

ANUK/Unipol National Codes for Purpose Built Student Accommodation

Annual Report for the
Department of Levelling Up,
Housing and Communities 2023

Covering the period 1st August 2022 to 31st July 2023



History of the National Codes

The National Codes were developed in response to concerns raised by a number of organisations, including the National Union of Students (NUS), about management standards in the expanding new sector of privately-owned and -managed student accommodation.

Following initial discussions in 2002, the Accreditation Network UK, NUS and Unipol Student Homes formed a consortium in 2004 and began to devise a Code for private sector accommodation providers. Discussions were held with a number of private providers, some of whom agreed to become founding members of the Code. Meetings were also held with other interested stakeholders, such as the Association of Residential Student Accommodation and College and University Business Officers, who suggested developing a Code for accommodation managed by universities and colleges as well.

The Codes were formally launched in November 2004 and the first membership year began in 2005 – with around 50,000 bed spaces covered.

During the passage of what became the 2004 Housing Act, the Government expressed some interest in recognising Codes of Practice/Standards within the scope of this legislation. It therefore awarded 'Approved' status to both of the ANUK/Unipol Codes in 2006 (and did the same for the Code operated by Universities UK).

By 2007 it had become clear that the ANUK/Unipol Code for Educational Establishments was in need of some revision in order to better reflect the standards that managers of University and College accommodation were aspiring to. A review was carried out and a revised Code received government approval in August 2008.

Both of these Codes have 'Approved' status under Section 233 of the 2004 Housing Act, which requires local housing authorities to except accommodation operated by educational establishments from mandatory HMO Licensing. However, accommodation operated by non-educational establishments is not excepted.

The above legislation only applies to England, and different requirements exist in Wales and Scotland. However, where a provider has signed-up to the National Codes, their requirements apply to purpose-built student accommodation throughout the whole of the UK.

Following review of the ANUK/Unipol Code for Non-Educational Establishments, a revised version came into effect from March 2022. A review of the Code for Educational Establishments is currently being consulted upon and a final draft version is expected to be presented to the Department for Levelling Up Housing and Communities before the end of 2023.

Contents

Executive summary	4
Introduction	7
2022/23: the year in review	7
Looking forward: opportunities and challenges in 2023/24.....	17
Looking further ahead	19
Membership of the Codes	20
Governance.....	25
Appendix 1: List of members.....	27

Executive summary

The ANUK / Unipol [National Codes](#) support compliance and improve student confidence in the quality of purpose-built student accommodation (PBSA), alternatively known as 'student halls', enabling students to focus on their studies without distracting housing concerns. During 2022 – 2023 the National Codes have continued to effect positive change in the sector for their stated purpose “to act in the best interests of students”.

2022/23: A Year in Review

Review of the Code for Educational Establishments

Although a review of the Code for Educational Establishments began in April 2022, the process is due to complete in late 2023, at which point it is to be submitted to the Department for Levelling Up, Housing and Communities for approval.

A draft version of the revised Code was sent out to members and stakeholders for consultation in July 2023 and this highlighted proposed changes to the content with respect to a number of different sections/clauses, including: limits to rent chargeable for disabled students; internet provision; mail distribution, health and wellbeing, lifts, and complaints. In addition, the consultation made reference to proposals for the introduction of new sections and clauses and these included: accommodation guarantees; new and late buildings; and fire safety and remediation.

Verification visits

In 2022/23, 184 standards verification visits to members' properties were completed, 17 per cent more than in 2021/22. Of the visits conducted, 92 per cent resulted in action, the largest annual proportion recorded for the Codes' six-year dataset.

Updating of the self-assessment questionnaire

The online self-assessment questionnaire that members of the Code for Non-Educational Establishments are required to complete once every three years was updated to include the newest Code requirements. It was also overhauled in terms of how it operates in order to make it more user friendly for both members and verifiers.

A greater focus on fire risk assessments

As a result of both enhancements to the Code with respect to fire safety and changes to legislation, more emphasis was placed on members of the Code being able to demonstrate that they possessed fire risk assessments and that they were actively ensuring that any works identified by the assessments were being undertaken.

Training

A wide range of training sessions were offered during 2022-2023. These included further mental health first aid courses, but also some specific briefings for students unions and also a new edition of “Understanding LGBTQ Issues in Student Accommodation”. A full list of courses is given later in this report.

Complaints

In 2022/23, there were 342 complaints to the National Codes, 112 per cent higher than in 2021/2022 (161) and seven per cent higher than those for 2020-2021. All but four per cent of cases have now been closed, with the majority of these having been resolved by the providers themselves. The Codes Full Tribunal met for the first time in nearly five years, which resulted in the expulsion of the provider concerned.

Student engagement and input into the Codes

Engagement with Student Unions' has increased this year, and the National Codes has offered briefing session for Student Advice teams to raise awareness of the benefits to students of the Codes and how to make best use of the Complaints process. A new Student Advisory Group has also been established.

The year ahead

Significant sector trends

A number of the trends identified in the 2022 Annual Report look to be ongoing for 2023. These include:

- Shortages of accommodation in certain locations throughout the UK as a result of supply chain issues and development costs impeding supply, together with expanding student numbers
- The private sector continuing to grow PBSA market share, with slower growth from educational institutions and the HMO market contracting.

Impact of the Renters Reform Bill

It remains unclear as to the likely impact that this legislation will have on student accommodation as a whole, although there are warnings that the off-street sector will struggle to maintain viability following tenure reform with the consequence that some landlords leave the student sector, reducing availability of housing. It has been flagged in the Bill that PBSA will be exempted from some aspects of tenure reform and the National Codes will continue to monitor this and liaise with Government as more detail emerges.

The National Codes: Scotland and Northern Ireland

Whilst Ministers in Scotland are currently considering a series of recommendations arising from the PBSA Review that was undertaken in 2022, discussions with the Scottish Government concerning its relationship to the Code are paused. Any approach to the Northern Ireland Assembly will have to await the restoration of the power sharing arrangements in the six counties.

Student growth and international diversification

Although undergraduate numbers have shown a small decline this year, international postgraduates continue to increase leading to an overall growth in student numbers and accommodation demand. However, there is increasing diversification in the country of origin of these internationals with significant growth from India and Nigeria, where budgets may not stretch to some of the higher rents charged in PBSA. Accommodation demand is consequently becoming more diverse, with rising international numbers not translating directly into PBSA demand.

RAAC Checks

Following the publicity arising from the problems resulting from the use of Reinforced Autoclaved Aerated Concrete (RAAC) in public sector buildings, members of the ANUK/Unipol National Codes were contacted by the Code Administrators and asked whether they had undertaken any checks for this within their own buildings. They were also asked what action they were planning to take should any be identified. As of the end of September 2023 replies had been received from 34 members. Most reported that as their buildings were constructed at a time when this material was no longer in use there was not an issue, but several stated that they were (or had completed) checking for its presence and would notify the Codes should it be identified. The only major PBSA building known to be affected is the Grade II listed Norfolk and Suffolk Terrace (the Ziggurats) owned by the University of East Anglia and therefore not covered by the ANUK/Unipol National Codes, which has caused the 750 rooms to be evacuated and students relocated.

Home Office procurement of student accommodation

In the summer of 2023 the National Codes received a report from a member of the Code for Non-Educational Establishments about a building they had been planning to manage for students being procured by the Home Office for asylum seekers. At present it is unclear whether this is a one-off occurrence or part of a developing trend.

Black Students Commission

During 2022 – 2023 the National Codes took part in the Living Black at University Commission, an initiative launched by a Code member, Unite Students, following research that indicated that black students have worse outcomes in student accommodation. As a result of this initiative, during 2023 - 2024 the National Codes will be making some improvements to information provided about the Complaint Process and also introducing a specialist equality, diversity, belonging and inclusion module to the Online Training course.

Membership of the Codes

There are now 406,696 bed spaces covered by the Codes, and membership is rising steadily. It is estimated that this accounts for 97% of those eligible to join the Codes. From summer 2018 to summer

2020, some 30,000 new bed spaces were added each year. However, this figure dipped to 18,000 in 2021 and was lower still in 2022 (14,248), and there is no sign of a recovery in these numbers as just 10,762 bed spaces were registered with the Codes for the start of the 2023/2024 academic year.

In the year to June 2023, the Codes welcomed four new members, who together added 1,671 bed spaces to the total. In contrast, nine private sector members were removed or withdrew from the Code in 2022.

Governance

The Codes' standing bodies – the Committee on Management, the Audit Panel and Consortium – are running effectively and meeting regularly to discharge their responsibilities fully, with attendance being good and improving. A new body, the Student Advisory Group, met for the first time this year with the intention of strengthening student input into the Codes.

Looking further ahead

Across the next three years, the aim is to lay the foundations of a national student advice system, developed as part of the National Codes student guidance role. This student advice service will give better information on students' housing options and costs. In the light of growing accommodation shortages across the UK, over the next year, it is hoped that a 'traffic light' system can be developed to tell students where there are shortages and how it might affect them across a letting year.

