National Codes Annual Report
to Communities and Local Government

2016

NATIONAL CODE
assured accommodation

Contents

Introduction and Background

This is the tenth 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 tenth report references these objectives, it also focuses on activities that have taken place during the course of the year (July 2015 to June 2016) in managing, developing and promoting the Codes. This also outlines the benefits that have been derived from the self-regulation of this important sector of the student housing market and highlights 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.

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 20015-2016, including details of all new members who have joined in the last year;
- Governance of the Codes, a report on changes made to the way the Codes are operated;
- Joint Codes Conference Report;
- Meeting the Challenges of the Tenth 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 eleventh year of operations.

Section 1: Membership Report 2015 - 2016

As of the 30th June 2016 there were a total of **251,699** bed spaces accredited under both the ANUK/Unipol National Codes, an increase on the numbers reported in the last annual report of 14.45%. 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 83.5:16.5.

A more detailed breakdown is provided below.

The total number of private providers and educational establishments signed-up to both of the ANUK/Unipol Codes was 147. Whilst 100 of these were members of the Code for Non-Educational Establishments, the remaining 47 belonged to the Code for Educational Establishments. During the course of 2015/16 visits were undertaken to 55 out of these 147 members (37%), so just over a third of the entire membership received at least one verification visit.

There was a net increase of nine providers signed-up to these Codes between start of July 2015 and the end of June 2015 (a 6.5% increase), which has mainly 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 below

Table 1: New Members and Withdrawals/Removals from Membership in 2015-2016

New Members	Members Withdrawn/Removed
Axo Student Living	Bradford College
Bloomsbury Hall Ltd	GVA
Clever Student Lets Ltd	
Guy Chester Centre	
Homes for Students	
Juniperloch Ltd	
Omnia Estates Ltd	
Opto Living Ltd	
St Modwen SAC	
Student Cribs	
University of the Arts, London	

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 11 providers concerned, the

largest has 1,901 bed spaces and the smallest 33. Should all of the 11 new applicants be accepted into membership this would add an additional 5,338 bed spaces.

The total bed space numbers accredited under the Educational Establishment Code was 35,522, an increase of 1,564 on the figure for the end of June 2015 (up by 4.6%). This is despite the loss of one member of this Code during 2015/16 (Bradford College), and can mostly be explained by the addition of a new member of this Code - The University of the Arts, London.

As for the number of bed spaces covered by the Code for Non-Educational Establishments, the total was 216,177 - up by 29,608 on the figure for the end of June 2015 (an increase of 15.86%). The reason for this increase was due to a combination of the acceptance of new members as well as 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 accredited under this Code as a result of the on-going churn in operational management of developments.

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 accredited bed spaces until the visit has occurred and the verifier has recommended that the development be re-accredited. As of the end of June 2016, a total of 3,016 bed spaces were not included in the totals due to this reason, which was actually around a third less than the numbers reported in the 2015 annual report.

Analysis of the geographical spread of developments belonging to the Codes reveals that 80 different locations in the UK had at least one building signed-up to either Code, a net increase on 2014-2015 of three. Most of these were in England (67), but six were 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 1,681 - a net increase of 119 on the figures reported in the previous annual report (7.6%). Interestingly, although bed space numbers were higher within the Non-Educational Establishment Code, the Code for Educational Establishments covered a larger number of developments - 866 as opposed to 815. This was due to the significant number of developments managed and controlled by the 31 Cambridge Colleges.

Table 2 (below) identifies the ten locations that had the most bed spaces covered by the two Codes, along with the number of developments being operated under them.

TABLE 2: 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	43,434	160
2	Leeds	19,426	94
3	Cambridge	17,987	742
4	Nottingham	17,032	55
5	Liverpool	13,703	45
6	Sheffield	11,208	35
7	Birmingham	10,195	26
8	Manchester	9,618	28
9	Leicester	8,285	32
10	Newcastle	8,142	27

London continued to have the greatest number of accredited bed spaces under the Codes and, as with all of the other cities within the top ten, there was an increase in the numbers in comparison with the previous year. Sheffield replaced Manchester in sixth place (the latter falling to eighth spot), whilst Newcastle replaced Glasgow.

The differences between the 147 members of the Codes in terms of the number of bed spaces that they were operating is shown in tables 3 and 4 below, which reveals 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 3: 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	43,779	126
2	Liberty Living	18,969	45
3	Vero Group	17,337	37
4	Fresh Student Living	11,665	42
5	CRM	11,329	47
6	Victoria Hall Ltd	10,684	30
7	Derwent Students	10,401	27
8	Campus Living Villages	10,163	15
9	Homes for Students	6,639	31
10	Sanctuary Students	6,513	22

The most significant finding from Table 3 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 eleventh with 5,419 bed spaces. Also worthy of note was the appearance in this list of Homes for Students, who had acquired this number of bed spaces in less than a year - mainly from Mansion Property Management - who no longer appear in the top ten.

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

| Position	Provider	Total Number of Bed Spaces Operated	Total Number of Developments
138	Hillcroft College	49	2
139	Trent Pads	46	1
140	Carr Mills (D&B Property Management)	44	7
141	G Murphy Properties	41	2
142	SCIO	40	1
143	Student Living	35	1
144	Congregational Federation	33	1
145	Mohammed Aslam	30	1
146	Baaz Properties	27	1
147	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 4 operate in Nottingham (Trent Pads, Student Living, and Congregational Federation), two in Leeds (Carr Mills and Mohammed Aslam) and one in Portsmouth (G Murphy Properties).

GRAPH 1: Number of Bed Spaces Covered by the ANUK/Unipol Codes - 2005 to 2016

Bed Spaces in the National Codes 2005 - 2016
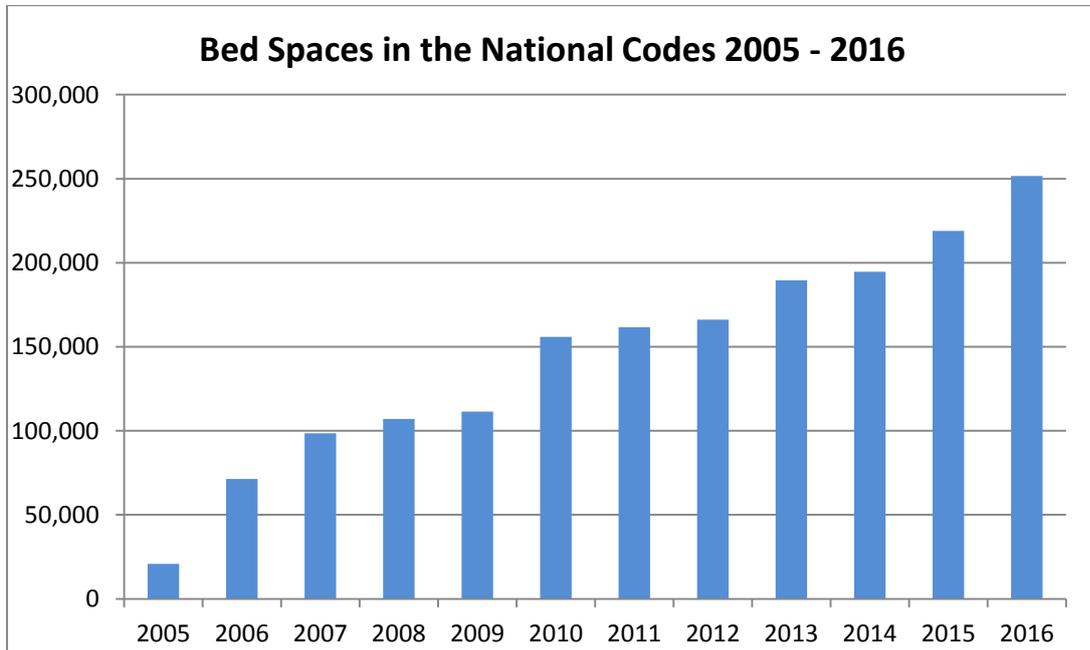
Graph 1 depicts the increase in the number of bed spaces covered by both Codes since 2005, when the Codes were first launched. The numbers have increased year on year in a more or less steady manner, especially since the large increases in both 2007 and 2010, until they have now exceeded the 250,000 mark for the first time.

