of the Chair of the Audit Panel) sends that provider a congratulatory letter.

Table 14 details how common it has been for verifiers (over the last five years) to be unable to identify action points and the extent to which this has been the case in comparison with all visits undertaken during that particular visit period.

Table 14: Visits Where No Action Points Were Identified Compared with Overall Number of Visits Completed - 2012 - 2013 to 2016 - 2017

Year	Number of Visits with No Action Points	Total Number of Visits Completed	Percentage of Visits with No Actions
2012/13	25	77	32.50%
2013/14	25	120	20.75%
2014/15	16	131	12.25%
2015/16	36	135	26.67%
2016/17	34	158	21.51%

There is no evidence from Table 14 of any specific pattern developing with the non-identification of action points, other than some years have higher percentages than others.

In terms of the outcomes from verification visits where action points are identified, verifiers make clear within the draft reports exactly which clauses of the Codes were not being complied with. In addition, verifiers make clear on the reports the deadline by when the works should be completed by. In previous years these deadlines have been left completely to the verifier's discretion, but since the beginning of 2017 - apart from in the case of urgent actions relating to certain health and safety matters - verifiers are required to choose one of the following quarter dates: 31st March; 30th June; 30th September or the 31st December.

The National Codes Administrator records the details of these and requests that verifiers report on whether they have been notified that the required works have been completed and, if so, whether this was within the given deadlines they had set for them. The NCA prepares reports for each of the Audit Panel meetings detailing which, if any, providers have failed to complete actions by the given dates, so that decisions can be taken about how such failings should be dealt with.

Table 15 gives details of the outcomes from all visits completed during 2016 - 2017 by the type of visit it was, and it also compares these with the outcomes from the 2015 - 2016 period (figures shown in brackets)

Table 15: Outcomes from Verification Visits Undertaken between 1st July 2016 and June 30th 2017, by Category (figures for same period in 2015 - 2016 shown in brackets)

Category of Visit	Number With No Actions	Number With Between 1 and 4 Actions	Number With Between 5 and 9 Actions	Number With 10 or More Actions	Totals
New Applicants	0 (2)	7 (2)	4 (2)	8 (3)	19 (9)
Existing Member	7 (6)	14 (16)	4 (1)	4 (0)	29 (23)
Cyclical Revisit	10 (3)	15 (11)	11 (4)	9 (2)	45 (20)
Change of Operational Management	15 (16)	29 (38)	10 (9)	8 (1)	62 (64)
New Developments	1 (0)	0 (0)	0 (0)	0 (0)	1 (0)
Complaints	0 (0)	1 (0)	0 (0)	0 (0)	1 (0)
Revisits	0 (0)	1 (1)	0 (0)	0 (0)	1 (1)
Totals	33 (36)	67 (75)	29 (18)	29 (6)	158 (135)

The most outstanding feature from Table 15 is the massive increase in the number of visits undertaken in 2016 - 2017 that identified 10 or more actions, amounting to almost 1 in 5 of the total visits completed, compared with less than 1 in 20 during 2015 - 2016. This clearly requires some analysis, along with some comment on progress made by these providers to address the action points within agreed deadlines.

It is not unusual for a larger number of new applicants to be found to have a lot of action points, and as with the previous year most of these were identified as having 10 or more. Four out of these eight applicants were granted membership on the basis that they had addressed the majority of the actions, whilst the other half are still not regarded as having made sufficient progress to be awarded it.

The evidence suggests, however, that it is much less likely for existing Code members to be found with ten or more actions. Through combining the figures for existing member and cyclical revisits (the latter are only conducted to providers who are already Code members anyway), it can be seen that at one in five of these visits the verifier identified ten or more actions. Analysis of the providers concerned reveals two common factors: 1) They are very small management platforms with just one or two developments at most and less than 100 bed spaces in total; and/or 2) The company has undergone significant changes at a senior management level. In many of these cases the Audit Panel has instructed the National Codes Administrator to have a watching brief over these members.

Although the ratio of the visits due to changes of operational management was not as great as for other categories, the fact that a not insignificant number did identify ten or more actions requires some analysis too. Half of the visits were made to small or medium sized operators who had recently either expanded their portfolios OR had undergone some form of restructuring. The other half were to more established, medium or large operations, who had encountered some specific challenges when taking over particular sites. For example, at one they had been required to undertake a complete new fire risk assessment as the previous operator had simply not passed on the previous one. Analysis of the speed of response by these providers to the works as identified reveals that the majority completed them within the given deadlines, whilst the others were able to demonstrate an acceptable level of progress.