The standards team at Unipol, who run the Codes, are very proud of the work that has been done in the sector over the past year, and we look forward to continuing to extend this beneficial influence over the student accommodation sector in the forthcoming year.

A year in review: key statistics 2022/2023

406,696 bed spaces covered by the National Codes  **0.15%**

A net increase of 61 new bed spaces in member organisations

56 per cent of the whole sector's bed spaces are covered by the Codes

4 new member organisations

1,502 members enrolled on National Code training courses

33,661 visits to the National Code website

184 verification visits completed, 170 of which resulting in actions and improvements

342 complaints to the National Code, 74 of them investigated by the Code Investigator

92 per cent of complaints resolved for the year

Introduction

The [National Codes](#) continue to test and improve property and management standards in the purpose-built student accommodation (PBSA), operated by both the educational and private sectors. The National Codes take a mission-led approach to “act in the best interests of students”, enshrining this in the new Code for Non-Educational Providers Code in 2022.

The robust and transparent operation of the Codes are a key element that gives members and students confidence, and this is underpinned by:

- Formal documentation and processes that support efficient and fair outcomes
- Independent oversight of audit and complaint processes
- A student-led focus, with educational outcomes a key driver in setting standards.

2022/23: The Year in Review

Major development work

The new Code for Educational Establishment Providers

Review processes

Although the initial stage of the review process began in June 2022, the bulk of the work has taken place since September 2022.

The terms of reference for the Review Group were “*To examine all aspects of the ANUK/Unipol Code of Standards for Large Developments for Student Accommodation Managed and Controlled by Educational Establishments and to make recommendations for future changes to the Code*”. In other words, a detailed examination of the content of the Code and the development of proposals for changes and additions to that content.

At the first meeting of the Review Group some proposals were made for the deletion of or changes to existing Code clauses. In addition, it was noted that since the completion of the review into the Code for Non-Educational Establishments in March 2022, the two Codes now diverged considerably and that, as such, the group might wish to consider making changes with respect to the following areas:

- Additional equality and diversity requirements, particularly focussing on disabled students
- Provisions around late delivery and opening of new buildings, introducing a number of ‘no quibble’ payments for students when this happens
- Additional requirements in relation to fire and building safety
- Clarifying complaints process
- Other minor changes to support efficient administration.

When the National Codes Consortium met on September 9th 2022 it agreed that the Review Group be invited to consider the inclusion of two brand new headings - 1) Accommodation Guarantees and 2) Allocation of accommodation in locations remote from the educational establishment at which students will be studying. These two issues had raised some concerns over the summer of 2022.

Another significant development with the process was agreed when the Review Group met in October 2022, namely the decision to request the input of members of the new Student Advisory Group into the development of the revised Code, ahead of the Review Group’s third meeting. To facilitate this, a meeting was held with SAG members at the end of November 2022, at which they were invited to comment on a range of suggested changes, as well as to make any of their own.

At the third meeting of the Review Group, in February 2023, members were invited to consider a revised version of the Code that was based on discussions from the previous two meetings as well as the

comments from the Student Advisory Group and, on the basis of this, a track change document was devised that formed the basis of the consultation process with members and stakeholders.

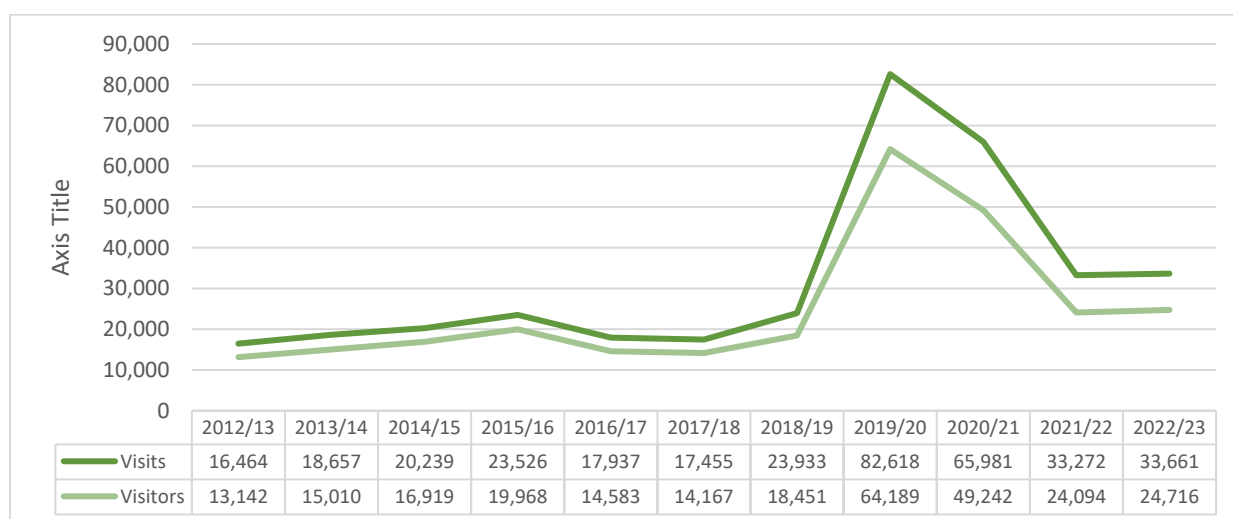
The consultation for the new standards was launched in July and, as such, the final stages of the review will not be completed until the end of 2023 at the earliest.

The National Codes website

Use of the website

Visitor numbers spiked over the two years of the pandemic (Figure 1) highlighting how much of a resource centre the Code website had become. Whilst these numbers declined immediately following the two pandemic periods, they were still greater than in 2018-2019 and they increased slightly in 2022/2023.

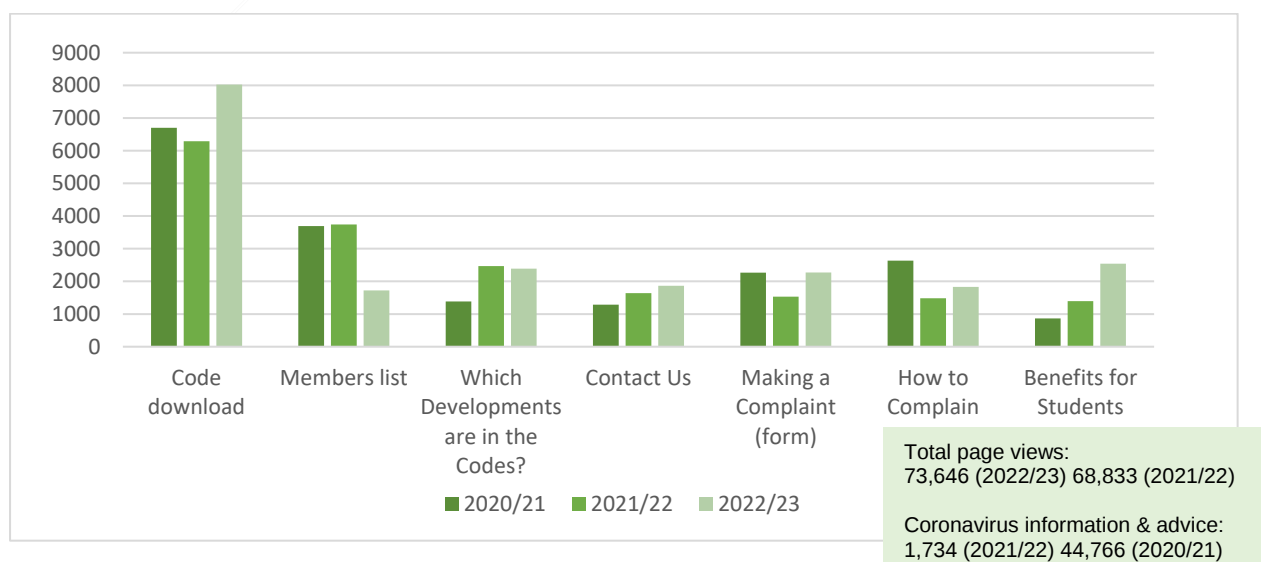
Figure 1: National Code website: visits and visitors



In terms of the pages of the website that have attracted most attention (Figure 2) are Download the Code and the Members List. There is growing visitor numbers to pages related to complaints and benefits to students, which is supported by the complaint numbers seen this year.

The above indicates that use of the website looks to have returned to more of a pre-Covid level but with growing visitors.

Figure 2: Page views 2021/22 and 2022/23



Fire risk assessment checks

As was reported in the last edition of the Annual Report, one of the additions made to the requirements for members of the Code for Non-Educational Establishments in 2022 was with respect to fire safety checks of buildings. Members now need to provide the Code with a copy of their fire risk assessment, as well as to provide one for all buildings included within the verification visits programme and/or those which change operational management. In addition, where a building is 18m or higher the operator needs to supply the FRA on an annual basis. The other significant change that was imposed in 2022 was the need for a type 3 fire risk assessment to be undertaken for all new developments when first occupied, which means that checks are made of living areas as well as communal spaces.