GRAPH 2: Percentage Increases in Bed Space Numbers - 2005/06 to 2015/16

% Change
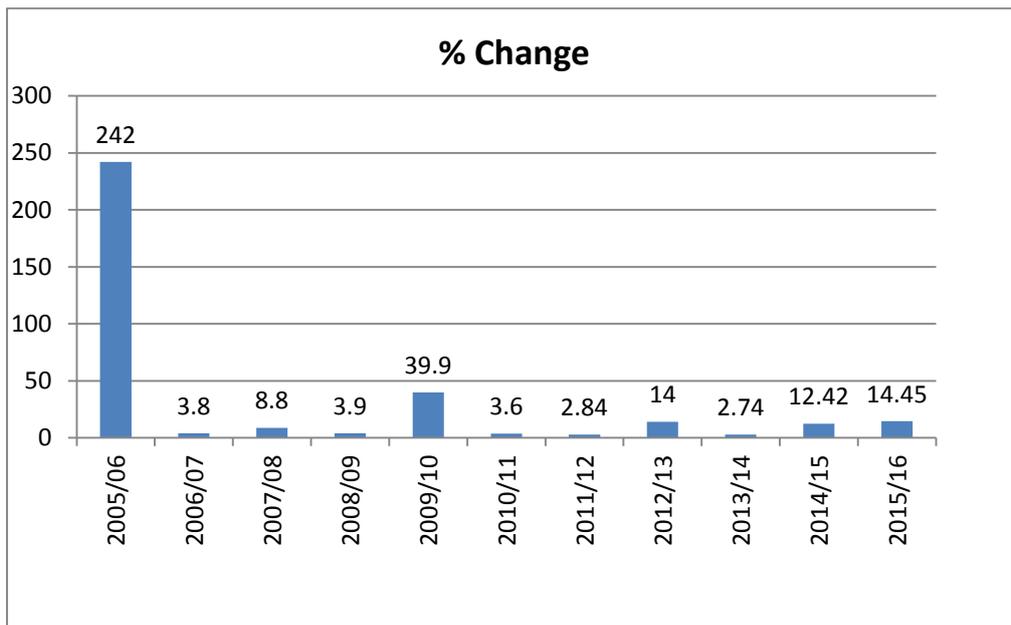
Graph 2 reveals the large percentage increase that occurred in bed space numbers between the first year of the Codes in 2005 and the following year. Whilst it is not likely that such percentage rises will occur again, some double digit ones did occur in 2009/10, 2012/13, 2014/15, and 2015/16.

GRAPH 3: Comparative Bed Space Coverage by Code - 2006(1) to 2016(11)
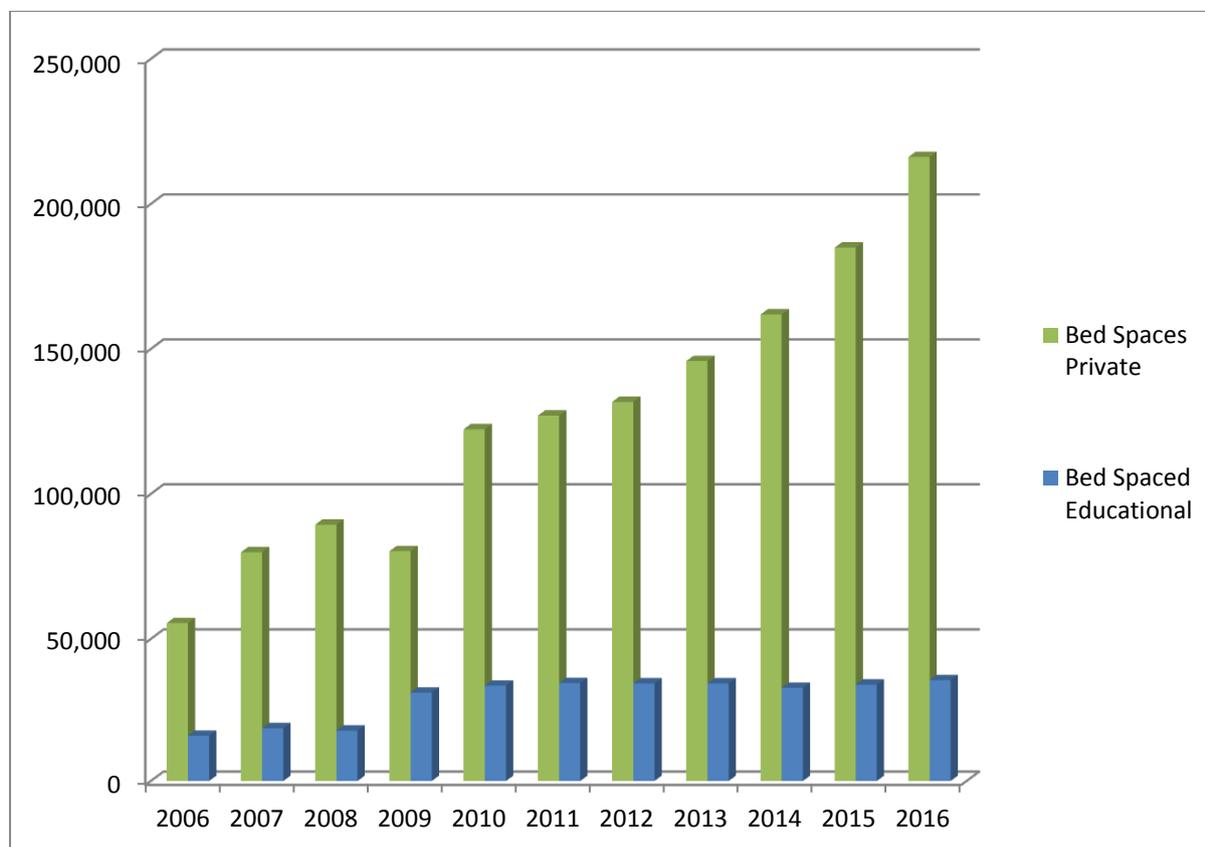
Graph 3 shows the relative size of the two Codes in bed space numbers and serves to highlight the comparative changes in membership of the two Codes since 2006 - when the Code for Educational Establishments was first approved by the Government. The overwhelming dominance of the private sector is demonstrated clearly in this graph, although the first inclusion of the Cambridge colleges within membership of the Code for Educational Establishments in 2009 is also apparent.

Section 2: Governance of the Codes

<u>Committee of Management</u>

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 has met on three occasions since July 2015: 23rd October 2015; 7th March 2016; and 23rd June 2016, the latter being an extraordinary meeting convened in order to discuss the issue of Additional and Selective HMO Licensing. It was agreed in 2015 that the number of times the CoM meets each year should be reduced from three to two, with the possibility of a third meeting if it was felt necessary to hold one. It was also agreed that the point at which provider members became eligible for a seat on the CoM should be when they were operating a minimum of 3,000 bed spaces, instead of 2,000 - as it had been.

A number of changes to membership of the group occurred over the period from July 2015 to the end of June 2016.

The following people left the CoM, for a variety of reasons:
- Heriberto Cuanalo (Collegiate AC), Simon Jones (Unite) and Geraldine Ward (University of Hertfordshire) stood down in favour of colleagues with greater responsibilities for operational matters within their organisations;
- John Gautrey (IQ) ceased to be eligible for membership as IQ merged with Prodigy and became the Vero Group;
- Brian Hipkin (AMoSSHE) was deemed to have resigned from the group as he had failed to attend three consecutive meetings;
- Abbie Johnson (DCLG) ceased to have responsibility for the student housing sector;
- Charles Kerr (South Street) and Joann Pollard both ceased working for the organisations that they were representing;
- Mark Smithers (Urbanest) and Tommy Styles (Prime Student Living Ltd) both ceased to be eligible for automatic membership when the threshold for this was increased from 2,000 bed spaces to 3,000;
-

The following new members have joined the CoM:
- Tariq Akbar (Downing Students), Laura Bryant (Chapter Living), and Rachel Ramella (Homes for Students) as their organisations had reached the 3,000 bed space threshold;
- Alan Blackmore (Collegiate AC) replaced Heriberto Cuanalo, Simon Griffiths (UNITE) replaced Simon Jones, Hassan Khalil (University of Hertfordshire) replaced Geraldine Ward,

Angela McKinney replaced Charles Kerr) and Fay Sherrington (AMoSSHE) replaced Brian Hipkin ;

- Sheldon Ferguson (DCLG), who was appointed as the link person with the Government department;
- Amelia Frith (Mansion Group), who became a co-opted member of the CoM representing a provider with less than 3000 bed spaces;
- Bob Mayho (Chartered Institute of Environmental Health), was reappointed to represent this body on the CoM;

One further change that is worthwhile noting is the decision that was taken to hold meetings at set venues rather than asking members to host them. This means that all of the March meetings (which will now be the first one of each calendar year) will take place at Unipol Student Homes' offices in Leeds, and the November meetings will be held at a venue in Central London.