Because verifiers report which specific clauses of the Codes they believe a provider to be in breach of, it's possible for an assessment to be made of the most common aspects of non-compliance with the Codes. Table 16 indicates which clauses of the Code for Non-Educational Establishments were cited in reports for 20 or more visits undertaken to members of that Code during 2016 - 2017. It also indicates the number of times the same clause was cited in the 2015 - 2016 period

Table 16: Clauses Which Members Were Found Not to be Complying with Most Following Visits in 2016/17 and in 2015/16

Clause	Number of Visits Cited for in 2016 - 2017	Number of Visits Cited for in 2015 - 2016
Tenants are informed of the minimum bandwidth that they can expect (3.20)	37	NA
Managers are required to complete the online training course (1.2)	35	NA*
All Staff are aware of the Emergency and Disaster Management Plan (6.27)	34	17
The tenant satisfaction survey will cover both qualitative and quantitative elements including - do residents know the developments is part of the Code(5.3)	30	NA
The extent of WiFi coverage is made clear within marketing and tenant information (3.19)	25	NA
The building has a security plan which details the level of management necessary to maintain security standards and also stipulates the information to be given to tenants and is available to be seen on request by the tenants (6.24)	25	20
A satisfactory survey of their student tenants is carried out at least once every 24 months (5.0)	23	16

A waste disposal plan is exists for the building (6.35)	23	15
We have drawn up an Emergency and Disaster Management Plan and review it annually (6.25)	22	0
Occupants of ground floor rooms are provided with specific security information (6.23)	20	0

Four of the most common breaches relate to requirements of the Code that were only first introduced at the beginning of the 2016 - 2017 period, and therefore cannot be compared with the findings from the 2015 - 2016 period. Having said that, however, clause 1.2 was altered to read as it does now but had read as follows before that: *All reasonable steps are taken to ensure that staff are conversant with (as appropriate to their job role), and have an up-to-date working knowledge of all aspects of this ANUK Code and your establishment's legal responsibilities and obligations.* For the 2015 - 2016 period that clause was cited as having been breached at 14 visits.

Five of the other common breaches cited relate to a variety of different plans - emergency and disaster management; as well as security and waste management. For those which had been identified at visits undertaken in both periods, the numbers were grater in 2016 - 2017. The most obvious reason for verifiers to have focused on these issues is that the Code does not specify the detail of what should be in such plans (mainly because this could vary depending on the size and lay out of the developments), and therefore they form their own views as to whether such plans (where they exist) are adequate. It is no surprise, therefore, that the Audit Panel's moderation exercises have been focused on such aspects of the Code.

Two of the common breaches relate to tenant satisfaction surveys, either in terms of whether they are issued at all OR what questions are asked within them. The findings indicate an increase in the number of visits where the verifier believes the provider does not issue a survey of any kind in comparison to 2015 - 2016, which may be explained partly by the general increase in the number of new applicants that were visited during 2016 - 2017, as they are less likely to be aware of such a requirement. The other aspect relating to these surveys that is cited as a breach in verifier's reports is that they do not include a question on whether students are aware that the provider is a member of the Code. As this requirement was added in at the start of the 2016 - 2017 period, it is not surprising that it is referred to so often in reports.

It is also possible to be able to report on the most common features arising from visits to educational establishments, something that could not be provided in the 2016 edition of this report because so few members of that Code had been visited. Table 17 reveals what the six most cited clauses of the Educational Establishment Code from the 28 visits undertaken were.

Table 17: Clauses Which Members of the Educational Establishment Codes Were Found Not to be Complying with Most Following Visits Completed in 2016 - 2017

Clause (number)	Number
A satisfaction survey of the tenant population is carried out at least annually covering both qualitative and quantitative elements including certain issues (5.0)	17
By October 1st 2016, an Emergency and Disaster Management plan should be drawn up and in place (6.18)	9
The satisfaction of tenants with the mail handling system is formally monitored (4.23)	8
The Code is used as a framework for self-assessment (1.1)	7
The satisfaction of tenants with the system of reporting and resolving repairs is regularly measured (4.8)	6
All staff should be are of the Emergency and Disaster Management plan (6.20)	6

The most likely reason that the issue of tenant satisfaction surveys was cited so often by verifiers is that these were from visits undertaken to the Cambridge colleges and, historically, this is something that few of them did because of their own existing systems for generating tenant feedback. On the evidence supplied by the college peer to peer verifiers following on from the visits, the colleges have all now taken steps to address this matter.