The National Codes now have a growing digital record of Fire Risk Assessments and during 2023 – 2024 work will be undertaken to develop an evaluation system as part of the verification process.

Review of core activities

Verification visits

Visits to member properties to ensure compliance with Code standards on safety and operational effectiveness are a core component of scheme administration. There are eight types of visit conducted each year:

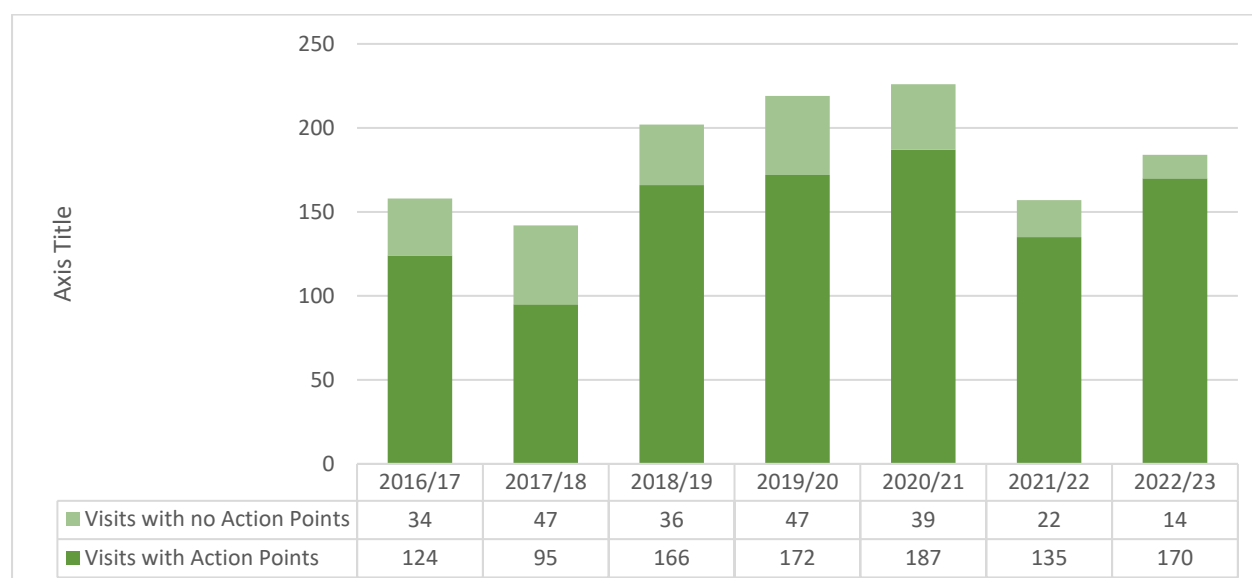
New applicants	Cyclical re-visits	New developments	Complaints
Existing members	Revisits	Change of operational management	Chairs' action

In 2022/23, 184 verification visits were completed, 17 per cent more than in 2021/22. The increase is attributable to:

- More new development visits
- Visits to all 32 of the Cambridge colleges.

Of the visits conducted, 92 per cent (170) resulted in action, the largest annual proportion recorded for the Codes' six-year dataset (Figure 3).

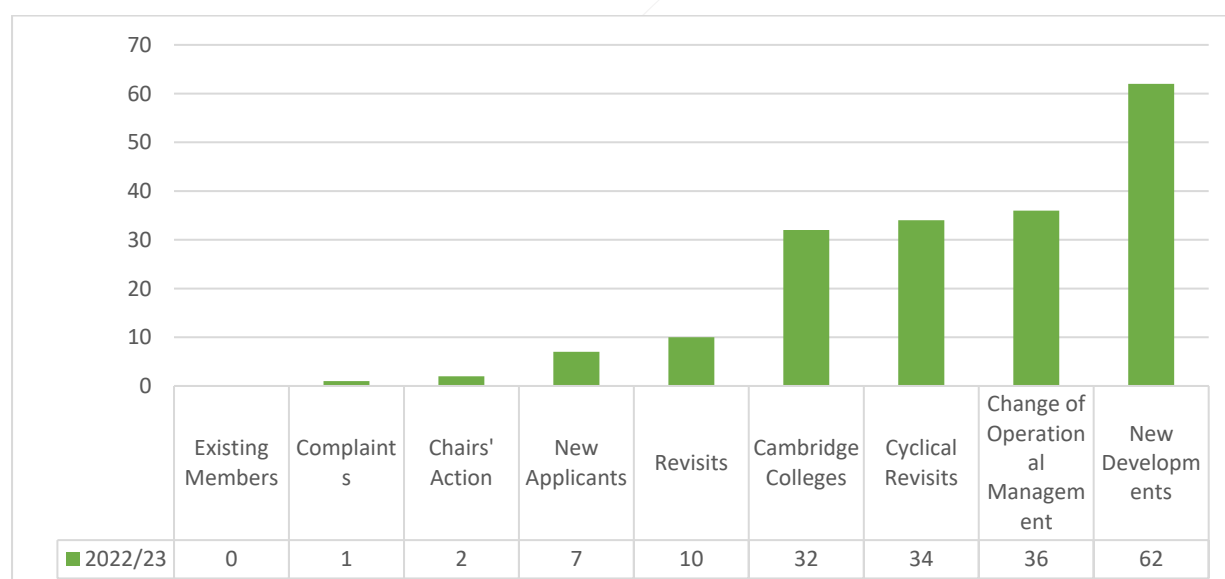
Figure 3: Verification visits completed since 2016/17 by actions needed



The trend for a decreasing number of visits with no action points identified continued in 2022/23 and a new low of less than eight per cent of visits without one or more actions being reported by verifiers was recorded.

Figure 4 splits down the 2022/23 verification visits by type. New developments and changes in management accounted for 53 per cent of all visits (a decrease from 61% in 2021/22).

Figure 4: Verification visits by type 2022/23



Each year, in addition to the visits triggered by sector activity, verifiers run a location-specific visit programme. In 2023, Coventry was chosen for this purpose and 18 visits took place. The location-specific visit allows a team-based approach to verification and individual views can be moderated to ensure consistency in the verification programme.

Self-Assessment Questionnaires

In January 2023 the project to overhaul the self-assessment questionnaire which members of the Code for Non-Educational Establishments are required to complete was concluded having been delivered both on time and on budget.

Since 2013 members of the Codes have been required to complete an online assessment questionnaire, once every three years, detailing their levels of compliance with the Code. These were then used to inform the verification visit process, including a draft report following a visit to the provider. However, it was clear by 2021 that the system was outdated and needed an overhaul, and so in 2022 Mr Paddy Jackman (Former chair of the Audit Panel) was commissioned to devise a system that was more user-friendly, as well as capable of providing greater analysis of outcomes from visits for use by the Codes Audit Panel.

The new system now requires members of the Code for Non-Educational Establishments to complete two questionnaires. The first one is the organisational self-assessment questionnaire (OSAQ), which members will need to update at least every three years, and this sets out questions covering the parts of the Code which are the responsibility of the organisation as a whole. The second one covers matters specific to the day to day management of the building, and this site self-assessment questionnaire (SSAQ) is completed ahead of a visit to a development taking place.

Another significant difference with the revised assessment system is that the verifier, when completing their report is able to RAG rate any action points that they identify during the visit and this helps prioritise these matters for both the verifier and the provider. The revised system also permits the provider themselves to notify verifiers online when actions have been completed.

Once the revised Code for Educational Establishments has been finalised, the SAQ system relating to that Code will also be altered in line with the one described above – with the creation of a specific OSAQ and SSAQ that will incorporate the updated requirements for members of this Code.

Training

A range of training is provided for members of the National Codes to support good practice and compliance. Engagement with training was exceptionally strong during the height of the pandemic, and reflects members' confidence in the Code management to deliver reliable, up-to-date information and quality advice in challenging circumstances.

Engagement with National Code training courses over time

Figure 5: National Code training: members enrolled on courses

	2020/21	2021/22	2022/23
Members enrolled	1,251	1,617	1,502

In addition, these courses were offered during 2022/23:

- Understanding HE and the National Codes for PBSA – An Introduction for New Staff
- The Fire Safety Act – Requirements in Purpose Built Student Accommodation
- Understanding Essential Health and Safety in Purpose Built Student Accommodation
- Various briefings for Students Unions.

In July 2023, a new free course was introduced for operational staff to improve their understanding of LGBTQ issues.