Current Members of the CoM:

Tariq Akbar (Downing Students)

Mark Allen (UPP Projects Ltd)

Shelly Asquith (NUS)

Andy Attewell (Victoria Hall)

Alan Baser (UUK Code)

Alan Blackmore (Collegiate AC)

Martin Blakey (Unipol)

Laura Bryant (Chapter Living)

Karen Burke (ASRA)

Alene Campbell (Sanctuary Students)

Bryan Carroll (CUBO)

Linda Cobb (ANUK)

Jane Crouch (Fresh Student Living)

Cheryl Darnell (Association of Colleges)

Wendy Evans (Cambridge Colleges)

Sheldon Ferguson (DCLG)

Ian Fletcher (Chair)

Amelia Frith (Co-Opted)

Simon Griffiths (UNITE)

Linh Hawke (Viridian)

Allan Hilton (Cass and Claredale)

Jo Hynes (University of Leeds)

Paddy Jackman (Chair of Audit Panel)

Victoria Johnson (Co-Opted)

Hassan Khalil (University of Hertfordshire)

Bob Mayho (Chartered Institute of Environmental Health)

Steve McDonough (Derwent Students)

Angela McKinney (Digs Student)

Huw McLean (Welsh Assembly Government)

Robert Moyle (Campus Living Villages)

Fleur Priest-Stephens (NUS)

Rachel Ramella (Homes for Students)

Ian Robertson (Unipol)

Paul Rowlinson (Vero Group)

Fay Sherrington (AMoSSHE)

Richard Stott (Kexgill)

Terry Waide (Northern Ireland Housing Executive)

Paul Watson (Liberty Living)

Brian Welsh (Knightsbridge Student Housing Ltd)

Keith White (CRM)

Trevor Willis (UUK)

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 2015/16 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.

The first of these annual meetings agreed on the appointment of the Tribunal Chair, a series of proposals relating to the operations and membership of the Committee of Management, the implementation of an annual series of location-wide verification visits, and also the final content of the 2015 report to DCLG. A second 'meeting' of the Consortium occurred in January 2016, but it was conducted electronically and members were asked to provide their views on a number of issues highlighted in papers presented to them.

A date for the 2016 annual meeting of the Codes Consortium has yet to be scheduled, although it may be delayed until the autumn one of the existing representatives of ANUK is on maternity leave until then. However, members of the Consortium will be asked for their thoughts on candidates for the posts of Audit Panel and CoM Chairs, both of which will need to be appointed before the end of 2016.

Current Members of the Consortium

Accreditation Network UK (ANUK)

Linda Cobb

Ian Fletcher

National Union of Students (NUS)

Shelly Asquith

Fleur Priest-Stephens

Unipol

Martin Blakey

Ian Robertson

Section 3: Joint Codes Conferences Report

The sixth Joint Codes Conference took place on November 19th, at the Wellcome Collection in Central London, and was attended by almost 100 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 5 and 6 (1 equals excellent, 2 equals very good; 3 equals good; 4 equals average. 5 equals poor).

Table 5 - General Ratings

Heading	Average Rating
Whole conference	2
Relevance to delegates' needs	2
Venue rooms	2
Location of Venue	1.7
Food	2.5
Unipol administration before the event	1.5
Unipol administration during the event	1.2
Overall Average	**1.8**

Apart from the usual excellent ratings for the work of the Unipol Training and Events Officer, Megan McElroy, the location of the venue scored significantly well amongst delegates. All of the other headings were rated as either very good or good, with the food being rated less well than the other aspects.

Table 6 - Session Ratings

Session Title	Average Rating for Presentation	Average Rating for Relevance
Pastoral Care: Is this something that non-educational establishments should be providing?	2.4	1.8
An Introduction to the Three Codes of Practice for New Delegates	2.5	2.3
Review of the ANUK/Unipol Code for Non-Educational Establishments	1.8	1.5
Changes to the UUK Code and the Annual Report	2.6	2.6
Common Themes Emerging from Assessments	2.1	1.7
The NUS Accommodation Costs Survey	2.3	1.7
Common Trends with Complaints	2	1.6
Sharing Best Practice - The Student Housing Heating Regulations	4	3.4
Sharing Best Practice - Paying Compensation	1.8	2
Sharing Best Practice - Increasing Participation in the Student Satisfaction Survey	2	1.6

The scores for the presentations, with one exception, indicate that delegates felt these were generally either very good or excellent and, with five out of the ten sessions scoring an 'excellent' for relevance, it could be suggested that the content of the day was just about what the delegates were after. Unfortunately, only four delegates provided any further comments (see below), however, if they are at all representative of the majority of delegates then the 6th Joint Codes Conference can be viewed as an overwhelming triumph.

- "This joint conference was the best one so far. Very informative, great set-up, great sessions in terms of relevance";
- "A very useful event and time well spent. Thank you";
- "Preferred this venue to 2014 as it had much (sic) better layout";
- "Excellent, engaging and informative - thanks".

In terms of how this event compares (in evaluation terms) with the previous conferences, tables 7 and 8 reveal the ratings it is possible to show comparisons of.

Table 7 - 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)
Overall Rating	2.50	2.21	2.14	2.23	1.8
Overall Relevance	2.20	2.51	2.30	NA	2.0
Rating of Venue	2.90	2.62	1.88	1.66	2.0
Location of Venue	2.20	2.05	1.69	1.35	1.7
Rating for Food	2.80	2.71	2.30	1.97	2.50

Table 7 would appear to confirm the view that the 2015 event was the most successful in terms of the overall and relevance ratings, although interestingly the ratings for venue, location and food were not as high as the previous two conferences. It's possible that the scores for the venue are a statistical anomaly produced by a difference in the number of respondents to the evaluation, but as both results suggest delegates rated them as either 'excellent' or 'very good', there is little cause for concern. This leaves the rating for food, which would be a concern if there was some evidence to suggest it was not of good quality. Therefore it might be worth asking delegates for their thoughts on this more specifically, or asking whether the venue could offer more choice for the next conference.

Table 8 - Average Combined Scores for Different Sessions at the Last Five 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

Although the findings in Table 8 suggest that delegates did not rate the quality of presentations at the 2015 conference as highly as those from two years earlier, the fact that the scores for relevance were the closest they have ever been to the 'excellent' rating suggests that the content of the 2015 conference was almost exactly what delegates wanted to discuss. The obvious repost to this assertion would be that the audience was in effect self-selecting, based on the content of the agenda. However, even then it could be argued that as a result of that selection it is now possible to determine the sort of audience most attracted to the conference.

Section 4: Meeting the Challenges of the Tenth Year

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

- Completion of the review of the Code for Non-Educational Establishments by the start of 2016;
- Increasing the robustness of the verification procedures;
- Raising the profile of the Codes;
- Updating the online training course to incorporate the changes made by the review of the Non-Educational Establishment Code and to refresh its contents more generally;
- Undertaking a review of the operations and membership of the Committee of Management;
- Producing core materials about the Codes for use by regulators;
- Increasing the total number of bed spaces covered by the Codes by 25,000 during the year (2015 to 2016);
- Generating additional resources through higher membership fees.

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.

Review of the Code for Non-Educational Establishments

Although the review group that had been established in order to review the content of this Code had produced a final draft of the revised Code by the beginning of 2016, a number of issues were highlighted through the consultation process with members and stakeholders which meant that the final version was not signed off by the National Codes Consortium until late January 2016. It also agreed that the revised Code should become operational from May 1st.

