The ANUK/Unipol National Code of Standards for Larger Student Developments

Annual report for the Ministry of Housing, Communities and Local Government

Covering the period
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nationalcode

Contents

Foreword

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This report provides a valuable overview of the changes effected by the National Code to meet a changing operational environment in the Higher Education and Purpose Built Student Accommodation (PBSA) sectors. Included is an update on progress being made on a review of the operation and governance of the Codes to ensure they remain robust and continue to deliver for the needs of all stakeholders, and in particular students whose rights have been improved when renting in PBSA. The past year has seen significant changes in the regulatory environment within which the Codes operate. Alongside an increasing number of beds covered by the Codes in 2025, reaching some 432,023 – an increase of **3.2%**. These come from **156** Members, **105** from the private sector and **51** educational establishments. The Codes accounted for **59%** of the UK PBSA sector.

But what are the National Codes and why do they exist?

The Codes establish a set of specific standards for larger student developments, which have specific management requirements. The Codes reflect their specialist status as an important part of the student accommodation supply, supporting participation and access in Higher Education.

The Codes are voluntary, with membership a choice, although increasingly in recent years the English Government has recognised members with special treatment or concessions under legislation such as the Renters' Rights Act 2025. There are strong legal incentives, in England at least, to gaining membership.

The ANUK/Unipol National Codes are jointly owned by a Consortium of organisations: Unipol Student Homes, the Accreditation Network UK and the National Union of Students. This Consortium has appointed Unipol to administer the Codes on its behalf, and the operation of the Codes therefore sits within Unipol's corporate structure and financial arrangements, although they have separate governance arrangements.

The purpose of the National Codes is to:

a) Establish a framework of voluntary standards to support how member owners, managers and their student occupants can do business with one another effectively and fairly; and

b) Act in the best interests of students.

The Code standards have been developed to reflect a balance of common-sense obligations and responsibilities between the managers of larger student accommodation buildings and tenants. The benchmark standards set out in the Codes have been designed so that managers can achieve compliance without significant expenditure of time and money and without prejudice to their respective legal rights.

A changing regulatory environment

Developing an updated Code to meet the changing needs of the Renters' Rights Act 2025 has been the main focus for the last year, involving Code members, Unipol staff, students, Government and other interested parties. The Codes leadership worked closely with the Ministry of Housing, Communities and Local Government (MHCLG) to ensure that exemptions were provided for Members of the Code for Non-Educational Providers that allowed the sector to meet the needs of students as far as possible whilst supporting the main aims of the legislation. Consultations across the membership were undertaken throughout this process.

This work resulted in a revised Code for Non-Educational Establishments ready to deal with the changes affecting the sector by the Renters' Rights Act 2025, as well as transitional arrangements for Members. The collaboration with MHCLG has been critical in ensuring the best possible outcome for the revised codes and its members.

A review of Governance was also started and this continues, whilst changes have already been made to the Audit Panel. Work is currently underway to ensure that the Committee of Management continues to oversee the operation of the codes in the most effective way.

This report provides much detailed information on many aspects of the considerable amount of work that underpins, supports and governs the codes and steps being taken to ensure a smooth transition as the new Act comes into being.

This is an essential document for all who have an interest or stake in the PBSA sector and the welfare of students accommodated by code members.

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 (ASRA) and College and University Business Officers (CUBO), 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 coverage of around **18,000** bed spaces. During the passage of what became the Housing Act 2004, the Government expressed some interest in recognising Codes of Practice/ Standards within the scope of this legislation.

By 2006 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 Codes have 'Approved' status under Section 233 of the Housing Act 2004, 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 applies only to England; different requirements pertain in Wales and Scotland. However, where a provider has signed up to the National Codes, their requirements apply to purpose-built student accommodation UK-wide. 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 was completed in April/May 2024 and submitted to MHCLG, and the Statutory Instrument for it was laid on 12 September. Following an interim (intra-cycle) review undertaken in 2024/25 in light of the forthcoming Renters' Rights Act 2025, a revised version was submitted to MHCLG in July 2025 and, at the time of writing, is awaiting government approval.

Executive Summary

Major development work – The Renters' Rights Act (RRA)

For the National Codes community, the Renters' Rights Act dominated the agenda in 2024/25. Throughout the year, there was a high level of uncertainty about the final form of the draft legislation and its implications, not least in connection with how the business models of members would need to adapt; the detail of transitional arrangements and their impact on the future availability of enough appropriate housing for students; and what changes would need to be made to the Codes and how they were run. For the Codes, the major challenge was to help shape regulatory outcomes that supported the interests of both students and members and the continuity of provision levels, while aligning with the overarching policy objectives of the Government and the founding principles of the Codes.

Responses to the Government's plans were focused on making changes to the Code for Non-Educational Providers to harmonise with the evolving RRA; tightening the integrity and transparency of Code systems; capacity planning for growth in membership and business; supporting and communicating with members and other stakeholders on Bill-related matters; and keeping in view the organisation's fundamental commitment to acting primarily in the interests of students.

Accordingly, a formal intra-cycle review of the Code for Non-Educational Providers was undertaken and completed. The key proposed changes related to:

- The maintenance of up-to-date information about code membership
- Occupants' freedom to withdraw from their tenancy agreement, if they withdrew from, suspended or could not start their studies
- Non-enforcement of any guarantor agreement if the tenant died
- A continuing requirement on members to protect tenants' deposits in a government-approved tenancy deposit scheme
- Expansion of requirements in line with the building safety and fire safety acts
- Tighter guidance on responding to damp and mould
- Revisions to the complaints section
- A new section on joining the code that makes the application and sign-up processes clear and unambiguous
- Enhanced health and safety standards.

Public consultation elicited responses from 41 organisations, including private providers, students' unions and universities. It is the firm view of the National Codes leadership that the changes made to the Code offer students' some important new rights appropriate to their status in a responsible and fair framework that members can work with. The revised Code was endorsed by the Consortium on 23 July 2025 and submitted to MHCLG for approval on 28 July.

With the British Property Federation, the National Codes leadership has worked through the likely impacts of the conversion of existing assured shorthold tenancies to assured tenancies, including the risk of substantial disruption to the availability of accommodation for students in advance of the 2026/27 academic year. In approaching the challenges presented by the transitional period, the National Codes have been briefing MHCLG on their concerns; making representations on potential ways of mitigating some adverse impacts on providers' interests; and providing continuing support to members.

Approved by the Consortium in July 2025, membership guidance has been produced in response to the RRA to ensure the process and criteria for membership are transparent and unambiguous. The tightening of membership criteria will sit alongside the conditions set out in the RRA.

The Unipol Board raised National Code membership fees by **5%** for 2025/26. Slightly above CPI, the increase takes account of additional resources required to scale up operations to meet the challenges of the organisation's enhanced role in the new regulatory regime.

Operational activity

***The revised Code for Educational Establishments* was** approved on 15 October 2024 and remained approved until 15 January 2025. Code members were set a deadline of 15 January 2025 to rejoin for the next three-year membership period (subject to continuing compliance).

In 2024/25, **164 *verification*** visits were completed, **13%** fewer than in 2023/24. This fall is a consequence both of fewer new developments and of the deferral of Educational Code visits until the overhauled self-assessment questionnaire system is introduced in 2025/26. Of the visits conducted in 2024/25, **96% (157)** resulted in action points for the provider. An important factor in sustaining an elevated proportional value here has been the Audit Panel's decision to focus on fire risk assessments, which typically produce a higher rate of actions required. Changes in management and new developments accounted for **68%** of all visits. Twenty visits took place in the annual location-specific programme of visits (Nottingham in 2024/25).

For the year in review, **complaints/enquiries** rose to a record high of **417**, up 53 on 2023/24 (**+15%**). Except for pandemic-affected 2021/22, there have been year-on-year increases in the number of enquiries/complaints since 2019/20 and incremental growth in the number of complaints as a proportion of Code stock over time. Nonetheless, measured against this index, numbers are still low at less than **0.001 per bed space**. Gradual increases are likely to be factored by growing awareness of, and confidence in, processes operated by members and the Codes. In 2024/25, **19%** of complaints received were escalated beyond the provider, the lowest figure since 2019/20. This suggests that the performance of members in providing early-stage remedies to the satisfaction of complainants continues to improve.

The most frequently complained-about issues in 2024/25 were the state of repair/condition of a building; tenants seeking release from their tenancy or a refund; and lifts being out of order. Reported disrepair issues increased slightly against the previous cycle, but most were resolved by the provider: 16% were escalated to stage two, down a percentage point on 2023/24. Tenants seeking release from their contract or a refund increased for the year in review. Numbers in this category have gone up steadily year on year from **10** in 2021/22 to **52** in 2024/25. Other complaint trends in 2024/25 included:

- Complaints about staff conduct
- The emergence of reports from tenants that hot water and/or heating systems were not working
- Growing claims that inadequate notification had been given by the provider to gain access to a property
- More cases of tenants complaining they had been ‘mis-sold' their rented property.

One case was referred to the Tribunal Chair in 2024/25. The Tribunal recommended that the complainant‘s representative set out the detail of specific alleged Code breaches and adduce substantive evidence. A verification visit confirmed that the development met Code standards. No further correspondence has been received from the complainant, and the case has been closed.

Year on year, visits and visitors to the National Codes website in 2024/25 increased by **11%** and **6.9%** respectively. Page views totalled **25,095**, **10%** up on the previous cycle. The number of users accessing the ‘Contact us' page more than doubled (**+120%**), likely driven by an appetite for advice and information about the implications of RRA.

Twenty Unipol training events took place between August 2024 and July 2025. Although five fewer than for the previous year, delegate numbers were up from 629 to 941, of whom 185 were paying attendees. High attendance levels at the RRA-themed sessions are particularly noteworthy. The second Student Experience Conference was held on 27 February 2025 at Cutlers' Hall, Sheffield, with **134** attendees. from **75** organisations represented at the event.

For the verification team, training in 2024/25 was given a fresh focus on moderation, consistency of approach and transparency in decision-making, particularly around the reporting of fire risk assessment actions and health and safety matters. Further training for the team will be informed by a newly-established skills audit regime.

Foremost among Unipol's research and advocacy activities in 2024/25 was a Student house hunting behaviour survey conducted to understand how students find accommodation and to explore the house hunting process, its characteristics, context and challenges. The periodic Unipol/NUS Accommodation Costs Survey (ACS) will be run in early 2026.

At the end of July 2025, National Codes membership totalled **156** National Code providers: **105** from the private sector and **51** educational establishments. Bed space numbers covered by Code members stood at **432,023**, an increase of **13,414 or 3.2%** on the previous year, but significantly below the scale of new stock delivered annually before the pandemic. Bed spaces covered by the Codes amounted to **59%** of the UK's PBSA sector for the year in review. Private providers accounted for **91.4%** of in-membership stock, up 0.3 percentage points on 2023/24. Growth was driven by **16,282** new private sector bed spaces entering the Code for non-educational providers in 2024/25. This figure reduces to **13,414**, once exiting provision is factored in. Code administrators are anticipating continuing heightened interest from private PBSA suppliers, as the full impact of the RRA's assured tenancy regime approaches. At the time of writing, **31** new applications for membership were in process, all from private providers. These would add **69** developments and **8,187** bed spaces to Code coverage.

A total of **57** new and refurbished buildings were due to open for the start of the 2025/26 academic year. There were fewer delays in members getting new buildings into commission than in the previous cycle. In autumn 2025, over a quarter of new buildings suffered some degree of delay (**15 out of 57 or 26%**). This compares to over a third in autumn 2025 (**13 out of 36 or 36%**). Extended delays in the previous year were considerably worse: nine out of 13 (**69%**) in 2024/25, contrasting with three out of 15 (**20%**) in 2026/27.

PBSA investment and construction remain sluggish, but, given evidence of a significant fall in student recruitment nationally in autumn 2025, there are no concerns overall about unmet demand for student accommodation in 2025/26, although this will vary significantly from one locality to another.

Governance in 2024/25

In 2024/25, the main items of business transacted by the decision-making bodies of the National Codes included the implications of RRA and the transitional period; the interim review of the Non-Educational Code; processes for membership renewal for the Educational Establishments Code; policy on members declaring interests; Code complaints analysis; pilot project on fire risk analysis; updating of HMO licensing survey information; and monitoring of late new buildings and concerns about Building Safety Regulator delays and about international recruitment agents.

In 2024/25, the Consortium met three times, up from twice a year previously – a new level of frequency to be maintained henceforward. The Committee of Management met four times in 2024/25, up from three the previous year. The increased frequency of meetings reflects growth in the business the Consortium and Committee need to transact.

The Audit Panel met five times in 2024/25. It has had one independent Chair since July 2024, down from two independent co-chairs previously. In anticipation of a need to handle more Code applicants and more Code members under the new legislative regime and to bear more intense scrutiny of the use of its processes and decision-making, the Audit Panel, its governance mechanisms and the role of verifiers were reviewed, clarified and strengthened in 2024/25.