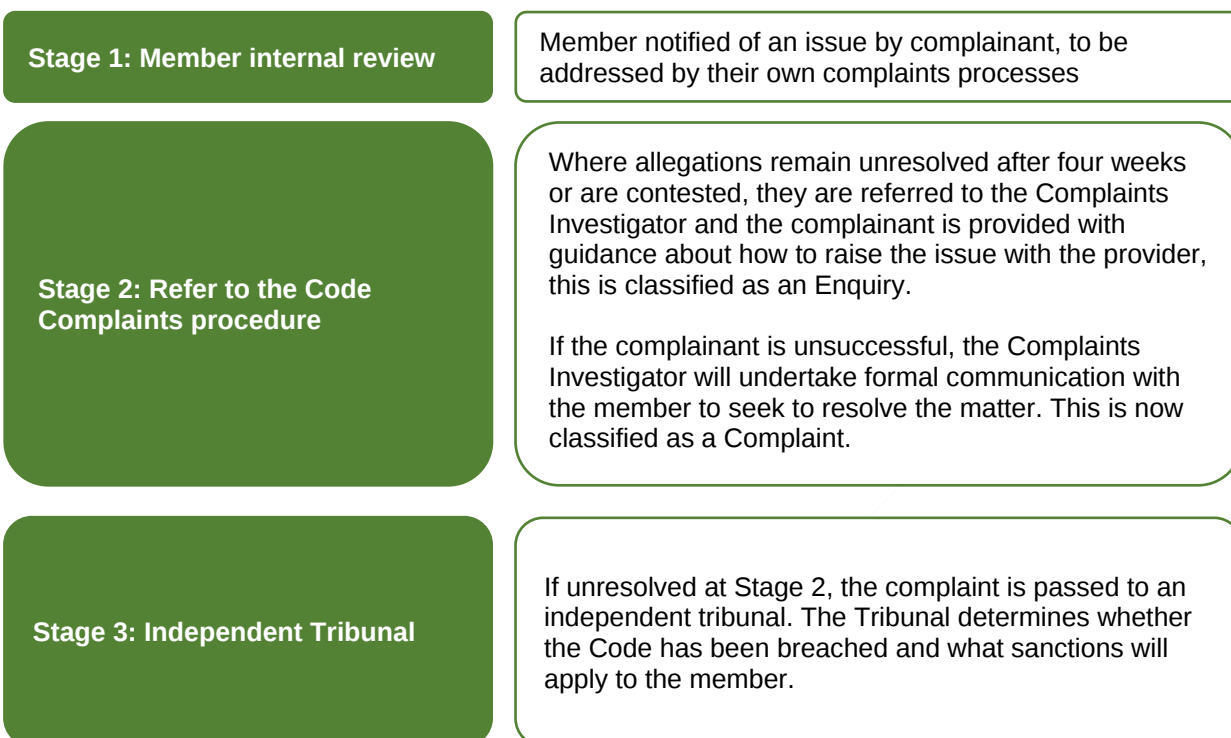
Because it is a requirement of the Code for Non-Educational Establishments that members of the Code for Non-Educational Establishment will ensure that their staff are trained in mental health crisis management, Unipol has continued to offer its *Mental Health First Aid* training course, which remains very well attended.

Further training courses are being planned for the 2023/2024 period and these will cover such matters as how to take a constructive approach to dealing with complaints, as well as some specialist legal workshops that will be led by a housing law specialist.

Code Complaints, Investigations and Tribunals

The Codes complaints procedure follows a three-stage process. This provides for cases to be escalated as necessary:

Complaints process: three-stage process



Complaints activity 2022/23

In 2022/23, there were 342 enquiries and complaints to the National Codes. As of the end of July 2023 there were 26 cases outstanding, but of the other 299, most had been resolved by the provider. 65 per cent of cases were resolved by the provider themselves with some initial guidance from the Code Complaints Investigator (known as an Enquiry). A further 25 per cent required some intervention and were dealt with as formal Complaints, and an additional 10 per cent were passed to the Tribunal for consideration. The Tribunal resolved a significantly larger number than in the previous four-year period, although this was due in part to one group issue involving 13 complainants (Northend Management – Eldon Court).

Figure 6: Enquiries and Complaints

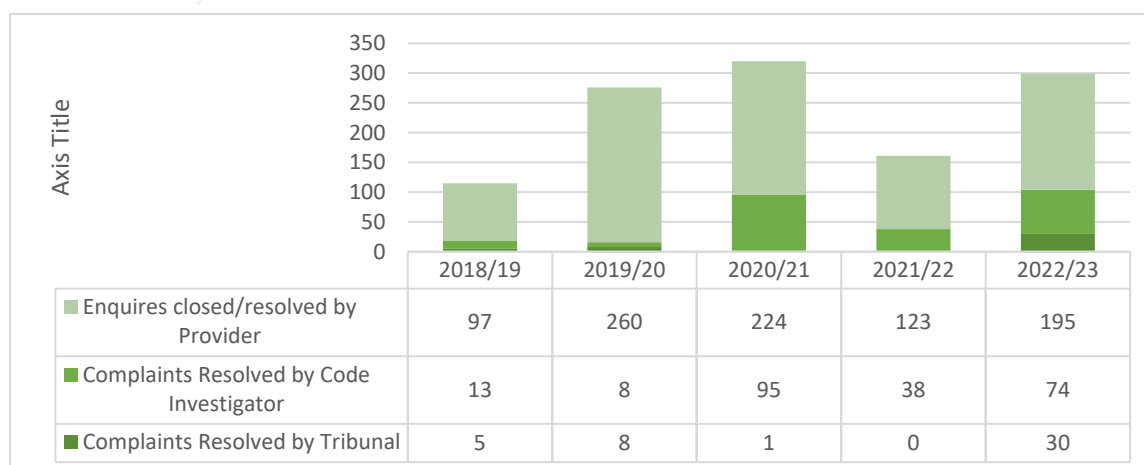
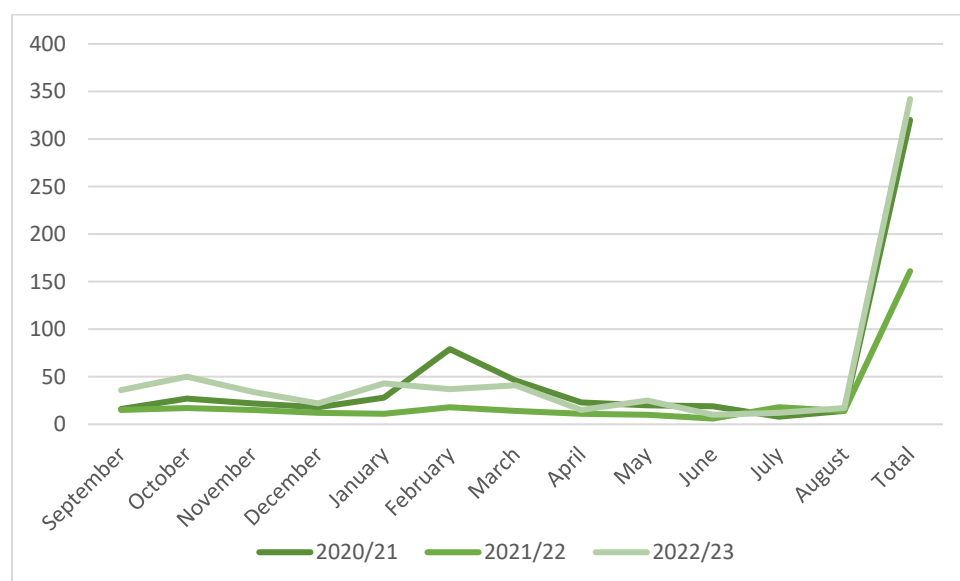


Figure 7: Complaints and enquiries by month 2020/21 to 2022/23



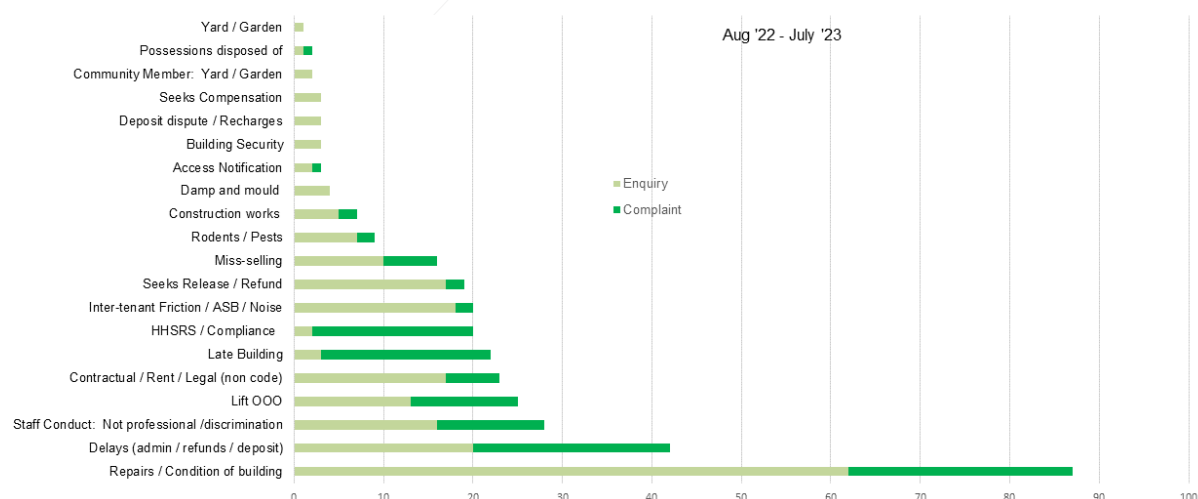
Complaints and Enquiries by Month	2020/21	2021/22	2022/23
September	16	15	36
October	27	17	50
November	22	15	34
December	18	12	22
January	28	11	43
February	79	18	37
March	46	14	41
April	23	11	15
May	20	10	25
June	19	6	10
July	8	18	12
August	14	14	17
Total	320	161	342

Complaint numbers have grown this year and this is likely due to two factors: growing awareness of the complaints process, and growing dissatisfaction related to service delivery especially repairs, highlighted in figure 8. Whilst repairs continue to dominate as the most common reason cited, added to the category in the last year are concerns with the condition of the building at the time of the students' arrival (Delays).