Minor wording/grammatical alterations were made to 13 of the clauses within the Code and the wording of a further 10 clauses was altered. However, a total of 13 new clauses were added to the Code, which reflects a need for it to meet not only new regulations but also to set standards in respect of aspects that had not previously been recognised but which are now firmly a part of the sector - most notably WiFi provision. In addition, the review group decided to add in more prescriptive requirements in respect of late running buildings, something which it accepted had become a much more common feature within the sector.

The following list summarises the key alterations made to the Code:
- Managers of buildings are required to complete the online training course, within eight weeks of being appointed;
- All changes of operational management of buildings need to be reported to the National Codes Administrator (NCA),within a given period of time, by the new operator;

- The NCA will be notified where buildings contain dwellings that are not all within the control of the Code member;

- The NCA will be notified, within a given period of time, that a building is running late (includes new buildings and refurbs) and what action the provider is taking as a result of this;

- In the event that a building is running late, providers will need to follow more prescriptive requirements, in line with those already required in the Educational Establishment Code;

- Tenants will be made aware of the benefits to them of the provider being a member of the Code;

- The National Codes logo will appear on the provider's own website within a week of them being awarded membership;

- Contact details for all senor staff on site will be provided to tenants, and tenants should be notified of any changes to senior staff, within a reasonably timeframe;

- Buildings will comply with all relevant HMO licensing procedures that may be applied by the local housing authority;

- Tenants satisfaction surveys will include a question about whether the tenants are aware their accommodation is part of the National Code;

- Requirements have been added in with respect to the provision of WiFi, specifically information to tenants about how this operates and any restrictions that might exist;

- Developments will be compliant with Energy Efficiency Regulations (England and Wales only) from 1st April 2018;

- Personal Emergency Evacuation Plans (PEEPS) will be devised, where appropriate, to assist people with disabilities exist buildings in an emergency;

- Suitable precautions will be taken to prevent and control the risks of exposure to legionella.

Making the Verification Procedures More Robust

This challenge consisted of three specific elements: 1) Implementation of an annual location wide verification visit; 2) Building a new Codes database; 3) Improving verification reports.

The National Codes Consortium agreed in January 2016 that members of the verification team should undertake visits to at least one development of all members of the Codes operating in a specific geographical location on an annual basis. The aims of this being to: improve the visibility of the verification process; increase engagement with staff operating sites accredited under the Codes; and allow for greater moderation of verification standards. As can be seen from the report in Section 5, Liverpool was the chosen destination for the 2016 series of location wide visits, which occurred over a two day period in March.

Unipol's head of IT and Communications has been working on a new database for the National Codes since the middle of 2015, which is scheduled to go 'live' by the end of July 2016. This will provide an easier way of calculating the number of buildings accredited, number of bed spaces being operated,

and details of the people responsible for their day to day management. It should also enable the development of a paperless system for verifications reports and responses.

The National Codes Audit Panel agreed some alterations to the way in which verifiers report the outcomes from visits, which have been operational since the start of the 2015/16 round of verification visits. The changes, relating to section 5 of the verification report - *General Commentary and Remarks* - require verifiers to provide: i) a general summary of how the visit went; ii) an indication of what, if any, positive aspects that were identified; iii) a brief summary of the main action points; iv) a list of actions/recommendations that the provider needs to address. The effectiveness of this change to the reporting system will be evaluated when the Audit Panel meets in August 2016.

Raising the Profile of the Codes
There were also three aspects to this particular challenge: 1) Better liaison with the HE sector's professional bodies; 2) Providing more advice and information to students and their parents on the National Codes website; 3) Making better use of digital and social media to communicate with students directly.

In order to achieve the aims of the first aspect, the National Codes Administrator approached both ASRA and CUBO (the HE sector's main professional organisations that deal directly with student accommodation) to enquire as to whether it would be possible to have a platform at their annual conferences through which to promote the Codes. Both organisations agreed to allow this and the NCA staffed a stall and ran a workshop at the ASRA conference, and then jointly led a workshop with the Chair of the UUK's Code at the CUBO one. The Codes' Committee of Management has agreed that it would be beneficial if the Codes had some sort of presence at future conferences of these groups (especially ASRA), but that there should always be a specific focus to that presence in order to better engage with delegates attending the events.

Although some thought has been given to the second of the aspects, this is an area of work that will not be completed much before the end of 2016.

Similarly, the final aspect is one which will remain ongoing throughout the rest of 2016 and probably also into 2017. The NCA will be liaising with the recently appointed member of Unipol staff responsible for student engagement via social media in order to explore ways of making students much more aware of the National Codes.

Updating the online Training Course
The NCA has amended sections of the online training course so that it is now appropriate for use by members of both of the Codes and not just the one for Non-Educational Establishments. However, more work is still required to it, -specifically, it will need further amendments that will incorporate the

changes that have been made to the content of the Non-Educational Establishment Code, and the videos that are contained within modules 1 and 2 will need to be revised.

Reviewing the Operations and Membership of the Committee of Management
When the National Codes' Committee of Management met in October 2015 it agreed a number of changes to its own operations and membership, with the aim of making it leaner, more efficient and more focused on its tasks.

In order to achieve the first of these aims the CoM decided that provider members should only be eligible for automatic membership of the group once they had 3000 or more bed spaces accredited under either Code, as opposed to the previous threshold of 2000. Although this change resulted in the immediate removal of two members, three new providers became eligible for membership as a result of them operating 3,000 or more bed spaces.

In relation to the aim of becoming more efficient, it was agreed that the number of meetings per year should be reduced from three to two, albeit with the option of holding a third meeting should members feel it was necessary. Meetings are now scheduled for early March and November (the latter being linked to the day before or after when the Joint Codes conference takes place), and are held in Leeds (at the Unipol offices) or London.

Production of Core Materials for Regulators
This particular challenge was set because there was a perception that local housing authorities did not understand the differences between the way in which operators of purpose-built student accommodation functioned in comparison to landlords of older off-street shared houses, and that therefore they required some explanations as to why the former ought to be exempted - or be subject to only "light touch" regulation - from additional and selective HMO licensing schemes. However, as over the course of 2015/2016 it became apparent that many of these types of schemes were more focused on the need by local housing authorities to raise revenue, as opposed to improving local housing standards, the emphasis has shifted towards seeking a legislative solution that will prevent or severely restrict attempts by LHAs to use the PBSA as a 'cash cow' (see first item under "Additional Achievements of the Tenth Year" below).

Increasing Bed Space Numbers
The target of an additional 25,000 bed spaces that was set for the tenth year was not only reached but surpassed (see Section 1 of this report), and this expansion in numbers occurred within both Codes. The reasons for this increase can be attributed not only to the arrival of new members but also to the expansion of the portfolios of existing members, four of whom (CLVUK; Fresh Student Living; the Vero Group; and Victoria Hall Management Ltd) had grown by between 36% and 60% from the start of July 2015 and the end of June 2016.

Generating Additional Resources

The CoM agreed a budget at its meeting in October 2015 that resulted in a significant uplift in the fee level for the larger providers (those operating 510 or more bed spaces) who pay at a per bed space rate, whilst at the same time agreeing to freeze the minimum membership fee - paid by those operating less than 510 bed spaces - until the start of 2018. The per bed space fee for existing members was increased from 90p to £1.08 (a rise of 20%), which impacted on 49 members. The fee levels for new applicants with 510 or more bed spaces also rose, from £1.03 to £1.23 (19.4%).

The CoM accepted the arguments that in order for improvements to be made to the way in which the Codes are both operated and promoted then it would cost them more, and therefore the budget was accepted unanimously.

Additional Achievements of the Tenth Year

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

Responding to HMO Licensing (Additional and Selective)

As was reported in the 2015 annual report, the National Codes Administrator had responded to a number of consultations by local authorities who wished to introduce additional or selective HMO licensing schemes and made a case for the purpose-built student accommodation sector to either be exempted or offered significant discounts if they were accredited under the ANUK/Unipol Codes. However, in March 2016 a number of members of the Codes raised some concerns about the way in which a proposed selective licensing scheme in Liverpool was being operated, and at the same time the NCA received reports that some local authorities were simply introducing schemes with no consultation (and with no exemptions for the PBSA). It was therefore decided, in conjunction with the British Property Federation, to make an approach to DCLG for some legislative changes that would remove the whole of the PBSA from additional and selective licensing.