Following 20 years' service, John Martin resigned as Chair of the Tribunal in April 2025 and was replaced by former Director of Policy at the British Property Federation, Ian Fletcher, whose induction training was completed the same month.

Working with partners in the sector

In 2024/25, a number of meetings held with the UUK Code leadership resulted in agreement on a set of areas of joint working worthy of exploration: joint training and promotional events; collaboration with CUBO on broadening the range of student accommodation types covered in the periodic Accommodation Costs Survey; pulling together a dataset to support intelligence on the scale and shape of the off-street student housing sector; working with UUK/GuildHE to help compile a directory of national and local housing contacts; and a joint review of the government-mandated protocol on how the ANUK and UUK codes work together. The National Codes continue to be involved with the Scottish Government's PBSA Review Group.

Looking ahead: major priorities for 2025/26

In 2025/26, the National Codes leadership will maintain a watching brief on how the transitional period, the new legislative regime and associated Code adjustments play out in reality – including monitoring the RRA's impact on the cost, affordability and availability of student housing; and continuing support for members and awareness raising among the student body.

Key themes for major priorities in the year ahead will include fit-for-purpose governance and operational processes; a considered approach to communications with members and other stakeholders; and comprehensive training plans for members and verifiers. Within this framework, significant tasks in the pipeline include:

- Full review of Code governance arrangements and a strategy review
- Consideration of how value might be added to membership
- Benchmarking complaints
- Progressing accredited buildings management training through an independently validated degree apprenticeship
- Consideration of how to deepen student engagement with the National Codes
- Working with UUK/GuildHE, CUBO and other partners to identify and progress collaborative activities where beneficial
- Training for members on common law tenancies
- Producing a pre-application training course to assist applicants with joining
- Further tightening of verification and audit function processes and their use to extend consistency and transparency
- Major IT updates.

Higher membership fees will enable the release of additional resources to support this ambitious programme and to underpin the integrity of enhanced core functions.

Headline numbers for 2024/25

432,023 bed spaces covered by the National Codes compared to **418,609** for 2023/24	**13,414** more Code bed spaces than in 2023/24	**13,901** new bed spaces from existing members of the Code for Non-Educational Providers
2,381 new bed spaces brought into the Code for Non-Educational Providers by eight new members	**2,828** bed spaces lost from the Code for Non-Educational Providers as a result of three private providers exiting the market	**59%** of the PBSA sector's bed spaces covered by the National Codes
26% new buildings affected by delay for the start of 2025/26, compared to **69%** in the previous cycle	**31** applications from prospective new members of the Non-Educational Code at the year end	**164** verification visits completed, **157** resulting in actions and improvements
417 complaints, up from **364** in 2023/24	**19%** of complaints escalated beyond the provider, down from **25%** in 2023/24	**39,385** visits to the National Codes website
26,459 visitors to the National Codes website	**20** Unipol training events available to Code members across the year	**941** members enrolled on National Codes training courses, up from **629** the previous year

Introduction

The context in 2024/25

The higher education and student accommodation markets

The headwinds for the sector identified in last year's report have not abated. If anything, they continue to strengthen. Investors, developers, universities and students all face challenging economic conditions.

On the supply side, rises in development costs are driven by recent inflation in the price of building materials and additional expense associated with a more heavily regulated PBSA development/construction process. The entry of new bed spaces into the market is geographically uneven. Three host cities accounted for nearly half of all stock brought into commission in 2024/25, as investors and developers become increasingly risk-averse. Nevertheless, high levels of volatility in student demand, combined with long lead-in times, mean that this concentration of new supply does not always reflect the size of the demand pool in reality – Nottingham and Leeds are currently prime examples of this vulnerability.

Overall, demand softened for the year in review. In 2024/25, there was a steep drop in postgraduate recruitment – particularly in the international segment, factored by weakening economic conditions in major supplying countries, the emergence of more attractive in-domicile study options, higher visa and healthcare costs, and the recently introduced bar on non-research students from overseas bringing their families with them.

In broad terms, higher-tariff institutions – including Russell Group members – have felt downward pressure on international postgraduate recruitment in 2024/25, but often have the means to boost overall numbers by lowering entry requirements for home students. Other universities have suffered worse losses in international and postgraduate recruitment and have struggled to grow their domestic undergraduate base in the face of intensifying competition from higher tariff providers. Recruitment of UK students has been further hampered by a protracted cost-of-living crisis and a major gap between rent/living costs and available student loan levels.

This financial squeeze on UK students has been shifting consumers' decision-making criteria on where to study and where to live. A mismatch between evolving student preferences and the shape and price point of much of the PBSA available became more marked in 2024/25. Of particular concern for accommodation providers is a significant rise in students commuting to their place of study. According to new figures published by UCAS, **31%** of UK 18-year-old accepted applicants indicated, as part of their application process for autumn 2025 entry, that they intended living at home. This represents a new high, following an overall upward trend since 2016, when the figure stood at **22%**.

Taken together, a weakening higher education market, persistently high development costs and affordability concerns are defining an unprecedentedly challenging environment for student accommodation providers. For the year in review, these factors resulted in PBSA occupancy levels reported as poor in some local markets.

Big changes in the policy environment for student accommodation

The Renters' Rights Act 2025 (RRA) dominated the agenda within the National Codes community in 2024/25. Throughout the year, there was a high level of uncertainty about the final form of the draft legislation. The implications of a major overhaul of the legal framework raised many questions about:

- How the business models of members would need to adapt
- The detail of transitional arrangements and their likely impact on members and students
- The likely impact on the availability of appropriate housing for students in sufficient volume for 2026/27 and the future more generally
- What changes would need to be made to the Codes and how they were run.

For PBSA providers, concerns about how legislative change might affect their interests was brought into sharper focus by the weakening market conditions summarised above. For the Codes, it was clear there was a major challenge to help shape regulatory outcomes that supported the interests of both students and members and the continuity of provision levels, while aligning with the overarching policy objectives of the Government and the founding principles of the Codes.

Summary of performance in 2024/25

In both the educational and private sectors, the National Codes continued to serve as a highly effective vehicle for raising property and property management standards in larger residential developments for students. Trust and confidence continued to underpin the enterprise's success, relying on:

- The integrity and robustness of the formal documentation that underpins the Codes
- The effective, consistent and fair use of that documentation through trusted, competent professionals operating in sound administrative and governance structures
- The high profile of its website as not only a reference facility for stakeholders but as an authoritative source of up-to-date information, guidance and advice on good practice for the whole sector.

In an unusually busy year, the Codes leadership channelled much of its energy into considering and making preparations for the implications of the Renters' Rights Act 2025 and the 'transitional phase', the crossover period between legislative regimes. These responses to the Government's plans have been focused on:

- Making changes to the National Code of Standards for larger developments for student accommodation not owned or managed by Educational Establishments (hereafter referred to as the 'Code for Non-Educational Providers') to harmonise and align with RRA as it evolved
- Tightening the integrity and transparency of Code systems
- Making provision for growth in membership and in the volume of business
- Supporting and communicating with members and other stakeholders on Bill-related news and compliance issues.

In all these undertakings, the Codes leadership kept in view:

- The primacy of maintaining the trust and confidence of the sector, its end users and the Government
- Its fundamental commitment to acting primarily in the interests of students.

Because of the regulatory landmark the RRA represents, the content of this report follows through on the renewed focus on transparency and sets out in some detail various review processes and outcomes related to legislative change.

It is fair to report that some Code plans gave way to the demands of addressing RRA-related issues in 2024/25. The Code leadership has not, however, lost sight of these matters and they are included in the programme of work scheduled for 2025/26 and set out in the Looking ahead section of this report.

The year in review

Major development work

Interim review of the Code for Non-Educational Providers

Context

A review of the Code for Non-Educational Providers was undertaken and completed in 2024/25. Although the five-yearly review does not fall due until 2026/27, there was recognition of an immediate need to conduct an intra-cycle review exercise in the context of changes necessitated by the evolution of the RRA and its implications for the purpose-built student accommodation (PBSA) sector. As a major one-off task, this overhaul was a central focus of the National Codes leadership for the year in review.

While Paragraph 8 of schedule 1 Housing Act 1988 already enabled the conferment of 'specified status' for educational establishments, the Government signalled its preparedness to grant a form of specified status to members of the Code for Non-Educational Establishments to remove them from the requirement under the new regime to:

- Adopt assured tenancies
- Register with a new complaint's ombudsman
- Join a new landlord database
- Comply with the new Decent Homes Standard and Awaab's Law.

The Government's decision was based on its recognition that:

- Student tenants and PBSA were special categories with their own needs/interests
- The Codes offered substantial protections for the interests of student tenants consistent with the objectives of the RRA.

In November 2024, the National Codes Committee of Management determined a set of guiding principles for the interim review:

- The National Codes will continue to act primarily in the interests of students in accordance with its founding commitment enshrined in the Code
- Existing rights: on balance, student rights should not be disadvantaged by a move out of the assured tenancy regime and the National Codes will seek to adapt membership criteria to ensure appropriate rights continue
- New rights: consideration will be given to how the new rights for tenants in the Bill can be introduced into membership criteria in a manner that pays regard to the needs of landlords/operators
- Review: it will be necessary to review the content of the Codes, but the scope of this will be limited to aspects with relevance to the Bill
- Consultation: members of the Code will be involved in the review and consulted about any changes to the Code
- Student voice: Unipol will consult with students about any proposed changes
- Transparency: the Codes will provide transparent information to the Committee, members and other stakeholders about how decisions have been taken
- Guidance: the Codes will provide clear and detailed guidance about any new membership criteria, and also about the requirements of the Bill as more becomes known.

Key areas for change

In the context of the Government's schedule for introducing RRA and the limited time available to conduct the interim review, the decision was taken to confine its scope to matters directly related to the need for changes to be made in the service of RRA. In the key areas identified, the review gave consideration to:

- The need for fully clear and unambiguous membership criteria, given that joining the Code would be viewed as a way non-educational PBSA providers could remove themselves from the scope of the tenure reforms – with likely implications for changes to operational management and the registration of new developments
- The status of tenancy agreements where a member was suspended or where an individual member's building was suspended
- How students could retain existing deposit protections
- Due reference to the proposed Decent Homes Standard and Awaab's Law (although the timescale for their implementation was unclear).

Review Advisory Group

Comprising five appointees drawn from Code members represented on the Committee of Management, a Review Advisory Group established for these purposes met four times between January and March 2025. Working with the Committee of Management and several larger Code members, the Advisory Group produced a draft revised version of the Code for Non-Educational Providers.

Summary of the main proposed changes

The key changes circulated for consultation concerned:

- The publication and maintenance of accurate and timely information about Code membership
- Occupants' freedom to withdraw from their tenancy agreement with four weeks' notice, if they permanently withdrew from study at their institution; did not gain a place on a course; or, with the agreement of their institution, suspended their studies due to significant ill-health (not applicable to transitional assured tenancies)
- Code members desisting from the enforcement of any guarantor agreement in the event of an occupant's death
- A continuing requirement on members to protect tenants' deposits in a government-approved tenancy deposit scheme
- Expansion of requirements in line with the Building Safety and Fire Safety Acts and tighter guidance on responding to damp and mould
- A revised section on complaints that would tighten timescales; provide clarity on the status of tenancy agreements where a member or building had been suspended; and give Code members a clearer pathway to ensure they responded promptly to complaints from occupants
- A new section on joining the Code that makes the application and sign-up processes clear and unambiguous
- Enhanced health and safety standards.

The changes to the Code are designed to protect and improve students' rights in renting PBSA.

Review consultation and outcomes

Open to all Code members, stakeholders, members of Code governance bodies and students' unions, the public consultation ran from 9 April to 23 May 2025. Forty-one organisations responded: **22** private providers, **12** students' unions, four universities, one investor and two others.

Generally, respondents received the proposed changes favourably. However, the proposed Clause 4.6 enabling tenants to give notice in certain circumstances elicited some opposition among the membership, but strong support from students' unions. In weighing variant consultation responses as part of any review, the National Codes leadership is committed to balancing the views and interests of a range of stakeholders and evaluating the consequences of change. The guiding principles of the review established by the Committee of Management were key considerations in reaching conclusions about which suggestions should be taken forward, as was the fundamental precept of the RRA to rebalance rights in favour of tenants. The changes made to the Code reflect this new reality and offer students' some important new rights appropriate to their status in a responsible and fair framework that members can work with.

Next steps

Having been endorsed by the Consortium on 23 July 2025, the revised Code was submitted to MHCLG for approval on 28 July. Once approved by MHCLG, the revised Code would be launched on and would be operational from the date the relevant Secondary Legislation came into force.

There were matters that needed to be resolved with the Welsh Assembly Government over references in the revised Code to regulations which apply to them. These will be imported into the Code as part of the full review due in 2026/27.

Code members were kept informed of progress via the National Codes website and circulars.