Two new categories have appeared in the figure in comparison with last year – staff conduct and out of order lifts – and these suggest that students have become much less likely to accept situations where they believe the service provided to them is sub-standard. Interestingly, the PBSA sector itself has recognised that challenges in these areas arose during 2022/23, due to difficulties in obtaining replacement parts/engaging contractors for lift repairs and staff recruitment and retention.

Figure 8: Top reasons for complaints/enquiries 2022/23

	Enquiry	Complaint	Total
Repairs / Condition of building	62	25	87
Delays (admin / refunds / deposit)	20	22	42
Staff Conduct: Not professional /discrimination	16	12	28
Lift out of action / disrepair	13	12	25
Contractual / Rent / Legal (non code)	17	6	23
Late Building	3	19	22
HHSRS / Compliance	2	18	20
Inter-tenant Friction / ASB / Noise	18	2	20
Seeks Release / Refund	17	2	19
Miss-selling	10	6	16
Rodents / Pests	7	2	9
Construction works	5	2	7
Damp and mould	4		4
Access Notification	2	1	3
Building Security	3		3
Deposit dispute / Recharges	3		3
Seeks Compensation	3		3
Community Member: Yard / Garden	2		2
Possessions disposed of	1	1	2
Yard / Garden	1		1
Grand Total	209	130	339



Ratio of Enquiries/Complaints to Tenants

The National Codes considers complaints received by members in relation to the number of beds under their management, as well as how likely Enquiries are to progress to Complaints. This information is used to highlight member organisations where complaint handling processes may be less effective or student-focussed.

Figure 9 below details the 15 members with the highest number of enquiries and complaints, analysed by 1,000 bed spaces.

Where it becomes apparent that complaints are not being dealt with efficiently or above average numbers are received, the Audit Panel will consider the matter and may take action such as recommending the provider attend complaint handling training. One member (Provider B on figure 9) has received this training in 2022/23.

Figure 9: 15 members with highest numbers of enquiries and complaints received, analysed per 1,000 bed spaces.

	Complaints / Enquiries Per 1,000 beds
Provider A	0.74
Provider B	1.31
Provider C	0.69
Provider D	0.74
Provider E	0.75
Provider F	75.00
Provider G	15.00
Provider H	1.09
Provider I	2.75
Provider J	0.53
Provider K	0.78
Provider L	1.00
Provider M	2.50
Provider N	1.00
Provider O	1.33

There are some standout entries in Figure 9. Providers F and G are both small operators who were the subject of a significant numbers of complaints, with both progressing to Tribunal.

Further information on the number and type of complaints received is available on the [National Codes website](#).

The Complaints Tribunal: decisions and audit outcomes

The National Codes website contains details of the cases which have been upheld through the Tribunal and Audit Panel processes. Details of all upheld decisions are posted on the [Tribunal and audit outcome web pages](#), and remain there for three years. The Tribunal upheld four complaints in the 2022/23 academic year.

Advocacy and Research

The secretariat for the National Codes sits within the student housing charity [Unipol Student Homes](#), which has a [research and advocacy](#) arm focussed on advancing understanding of the needs of students and the sector.

For the benefit of its members, the National Codes website routinely provides ready access to publications by Unipol and other national agencies engaged in higher education and student housing research. In 2022-23, these included:

- [Purpose built student accommodation \(PBSA\) and student housing: research-findings](#) Scottish Government, December 2022
- [Sharing Information to Support Student Wellbeing and Safety](#) Professor Edward Peck, April 2023

- [*The Latest Developments in Student Accommodation*](#), published by the Higher Education Policy Institute, March 2023
- [*Accommodation shortages: Are the odds stacked against students?*](#), published by the Higher Education Policy Institute, August 2023

Also, Unipol has been working on updates to two pieces of research work that were referenced in last year's report (see below)

- [*International students and factors affecting accommodation in the UK*](#)
- [*Accommodation Costs Survey*](#)

The findings for both of these will be released in the autumn of 2023 and details will be included within the 2024 DLUHC Annual Report. Further to this, Unipol together with Leeds City Council and the National Residential Landlords Association is also involved in a DLUHC funded Pathfinder project, investigating how to improve landlord take up of accreditation and forms of self-regulation, which is due to report in March 2025.

Some key National Code and sector highlights for 2022/23

Looking forward: opportunities and challenges in 2023/24

The National Codes, influencing accommodation suppliers and government

The Renters Reform Bill could see the most significant tenure reform for a generation if enacted in 2024, but this could have serious implications for the availability of student housing in the off-street market. Any further imbalance in supply and demand could service to reduce housing affordability and representations have been made to Government on this issue.

The new Code for Educational Providers

A revised Code and requirements to complete the upgraded Self-Assessment Questionnaire will improve standards and data visibility.

A new student advisory system

By 2026, the foundations of a national student advice system will be laid, developed as part of the National Codes regulatory role.

The student advice service will give better information on students' housing options and costs.

Regulation

The Building Safety Act 2022 now requires certification of most PBSA buildings, with a new system of checks for buildings every 5 years by the Building Safety Regulator.

In addition to building in regulatory changes to the content of the Codes, members have received briefings on updates made to requirements with respect to building and fire safety. The Codes will continue to monitor these matters and advise members of all relevant matters.

Student support and wellbeing

The publication of Edward Peck's report on student wellbeing and safety will have an impact on all providers of purpose-built blocks of student accommodation, which the Codes will respond to both in terms of what members are required to do as well as by offering relevant training for those working in the sector.

The Codes will strengthen staff training in equality and diversity in 2024 through new online training.

Volatility and sector segmentation

A fragmenting accommodation market

The PBSA sector is reacting and being shaped by changing student numbers. In September 2023, both home and international undergraduate numbers have declined. This is despite the UK population expanding by 27% between 2020 and 2023, including more than a million extra 18-year olds, which on recent admission trends should mean an additional 70,000 students in HE between 2020 and 2025. However these rising numbers are not being reflected in undergraduate admissions.

In 2022- 2023, there was no increase in home students and UK student intake was lower than it was in 2020. It would appear that the boom in undergraduate international entrants has ended, albeit at a higher level than pre-Covid (which was 30,040 international undergraduates in 2019). There are signs that Home student demand is being depressed by the cost of studying and living, affecting both potential students and their parents who often need to support them.

Postgraduate Intake

The main driver for growth (and accommodation demand) is international students, particularly postgraduates on one-year taught courses with international student numbers increasing by an estimated 72% (276,110) between 2019 and 2022 with 63% of these being taught postgraduates. As of September 2023 it is too early to tell what any final numbers are and the HESA figures (which show the position in 2022-2023) will not appear until January 2024 but in summer 2023 overall postgraduate international intakes are still expected to hold steady.

Affordability

It is now very clear that the rise in numbers of international students from India and Nigeria is not translating directly into demand for PBSA beds, which, for many, are too expensive. Some of those students are moving to the off-street housing market or lower cost beds wherever they are to be found. In many cases a proportion of students are living with family contacts and commuting into universities to study often from considerable distances.

For many undergraduates the student maintenance model is not providing adequate support. Initial figures show that the headline annual rent in 2023-2024 has seen a rise of 15% over the past two years and now stands at £7,475. Over that time the proportion of the maximum student loan taken up by average rent has risen from 70% to 76% but based on the average maintenance loan received by English students in 2021-2022 (latest available) of £7,010, the average room that year would have cost 95% of the average loan received.

Conclusions on Market Conditions

The student accommodation market is becoming increasingly segmented as both home and international students seek to adjust their living costs to their available resources. The traditional pattern of fairly homogenous demand from home undergraduates is crumbling and the notion that every international student translates into a PBSA bed space is no longer true. Rent levels are increasingly varying according to demand from students, particularly where there are housing shortages with much higher rents in shortage areas.