It is also interesting to note that two other clauses relating to the tenant satisfaction survey are cited so frequently in reports, and from discussions with the peer to peer team in April 2017 (following the meeting of the Audit Panel hosted by Newnham College) it emerged that although many colleges had agreed to devise such surveys they were not systematically asking the same questions. As with the use of the survey in general, there was evidence to suggest that the colleges would begin to adapt their surveys to encompass these matters in the future.

The appearance in Table 17 of emergency and disaster management plans is best explained by the fact that the requirement for these to be in place had a phased implementation date of October 1st 2016, and a significant number of the visits undertaken to the colleges took place before that date. Once again, however, from the responses made to the reports by the colleges, the evidence is that these issues will be addressed within the deadlines set by the verifiers.

The Audit Panel

The Audit Panel met on three occasions between the start of July 2016 and end of June 2017. The first was hosted by Unipol Student Homes, in Leeds; the second at Helen Graham House, in London, hosted by Viridian; and the third was hosted by Newnham College, Cambridge. For the 2017 - 2018 period the Audit Panel will meet on four occasions - July, October, January and April - and this is because of the decision to adopt quarterly action point deadlines.

The membership of the Audit Panel has changed since the last annual report, with two members (Fleur Priest-Stephens and Victoria Tolmie-Loverseed) taking maternity leave but only one of them has to date been replaced. A new verifier has also been appointed, Ms Elizabeth Beattie - who will mainly cover visits needed to sites in Scotland and the North of Ireland, as well as some parts of northern England.

The National Codes Administrator estimates that at least 109 visits will need to be completed before the end of June 2018, and that does not include any to providers who completed their SAQ after the start of July 2017 OR any changes of operational management not notified to the NCA before that same date. In terms of the types of visits to be undertaken, they break down as follows:

New Applicants	1
Existing Member	2
Cyclical Re-Visits	32
Change of Operational Management	11
New Developments	62

The current membership is as follows:

Mr Paddy Jackman, Chair
Ms Elizabeth Beattie - Verifier
Ms Mary Bright - Verifier
Ms Wendy Evans - Cambridge Colleges
Mr Derek Goss - Verifier
Mr Richard Lord - Verifier
Mr Philip Moxon - Verifier
Mr Jakub Pietruszewski - Verifier
Mr David Robertson - Verifier
Mr Nick Stanton - Verifier
Ms Rebecca Young - NUS
Vacancies - ANUK and Unipol

Section 6 – Complaints and Tribunal Procedures

Code Complaint Contacts

Table 18: National Code Complaints Received, by year and status

Year	Total No. contacting the NCA	No. of formal complaints submitted	No. of formal complaints referred to the Tribunal
2005	1	0	0
2006	5*	0	0
2007	5*	2	1
2008	20*	3	2
2009	21	7	7
2010	17	3	1
2011	27	6	2
2012	45	18	5
2013	40	14	4
2014	41	8	3#
2015	62	6	4#
2016	70	19	6#
2017	45 (to end of June)	8	1
TOTALS	399	94	36

* one of these concerned a development that was not covered by the Codes

= At least one complaint was dealt with by the Full Tribunal

Table 18 indicates clearly the extent to which the Codes' complaints procedures have been accessed since the Codes were first launched, and provides a sense of the increased awareness amongst tenants (and their representatives) about the Codes and the complaints process that pertains to them.

Since 2016 it has been the task of a Complaints Investigator to record all contacts made by students (or their representatives) who live (or were living) in developments covered by the Codes which may be regarded as a complaint about a member not complying with the relevant Code. As can be seen, the number of such contacts steadily increased between 2005 and 2009, and then (with the exception of 2010) significantly increased after that - with 2016 having received the most number of tenant contacts in anyone year so far.

Table 18 also makes clear that only around 25% of all the complaint-related contacts made over the years have developed into formal complaints, defined as complaints either issued on the prescribed complaints form or deemed as requiring a reply from the relevant member as a result of information provided by the complainant.