Renters' Rights Act 2025: transitional phase

The National Codes leadership has worked through the detail of the likely impacts of the conversion of existing assured shorthold tenancies to assured tenancies on Code members and on students – including the risk of substantial disruption to the availability of accommodation for students in the run-up to the start of the 2026/27 academic year.

In approaching the challenges presented by the transitional period, the National Codes have been:

- Briefing MHCLG on their concerns
- Making representations on potential ways of mitigating some adverse impacts on providers' interests
- Providing continuing support to members through regular updates and guidance bulletins, plus plans to give training on assured tenancies.

Membership and tenure: review of joining arrangements and annual fee level

Membership criteria, status and processes for joining

Approved by the Consortium in July 2025, membership guidance has been produced in response to the RRA in order to help ensure that the process and criteria for membership are transparent and unambiguous. It was determined that the tightening of membership criteria would sit alongside the conditions set out in the RRA and come into effect following the Bill's enactment. Once approved, the arrangements will be published in draft form on the National Codes website for the benefit of new and prospective members.

An annex was added to the Code for Non-Educational Providers to fully codify:

- Membership eligibility criteria and processes for joining
- Membership and tenure status for existing members, new members, new members with an established track record (to help deal with the growing number of changes in operational management), new buildings controlled and managed by existing members, renewal – and, importantly, tenure status relating to members or buildings suspended or expelled from the Code.

At the time of writing, the annex is awaiting government approval.

Membership fees

The decision on, and rationale for, transferring the power to determine annual membership fees from the Code Committee of Management back to the Unipol Board has been reported previously. For 2025/26, membership fees will increase by **5%**, slightly ahead of the Consumer Prices Index rate which stood at **3.4%** in May 2025. Fixing it at this level takes account of additional resources required for ongoing and enhanced administration in light of the RRA. Set out in the Looking ahead section, the schedule of major priorities for 2025/26 gives a sense of how much the organisation will be scaling up to meet the challenges of its enhanced role in the new regulatory regime.

The full fee schedule was circulated to members on 19 August 2025.

Operational activity in 2024/25

Introduction of the revised Code for Educational Establishments

The revised Code for Educational Establishments became operational on 15 October 2024. The outgoing version remained in approval until 15 January 2025. Members of the Code were set a deadline of 15 January 2025 to register their wish to rejoin for the next three-year membership period.

Verification visits

Visits to member properties to ensure compliance with Code standards on safety and operational effectiveness are a core component of scheme administration. In addition to an annual programme of location-specific visits, there are eight types of visit conducted each year:

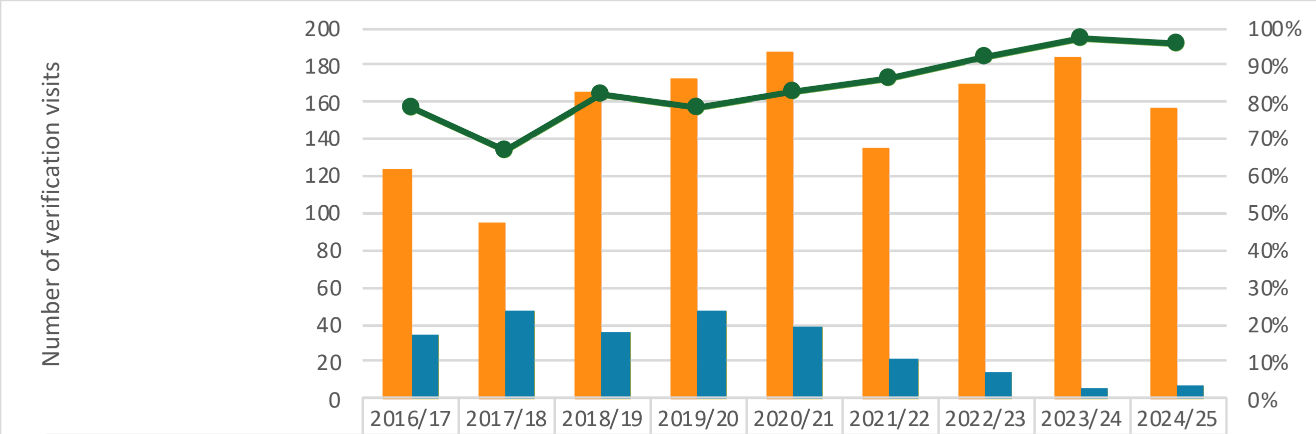
New applicants	Cyclical re-visits	New developments	Complaints
Existing members	Revisits	Change of operational management	Audit Panel’s action

In 2024/25, **164** verification visits were completed, **13%** fewer than in 2023/24. The lower number for the year in review is attributable to several factors:

- Fewer three-yearly visits fell due in 2024/25
- The Cambridge colleges cycle aside, Educational Establishment Code member visits were postponed from 2024/25 to 2025/26, when an overhauled self-assessment questionnaire system will be introduced to align with changes made to the SAQ processes used for the Non-Educational Code
- There has been a substantial fall in the number of new developments entering the system.

Of the visits conducted in 2024/25, **96% (157)** resulted in action points for the provider. Although this marks a slight proportional decrease on 2023/24, it is still the second highest on record (Figure 1). An important factor in sustaining an elevated rate is the Audit Panel’s decision to focus on fire risk assessments, which typically produce a higher rate of actions required, especially in recent years as the PBSA sector adapts to the new requirements of the Building Safety Act.

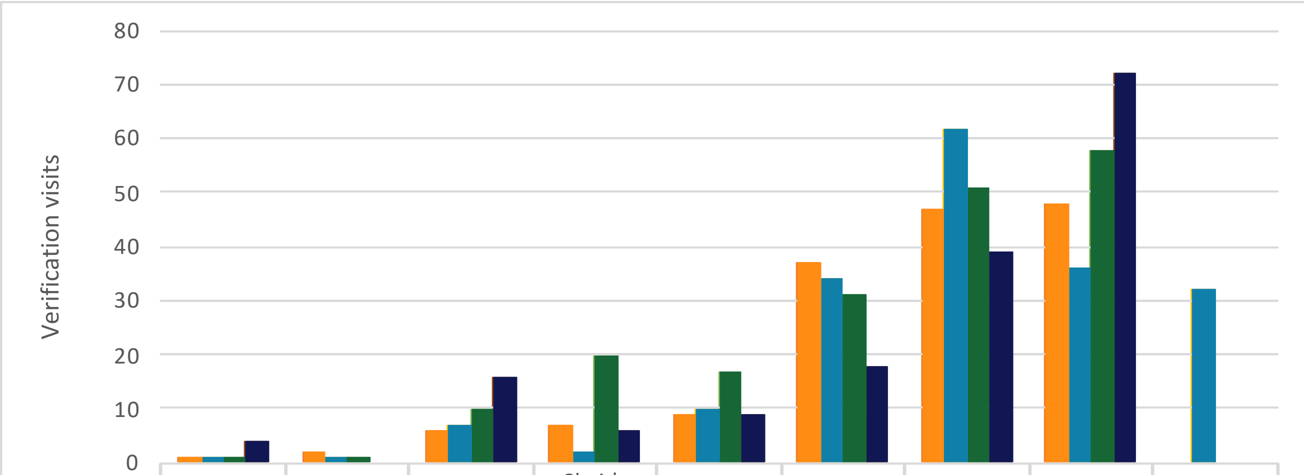
Figure 1: Verification visits completed since 2016/17 by actions needed



	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Visits with action pts	124	95	166	172	187	135	170	184	157
Visits with no action pts	34	47	36	47	39	22	14	5	7
% of visits with action pts	78%	67%	82%	79%	83%	86%	92%	97%	96%

Figure 2 splits down the 2024/25 verification visits by type. Changes in management and new developments accounted for over two-thirds (**68%**) of all visits.

Figure 2: Verification visits by type 2024/25



	Complaints	Existing members	New applicants	Chair's action/Aud Pnl visits	Revisits	Cyclical revisits	New devts	Change of opnl mgt	Cambridge colleges*
2021/22	1	2	6	7	9	37	47	48	0
2022/23	1	1	7	2	10	34	62	36	32
2023/24	1	1	10	20	17	31	51	58	0
2024/25	4	0	16	6	9	18	39	72	0

** conducted every three years*

In addition to the visits triggered by sector activity, verifiers run an annual location-specific programme of visits. Nottingham was chosen for the year in review and **20** visits took place in May 2025. In the debrief for the event, it was agreed that guidance for verifiers and Code members on Fire Risk Assessor competence was necessary and that the revised typology of verification visit outcomes, trialled during the Nottingham exercise, needed further adjustment.

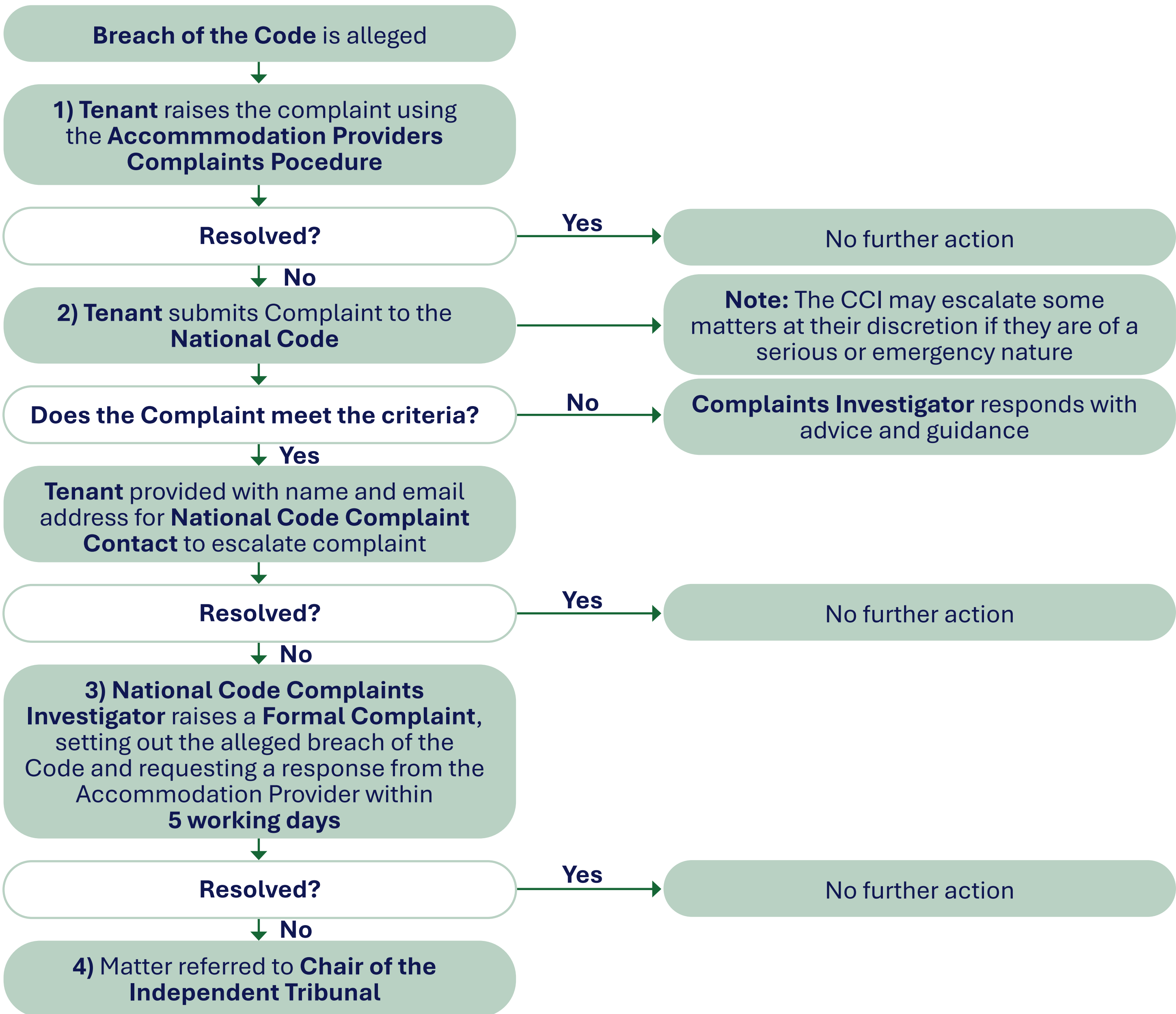
Code complaints, investigations and tribunals

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

Figure 3: Three-stage complaints process and flowchart

Stage 1: Member's internal review	Member notified of an issue, to be addressed by their own complaints process.
Stage 2: Refer to the Code complaints procedure	Where complaints/allegations remain unresolved after four weeks or are contested, they are referred to the Complaints Investigator. Further investigation is undertaken.
Stage 3: Independent Tribunal	If unresolved at Stage 2, the complaint is passed to an independent tribunal. The Tribunal determines whether the Code has been breached and what sanctions will apply to the member.