A meeting took place with the department in June 2016 and the issues discussed. It was agreed that the BPF and the operators of the Codes would provide DCLG with some additional information to support the case that was being made for exemption.

Revision of the Self-Assessment Questionnaire for the Non-Educational Establishment Code

Members of the National Codes are required to re-issue their self-assessment questionnaires at least once every three years, and as the last time that the majority of members did so was in 2013, they were due to do so again this year. However, because the Code for Non-Educational Establishments was also in the process of being reviewed, and the SAQs are linked directly to the content of the Codes, it was agreed that those members who were required to resubmit should not need to do so until the relevant SAQ had been up-dated.

The NCA drafted out the necessary changes to this SAQ in May 2016 and these were sent to the design team which created the original SAQ document - with a deadline of the end of July 2016 for completion of the changes.

Appointment of a Dedicated Codes Complaints Handler
The CoM was informed, at the time that the 2015/2016 was being discussed, that should it agree to the increase in the fee levels being proposed then some of the increased income that was to be generated would be used to employ a dedicated member of staff who could handle all incoming complaints, as well as follow-up on the outcomes from these.

Sian Davies was appointed to the post in March 2016, and began work in April. She will deal with all National Code complaints in the first instance, ensuring that she has all of the information about the complaint before (and where necessary) making contact with the Code member to request a response to the allegations. Sian will also follow-up with anyone who is referred back to their accommodation provider's own complaints procedures in order to ascertain whether the complaint was dealt with adequately by them. The National Codes Administrator will liaise with Sian and will retain responsibility for making referrals to the Chair of the Tribunal.

Verification Visit Observations
In order to assess the levels of consistency of approach to verification visits, the National Codes Administrator accompanied all but one member of the verification team as they have gone about their visits during 2015/2016, and the findings from this process will be presented to the August 2016 meeting of the Audit Panel.

It is likely that the NCA will propose that in future verifiers should:
- make more direct use of the provider's own SAQ in order to determine what documents they request at visits (as opposed to relying upon the toolkit document for this) and that they ask members to provide more documentation in advance as a way of reducing the amount of time dedicated to this aspect of the visit;
- make an attempt, where possible, to meet directly with groups of tenants during the visits so that they can explain why they are there, what information they want to know and what will happen following the visit;
- make more of a presentation of their findings at the end of the visit and use this, where appropriate, as an opportunity to praise local managers where they find no action points and, where they do, to engage in discussions with the provider about how they might address these and the timescales for doing so;
- give an explanation to the provider, again where appropriate, of how they can access their draft reports and what they need to do with them when they arrive - the information about which will be supplied to them by the NCA.

Section 5 – Assessment and Verification Procedures

Verification Visits and Re-Visits

Two rounds of verification visits were completed during the course of the 2015/16 period. Between July and the end of December 2015 a total of 41 verification visits or re-visits occured (nine fewer than during the same period in 2014), whilst between January and the end of June 2016 a further 94 were conducted (thirteen more than the same period in 2015). This means that the total number of verification visits for the period to the end of June 2016 was marginally greater than in 2014/15, however, it does not include two revisits that were scheduled to take place in July 2016.

Table 7: 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

Although the number of visits undertaken in 2015/16 slightly exceeded those of 2014/15, the particular category of visits undertaken was significantly different - as shown clearly in Table 8 below.

TABLE 8: Visits by Type, July 2015 to end of June 2016

Category	Number of Visits July-Dec 2015	Number of Visits Jan-June 2016	Totals
New Applicant	4	5	9
New Development of Existing Member	6	18	24
Cyclical Revisit	8	12	20
Change of Operational Management	22	43	65
Complaint	0	0	0
1st revisit	1	0	1
2nd revisit	0	0	0
One-off city-wide	0	16	16
Totals	**41**	**94**	**135**

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 2014/15 a total of 21 visits were undertake to new applicants, but in 2015/16 it was fewer than 10. This does not represent a decrease in the number of applications for membership that the National Codes Administrator received, but is more a reflection of the amount of time it took those applicants to get to the point where a visit could take place.

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 37 such visits occurred in 2014/15, but only 24 in 2015/16, and this is probably due to the fact that some of these members also were subject to visits to sites where a change of operational management had occurred, making additional visits on top of these unnecessary.

The number of cyclical revisits carried out in 2015/16 - 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 2012/13, 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 2015/16 was the fact that the Cambridge Colleges became due for their three yearly visits, beginning in 2016.

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 8 reveals the extent to which the on-going churn within the purpose built student accommodation sector shows little sign of coming to an end. Indeed, the number of visits within this category were significantly greater than they had been in 2014/15, when 51 had taken place.

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 three or more complaints were raised with the NCA about the same building during the course of an academic year, the development should be visited to ensure that the matters identified within the complaint had been addressed. The fact that no such visits occurred in 2015/16 can be taken as a positive sign.

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 8 for the period from the start of July 2015 to the end of June 2016 masks the fact that two others were identified as being necessary by the verifiers, but they could not take place until July 2016.

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. It was determined that Liverpool should be the location for the 2016 visits, and over the course of two days in March a total of 16 developments were visited.
 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 2015/16. However, the main focus of these was on the Code for Non-Educational Establishments - as can be seen from Table 9 below.

Table 9: Number of Visits Undertaken by Code and Category, July 2015 to June 2016

Non-Educational Code Category	Number of Visits	Educational Code Category	Number of Visits
New Applicant	8	New Applicant	1
New Development of Existing Member	24	New Development of Existing Member	0
Cyclical Revisit	14	Cyclical Revisit	6
Change of Operational Management	65	Change of Operational Management	0
Complaints	0	Complaints	0
1st Revisit	1	1st Revisit	0
2nd Revisit	0	2nd Revisit	0
Location Wide Visit	16	Location Wide Visit	0
Totals	**128**	**Totals**	**7**

Seven out of the 47 members of the Code for Educational Establishments were visited in 2015/16, 14.89% of the total membership of that Code. In terms of the visits to members of the other ANUK/Unipol Code, the 128 visits were to a total of 49 members - so 49% of the membership of that Code.

Whilst the number of visits undertaken in 2015/16 was slightly greater than those of the previous year, it is worth reflecting upon how the programme compared with those of the previous six years (see table 10 below).

Table 10: Number of Visits by Type (both Codes) 2010/11 to 2015/16

Category	10/11	11/12	12/13	13/14	14/15	15/16
New Applicant	14	13	21	15	21	9
New Development of Existing Member	12	26	19	13	37	24
Cyclical Revisit	17	8	9	63	14	20
Change of Operational Management	0	0	18	14	51	65
Complaints	0	0	0	0	3	0
1st Revisit	19	17	4	6	4	1
2nd Revisit	0	0	5	0	1	0
Location Wide Visit	0	0	0	9	0	16

The number of new applicants visited was at its lowest level for the whole six year period. However, this is likely to be a blip and - assuming all of the currently applicants for membership progress to the visit stage during that period - numbers are likely to return to their usual levels in 2016/17.

Looking over the whole of the six year period, the number of visits to developments belonging to existing members that were undertaken in 2015/16 (although less than in the previous year) was greater than in the two years proceeding that.

In terms of the cyclical revisits, the numbers completed by the end of June 2016 were greater than at any time since 2013/4, when the Cambridge Colleges last were due such visits. As these same colleges were mostly all due to complete visits again in 2016, this increase was to be expected. However, as some of the colleges were scheduled for visits after the end of June 2016, the full impact of the process is not reflected in the figures in Table 10.

Visits as a result of changes of operational management were only agreed as a policy in 2012, a reflection of the amount of churn taking place within the sector. Table 10 shows that following a small decrease in 2013/14, this trend has massively accelerated and continues to be the dominant reason for visits needing to take place.

The other trend that can be identified clearly from table 10 is the steady decrease in the number of revisits that verifiers believe it has been necessary to undertake. This, it could be argued, is a sign that members have become much more responsive to the verification process over time and so verifiers are able to feel confident that action points have been addressed without the need for follow-up visits.

The next question concerns the outcomes that arise from the completion of these verification visits, especially the extent to which they indicate adequate levels of compliance with the Codes.