In terms of the number of formal complaints that it has been necessary to refer to the Tribunal, 38% have been referred, and in three cases the Tribunal Chair determined that the complaints were sufficiently serious to warrant a meeting of the Full Tribunal. As for the proportion of formal complaints that it has been necessary to refer to the Tribunal, this has tended to fluctuate in the last few years but there is no evidence to suggest that the increase in the number of formal complaints issued has led to a rise in the number of referrals made.

Whilst Table 18 is helpful in depicting the volume of complaints that have been received and processed, it does not convey any sense of the level of complaints in comparison with the size of the sector as a whole. Following a request from the Committee of Management in November 2016 for some analysis to be made of the number of complaint contacts received in terms of the number of bed spaces being registered under the Codes, the National Codes Administrator compiled this information - the details of which are shown in Table 19.

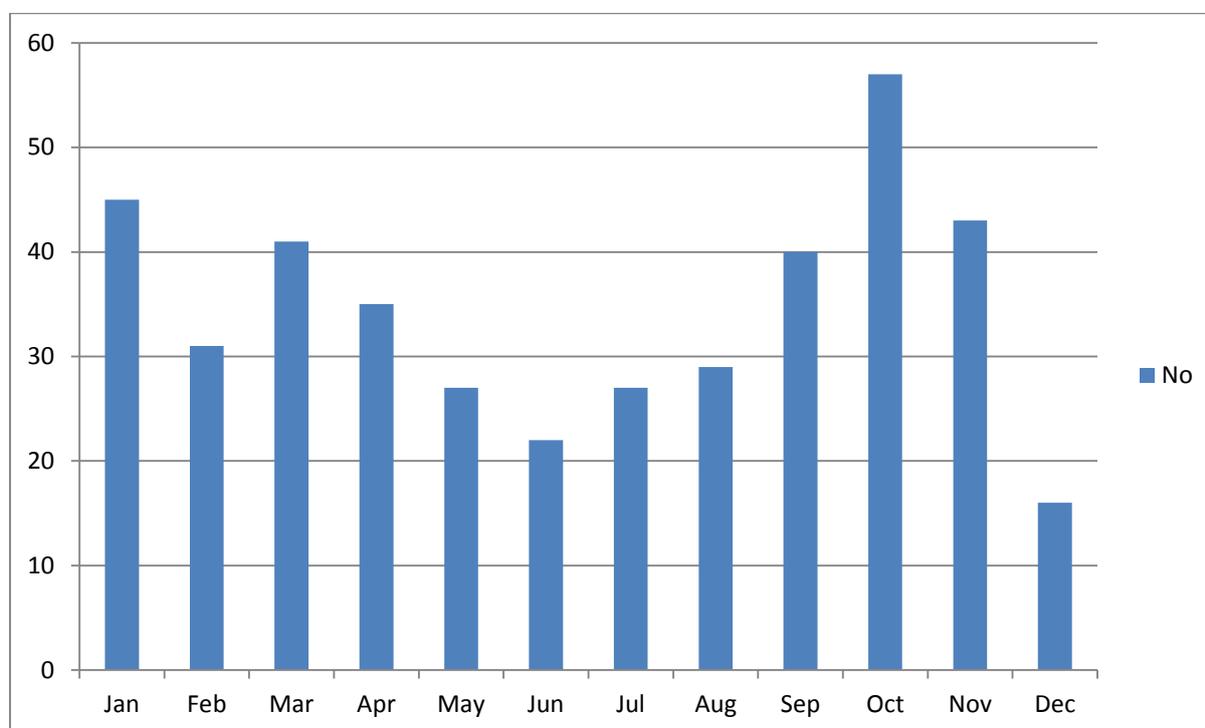
Table 19: Ratios of National Code Complaint Contacts s Received Compared to Overall Bed Space Numbers Registered

Year	Total No. contacting the NCA	No. of Bed Spaces Accredited (to nearest 1,000)	Ratio of Complaint Contacts Made (to nearest 1,000)
2005	1	21,000	1 in 21,000
2006	5*	72,000	1 in 14,000
2007	5*	99,000	1 in 20,000
2008	20*	107,000	1 in 5,000
2009	21	112,000	1 in 5,000
2010	17	156,000	1 in 9,000
2011	27	162,000	1 in 6,000
2012	45	166,000	1 in 4,000
2013	40	190,000	1 in 5,000
2014	41	195,000	1 in 5,000
2015	62	219,000	1 in 4,000
2016	70	252,000	1 in 4,000
2017	45 (to end of June)	271,000	1 in 6,000

The picture that emerges clearly from Table 19 is that, leaving aside the first three years of the Codes' operations, levels of dissatisfaction with accommodation providers who are members of these Codes are very low. Even in 2015 and 2016, where complaints contacts were received from around 1 in every 4,000 occupants of registered developments, the percentage of students who appeared to be unhappy with the provider of their accommodation was 0.25%.