Stage 3: Independent Tribunal



In 2024/25, the total number of enquiries/complaints rose to a record high of **417**, up **53** on the previous year (**+15%**). With the exception of 2021/22 (when the pandemic resulted in many students studying from home), there have been year-on-year increases in the number of enquiries/complaints since 2019/20 (Figure 4).

While these are, to some extent, accounted for by expansion in the volume of bed spaces covered by the National Codes, there has been incremental growth in the number of complaints as a proportion of Code stock over time (Figure 5). Nonetheless, measured against this index, numbers are still low at less than **0.001** per bed space. Gradual increases are likely to be factored by growing awareness of, and confidence in, processes operated by members and the Codes to put right or remedy legitimate tenant grievances. Indeed, members are obligated to help raise tenant awareness of the Code by making the Code logo, relevant web content and the display of posters in developments highly visible. Member referrals of students to the Code complaints process to help resolve difficult issues continue to increase.

Figure 4: Overall enquiry/complaint numbers and year-on-year change

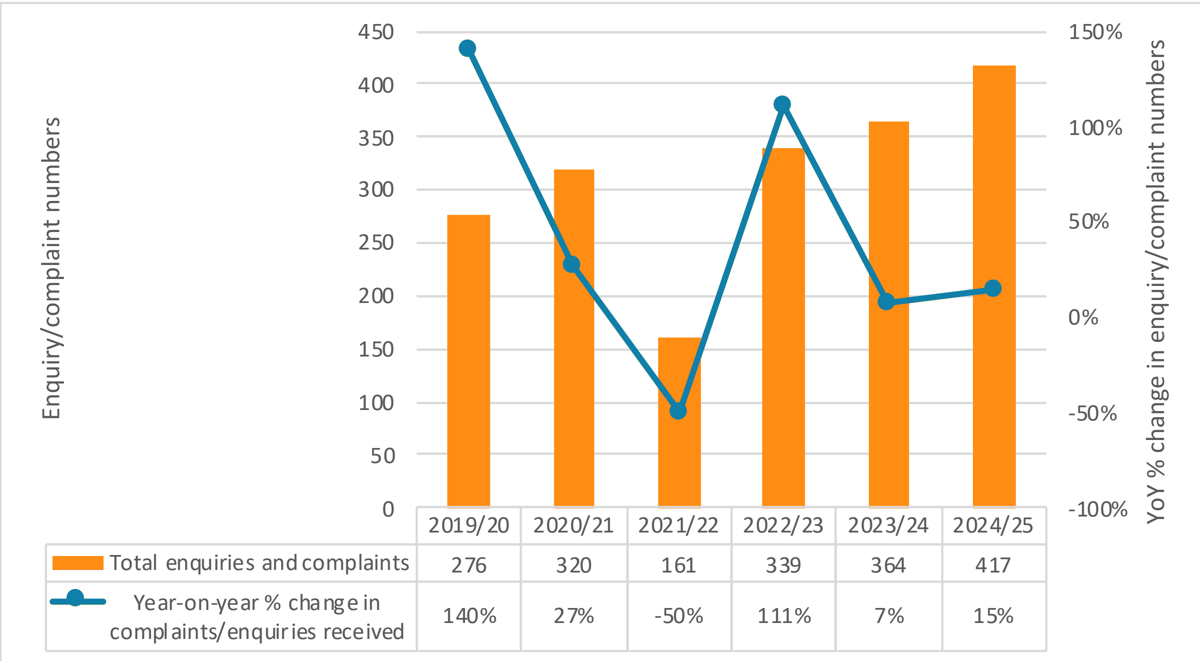


Figure 5: Enquiries complaints received as a proportion of total bed spaces covered by the Codes

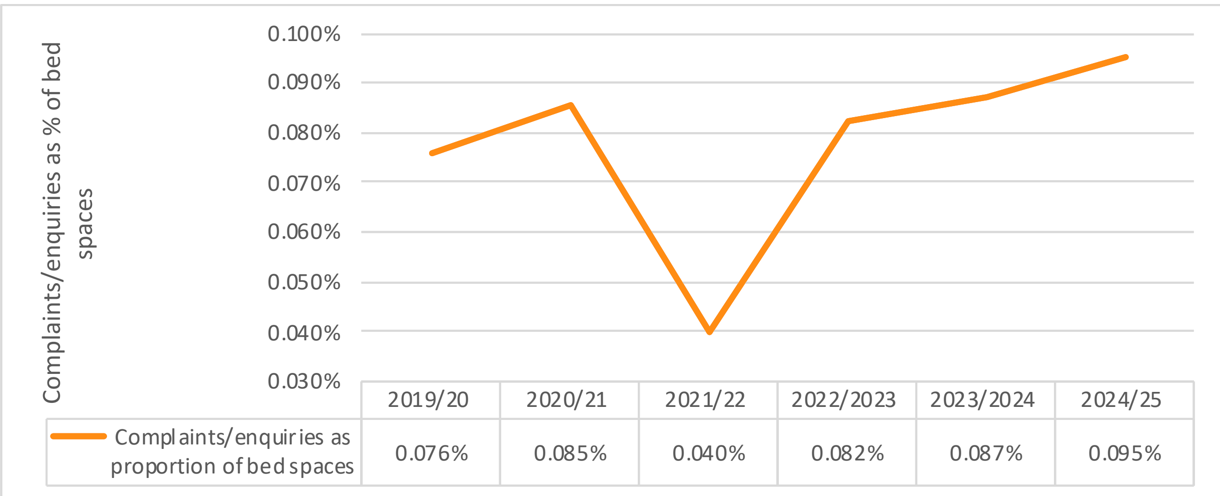
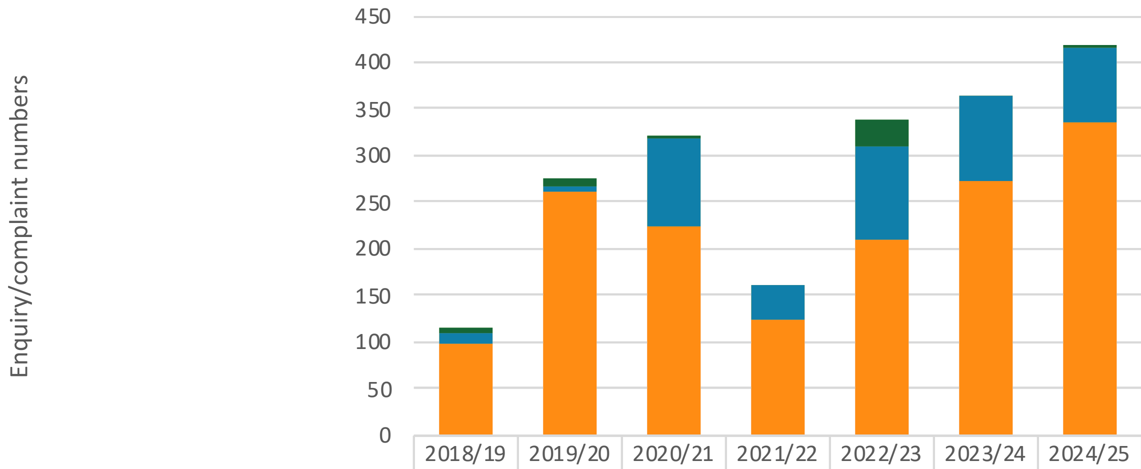


Figure 6: Handling of enquiries, complaints and investigations



	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Complaints referred to Tribunal	5	8	1	0	30	0	1
Complaints resolved by Code Investigator	13	8	95	38	99	90	80
Enquiries closed/resolved by provider	97	260	224	123	210	274	336

In 2024/25, **19%** of complaints received were escalated beyond the provider, the lowest figure since 2019/20 (Figures 6 and 7). This suggests that the performance of members in providing early-stage remedies to the satisfaction of complainants continues to improve. The recent downward trend in escalation numbers may also be factored by students' preparedness to lodge dissatisfaction on lower-level matters straightforwardly remediable by their provider.

One case was referred to the Tribunal Chair in January 2024. The complaint submitted included several allegations of by the of Code non-compliance but with little evidence provided to support these claims. The Codes Complaints Investigator was unable to resolve the matter to the satisfaction of the complainant, so the case was referred to the Tribunal for determination. The Tribunal could not resolve the dispute on the basis of the information made available to it, but recommended the complainant's representative:

- Clearly enumerate the alleged failures and how each of these constituted a breach of specific requirements/standards set out in the Code
- Supply all relevant evidence.

A verification visit took place, and this confirmed the development met Code standards. No further correspondence has been received from the complainant to date, and the case has been closed.

Figure 7: Complaints escalated beyond the provider

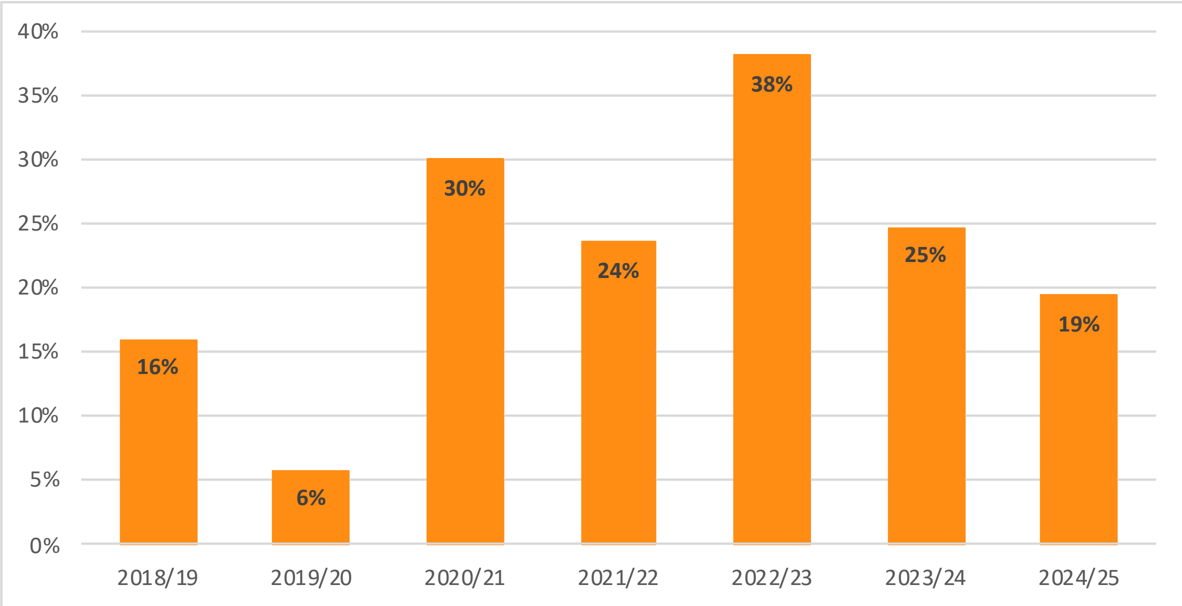


Figure 8 provides detail on the issues that triggered enquiries/complaints and the proportions of cases escalated beyond the Codes Complaints Investigator in 2024/25.[1]