TABLE 11: Outcomes from Verification Visits Undertaken between 1st July 2015 and June 30th 2016, by Category

Category (totals in brackets)	Number of Visits with No Action Points	Number of Visits with Between 1 and 4 Action Points	Number of Visits with Between 5 and 9 Action Points	Number of Visits with 10 or More Action Points
New Applicant (9)	2	2	2	3
New Development of Existing Member (24)	6	16	1	0
Cyclical Revisit (20)	3	11	4	2
Change of Operational Management (65)	16	38	9	1
Complaints (0)	NA	NA	NA	NA
1st Revisit (1)	0	1	0	0
2nd Revisit (0)	NA	NA	NA	NA
Location Wide Visit (16)	9	5	2	0
Totals	**36**	**75**	**18**	**6**

The findings outlined in Table 11 reveal that a very significant number of the visits (26.67%) undertaken in 2015/16 resulted in the identification of no action points at all. This was particularly the case in relation to visits where changes of operational management had occurred (24.6%) and also visits to existing members, where if the figures for the location-wide visits are included along with these, then 37.5% of all such visits were found to have no action points. As for the 99 visits where some action points were identified, in the overwhelming majority (75.75%) of cases only between one and four were discovered, and in around 6% of visits 10 or more were identified.

It is something of a surprise to discover that two of the new applicants were fully compliant at the time of their first visit, and suggests that a great deal of effort was put into the process by those providers in advance of it taking place. It is less surprising that the largest single number of visits revealing 10 or more action points were to the new applicants, and is as much a reflection of the fact that verifiers are required to check more carefully on visits to new applicants than to those who have already been

granted membership [NB: A full list of the visits for which no action points were identified is shown in appendix 3 to this report, page 42]

Whilst the vast majority of developments that have been subject to changes of operational management were found to have between one and four action points, the finding that around a quarter of them were fully compliant at the time of the visit is of interest. In many cases these visits took place to long-standing members of the Codes - Liberty Living, UNITE and Victoria Hall - who have a very good understanding of what is required. However, as many were also undertaken to a new provider called Homes for Students, they too have demonstrated that they have a firm grasp of the Code's requirements.

Finally, in terms of the outcomes from the seven visits undertaken to the developments operated by members of the Educational Establishments Code, three were found to be have no action points (including the one new applicant), and only one was deemed to have more than five and less than 10 action points.

As for how the findings contained within Table 11 compare over time, Table 12 (below) shows the differences over the last six years in terms of the number of visits that revealed no action points. The findings suggest that the decrease in both the number of visits that did not identify any action points, as well as in the percentage of these in comparison to overall visit activity since 2011/12, has been reversed.

Table 12: Visits Where No Action Points Were Identified Compared with Overall Number of Visits Completed - 2010/11 to 2015/16

Year	Number of Visits with No Action Points	Total Number of Visits Completed	Percentage of Visits with No Actions
2010/11	18	62	29.0%
2011/12	28	64	43.75%
2012/13	25	77	32.5%
2013/14	25	120	20.75%
2014/15	16	131	12.25%
2015/16	36	135	26.67%

In terms of the outcomes from verification visits where action points were identified, verifiers made clear within the draft reports that they issued following the visit exactly which clauses of the Codes were not being complied with. The National Codes Administrator records the details of these and, more significantly, requests that verifiers report on a monthly basis whether they have been notified that the required works have been completed and, of so, whether this was within the given deadlines they had set for them to have been so in their draft reports.

Table 13 (on pages 27 to 28) lists all of the clauses of the Code for Non-Educational Establishments where ten or more draft reports from 2015/6 concluded that a provider was non-compliant with that particular clause, and the given completion rates for those specific actions - as notified by the relevant verifier. [NB: This does not include the Educational Establishment Code as too few visits were made to those members identified as having sufficient action points to make it statistically valid].

Table 13: Clauses Which Members Were Found Not to be Complying with Following Visits in 2015/16, and the Numbers Notified as Having Been Completed

Clause	Number of Visits	No. of Notified Completions (No. not yet overdue for completion)
We maintain and manage our buildings based on the Housing Health and Safety Rating system to ensure that the risks of potential health and safety hazards are reduced to as low a level as reasonably practical	22	14 (5)
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	20	14 (2)
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	20	9 (6)
We provide all our residential developments with properly maintained fire safety installations in accordance with current legislation necessary to enable tenants to safely evacuate the building in the event of fire	18	11 (6)
We have made staff aware of Emergency and Disaster Management plan, which is freely available as part of our policies and procedures, and which contains clear guidelines when the plan should be implemented and the role and responsibilities of staff in this implementation	17	9 (5)
A satisfactory survey of their student tenants is carried out at least once every 24 months	16	6 (8)
A waste disposal plan has been prepared for all waste facilities that are used by more than 10 tenants, this plan is made available to tenants on request and conforms to relevant standards for recycling refuse	15	8 (5)
Tenants (and prospective tenants) are made aware of our equality and diversity policies as part of the information provided	13	10 (1)

in marketing and tenant information		
We provide our tenants with full details of the times for cleaning and maintaining communal areas either in writing or displayed on appropriate notice boards within the residential development	11	11
All electrical installations are in satisfactory condition and possess a current periodic inspection report (based on Appendix 6 of BS7671) carried out by a competent electrical engineer	11	7 (3)
The Code logo appears on our website and clear reference is made on this to which buildings are within the Code	10	7 (1)

Table 13 indicates that in the majority of cases providers were able to address these action points within the timescales that the verifier set. However, where this was not the case, then the matter/s will be discussed when the National Codes Audit Panel meets in August 2016 and reviews the progress of outcomes from visits undertaken in 2015/16.

The Audit Panel

The Audit Panel met on three occasions between the start of July 2015 and end of June 2016. The first was hosted by Unipol Student Homes, in Leeds, whilst the second and third meetings were held at Helen Graham House, in London, and hosted by Viridian.

The membership of the Audit Panel has remained unchanged since the last annual report, however, Dr Stephen Battersby has recently informed the National Codes Administrator that he wished to cease being a verifier, as of August 2016. This means that a replacement verifier will need to be appointed.

In addition, it is very likely that another verifier may also need to be added to the team in order to assist with the volume of visits that will need to be carried out in 2016/17. The National Codes Administrator estimates that at least 68 visits will need to be completed before the end of June 2017, and that does not include any to providers who completed their SAQ after the start of July 2016 OR any changes of operational management not notified to the NCA before that same date.

The current membership is as follows:
Mr Paddy Jackman, Chair
Dr Stephen Battersby - Vice Chair (and Verifier)
Ms Mary Bright - Verifier
Ms Wendy Evans - Cambridge Colleges
Ms Fleur Priest-Stephens - National Union of Students
Mr Derek Goss - Verifier
Mr Richard Lord - Verifier
Ms Victoria Tolmie- Loverseed - Unipol

Mr Philip Moxon - Verifier

Mr Jakub Pietruszewski - Verifier

Mr David Robertson - Verifier

Mr Nick Stanton - Verifier

Vacancy - ANUK

Section 6 – Complaints and Tribunal Procedures

Code Complaints

Table 14: 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	7	4#
2016	25 (to end of June)	7	4#
TOTALS	**309**	**75**	**33**

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

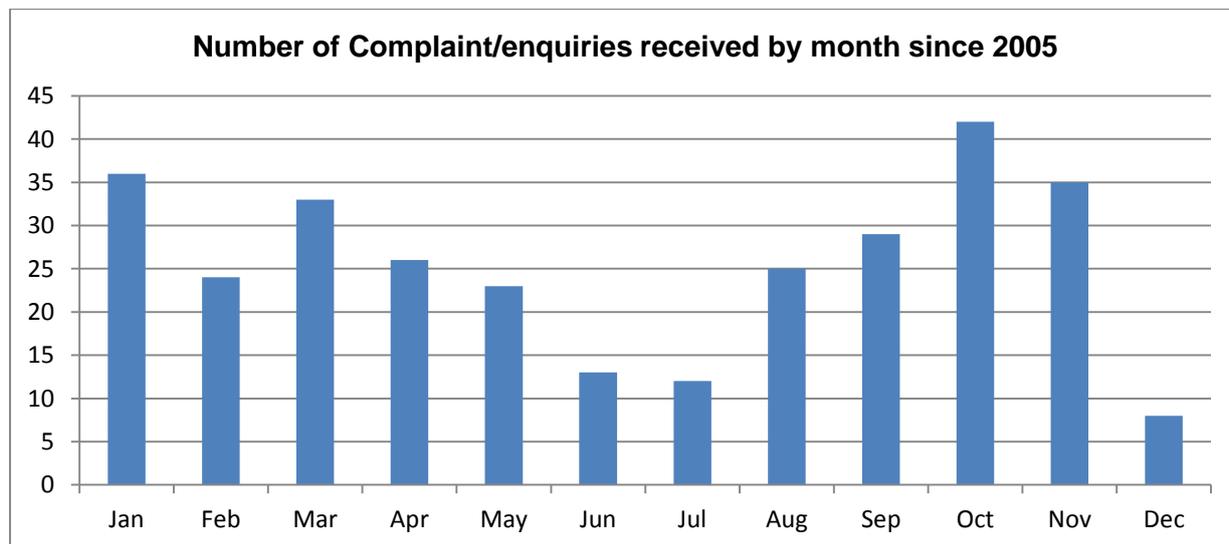# = A complaint was dealt with by the Full Tribunal

Table 14 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.