In terms of when during the year complaint contacts are made, Graph 5 reveals some interesting patterns of spikes and troughs. There are significant spikes in October, January and March, which can be explained in terms of the cycle of the tenancy. The October contacts usually relate to dissatisfaction with the property conditions when the students moved in; those in January may relate to problems that had previously existed but which were perceived not to have been resolved during the Christmas vacation, e.g. proposed maintenance work; whilst March is the time of year that many private providers set as the date for their final rent instalment, and this may trigger complaints from those who wish to pursue long-running grievances and/or make a bid to claim a rent reduction. The troughs seen in June and July relate to the summer vacation when very few students are likely to be in occupation. Contacts then begin to increase slightly in August, often linked to issues with deposit returns, and then considerably more so in September as new students arrive.

Graph 5: Complaints/enquiries received by month since 2005



Complaint Outcomes

The Codes' complaints procedures require that students raise any alleged breaches of these Codes with their accommodation provider directly and permit them time to address these. Where a complainant deems that the issues have not been resolved by the provider, they are then able to submit a formal complaint to the operators of the Codes and - at this stage - the provider will then be contacted formally and asked to respond, making clear what actions (if any) they took in respect of the allegations that they had breached the relevant Code. Should the matters not be resolved following that intervention, or where a dispute is reported to exist between the provider and the student over the allegations, then a referral will be made to an independent Tribunal that is empowered to adjudicate in respect of the complaint.

As can be seen from Table 18, 305 out of the 399 complaint contacts (76%) did not progress to the second stage of the procedures, and Table 20 sets out why this was the case.

Table 20: Outcomes from Non-Formal Complaint Contacts

Outcome	Numbers
The complaint had not been raised with the provider in the first instance	126
Complainant reported the provider had resolved the issue/s	40
Complainant made no further contact with the Codes	144
The complaint concerned non - members of the Codes	5
Total	305

Table 20 illustrates that most non-formal complaints had either not been dealt with by the provider's own complaints procedures at the time they were raised with the Codes, OR, having raised the concerns, the student/s did not decide to pursue matters any further. In a small number of cases complainants reported that the provider, having been made aware that a problem had occurred, resolved the situation without the need for it to be taken to any formal stage. Finally, some contacts were received about providers who were not members of the Codes and which, therefore, could not be dealt with.

In terms of the outcomes of the 94 complaints that have been processed through the Codes' procedures, Table 21 details clearly what happened with those.

Table 21: Outcomes from Formal Complaints

Outcome	Numbers
Referred to Tribunal and Up-held	23
Referred to the Tribunal and NOT Up-held	13
Resolved by Provider before the matter was referred to Tribunal	17
NOT referred as no additional information was provided to support the complaint	23
NOT referred as the matter had not been subject to the provider's own complaints procedure	14
On-going	4
Total	94

Most of the formal complaints received were not referred to the Tribunal at all, and the main reason for this was a failure on behalf of the complainant to provide additional information as requested by the operators of the Code, although it was also possible that either the matters had not been raised directly with the accommodation provider in the first instance OR the provider was able to resolve the

complaint following the second stage of the complaints procedure. However, even where a referral was made to the Tribunal, in about one third of the cases the complaint was not up-held.

Relationship Between the Audit Panel and Tribunal

All decisions concerning the removal of membership from the Codes are matters for either the Audit Panel or the Tribunal to consider, and both bodies possess the power to suspend a member whilst the matter is considered more fully.

Tribunal Membership

The current Tribunal Chair, Mr John Martin (a Barrister and acknowledged expert in the field of housing law) has been in post since the Tribunal first came into operation, and he was re-appointed in September 2015 for a three year period.