Late Construction

Turning to the 13,420 beds being delivered under the Codes this summer, 17 of the 57 buildings suffered from delays. The focus of the Code requirements is on minimising the impacts of delays on students by timely communication, provision of alternative accommodation and suitable compensation to recognise the effect of disruption at a key educational moment. It should be remembered that these requirements currently only apply to members of the Code for non-Educational providers, although this is being consulted on for inclusion in the Code for Educational Providers when it is next revised.

The number of affected students has been 1,241 out of 6,090 of beds in buildings affected by delays.

Percentage of students affected 2020-2023 by Construction Delays

Year	New beds affected by late delivery	Students affected by these delays
2020	6,090	1,241 (20%)
2021	6,454	2,034 (32%)
2022	5,163	2,007 (39%)
2023	4,811	1,470 (31%)

Generally, all providers have behaved in line with Code commitments and, as a consequence, there has been very little bad publicity about this as students and institutions have felt that they were kept informed and had alternative arrangements made for them or could make these themselves. PBSA providers are to be congratulated on their improvements in this area which will be having a tangible effect on the experience of students.

Increasing Complaint Levels

The number of complaints received by the National Codes continues to grow, and through analysis of the complaints / enquiries received per 1,000 beds it is apparent how effective complaint handling is within member organisations. Where the ratio exceeds 1:1,000 consideration will be given to offering additional training on handling complaints to improve resolution of issues, and it is expected this will be extended to several providers in 2023 – 2024.

Renters Reform Bill

It should become more apparent during 2023 – 2024 what the impacts of this delayed Bill will be on the PBSA sector, but more importantly for student choice and access, how it will affect the off-street housing sector where the current proposals risk significant dislocation between housing supply and student needs.

Looking further ahead

Across the next two years, the organisation's aim is to lay the foundations of a national student advice system, developed as part of the National Codes regulatory role. This student advice service will give better information on students' housing options and costs.

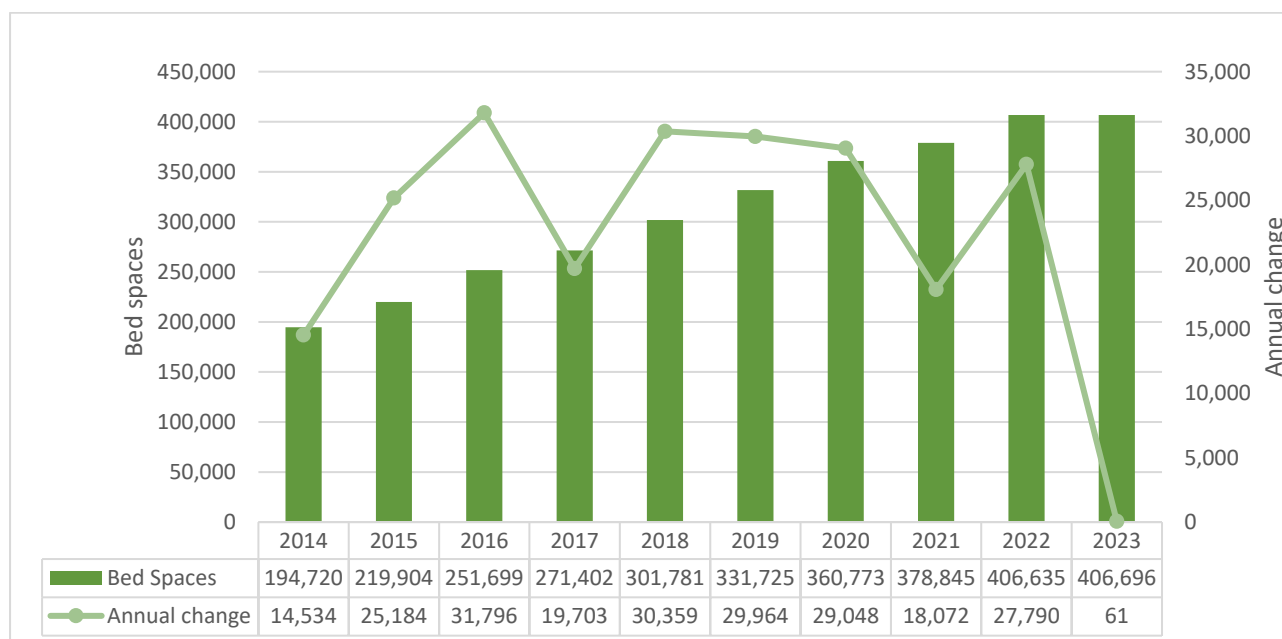
The National Codes will also enhance training and briefing opportunities for members with the aim of improving management practice and compliance.

Membership of the Codes

Volume of bed spaces covered by the National Codes

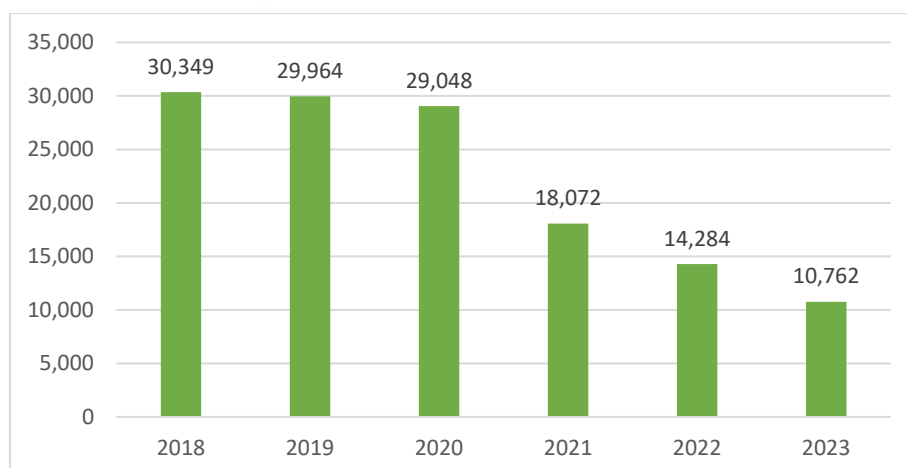
There are now 406,696 bed spaces covered by the Codes, and Code membership is rising steadily over time although this has slowed in 2022/23. The total size of the PBSA sector in 2023 is 718,805 according to Cushman & Wakefield in 2023.¹ This means that 56 per cent of the whole sector's bed spaces are members of the two Codes operated by ANUK/Unipol. Most of the remainder are members of the UUK Code. It is estimated that 97% of PBSA bed spaces are within one of the three Codes.

Figure 10: Volume of bed spaces covered by the Codes 2014-23



From summer 2018 to summer 2020, around 30,000 new bed spaces were added each year. This figure dipped to 18,000 in 2021. The fall was initially attributed to delays caused by Covid operating difficulties, but the persistence of low figures of new-build PBSA in both 2022 (14,248) and 2023 (10,762) disproves that theory. At the same time that the supply of new PBSA provision is falling, more existing bed spaces are being withdrawn for upgrading or remedial works.

Figure 11: ANUK/Unipol National Codes: new bed spaces 2018-23



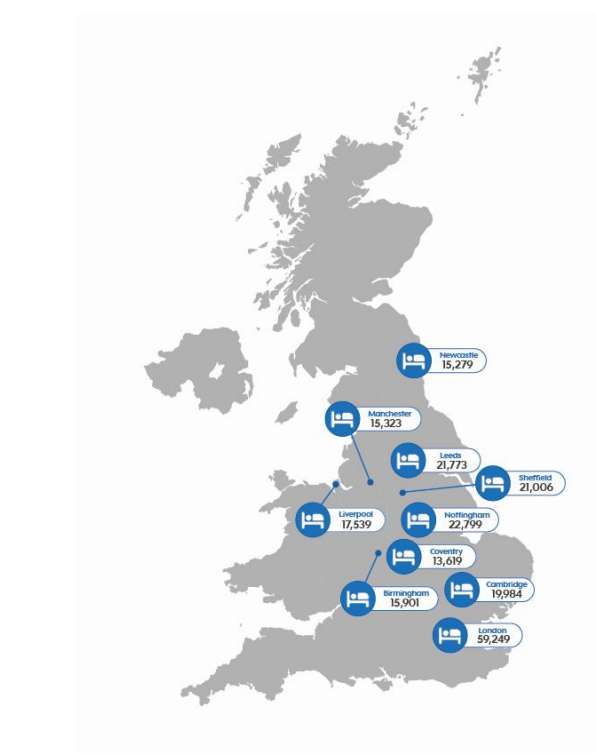
¹ Cushman & Wakefield Student Accommodation Annual report 2023.

The number of new beds coming into commission in 2023 is significantly lower than in 2022, and there is evidence to indicate that accommodation providers continue to delay the opening of buildings by upwards of 12 months from the point of completion in order to avoid disruption that might be caused to occupants as a result of snagging work, mainly for fear of the reputational damage that this might have on their businesses. This is likely to be added to by the new requirements of the Building Safety Act regarding sign off for new buildings. Although there is a belief within the PBSA sector that the decrease in new bed space numbers will have ceased by 2024, it is more likely that this will not occur until 2025.