Figure 8: Reasons for complaints 2024/25

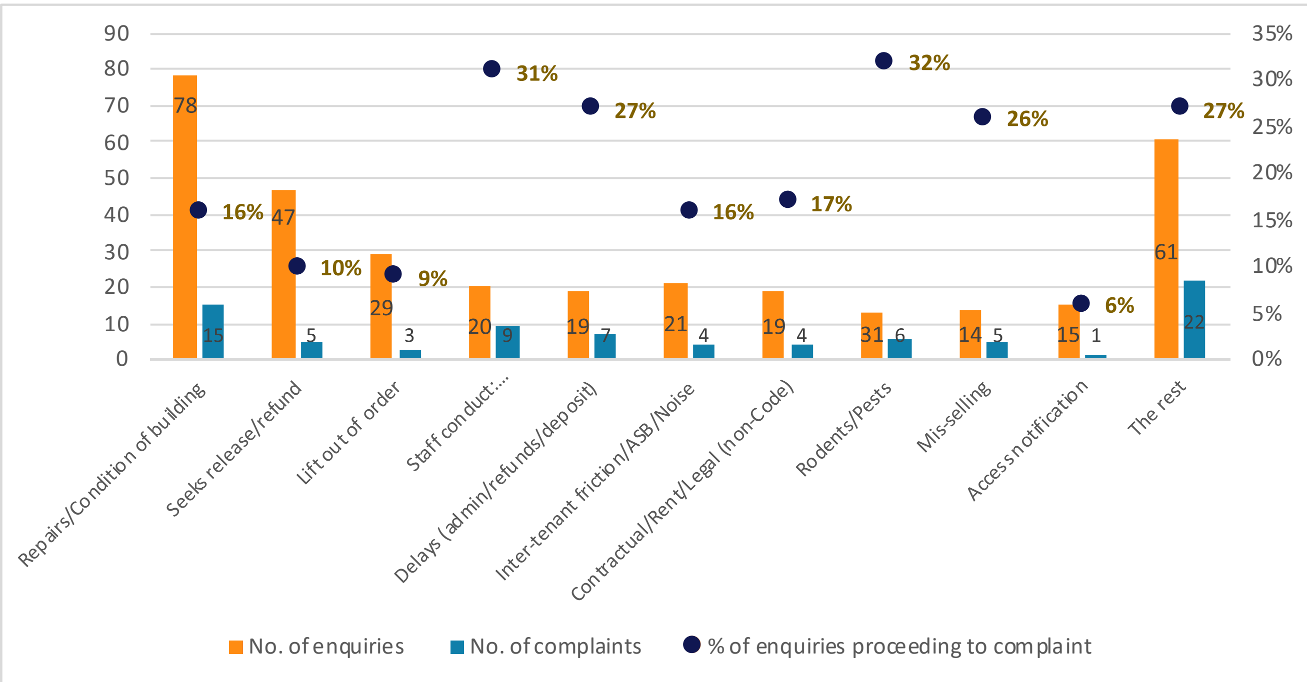
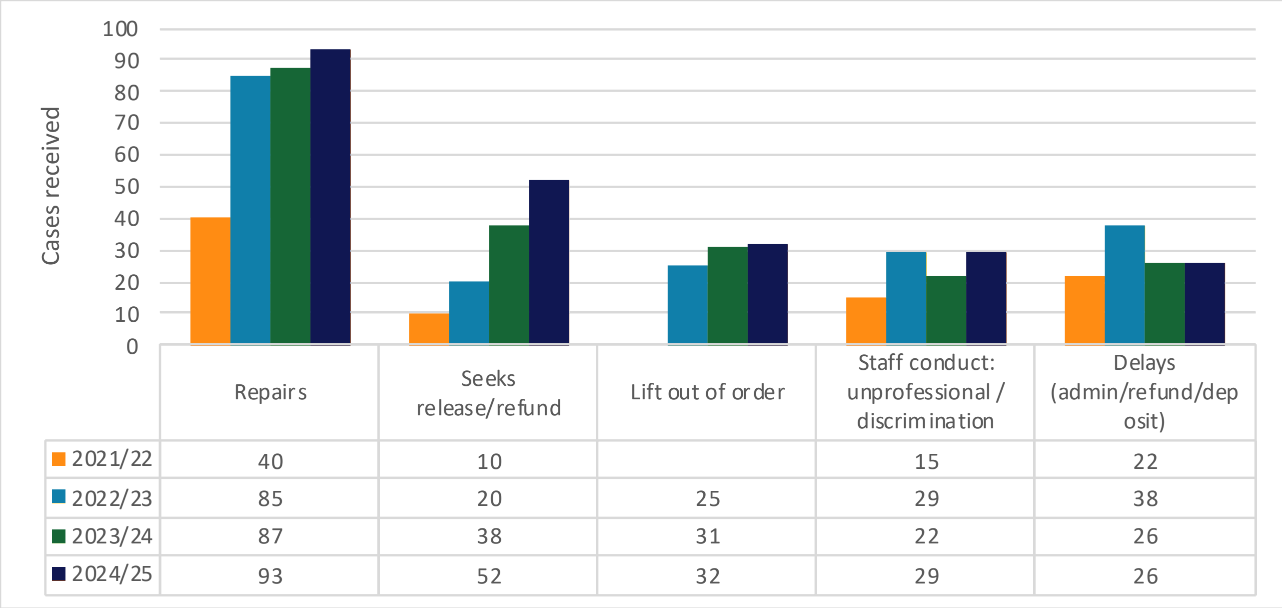


Figure 9: Top five complaint issues: change in case numbers over time



	Repairs	Seeks release/refund	Lift out of order	Staff conduct: unprofessional / discrimination	Delays (admin/refund/deposit)
2021/22	40	10		15	22
2022/23	85	20	25	29	38
2023/24	87	38	31	22	26
2024/25	93	52	32	29	26

The highest volume of complaints continues to be about disrepair and/or the condition of the property when tenants moved in, up slightly on 2023/24 to a new high. In most instances, however, matters were resolved by the provider: **16%** were escalated to stage two, down a percentage point on 2023/24.

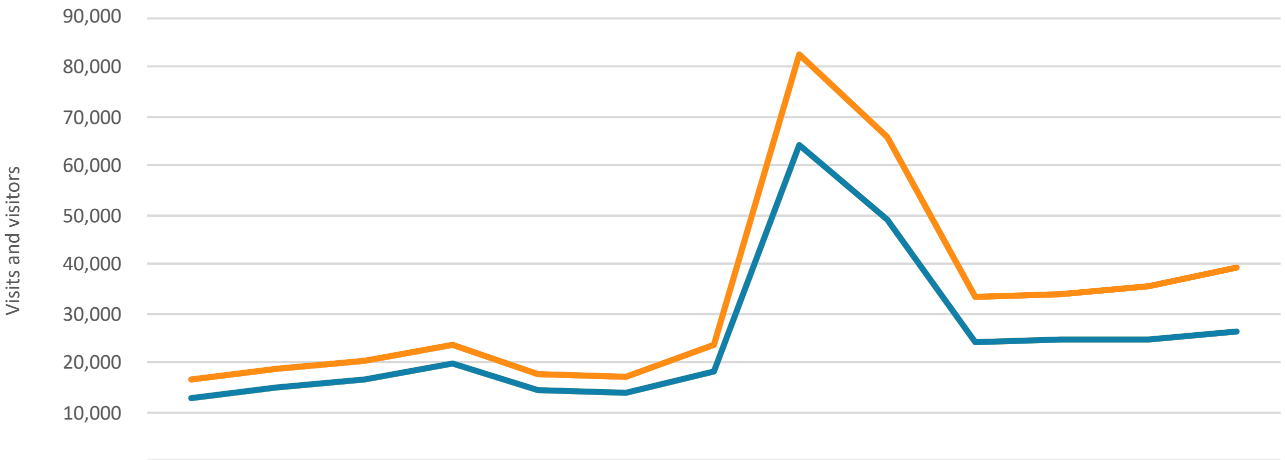
Tenants seeking release from their contract or a refund increased for the year in review. Numbers in this category have gone up steadily year on year from 10 in 2021/22 to 52 in 2024/25, a growth rate of **420%** for the period. The number of complaints about lifts being out of use were in line with figures for recent cycles. Complaints about staff conduct were on the rise again in 2024/25, amounting to **7%** of all enquiries/complaints. Often these were linked to a failure to respond within a reasonable timescale to correspondence from tenants.

Other complaint trends in 2024/25 included:

- The emergence of reports from tenants that hot water and/or heating systems were not working
- Growing claims that inadequate notification had been given by the provider to gain access to a property
- More cases of tenants complaining they had been ‘mis-sold’ their rented property – that is, they claimed, having moved in, that the accommodation was materially not as advertised
- Growing use by students of AI technology to research and seek resolution to housing issues.

National Codes website traffic

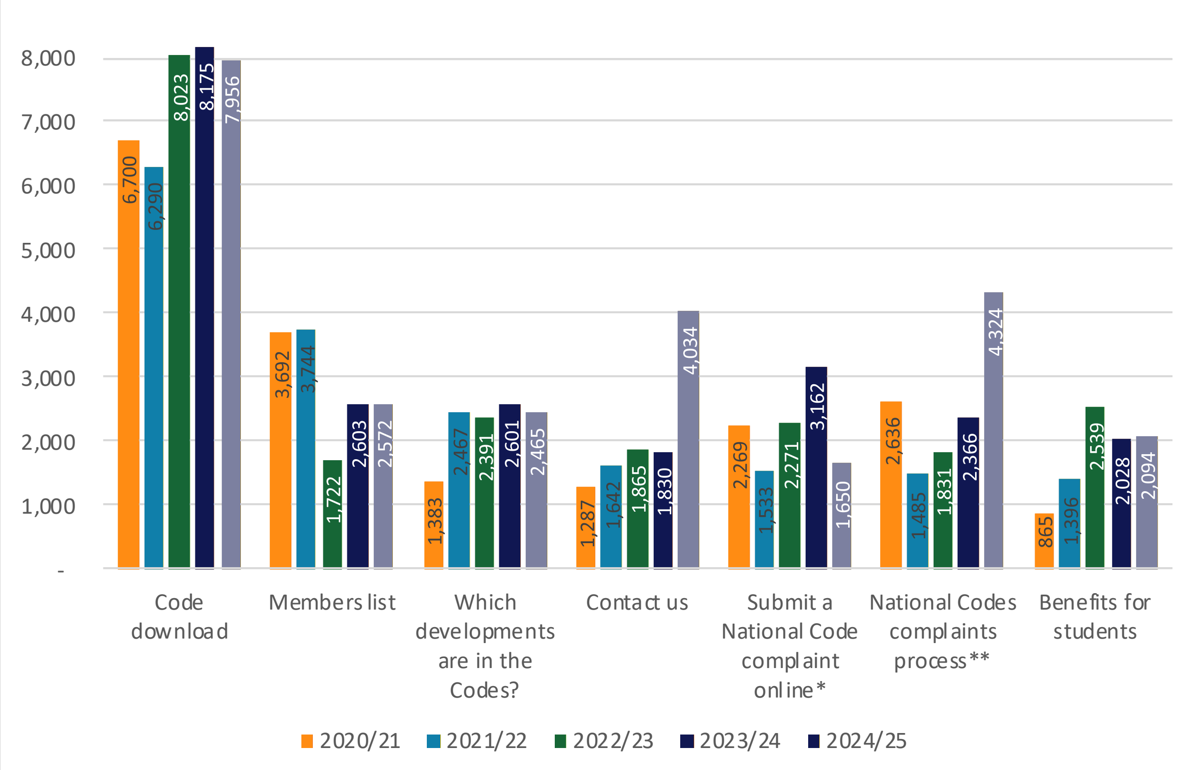
Figure 10: National Codes website: visits and visitors



	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Visits	16,464	18,657	20,239	23,526	17,937	17,455	23,933	82,618	65,981	33,272	33,661	35,358	39,385
Visitors	13,142	15,010	16,919	19,968	14,583	14,167	18,451	64,189	49,242	24,094	24,716	24,751	26,459

Compared to the previous year, visits and visitors to the National Codes website in 2024/25 increased by **4,027 (+11.4%)** and **1,708 (+6.9%)** respectively. Covid-affected cycles aside, the percentage rises for the year in review represent the biggest year-on-year rise since 2018/19, likely factored by interest in the implications of RRA.

Figure 11: National Codes website: page views



* *Previously tagged as 'Making a complaint (form)'*

** *Previously tagged as 'How to complain (advice)'*

In 2024/25, page views totalled **25,095**, repeating the **10%** year-on-year increase recorded for the previous cycle. Within this figure, there was some significant variance by page view type. The number of users accessing the 'Contact us' page more than doubled **(+120%)**, again possibly driven by an appetite for advice and information about the implications of RRA. The major changes in the complaint-related page types are likely to be accounted for by the reorganisation of content about making a complaint.

In 2025/26 and onwards, page views for student-directed content will be an important index of the success of efforts to raise awareness of the Codes among the student body.

Training and events

Twenty Unipol training events took place between August 2024 and July 2025. Although this is five fewer than for the previous year, delegate numbers were up from **629 to 941**, of whom **185** were paying attendees. Sixteen of the events were held online and four in-person. High attendance levels at the RRA-themed sessions are particularly noteworthy.

Month	Event title	Online/ in-person	Delegate numbers
August 2024	What's happening with student numbers? Insights for the 2024/25 year	Online	43
September 2024	Navigating the Renters' Rights Bill	Online	231
October 2024	This is not what I signed up for – the anatomy of student complaints	Online	14
November 2024	Mental health first aid	Online	17
November 2024	Renters' Rights Bill update for HMOs	Online	88
November 2024	An introduction to the law and student housing	Online	11
December 2024	Room to belong: diversity, equity, inclusion and belonging in student accommodation	In-person	9
December 2024	Launch of the Accommodation Costs Survey report on London	In-person	69
January 2025	This is not what I signed up for – the anatomy of student complaints	Online	13
January 2025	Mental health first aid	Online	15
February 2025	Tenancy support and wellbeing forum – inclusivity and EDI policies within student accommodation	Online	8
February 2025	Student accommodation 101: what you need to know about PBSA	Online	27
February 2025	Renters' Rights Bill update	Online	214
February 2025	National Codes student experience conference	In-person	134
March 2025	Mental health first aid	Online	16

May 2025	An introduction to the law and student housing	In-person	7
June 2025	Student accommodation 101: what you need to know about PBSA	Online	11
June 2025	Mental health first aid – refresher	Online	5
July 2025	Tenancy support and wellbeing online network - supporting care leavers and estranged students	Online	4
July 2025	Being queer in halls – preparing for the new term	Online	5

The second Student Experience Conference was held on 27 February 2025 at Cutlers' Hall, Sheffield. **134** attended, representing **75** organisations. Session themes included:

- Enhancing student engagement
- Giving students the right support at the right time
- Responding to students' evolving accommodation priorities and developing localised strategies to maximise student satisfaction
- The primacy of home, community, practicalities and affordability over the lure of luxury
- The role of PBSA providers in helping enable access to higher education
- The value of fostering long-term co-operation between private PBSA providers and universities
- The value of a multifaceted and integrated approach to student support
- Harnessing technology to support the student accommodation experience
- Easing transitions and reducing stress for neurodivergent students.