The Chair is supported by two Vice Chairs, who are also appointed on a regular basis. One of these is nominated by the National Union of Students, whilst the other is nominated from the provider membership that is represented on the Committee of Management. The current Vice Chairs are Mr Keith White (CRM Students), nominated by the providers, and Ms Izzy Lenga, the recently elected Vice President (Welfare) at NUS. Mr White was re-appointed in 2015 for a three year period, whilst Ms Lenga will serve until the end of her term of office.

There are a further six members of the Tribunal, nominated by provider members of the CoM as well as by the Codes Consortium, each of whom have a three year period of office. Currently these are:

Ms Jane Crouch (Fresh Student Living)

Mr Alan Hilton (Cass and Claredale)

Ms Liz Hodgen (Unipol)

MR Paul Rowlinson (IQ Student Accommodation)

Ms Rebecca Young (NUS)

Vacancy (ANUK)

Section 7 – Website Visits and Online Training Course

National Codes Website

The current National Codes website has been operational for more than five years and, as can be seen from Table 22, the usage that has been made of it over that time has varied.

Table 22: National Codes Website: Visits, Visitors and Pages Viewed, 2011 - 2012 to 2016 - 2017

Year	Visits	Visitors	Pages Viewed	Desktop	Mobile	Tablet
2011/12	9,406	7,476	29,808	94.96%	3.14%	1.90%
2012/13	16,464	13,142	44,594	89.20%	5.59%	5.21%
2013/14	18,657	15,010	48,108	83.48%	8.50%	8.03%
2014/15	20,239	16,919	48,249	85.88%	8.02%	6.10%
2015/16	23,526	19,968	59,724	82.32%	12.77%	4.91%
2016/17	17,973	14,583	43,401	75.22%	19.15%	5.63%

The most obvious findings to comment on is the considerable decline in the number of visits made to the site, the number of visitors using it and the number of pages viewed during the 2016 - 2017 period in comparison with the previous three years. Whereas all of these headings had experienced steady increases from the date the website was first launched, during the last year the figures for these fell by between 23.6% and 27.3%. These findings alone underline why it has been decided to refresh and renew the website.

In terms of how people chose to access the website, Table 22 confirms the decreasing trend in the use of desktops and a considerable increase in the numbers doing so with their mobiles. On the basis of the evidence that students are more likely to access websites using mobiles or tablets, Table 22 suggests that a quarter of all users were students. That is the highest share of use by students recorded since the website was established and supports some of the anecdotal evidence - especially in terms of complaints - that student awareness of the Codes is continuing to increase.

In terms of the pages of the National Codes sites that have been viewed (excluding the Home Page), the top ten most looked at pages during 2016 - 2017 are listed in Table 23, alongside a comparison with the same findings from the 2015 - 2016 period. Possibly the revelation of most significance is that eight out of the ten most viewed pages were the same in both periods and, with the exception of the number of views of the 'Members List' page, the numbers viewing them were roughly similar over time as well. The appearance at the bottom of Table 23 of the 'How to Complain' page for the 2016 - 2017 period once again supports other evidence that suggests students are much more aware of how useful the website can be in respect of finding out information about how to access the Codes' complaints process.

Table 23: The Top Ten Most Viewed Pages 2016 - 2017, Compared with 2015 - 2016

Page Title	Number of Page Views 2016 - 2017	Number of Page Views 2015 -2016
Members List	3,832	6,337
For Students and Parents	2,552	2,868
For Members	2,039	2,254
Scheme Overview	1,507	1,665
Code Download	1,455	1,626
ANUK Overview	1,125	1,305
Contact Us	794	917
How the Codes Work	692	819
What Kinds of Accommodation do the Codes Cover	677	NA
How to Complain	656	NA

Online Training Course

The online training course has been available for use since 2010, and up to the end of June 2017 a total of 3,495 users had either started or completed the course. Use has varied over time, as shown in Table 24, with the level of use steadily increasing from 2011 to 2013, almost doubling in 2014, falling back in 2015, before then massively expanding in 2016 - a trend that has continued into 2017.

The latter rise is due almost entirely to the change that was made to the Code for non-educational establishments in May 2016 that managers of sites should complete the course as a requirement of membership, as opposed to this merely being a recommendation. A similar requirement is likely to be included within the Code for educational establishments when it is revised from September 2018, which should mean a similar or even greater level of use will be made of the on-line training course from that point.