Largest cities

The city with the largest number of bed spaces in the Code is London with 59,249 beds. The total bed spaces in the top ten cities amount to 225,472, equating to 55 per cent of the bed spaces in the Code.

Figure 12: Top ten locations for Code bed spaces



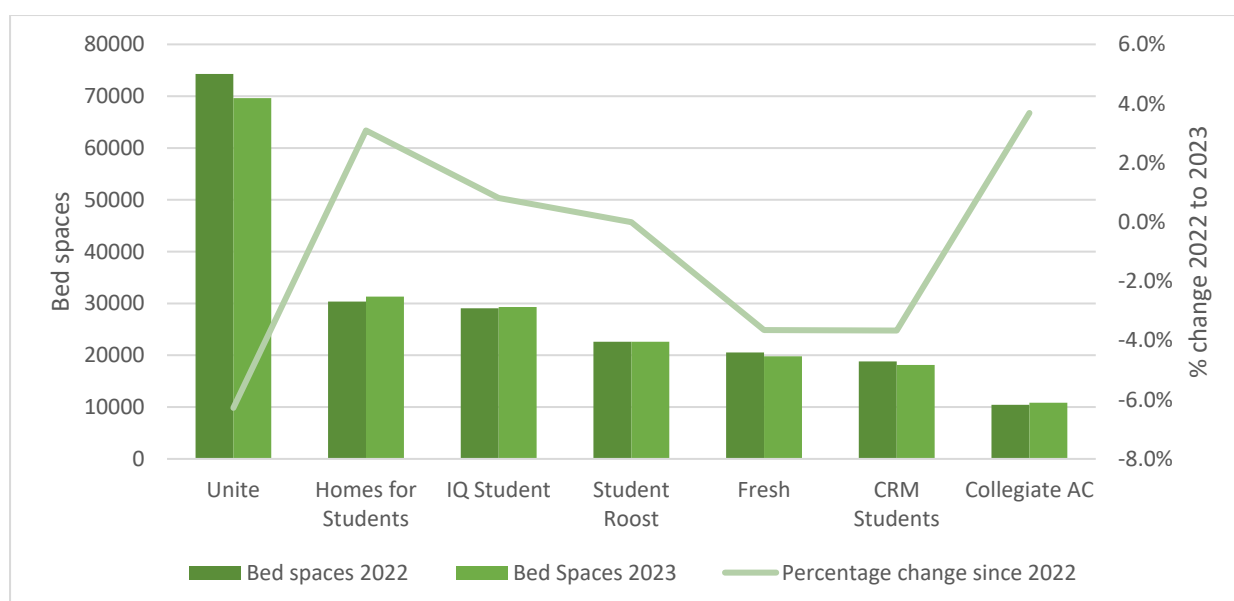
City	Bed Spaces 2023
London	59,249
Nottingham	22,799
Leeds	21,773
Sheffield	21,006
Cambridge	19,984
Liverpool	17,539
Birmingham	15,901
Manchester	15,323
Newcastle	15,279
Coventry	13,619

Largest members

The top seven largest members by number of bed spaces are shown in the following chart. They represent 49.5 per cent of the total bed spaces registered under the Code. Unite Students is by far the largest at 69,611 bed spaces.

Members work to a variety of operating models. Unite Students, iQ Students and Student Roost own and operate their own rooms, while Homes for Students, Fresh, CRM and Collegiate operate portfolios on behalf of other independent investors ('third-party operators'). This mixed model and the rise of third-party operators are indicative of the strength of the investment market and the appetite of many UK and international investors to get involved in the provision of student accommodation. It remains to be seen whether the manager-investor model, rather than owner-operator becomes more prolific in the PBSA sector.

Figure 13: Top seven providers by bed spaces in 2023



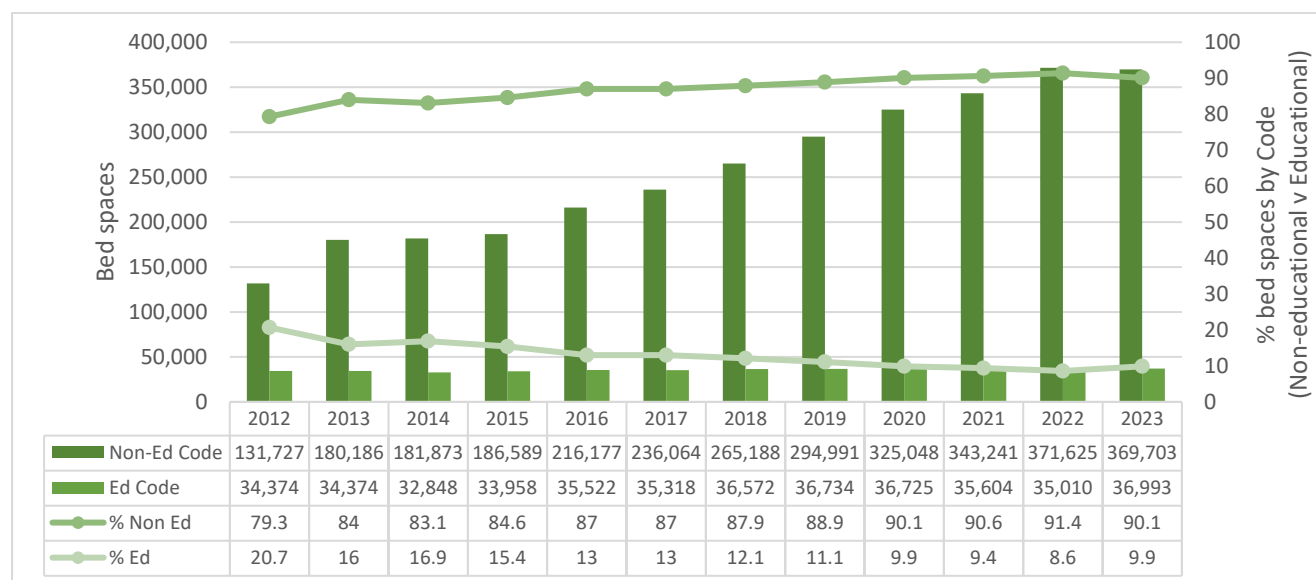
Provider	Bed Spaces 2023
Unite Students	69,611
Homes for Students	31,318
iQ Student	29,308
Student Roost	22,615
Fresh	19,803
CRM Students	18,127
Collegiate AC	10,839

Membership profile

Of the 406,696 bed spaces covered by both National Codes, 91 per cent (369,703) fall within the Code for Private Providers. Private sector provision of bed spaces is growing quickly over time and gaining market share. Figure 14 illustrates just how vigorous expansion is in the private sector: an increase of 65 per cent (or 239,898 additional bed spaces) since 2012/13.

The number of bed spaces in the Code for Educational Providers has changed very little in the ten-year period of the data (636 bed spaces, a 1.8 per cent change).

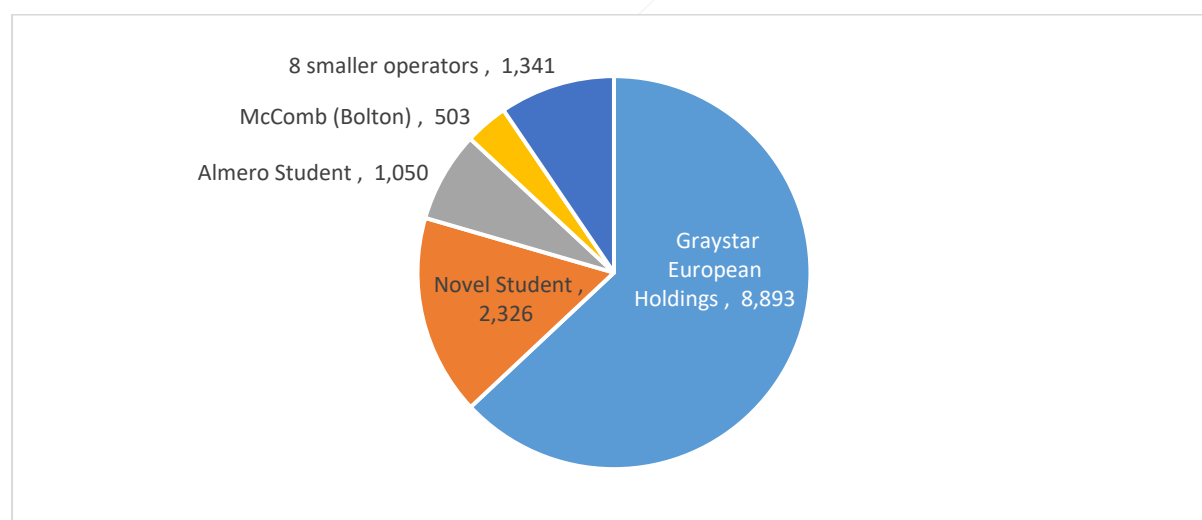
Figure 14: Bed spaces by Code (Educational and Non-Educational)



New members

In the year ending 31st July 2023 the Codes welcomed seven new members, who together added 3,222 bed spaces to the total. The largest new member is Acis Group (1,194 bed spaces).