For the verification team, training in 2024/25 was given a fresh focus on moderation, consistency of approach and transparency in decision-making, particularly in respect of the accurate reporting of fire risk assessment actions and health and safety matters. Further training for the team will be informed by a recent skills audit, which all verifiers have now completed. All new appointees will be required to undertake a similar exercise.

Training sessions scheduled by Unipol for 2025/26 include:

- Briefings on the RRA
- Mental health first aid
- Learning from complaints – how to resolve complaints efficiently while developing a constructive complaints handling culture
- Dealing with disgruntled tenants: conflict management in student accommodation
- Supporting neurodivergent tenants in student accommodation – creating inclusive, empowering living environments
- Being queer in halls – understanding LGBTQ+ issues in student accommodation

Advocacy and research

In May 2025, Unipol conducted a Student house hunting behaviour survey to understand how students find accommodation and to explore the house hunting process, its characteristics, context and challenges. The snapshot was timed to establish an important evidence base ahead of the significant legislative and regulatory change that the RRA will bring to the student rental sector. The study fits into Unipol's wider research to document and understand the special characteristics of student accommodation and students' housing needs. Fieldwork extended to students at **37** universities.

The key findings were:

- Students prefer to look for housing close to their place of study
- Affordability is students' foremost concern
- Students often have to find more rent money than they had originally reckoned on
- Students need significant financial support beyond government loans
- How easy it is to find suitable accommodation varies according to local rent and supply levels
- A room in a shared house was the ideal accommodation type for many respondents
- Returning students (ie students beyond their first year) were not concerned about large social spaces or cinemas as part of their accommodation package
- Respondents thought the start of the house hunting season was far too early in the academic year
- Students said they would benefit from better guidance on housing after their first year.

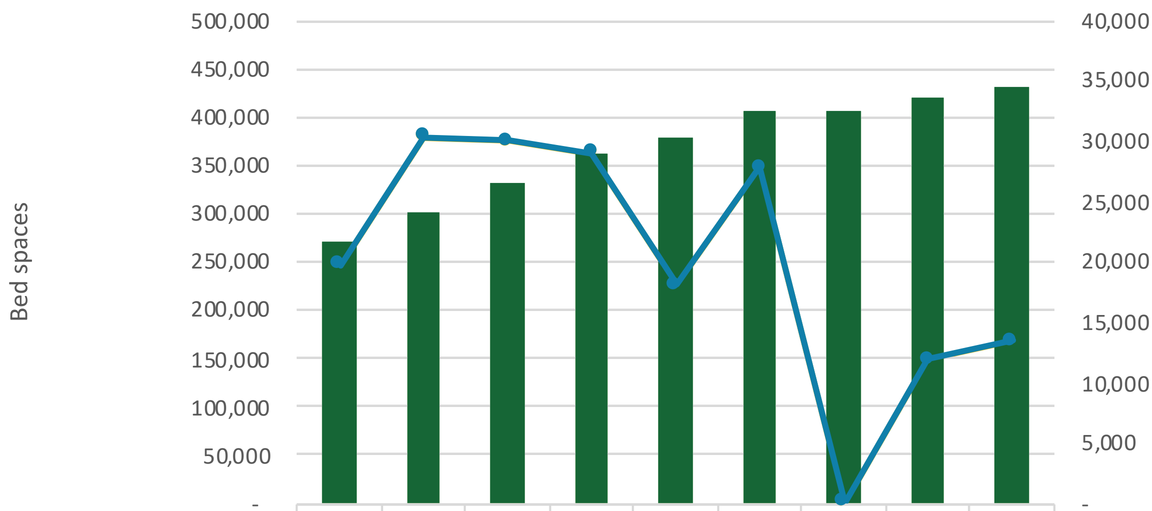
The periodic Unipol/NUS Accommodation Costs Survey (ACS) will be run in 2026. The ACS is a longitudinal dataset that analyses trends in the provision of student accommodation and its cost, and captures the strategic direction and key issues facing student accommodation providers in the UK. The scheduling of the next iteration of the full survey has been deferred by two years as a result of the decision to undertake intra-cycle mini-surveys on a sample of 10 cities (2023) and on London (2024), prompted by unprecedentedly turbulent market conditions. (The findings of these pieces of research were covered in previous annual reports to MHCLG.. Fieldwork for the 2026 exercise will begin in early 2026.

National Codes: membership levels and bed space coverage

Membership profile

At the end of July 2025, there were 156 National Code members: **105** private providers and **51** educational establishments. Bed space numbers covered by Code members stood at **432,023**. While this represented a **3.2%** increase on the previous year, growth remained significantly below the scale of new stock delivered annually before the pandemic. Bed spaces covered by the Codes amounted to **59%** of the UK's PBSA sector for the year in review. [2]

Figure 13: Volume of bed spaces covered by the Codes since 2017

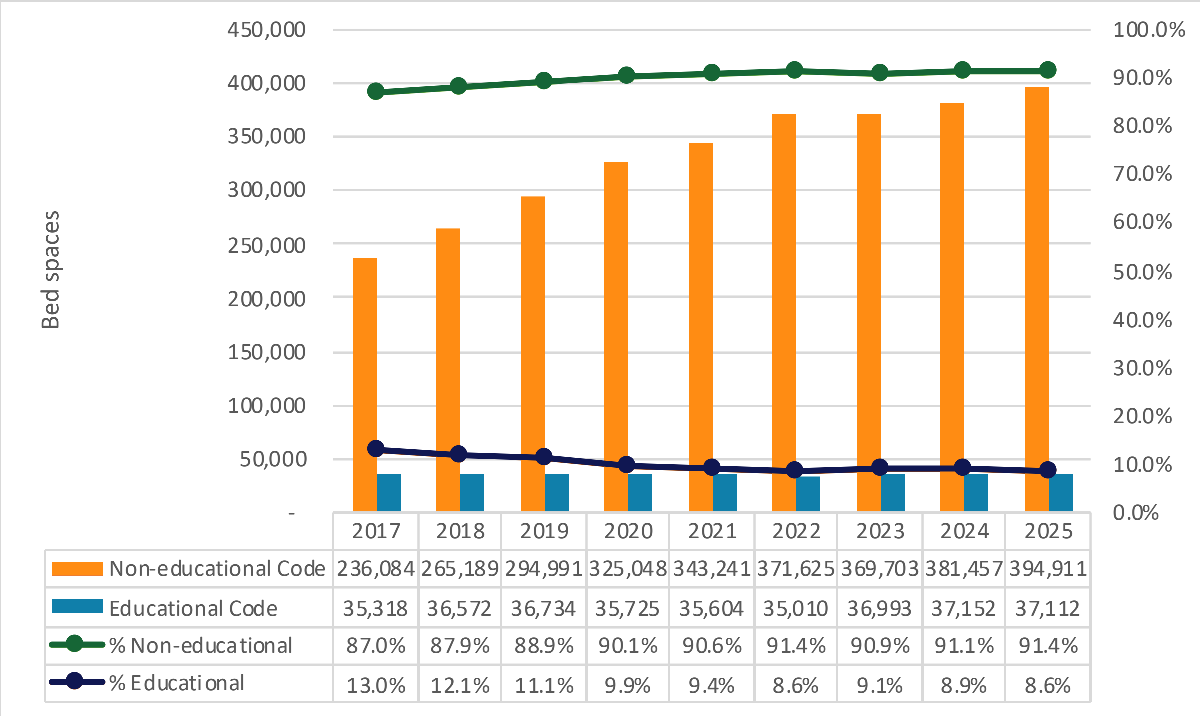


	2017	2018	2019	2020	2021	2022	2023	2024	2025
Bed spaces	271,402	301,761	331,725	360,773	378,845	406,635	406,696	418,609	432,023
Year-on-year increase	19,703	30,359	29,964	29,048	18,072	27,790	61	11,913	13,414

Private providers accounted for **91.4%** of in-membership stock, up **0.3** percentage points on 2023/24. What growth there was was driven by **16,282** new private sector bed spaces entering the Code for non-educational providers in 2024/25 (including new provision from both existing and new members). (This figure reduces to **13,414**, once exiting provision is accounted for.)

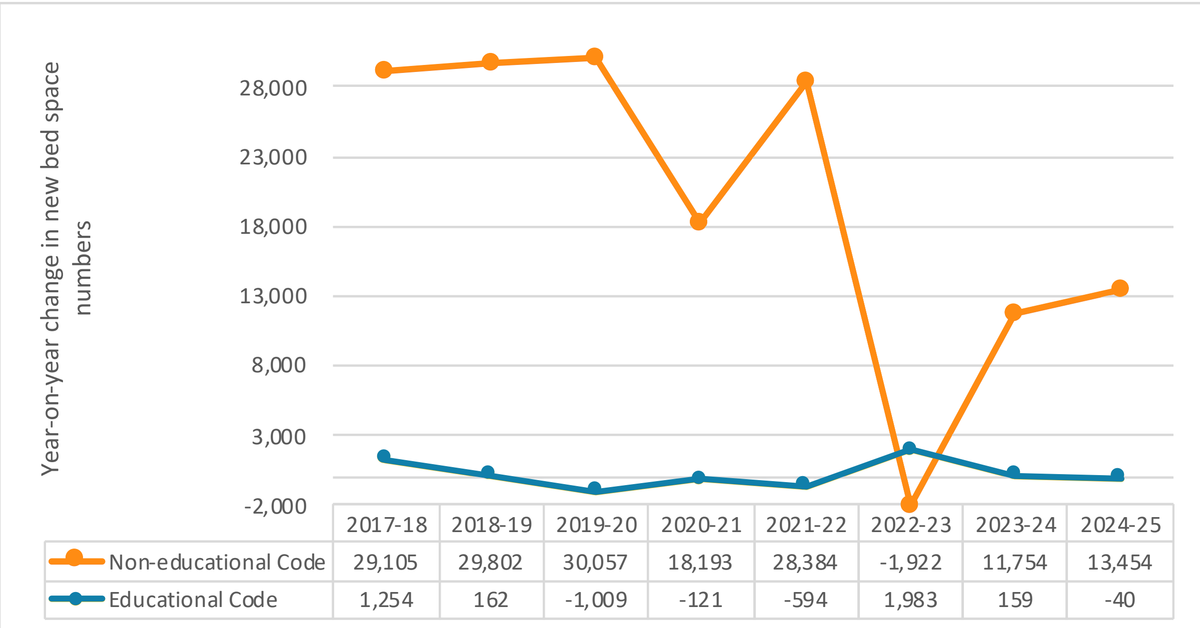
In the most recent cycle, the widening gap between the two provider segments reflects a long-term trend in the PBSA sector as a whole, but has been given fresh impetus by a growing perception among private providers that Code membership is likely to become business-critical as a direct consequence of the legislative exemptions it offers them (notwithstanding the rigorous standards set by the Code).

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



	2017	2018	2019	2020	2021	2022	2023	2024	2025
Non-educational Code	236,084	265,189	294,991	325,048	343,241	371,625	369,703	381,457	394,911
Educational Code	35,318	36,572	36,734	35,725	35,604	35,010	36,993	37,152	37,112
% Non-educational	87.0%	87.9%	88.9%	90.1%	90.6%	91.4%	90.9%	91.1%	91.4%
% Educational	13.0%	12.1%	11.1%	9.9%	9.4%	8.6%	9.1%	8.9%	8.6%

Figure 15: Non-educational and Educational Codes: year-on-year change in bed space numbers



	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
Non-educational Code	29,105	29,802	30,057	18,193	28,384	-1,922	11,754	13,454
Educational Code	1,254	162	-1,009	-121	-594	1,983	159	-40

Code administrators are anticipating continuing heightened interest from private PBSA suppliers, as the full impact of the RRA's assured tenancy regime approaches. At the time of writing, **31** new applications for membership were in process, all from private providers. If all applications are converted to membership, this will add **69** developments and **8,187** bed spaces to Code coverage.