The National Codes Administrator and Code Complaints Handler record all contacts made by tenants or former tenants (or their representatives) of developments covered by the Codes that 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 2015 having received the most number of tenant contacts in anyone year so far.

Table 14 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, 44% 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 increased markedly in the last two years.

Graph 5: Complaints/enquiries received by month since 2005

Number of Complaint/enquiries received by month since 2005

Month	Number
Jan	36
Feb	24
Mar	33
Apr	26
May	23
Jun	13
Jul	12
Aug	25
Sep	29
Oct	42
Nov	35
Dec	8

In terms of when during the year complaints/enquiries are made, Graph 5 reveals some interesting patterns of spikes and troughs. There are significant spikes in October, January and March, which could be explained in terms of the cycle of the tenancy. The October complaints/enquiries usually relate to dissatisfaction with the property conditions when the tenant/s moved in; January may relate to problems that had previously existed but which are perceived not to have resolved during the Christmas vacation, e.g. proposed maintenance work; whilst March is the time of year when the final rent instalment is due and may offer the final opportunity to attempt making a claim for a rent reduction. The troughs seen in June and July may relate to the summer vacation when the tenants are not likely to be living in the property.

Table 15: Outcomes from Non-Formal Complaints

Outcome	Numbers
Not pursued further	91
Issues resolved by provider	18
Still to be dealt with under the provider's own complaints procedures	114
Concerned non members	3
On-going	1
Total	227

Table 15 illustrates that, in the majority of cases, non-formal complaints tend not to have been dealt with by the provider's own complaints procedures at the time they were raised. Either that or, having received an initial response from the NCA or Complaints Handler (which may be a request for additional information), the complainant did not pursue the matter following that original contact. In a small number of cases the provider, having been made aware that a problem has been raised, may have sought to resolve the situation without the need for it to be taken to any formal stage. However, it is also possible that the reason the majority of these contracts did not turn into formal complaints is because the provider made an intervention, thus ensuring that the complainant either did not pursue the matter further OR they were satisfied with the provider's subsequent action. Previously it was not possible to determine the extent of such provider inputs, given the way the information is compiled. However, with the appointment of the Complaints Handler, it is anticipated that it will in future be possible to make an assessment of the extent to which providers themselves are resolving non-formal Code complaints.

Table 16: Outcomes from Formal Complaints

Outcome	Numbers
Referred to Tribunal and Up-held	21
Referred to the Tribunal and NOT Up-held	10
Resolved by Provider before the matter was referred to Tribunal	14
NOT referred as no additional information was provided to support the complaint	16
NOT referred as the matter had not been subject to the provider's own complaints procedure	12
On-going	2
Total	**75**

Table 16 is a much better indicator of the extent to which providers respond to complaints that have been received against them, and reflects the fact that - once a formal complaint has been made - the provider is required to respond to the allegations that are being made; it is only where the matter remains un-resolved after that contact has been made (or is disputed) that the complaint would be referred to the Tribunal procedures. The findings displayed in this table suggests that a provider is more likely to resolve a matter once they have been contacted by the NCA or Complaints Handler, however, it also reflects the fact that where the Tribunal is asked to adjudicate on a matter the complaint is more likely to be up-held than not.

In a small number of cases the complainant either does not provide any additional information to assist the NCA or Complaints Handler to complete the initial assessment of the complaint, or it is clear that they have not moved to the second stage of the complaints procedure before the first stage (the provider's own complaints process) has been entered into.

Table 17: Most common issues included in complaints - enquiries and formal complaints

Issue/s	No. of Time Raised in General Complaints	No. of Times Raised in Formal Complaints
Disrepair	57	13
Deposits	35	8
Dealing with disputes	30	5
Disrepair and dealing with disputes	14	7
Contractual matters	11	4
Tenant issues and dealing with disputes	10	3
Misleading advertising	8	5
Access to rooms/flats	8	2
Not acting professionally	8	2
Contractual issues and disrepair	8	3
Not responding to correspondence	6	1
Room not ready at start of tenancy	4	2
Harassment	2	2
Misleading advertising and dealing with disputes	5	3
Dealing with disputes and not responding to correspondence	3	1
Security issues	7	0
Disrepair, not dealing with disputes and not responding to correspondence	4	5
On-going external building works	2	2
Alternative accommodation not acceptable	2	1
Non-provision of disabled access	2	0
Theft of property/deposits	2	0

Table 17 lists the most common themes that have been cited as the reason for why a complaint - both general and formal - has been made (taking only those that have been given in at least two separate complaints), and makes a comparison between general complaints/enquiries and formal complaints.

It is not surprising that disrepair is the most commonly cited cause for a complaint, but the fact that dealing with disputes and deposit issues are a close second and third might be. However, 'deposits' is a broad heading and covers a variety of situations where a provider has failed to protect deposits, through to advice on end of tenancy cleaning. It should also be remembered that some providers covered by the ANUK/Unipol codes do not use Assured Shorthold Tenancies and, as such, are therefore exempt from the need to protect deposits.

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 power to suspend the member whilst the matter is considered more fully. Until recently these bodies were required to make a recommendation to the Committee of Management before suspension or removal could occur, however the Codes Consortium is very likely to rescind this requirement when it next meets.

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 further three year period - despite previously stating a desire to stand down from it. The Codes' Consortium, which took the decision to reappoint him, did so on the basis of both his experience as well as his continued enthusiasm for the role.

The positions of the two Vice Chairs and the other members of the Tribunal were also subject to re-appointment in the autumn of 2015. Shelly Asquith, having been re-elected as NUS VP Welfare, continues in the role of vice chair representing NUS, whilst Keith White continues as the Vice Chair representing providers.

A further six members of the Tribunal were appointed in the autumn of 2015, each for a three year term of office, and these are:

Mr Mark Allen (UPP)
Ms Jane Crouch (Fresh Student Living)
Ms Liz Hodgen (Unipol)
Ms Fleur Priest-Stephens (NUS)
Ms Victoria Tolmie-Loverseed (ANUK)
Mr Brian Welsh (The Student Housing Company)

Section 7 – Website Visits and Online Training Course

National Codes Website

The current National Codes website is now five years old, so it seems a good time to be assessing the amount of use that has been made of it over that time as well as what changes are likely to be needed to make to it in order that it remains relevant to all users.

Table 18: National Codes Website: Visits, Visitors and Pages Viewed, 2011/12 to 2015/16

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%

The steady increase in the number of visits and visitors to the National Codes website over the five years that it has been operational is probably to be expected, but none the less it is an indication that it provides people with the sort of information they require and that greater numbers are making use of it (and viewing its pages more times) each year. However, when these figures are compared with the usage that is made of the Unipol website, for example, the number of visits and visitors to that each year are counted in the hundreds of thousands. Of course, the purpose of the two websites are not the same so the comparison is misleading; the Unipol site is used by people searching for somewhere to live in a much more direct way, whereas the National Codes site promotes certain types of accommodation providers.

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 2015/16 are listed in Table 19 (below). The most popular was the list of members, suggesting that visitors are using the site to check out whether a provider is accredited under the Codes - very much as was intended. On the basis of the other most popular pages viewed, the impression gained is that the site is being used by a mixture of students, parents and Codes members themselves, which was also the intention when the site was created.