Table 24: Numbers Making Use of the National Codes Online Training Course

Year	Number of Users
2010	53
2011	241
2012	352
2013	398
2014	785
2015	380
2016	630
2017 (to end of June)	656

Section 8 – Conclusion

Achievements in the Eleventh Year

- Completed work on the creation of a new database for the Codes giving the buildings accredited, the number of bed spaces operated, details of the people responsible for day to day management and moving to a paperless system for verification reports and responses;
- Standardised the approach taken by verifiers during the course of undertaking visits - based on best practice identified from observing such visits - as well as the content of the reports and the ways in which they are accessed online;
- Identified ways of continuing to raise the profile of the Codes, both amongst members as well as students and their parents;
- Completed the review of the online training course;
- Ensured that the online Self-Assessment Questionnaires for both Codes are relevant to the content of those Codes and that any errors or typos have been eradicated;
- Collected new SAQs for all members of the Codes who last completed one in 2013 and 2014;
- Started the process of reviewing the content of the Code for Educational Establishments, with the aim of implementing the revised Code from September 1st 2018;
- Implemented a review of the design and content of the website.

Challenges for the Twelfth Year

- Implement a protocol for use by Code members who manage developments for third parties;
- Provide guidance on fire safety risk assessments for members with high rise developments;
- Identify on a database the number of high rise buildings and type of cladding system used
- Instigate a review of the content and suitability of the existing management test;
- Implement a feasible Fit and Proper person test;
- Consider the possibility of including a five yearly HHSRS inspection within the verification procedures;
- Discuss the addition of a clause within the Deposits section of the Code that requires members who protect deposits to do so within a given period of time;
- Complete the review of the Code for Educational Establishments;
- Complete the redesign of the website in early 2018;
- Finalise the changes to the draft verification report template and implement reforms to the online system which allow verifiers greater access to historical material;
- Identify ways of continuing to raise the profile of the Codes, both amongst members as well as students, parents and politicians, with a specific emphasis on the use of social media;
- Ensure that updated SAQs have been received from all existing members of the Codes;
- Prepare revised versions of the Codes declaration forms in time to begin the process of asking providers to sign-up for the next three year membership period (2018-2020) and also amend the property schedule so that it allows for the collection of additional data about developments, such as the number of storeys.

The Codes continue to make a real difference to the rising standards of management in student housing and are held in high regard by universities and colleges and by the private sector, as setting transparent and verified benchmark standards and promoting best practice.

This has only been possible by the support of the Codes members and the efficient administration of an increasingly large membership managing very substantial portfolios.

APPENDIX 1: LIST OF MEMBERS OF THE ANUK/UNIPOL NATIONAL CODES

The Educational Establishment Code

Blackpool and Fylde College
Chichester College
Christ's College, Cambridge
Churchill College, Cambridge
Clare College, Cambridge
Clare Hall College, Cambridge
Corpus Christi College, Cambridge
Darwin College, Cambridge
Downing College, Cambridge
Emmanuel College, Cambridge
Fitzwilliam College Cambridge
Foundation for International Education
Girton College, Cambridge
Gonville & Caius College, Cambridge
Hillcroft College
Homerton College, Cambridge
Hughes Hall College, Cambridge
Jesus College, Cambridge
Kings College, Cambridge
Leeds Beckett University
Loughborough College
Lucy Cavendish College, Cambridge
Magdalene College, Cambridge
Murray Edwards College, Cambridge
Newnham College, Cambridge
Nottingham Trent University
Pembroke College, Cambridge
Peterhouse College, Cambridge
Queens College, Cambridge
Robinson College, Cambridge
The Royal Veterinary College
SCIO
Selwyn College, Cambridge
Sidney Sussex College, Cambridge
St Catharines College, Cambridge
St Edmund's College, Cambridge

St Johns College, Cambridge
Trinity College, Cambridge
Trinity Hall, Cambridge
University of the Arts, London
University of Bradford
University of Chichester
University of Greenwich
University of Hertfordshire
University of Leeds
Warwickshire College
Wolfson College, Cambridge