Figure 16: Code bed spaces in 2024/25: top locations

Figure 17: Code bed spaces in 2024/25: top providers

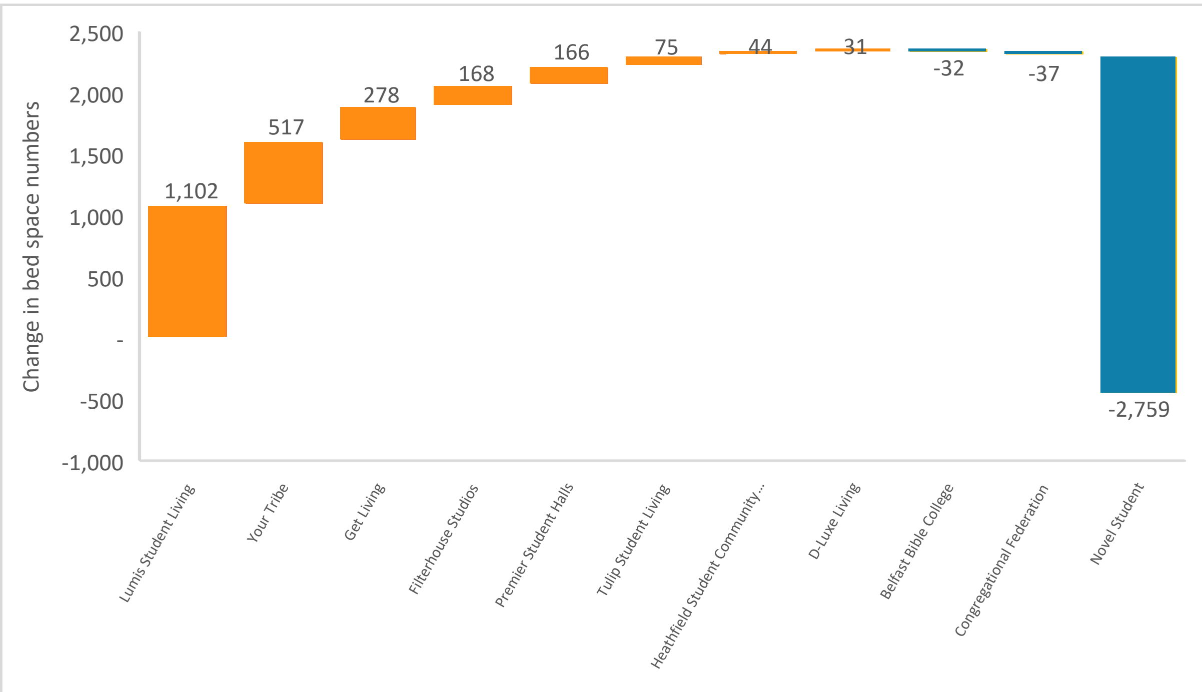
Provider	Bed spaces
Unite Students	64,306
Homes for Students	36,357
iQ Student	30,948
Student Roost	22,001
Fresh	14,797
CRM Students	12,093
Greystar	11,428
Student Castle	10,582
Yugo	10,000
Collegiate AC	9,640

Figure 18: Locations and providers of new bed spaces 2024/25

Location	Provider	Bed space numbers
Birmingham	Premier Student Living	166
Cardiff	Lumis	544
Lancaster	Filterhouse Studios	168
Leicester	Lumis	558
Lincoln	Tulip	75
London	Get Living; Your Tribe	795
Norwich	Heathfield Student Community Homes	44
Nottingham	D-Luxe Living	31

All eight new members in 2024/25 were private providers joining the Code for Non-Educational Providers. They added **2,381** bed spaces to Code coverage. Meanwhile, **2,828** bed spaces were lost to the Code through the withdrawal of three private providers from membership. All withdrawals were as a consequence of providers ceasing to operate student accommodation.

Figure 19: Changes in membership in 2024/25 and bed space numbers involved



A full list of members is set out in the appendix to this report.

New developments for 2025/26 and late construction

A total of **57** new and refurbished buildings were due to open for the start of the 2025/2026 academic year. Figure 20 provides details of the status of these developments.

On the supply side, the headwinds created by the pandemic and the war in Ukraine persist: recovery in PBSA investment and construction is slow. However, given evidence of downward pressure on student recruitment in the autumn 2025 cycle, there are no concerns overall about unmet demand for student accommodation in 2025/26, although this will vary significantly from one locality to another.

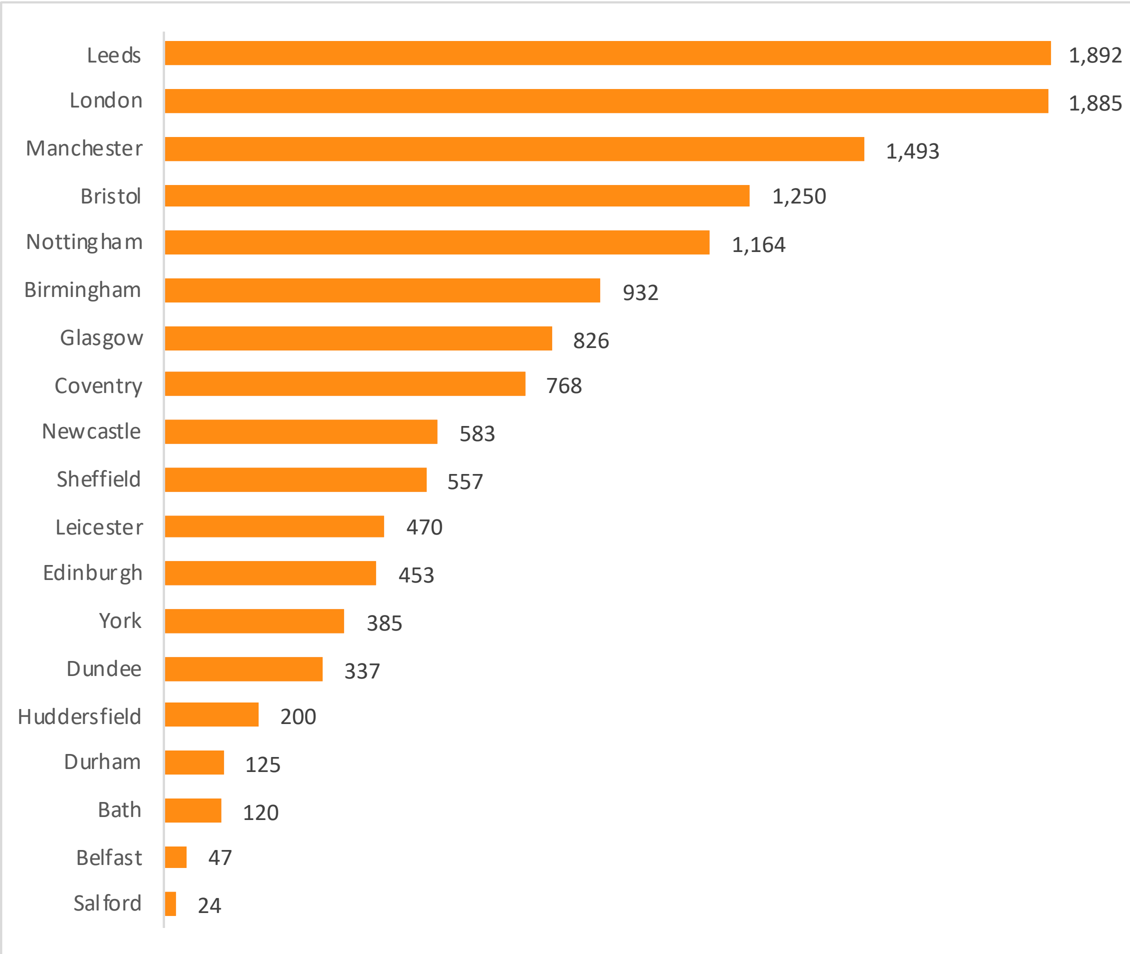
Figure 20: New buildings for 2025/26: readiness status

Category	Count	Bed spaces	Students impacted
Buildings opening on time	42	13,511	N/A
Buildings affected by delay	13	3,576	1,058*
Buildings delayed until 2026/27 academic year	2	93	N/A**
Total	57	17,180	1,058

* Still awaiting confirmation of total number of affected students at four sites
** No rooms let at time of delay occurring

Figure 21 details the distribution of the **13,511** new Code bed spaces entering the market in 2025/26 by city/town.

Figure 21: On-time new Code bed spaces for 2025/26



For the start of the 2025/26 academic year, there were fewer delays in members getting new buildings into commission than in the previous cycle. In autumn 2025, over a quarter of new buildings suffered some degree of delay (**15 out of 57 or 26%**). This compares to over a third in autumn 2024 (**13 out of 36 or 36%**). Extended delays in the previous year were considerably worse: nine out of 13 **(69%)** in 2024/25, contrasting with three out of 15 **(20%)** in 2026/27. If current logistical challenges with Building Safety Regulator processes persist, there could be some drag on the timeline for new developments entering the market.

Governance in 2024/25

Scheduling of a full review of Code governance arrangements

A full review of Code governance arrangements has been scheduled for 2025/26. The Consortium agreed in July 2025 to set up a working group to determine the scope and terms of the review and to commission an independent consultant to undertake the work. The review will have a particular focus on how the Codes engage with students.

Business transacted during the year

In 2024/25, the main items of business transacted by the decision-making bodies of the National Codes related to:

- The implications of RRA and the transitional period
- The interim review of the Non-Educational Code
- Processes for membership renewal for the Code for Educational Establishments
- Policy on verifiers declaring interests
- Code complaints analysis
- Pilot project on fire risk analysis
- Updating of HMO licensing survey information
- Monitoring late new buildings
- Monitoring and raising awareness of concerns about Building Safety Regulator delays, which members continue to report
- Monitoring concerns about international recruitment agents

Consortium

The National Codes Consortium has joint ownership of the Codes for educational establishments and for non-educational providers, and holds the copyright and intellectual property rights of both Codes. Its constituent organisations are Unipol, the Accreditation Network UK and the National Union of Students. The Consortium is the contracting body for the administrative arrangements with Unipol. It has responsibility for the overall governance and operation of the Codes, including for the terms of reference and conduct of the Committee of Management, the National Codes Audit Panel and the Complaints and Tribunal System, and for the appointment of the Chair of the Tribunal and Audit Panel. Its membership profile is made up of representatives from ANUK, NUS and Unipol (two each).

Figure 22: Membership profile of the Consortium in 2024/25

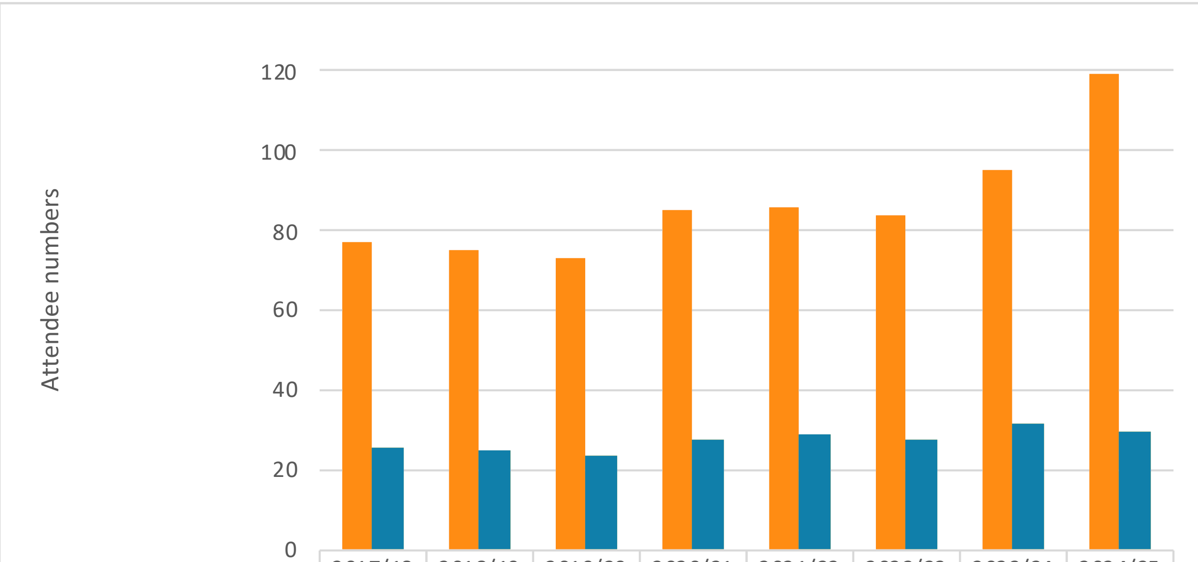
Consortium member	Nominating body
Sam Bailey-Watts	Unipol Board
Sue Green	Unipol Board
Linda Cobb	ANUK
Vacancy	ANUK
Amira Campbell	NUS
Hannah Sketchley	NUS

In 2024/25, it met three times (in November 2024 and in April and July 2025), up from twice a year previously. In the light of additional business flowing from the enactment of the RRA, formal scheduling will maintain this higher level of frequency – meetings to be held in October/ November, January and May, starting in October 2025.

Committee of Management

The Committee of Management has overall operational responsibility for the functioning of the Codes. It met four times in 2024/25, up from three the previous year. The increased frequency of meetings reflects growth in the business the Committee needs to transact. Average attendance numbers fell marginally on the previous year's high point of **32 (-2)**.