Table 19: The Top Ten Most Viewed Pages 2015/2016

Page Title	Number of Page Views
Members List Page	6,337
For Students and Parents	2,868
For Members	2,254
Scheme Overview	1,665
Code Download	1,626
ANUK Overview	1,305
Contact Us	917
How the Codes Work	819
What's in it for Housing Providers	738
What Training is Available	736

The findings in the final three columns of Table 18 are interesting because they not only reflect the general trends within society over the last five years for people to access websites from a greater range of devices, they also give a clue as to whether or not the percentage of student use of the site has increased over that same period. Because students tend to prefer accessing websites from their mobile phones or tablets, rather than desktops, the evidence from Table 18 is that although students do visit the site - and those visits have increased over time - they remain the minority of visitors.

Part of the reason for this might be due to the fact that the National Codes website was not designed in such a way as to encourage access from mobile phones, and in order for this to change a re-design would be necessary. Given the age of the site, and the stated intention of the Committee of Management that aspects of it require to be changed, one of the challenges for 2016/17 will be to begin the process of re-designing the site, with a target launch date of January 2018.

Online Training Course

The online training course has been available for use since 2010, and up to the end of June 2016 a total of 2,823 users had either started or completed the course. Use has varied over time, as shown in Table 20 (below), 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. The latter rise may be due to an increased vigilance from National Code verifiers during the 2015/16 period to check whether managers of developments that they visit had completed the training course, which from May 2016 became an actual requirement of the Code for non-educational establishments, as opposed to merely a recommendation.

Table 20: 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 (to end of June)	614

Work to ensure that the online training course reflects the recent changes made to the aforementioned code is on-going, but this should have been completed before the start of 2017.

Section 8 – Conclusion

<u>Achievements in the Tenth Year</u>

- Completing the review of the Code for Non-Educational Establishments by the start of 2016;
- Increasing the robustness of the verification procedures;
- Raising the profile of the Codes;
- Updating the online training course to incorporate the changes made by the review of the Non-Educational Establishment Code and to refresh its contents more generally;
- Undertaking a review of the operations and membership of the Committee of Management;
- Increasing the total number of bed spaces covered by the Codes by 25,000 during the year (2015 to 2016);
- Generating additional resources through higher membership fees.

<u>Challenges for the Eleventh Year</u>

There are a number of challenges for the forthcoming year that need to be met:

- 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;
- Improving both 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;
- Collection 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.
-

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: BUDGET COMPARISONS
Actual V Budget Comparison 1st August 2015 to 31 July 2016

2015-2016 Annual Budget £		2015-2016 Period 12 Actual £	2015 - 2016 Period 12 Budget £	Variance to Budget £
	INCOME			
280,600	Fee Income	331,900	280,600	51,300
7,000	Conference Income	0	7,000	(7,000)
2,500	Income from Revisits	13,654	2,500	11,154
25	Interest	26	25	1
290,125	**TOTAL**	**345,580**	**290,125**	**55,455**
	EXPENDITURE			
33,589	Office Costs	26,831	33,589	(6,758)
42,590	IT Expenditure	48,881	42,590	6,291
117,258	Staff Costs	114,785	117,258	(2,473)
1,000	Marketing Costs	0	1,000	(1,000)
3,750	Travel Costs	4,165	3,750	415
2,957	Communications & Publications	1,087	2,957	(1,870)
0	Consultancy	0	0	0
45,000	Verification	55,261	45,000	10,261
0	Audit Panel	0	0	0
2,000	Tribunal & Honoraria Expenses	2,860	2,000	860
25,000	PR & Advocacy	0	25,000	(25,000)
6,000	Joint Codes Conference	5,977	6,000	(23)
1,500	Legal	198	1,500	(1,302)
0	Debit and Credit Card Charges	9,875	0	9,875
0	Revolving Credit	1,779	0	1,779
2,500	Website Costs	0	2,500	(2,500)
1,000	Miscellaneous	3,620	1,000	2,620
(1,500)	VAT	(110)	(1,500)	1,390
5,448	Depreciation	3,874	5,448	(1,574)
288,092	**TOTAL**	**279,083**	**288,092**	**(9,009)**
2,033	**Surplus/(Deficit)**	**66,497**	**2,033**	**64,464**

DCLG are reminded that the financial year runs from August 1st 2015 to July 31st 2016 but fees are due on January 31st 2016 and runs for a calendar year. The cash flow for the National Codes is heavily in the negative until the half year point, when it moves into surplus.

Overall, the Codes are working within their current budget and, with some flex on staffing and administrative costs, have been able to absorb the additional attention necessary following a period of considerable change in the student purpose build market.

APPENDIX 2: 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

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

Aldwyck Housing Group

Asha House Management Co

Ashwell House

Mohammed Aslam

Atelier Property Asset Management Ltd

Baaz Properties

Britannia Travel Services Ltd

Campus Living Villages

Canto Court

Carr Mills (D&B Property Management)

Cass and Claredale Halls of Residence Association Ltd

Chapter 1

City Block Ltd

Code Student Accommodation

Collegiate AC Ltd

Congregational Federation

Cotton Mills Management Company

CRM Students

D & B Property Management Ltd

Derwent Students

Downing Students

Ducane Housing Association Ltd

Find Digs Ltd

Fortis Student Living

Fresh Student Living

Hamstead Campus Ltd

Hult International Business School

Independent Student Living

INTO Newcastle University

INTO UEA

IQ Letting Property Partnership

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

Notting Hill Housing Trust

Parklane Triangle

Parrish Court Developments Ltd

Priestley and Co

Prime Student Living Limited

Primo Property Management

Prodigy Living

Reed Residential Ltd

Sanctuary Students

Scape Student Living Ltd

Shumei Eiko Ltd

South Street IM Ltd

Spectrum Housing Group

Anne Staley Design Ltd

The Stay Club Limited

Student Castle Ltd

Student Facility Management Limited

The Student Housing Company

Student Living

Study Inn

TigerLime Limited

TJ Thomas Estates Co Ltd

Touchstone Student Living

Towers Lettings and Block Management

Unilife

Unipol Student Homes

UNITE

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

Victoria Hall

Viridian Housing

Vita Student Management Ltd

West One Student Accommodation

Whitfield Group

X1 Developments

Yara Students

YPP (Yorkshire Prosperity)

Zebra Housing Association

Zone Management

APPENDIX 3: Visits Undertaken in 2015/16 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.

Campus Living Villages (My Student Village, Exeter)
Campus Living Villages (Liverpool)
Fresh Student Living (Quebec House, Kingston)
Homes for Students (Canalside, Birmingham)
Homes for Students (Beaverbank Place, Edinburgh)
Homes for Students (Exeter One)
Homes for Students (Firhill Court, Glasgow)
Homes for Students (Dansgate House, Lincoln)
Homes for Students (St Andrews Gardens, Liverpool)
Homes for Students (Bowman House, Nottingham)
Homes for Students (The Glasshouse, Nottingham)
Jesus College, Cambridge
Kexgill (Radio House, Stockton)
Mansion Group (Haigh Court, Liverpool)
Prime Student Living (The Glassworks, Liverpool)
Prodigy Living (Penworks, Birmingham)
Prodigy Living (Studios 51, Birmingham)
Prodigy Living (Hayes Wharf, Lincoln)
Prodigy Living (Pavilions, Lincoln)
Prodigy Living (Astor House, Plymouth)
Sanctuary Student (Grenville Street South, Liverpool)
South Street (Ravenscourt House, London)
St Modwen Student Living (Swansea Campus)
Student Housing Company (Courtrooms, Bristol)
Student Housing Company (Ablett House, Liverpool)
UNITE (Sidney Webb House, London)
University of the Arts (Camberwell Campus, London)
University of Leeds
UPP (Broadgate Park, Nottingham)
Urban Student Living (Trinity Hall, Chester)
Vero Group (Abacus House, Brighton)
Vero Group (Great Newton House, Liverpool

Vero Group (IQ Brocco, Sheffled)
Victoria Hall (Penrhyn Road, Kingston)
Victoria Hall (Higher Cambridge Street, Manchester)
Vita Students (The Chapel, Liverpool)