The Non-Educational Establishment Code

A2 Dominion Group Ltd
Abodus
Aldwyck Housing Group
Asha House Management Co
Ashwell House
Atelier Property Asset Management Ltd
Axo Student Living
Baaz Properties
Bloomsbury Hall Ltd
Britannia Travel Services Ltd
Campbell Property
Campus Living Villages
Canto Court
Carr Mills (D&B Property Management)
Cass and Claredale Halls of Residence Association Ltd
Chapter Living
Chapter 1
City Block Ltd
Code Student Accommodation
Collegiate AC Ltd
Condor Properties
Congregational Federation
Cotton Mills Management Company
CRM Students
Derwent Students
Digs Student
Downing Students

Ducane Housing Association Ltd
Dwell Student Living
The East Cliffe Project LLP
Find Digs Ltd
Fortis Student Living
Fresh Student Living
Galbraith Estates Ltd
Global Student Accommodation
Guy Chester Centre
Hamstead Campus Ltd
Hello Student Management
Homes for Students
Host Student
INTO Newcastle University
INTO UEA
IQ Student Accommodation Services Ltd
Juniperloch
Kaplan NT Ltd
Kexgill
Lee Abbey London
Liberty Living
Linthorpe Property Management
Lulworth Student Company
Lutheran Council of GB
Manor Villages
Mansion Property Management
MARA Inc. London Ltd
Megaclose Ltd
Mezzino
G Murphy Properties
Niche Homes Ltd
Nido Collection
Notting Hill Housing Trust
Omnia Estates Ltd
Optivo
Opto Living Ltd
Parklane Propertuies
Parrish Court Developments Ltd
Priestley and Co

Prime Student Living
Primo Property Management
Purple Frog Group
Reed Residential Ltd
Sanctuary Students
Scape Student Living Ltd
Shumei Eiko Ltd
Sovereign Housing Association
St Modwen SAC 2 Ltd
The Stay Club Limited
Student Beehive
Student Castle Ltd
Student Cribs
Student Facility Management Limited
Student Letting Co
Student Living
Student Living by Sodexo
Study Inn
TJ Thomas Estates Co Ltd
Towers Lettings and Block Management
Trent Pads
Unilife
Uni2rent Ltd
Unipol Student Homes
UNITE
Unity Lettings
Universal Student Living
UPP Broadgate Park Ltd
UPP Nottingham Ltd
Urbanest UK Ltd
Urban Student Life Ltd
U Student Group Ltd
Vafai Trust
Varcity Living Ltd
Vita Student Management Ltd
West One Student Accommodation
Whitfield Group
X1 Developments
Yara Students
YPP (Yorkshire Prosperity)

Zebra Housing Association
Zone Management

APPENDIX 2: Visits Undertaken in 2016 - 2017 at Which No Action Points Were Identified

During the course of undertaking visits to the following providers and developments, verifiers identified no action points at all and, as a result of this, the Chair of the Audit Panel sent the member concerned a congratulatory letter.

Bradford University (The Green, Bradford)
Collegiate AC Ltd (Windsor House, Cardiff)
CRM Students (Jesmond and Melbourne, Newcastle)
Derwent Students (Corfe House, Poole)
Downing College, Cambridge
Emmanuel College, Cambridge
Fortis Student Living (Sovereign House, Sheffield)
Fresh Student Living (Laycock Studios, Sheffield)
Girton College, Cambridge
Hamstead Campus Ltd (Birmingham)
Hello Student (Bede Park, Leicester)
Hello Student (New Walk, Leicester)
Hello Student (Upper New Walk, Leicester)
Homerton College, Cambridge
Homes for Students (Agnes Jones, Liverpool)
Homes for Students (Bedford Street South, Liverpool)
Host Student (The Metalworks, Birmingham)
Lee Abbey (Lexham Gardens, London)
Liberty Living (Liberty Park, Birmingham)
Liberty Living (Liberty Village, Edinburgh)
Liberty Living (Liberty Park, Glasgow)
Liberty Living (Liberty Court, Leicester)
Liberty Living (Liberty Gardens, Liverpool)
Liberty Living (Liberty Central, Newcastle)
Liberty Living (Liberty Point, Nottingham)
Liberty Living (Liberty Hall, Sheffield)
Liberty Living (Liberty Quays, Southampton)
Mansion Student (Fountainbridge, Edinburgh)
Scape (The Pad, Egham)
Trinity Hall, Cambridge
UNITE (Charlton Court, Bath)

Viridian (Platt and Usher Hall, London)

Zebra Housing Association (Sentosa House, London)