Figure 23: Attendance at Committee of Management meeting in 2024/25



	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Total numbers attending	77	75	73	85	86	84	95	119
Average attendance	26	25	24	28	29	28	32	30

Audit Panel

The Audit Panel has operational responsibility for the National Codes self-assessment and verification system, ensuring Code standards are achieved and maintained, and for making early-stage decisions/referrals on non-compliance.

It comprises:

- An independent Chair
- Consortium representatives
- A representative of the Cambridge University colleges.

Members of the verification team are invited to be in attendance at meetings of the Audit Panel, when visit reports they have produced are scheduled for consideration.

The Audit Panel met five times in 2024/25. It has had one independent Chair since July 2024, down from two independent co-chairs previously.

Figure 24: Membership profile of the Audit Panel in 2024/25

Panel member	Role/background	Arrivals/departures
Claire Baxter – Chair	Specialist in public policy & business consultancy	
Wendy Evans/Darren Smith	Domestic bursars, Cambridge University colleges	
Victoria Tolmie-Loverseed	Standards Director & Company Secretary, Unipol	
Vacancy	NUS	
Sam Bailey-Watts – verifier	Formerly in regional management in private PBSA	Resigned with effect from June 2025 on appointment as Unipol CEO

Figure 24: Membership profile of the Audit Panel in 2024/25

Verification team member	Credentials	Arrivals/departures
Andrew Luck	Former Environmental Health Officer	
Rachel Campey	Formerly in regional management in private PBSA sector	
Derek Goss	Former head of service, university accommodation	
Richard Lord	Former Environmental Health Officer	
Philip Moxon	Former Environmental Health Officer	

Jakub Pietruszewski	Management of charity-run PBSA developments	
Beth Raine	Formerly in regional management in private PBSA sector	
David Robertson	Former head of service, university accommodation	
William Wilson	Former head of service, university accommodation	Resigned with effect from August 2025
Andy Attewell	Formerly in national management in private PBSA sector	Due to take up role in September 2025
Ross Halliday	Formerly in national management in private PBSA sector	Due to take up role in September 2025

Changes to governance arrangements for the Audit Panel

It is anticipated that RRA will mean more work for the Audit Panel, as it is required to handle more Code applicants and more Code members. There is also likely to be more scrutiny of its processes and their use, and of its decision-making, given the heightened importance of Code membership to the business model of private PBSA operators under the new legislative regime. In this context, a decision was taken to review the Panel's governance mechanisms and the role of verifiers. Aimed at strengthening its decision-making processes and providing assurance and transparency to members on the outcomes from verification visits, the changes approved by the Consortium in July 2024 included:

- The creation of two deputy Audit Panel Chairs, appointed by the Consortium (one independent and one from the Consortium) to provide additional input into Panel decision-making
- Amendments to the Panel's terms of reference, including the addition of:
    - A statement that the Audit Panel operates separately from, and independently of, the Committee of Management
    - A declaration of interests policy (incorporating a standard members' disclosures agenda item and an annual register of interests exercise for the Chair)
    - A new introductory paragraph explaining the purpose of the body
- Verification decision-making powers to be formally reserved to the Audit Panel Chair and to be exercised through Chair's action for report to both the Audit Panel and the Consortium
- Criteria to support Audit Panel consideration of when suspension or recommendation of expulsion to the Tribunal is appropriate
- Formal clarification that the role of verifiers at Audit Panel meetings is as attendees, not Panel members
- Mandatory training for Audit Panel members on the proper and effective discharge of their responsibilities.

Tribunal

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

The Chair is supported by two Vice-Chairs, who are reappointed on a regular basis. One of these posts is nominated by the NUS; the other from among the provider members on the Committee of Management. The Tribunal profile makes provision for a further six members, nominated by provider members of the Committee of Management and by the Codes Consortium.

Figure 26: Membership profile of the Tribunal in 2024/25

Name	Role/Organisation represented	Term
Ian Fletcher	Chair	Until April 2028
Keith White	Vice-Chair (provider representative)	Until November 2027
Vacant	Vice-Chair (student representative)	
Hannah Sketchley	NUS nominee	Until March 2026
Victoria Tolmie-Loverseed	ANUK	Until March 2026
Nikki Verity	Unipol	Until March 2026
Jane Crouch	Provider representative*	Until November 2027
Allan Hilton	Provider representative*	Until November 2027
Silke Dent	Provider representative*	Until November 2027

**Selected by Committee of Management*

After 20 years' service, John Martin resigned as Chair of the Tribunal with effect from 1 April 2025. As his replacement, the Codes Consortium appointed Ian Fletcher, until recently Director of Policy at the British Property Federation, with in-depth understanding and knowledge of the PBSA sector. The new Chair received induction training in April 2025.

The vacant NUS Vice-Chair position is currently being covered by Hannah Sketchley, but some elected officer input will be required in 2025/26. A means of filling the student Vice-Chair vacancy is under discussion with NUS.

Connecting with partners in the sector

Joint working initiatives

In November 2024, the Committee of Management agreed to participate in a joint working group with the UUK Code. A number of online meetings have since taken place. Five specific areas of joint working have been identified as worthy of exploration:

- Potential for some joint training and promotional events
- Collaboration with CUBO on broadening the range of student accommodation types covered in the periodic Accommodation Costs Survey and establishing a baseline rental dataset for this purpose
- Efforts towards pulling together a dataset to support intelligence on the scale and shape of the off-street housing sector available to students in order to provide an evidence base for assessments of the impact of future regulatory change and shifts in market conditions
- Working with UUK/GuildHE and their respective Code members to help compile a directory of national and local housing contacts in order to support greater sharing of information and views on current priorities and activities
- A joint review of the government-mandated protocol on how the ANUK and UUK codes work together, with a particular focus on using the revised protocol and supporting material to promote and raise awareness among students, providers and local authorities of the purpose of the codes, their differences and the landscape they inhabit.

The Scottish Government's PBSA review group

The National Codes continue to be involved with the Scottish Government's PBSA Review Group. The last meeting of the group in 2024/25 included discussion of:

- Tenancy agreement guidance – a copy of which has been shared with members who have developments in Scotland, with a request for feedback by the end of October 2025
- The need to produce an 'easy-read' document for students, explaining their tenancy rights
- Code membership
- Complaints processes, specifically the development of information packs.

Looking ahead

The challenging market conditions for PBSA providers are set to persist for the foreseeable future on both the supply and demand sides. Restrictions on the graduate visa from January 2027 and the levy of a **£925** flat-rate tax per international student per year from 2028 may soften market confidence further. Government steps to halt decline in the real-terms value of available student maintenance loans are unlikely to whet domestic appetite for higher education or to assuage existing consumer concerns about the affordability of student accommodation. For smaller/lower-tariff higher education providers, the difficulties of maintaining recruitment levels may compound, as higher-tariff institutions look to increase their share of a market that may continue stalling in both the domestic and international segments. Discounting headline rents and sub-optimal occupancy levels are likely to be a feature of the market in 2025/26, at least in some locations.

Although the detail and transitional arrangements for the new regulatory framework are largely determined, their roll-out and implications for providers and consumers still contain an element of uncertainty.

Major priorities for 2025/26

In 2025/26, the National Codes leadership will maintain a watching brief on how the transitional period, the new legislative regime and associated Code adjustments play out in reality. This will include close monitoring of the RRA's impact on the cost, affordability and availability of student housing. In this connection, there will be a focus on continuing guidance and support for members and awareness raising among the student body.

The Codes leadership recognises that strategic priorities for 2025/26 and beyond must take due account of both the RRA's impact on the National Codes and those it serves; and rapid change in market conditions. The formulation of priorities for the forthcoming year will be framed according to the following themes:

a) Governance and operational processes – to ensure that the organisation's governance structures and formal operational processes are fit for purpose following the enactment of the RRA, governance arrangements will be considered to ensure effective member engagement

b) Communication – to develop a considered approach to communicating with Code members, stakeholders, students and other interested parties

c) Training (members) – including a thoroughgoing overhaul of the online training course, plus the development of a programme of training on various aspects of the Codes, shaped by what members report is of value to them

d) Training (verifiers) – to finalise and roll out bespoke training for verifiers to fill gaps identified as part of a skills audit

e) Code meetings – to identify an optimum mix of meeting styles, modes and formats.

Within this framework, significant tasks in the pipeline for the year ahead include:

i. A review of Code governance arrangements to ensure effective member and student engagement in decision making

ii. Consideration of how value might be added to Code membership

iii. Benchmarking or effective use of code complaints data

iv. Progressing accredited training through an independently validated degree apprenticeship to take forward the professionalisation of buildings management in the PBSA sector

v. Consideration of how to deepen student engagement with the National Codes– including exploration of ways to give fresh impetus to the effectiveness of the Student Advisory Group

vi. Working with UUK/GuildHE, CUBO and other partners to identify and progress collaborative activities where these would be beneficial

vii. Training for members on common law tenancies in the context of the implications of the transitional period for the roll-out of RRA

viii. Producing a pre-application training course to assist applicants with joining and to ensure they are aware of the requirements of the Code before proceeding with an application

ix. Further refinement of processes relating to the verification and audit function (including verification guidance for handling changes in operational management and determining a revised range of verification visit outcome options)

x. IT updates to:

  - The self-assessment questionnaire system to cover the Code for educational establishments
  - The web complaints form and record database
  - National Codes web content to provide a guidance hub for students looking to rent in the PBSA sector, plus a communications campaign to raise awareness of the resource content for National Codes online training, including an additional optional module on equality and diversity.

The uplift in membership fees will enable the release of additional resources to support this ambitious programme and to underpin the integrity of enhanced core functions:

- Staffing
  - Recruitment of an extra member of staff to provide additional engagement activity for members (regular liaison and greater training and communications capacity)
  - Expansion of the verification team to meet demand
- Consultancy:
  - IT-related updates
  - PR/legal/regulatory advice to support the National Codes' continuing development and compliance.

Appendix: List of members 2024/25

The Code for Educational Establishments

Academy of Live Technology
Blackpool and the 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 Group
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
Ridley Hall, Cambridge
Robinson College, Cambridge
The Royal Veterinary College
SCIO
Selwyn College, Cambridge
Sidney Sussex College, Cambridge
St Catharine's College, Cambridge
St Edmund's College, Cambridge
St John's College, Cambridge
Stranmillis University College
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 and University Centre
West Dean College
Westminster College, Cambridge
Williams College
Wolfson College, Cambridge

The Code for Non-Educational Providers

A2 Dominion Group Ltd
Abodus
Acis Group Ltd
Affordable Accommodation for Students
Almero Student
Aparto
Ashwell House
ASN Capital Lettings Ltd
Axo Student Living
Baaz Properties
Beyond the Box Student Limited
Boudicca One Ltd
Campus Living Villages
Carr Mills
Carter Jonas
City Block Ltd
Cityheart Living (Scotland) Limited
Cloud Student Homes
Code Students
Collegiate UK
CRM Students
Derwent Students
D-Luxe Living
Downing Students
Dwell Student Living
Equans E&S Ltd
Fawleybridge Student Living
FHP Living
Filterhouse Studios Ltd
Find Digs Ltd
Flair
Fresh Student Living
Gather Students Ltd
Get Living
GLSP
Goodenough College
Graysons Properties Ltd
Greystar Europe Holdings Ltd
Guy Chester Centre
Hamstead Campus Ltd
S Harrison Group Ltd
Hello Student Management
Homes for Students
Host Student
IconInc
Infrastructure Investments Ltd
INTO Newcastle University
iQ Student Accommodation Services Ltd
Kaplan NT Ltd
Kexgill
Lee Abbey London
Lettuce Student Accommodation
LIV Student
Lumis Student Living
Luna Students
Manor Villages Ltd
Mansion Student
McComb (Bolton)
McComb Students
Megaclose Ltd
Mezzino
My Student Living
Now Student Living
Nurtur Student Living
Parklane Properties
Peabody
Portergate Property Management
Premier Student Halls
Prime Student Living
Primo Property Management
Realstar Management (UK) Limited
Reed Residential Ltd
Sanctuary Students
Scape Student Living Ltd
Southern Housing
Stockton Students
The Stay Club Limited
Student Beehive
Student Castle Ltd
Student Cribs
Student Facility Management Ltd
Student Living by Sodexo
Student Roost
Study Inn
SuperUni Housing
TJ Thomas
True Student Limited
Tulip Student Living
U Student Group Ltd
Uni2rent Ltd
Unilife
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
Warehouse Students Ltd
West One Student Accommodation
Your Tribe
Yugo
Zebra Housing Association
Zone Management

End Notes

[1] Only one issue is recorded against each complaint, selected by the Code Complaints Investigator. Typically in a complaint, a number of issues are raised, and therefore an element of judgment is exercised by the CCI in identifying the main motivating factor. This categorisation process will be revised in 2025/26 to improve accuracy.

[2] Based on total PBSA bed spaces estimated by Cushman & Wakefield for the sector in 2024/25 (C&W, UK student accommodation report 2025, p.24)

national code