Figure 15: New members by bed space numbers



Other changes in membership

Three private sector members were removed in 2022-23 as part of the Code compliance processes:

- **Loc8me** following confirmation that the landlord of a development this operator was managing was not willing to carry out essential works relating to fire doors, the Chair of the Tribunal endorsed the Audit Panel's recommendation that Loc8me be removed from membership of the Code.

- **Northend Management** in January 2023 the West Yorkshire Fire and Rescue Service served a closure notice on a development in Leeds operated by this provider, called Eldon Court. The notice set out a series of concerns with fire safety arrangements in the building, which were serious enough for the building to be closed on the same night that they made their visit, and this then resulted in 13 complaints from students who had been living in it up to that date.

In the process of investigating these complaints, Northend Management were required to supply a range of documentation and this included their emergency and disaster management plan. However, when the content of the plan was scrutinised it was apparent that it had simply been copied from one relevant to a care home and not purpose-built student accommodation.

Given the nature of these matters, a decision was taken to refer the complaints to a meeting of the Full Tribunal in order to consider allegations that the building had not been provided with properly maintained fire safety installations and that they had not drawn up an appropriately detailed emergency and disaster management plan. Having listened to the representative from Northend Management, the Tribunal decided that they should be expelled from membership.

- **UNINN Student Accommodation** was removed from membership for failing to sign a revised declaration form which they had been asked to do on three occasions, as well as for not paying their full membership fee for 2022.

These decisions demonstrate the robustness and effectiveness of the National Codes management and governance machinery in identifying and dealing with material risks posed to student occupants by members' non-compliance with specified standards.

Where non-compliance is found, the relevant local authority is informed for any regulatory action as are local educational institutions whose students might be affected.

Over the year a number of members withdrew from the Codes. These withdrawals represent natural changes to membership as providers exit the market, mainly as a result of the sale of accommodation to other members and an expected churn of bed spaces in the market.

Figure 16: Withdrawal of members 2022/23

Members	Bed spaces
APS Properties	106
Cotton House Management Co	274
Glenfern Student Lets	126
LA1 Student Living Ltd	119
Mears Student Life	409
Osbourne Developments	138

A full list of members is attached as Appendix 1.

Governance

The Codes Consortium

The [Codes Consortium](#) has joint ownership of the Codes and includes Unipol Student Homes, the Accreditation Network UK and the National Union of Students. The Consortium is responsible for the overall governance and operations of the Codes, and appoints the Chairs of the Tribunal and Audit Panel.

In 2023, the Consortium proposed a number of potential changes to the content of the Code for Educational Establishments and discussed possible candidates for the position of Committee of Management Chair.

Committee of Management

The [Committee of Management](#) has overall operational responsibility for the functioning of the Codes. Three meetings are held each year. Attendance has improved significantly since 2019-2020, although there was a very slight decrease in 2022-2023 in comparison with the previous academic year.

Figure 17: Attendance at Committee of Management meetings

	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23
Total Numbers Attending	77	75	73	85	86	84
Average Attendance	26	25	24	28	29	28

Audit Panel

The National Codes [Audit Panel](#) includes the current members of the verification team, each of whom either has direct experience of managing student accommodation or is a former environmental health officer. The Audit Panel has two independent co-chairs who oversee proceedings. The Audit Panel met on five occasions between the start of July 2022 and the end of June 2023.

Figure 18: Audit Panel: current membership

Panel Member
Claire Baxter – Co-Chair
Richard Kington – Co-Chair
Sam Bailey-Watts - verifier
Elizabeth Beattie – verifier
Mary Bright – verifier
Wendy Evans & Darren Smith – Cambridge Colleges
Derek Goss – verifier
Richard Lord – verifier
Philip Moxon – verifier
Jakub Pietruszewski – verifier
Beth Raine - verifier
David Robertson – verifier
Victoria Tolmie-Loverseed – Unipol
William Wilson – verifier
Vacancy – NUS

Credentials

- Two former Environmental Health Officers (Richard Lord and Philip Moxon)
- Two have previously been regional managers or directors involved in the management of privately-operated PBSA developments (Sam Bailey-Watts and Beth Raine)
- Five have been heads of service of university-owned and -operated accommodation (Elizabeth Beattie, Mary Bright, Derek Goss, David Robertson and William Wilson)
- One currently manages PBSA developments for a housing charity (Jakub Pietruszewski).

Although two members of the verification team stood down in August 2023 they will have been replaced by the start of 2024.

Tribunal membership

The Tribunal membership is made up of a Chair, two Vice-Chairs, and representatives of the Codes Consortium and Committee of Management. Referrals are made initially to the Chair of the Tribunal, who has the power to determine whether to involve the Vice-Chairs and/or request a hearing of the full Tribunal. Hearing proceedings formally provide for the participation of representatives from the relevant students' unions, educational establishments and local authorities.

The current Tribunal Chair, John Martin (a barrister and acknowledged expert in the field of housing law) has occupied the office since the Tribunal first came into operation.

The Chair is supported by two Vice-Chairs, who are reappointed on a regular basis. Usually, one of these posts is nominated by the NUS, whilst the other is nominated from the provider members on the Committee of Management.

The Tribunal provides for a further six members, nominated by provider members of the Committee of Management and by the Codes Consortium. Current members serving in this category are:

Jane Crouch (Fresh Student Living)

Alan Hilton (Cass and Claredale Halls of Residence Association Ltd)

Nikki Verity (Unipol)

Further consideration is being given to the most appropriate and effective means of recruitment to help fill the vacant posts.

Appendix 1: List of members

The Code for Educational Establishments

Backstage Academy
Belfast Bible College
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, Cambridge
Homerton College, Cambridge
Hughes Hall, Cambridge
Jesus College, Cambridge
King's 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, Cambridge
Queens' College, Cambridge
Robinson College, Cambridge
The Royal Veterinary College
SCIO
Selwyn College, Cambridge
Sidney Sussex College, Cambridge
Stranmillis University College
St Catharine's College, Cambridge
St Edmund's College, Cambridge
St John's College, Cambridge

Trinity College, Cambridge
Trinity Hall, Cambridge
University of the Arts, London
University of Chichester
University of Greenwich
University of Hertfordshire
University of Leeds
Warwickshire College
West Dean College
Westminster College, Cambridge
Wolfson College, Cambridge

The Code for Non-Educational Providers

A2 Dominion Group Ltd
Abodus
Acis Group Ltd
Affordable Accommodation for Students
Almero Student
Amro Property Management
Aparto
Ashwell House
ASN Capital Lettings Ltd
Axo Student Living
Baaz Properties
Beyond the Box Student Limited
Boudicca One Ltd
BPS Developments
Campbell Property
Campus Living Villages
Carter Jonas
Cataylst
City Block Ltd
Cityheart Living (Scotland) Limited
Cloud Homes
Code Student Accommodation
Collegiate AC Ltd
Congregational Federation
CRM Students
Derwent Students
Digs Student
Downing Students
Dwell Student Living
Fawleybridge Student Accommodation
FHP Student Living
FD Asset Management Ltd
Flare
Fresh Student Living
Gather Students Ltd
Get Living
GLSP
Goodenough College
Graysons Properties
Greystar Europe Holdings Ltd
Guy Chester Centre
Hamstead Campus
S Harrison Group Ltd
Hello Student Management
Herbal Hill Ltd
Homelets Bath
Homes for Students
Host Student
Iconinc
Infrastructure Investments Ltd
INTO Newcastle University
IQ Student Accommodation Services Ltd

Kaplan NT Ltd
Kexgill
Lee Abbey London
LIV Student
Luna Students
Manor Villages
Mansion Property Management
McComb (Bolton)
McComb Students
Megaclose Ltd
Mezzino
Nido Student
Njoy Student Accommodation
Novel Student
Now Student Living
Nurtur Student Living
Parklane Properties
Portergate Property Management
Prime Student Living
Primo Property Management
Realstar Management (UK) Limited
Reed Residential Ltd
Sanctuary Students
Scape Student Living Ltd
Southern Housing
The Stay Club Limited
Student Beehive
Student Castle Ltd
Student Cribs
Student Facility Management Limited
Student Living by Sodexo
Student Roost
Study Inn
SuperUni Housing
TJ Thomas
True Student Limited
U Student Group Ltd
Unilife
Uni2rent Ltd
Union House Management Co
Unipol Student Homes
UNITE
Universal Student Living
UPP Broadgate Park Ltd
UPP Nottingham Ltd
Urbanest UK Ltd
Vita Student Management Ltd
West One Student Accommodation
Yara Capital Limited
Yugo
Zebra Housing Association
Zone Management

