

National Codes Annual Report

to the Ministry of Housing, Communities
and Local Government

2021



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Introduction and Background

This is the fifteenth Annual Report on the operation and development of the ANUK/Unipol National Approved Codes for student accommodation controlled and managed by both educational establishments and private sector providers, but the first to the newly created Ministry of Housing Communities and Local Government.

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

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

Although this edition of the report references these objectives, it also focuses on activities that have taken place during the course of the year (July 2020 to June 2021) in managing, developing and promoting the Codes.

Format of the Annual Report

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

- Membership Report 2020-2021, including details of all new members who have joined in the last year
- Governance of the Codes, a report on who has been involved in the decision making process and what changes, if any, have been made to the operations of the Codes
- The review of the Code for Non-Educational Establishments
- Meeting the Challenges of the fifteenth Year, including responding to the pandemic
- Assessment and Verification Procedures, focusing especially on the number of visits completed and the outcomes from these
- Complaints and Tribunal Procedures, including the number of complaints received and how they were dealt with
- Website Visits and Online Training Course, a new section providing some insights into the usage being made of the National Codes website
- A report on the Joint Codes Conference, which took place online due to the pandemic
- Conclusion – including a list of challenges for the fifteenth year of operations

Simon Kemp
National Codes Administrator

Section 1: Membership Report 2020-2021

Bed Space Numbers

As of the 30th June 2021 there were a total of **378,845** bed spaces accredited under both the ANUK/Unipol National Codes, an increase on the number cited in the last edition of the report of 18,072, or in percentage terms, 5.00%. This represents a continuation of the growth of bed space numbers covered by the Codes since their creation fifteen years ago, although the percentage increase is slightly lower than at any point in the previous five years, as reflected in Table 1.

Table 1: Bed Space Increases by Number and Percentage since 2016

YEAR	BED SPACE NUMBERS	INCREASE FROM PREVIOUS YEAR	PERCENTAGE INCREASE
2020	360,773	29,048	8.75
2019	331,725	29,964	9.92
2018	301,761	30,359	11.18
2017	271402	19,703	7.82
2016	251,699	31,795	14.45

The main reason for the year on year increases is the addition of new buildings, and the relative decline in the extra bed spaces in 2021 is the result of fewer new buildings being registered this year, which is likely to be due to a slow-down in construction and delivery of new sites brought about by the pandemic. In addition, in 2021 members of the Code for Non-Educational Establishments were invited to sign-up once again and a small number decided not to do so, which had also an impact on the total number of bed spaces covered.

However, it is the case that the majority of the bed spaces are operated by members of the Code for Non-Educational Establishments rather than the Code for Educational Establishments. As of the end of June 2021 there were:

- 343,241 bed spaces within the Code for Non-Educational Establishments
- 35,604 in the educational establishment Code

The decline in numbers in the code for educational establishments was due to a readjustment of bed space numbers by a number of the Cambridge Colleges.

As Table 2 two reveals, whilst the number of bed spaces for members of the Non-Educational Establishment Code have risen annually over the last five years, those for the other Code have remained fairly stable. This is due to the fact that very few new educational Code members have been added since 2009.

Table 2: Bed Space Numbers by Code Since 2016

YEAR	NON-EDUCATIONAL CODE BED SPACE NUMBERS	EDUCATIONAL CODE BED SPACE NUMBERS	RATIOS OF TOTAL BED SPACE NUMBERS
2020	325,048	35,725	90:10
2019	294,991	36,734	88:12
2018	265,189	36,572	87:13
2017	236,084	35,318	87:13
2016	216,177	35,522	86:14

The bed space numbers cover the whole of the UK, although the vast majority - 92% - are in England and Wales. As of the end of June 2021 there were a total of 27,330 bed spaces located in Scotland and just 2,973 in the North of Ireland.

Table 3 gives details of the top ten locations in England and Wales for bed space numbers, as of the end of June 2021.

Table 3: Top 10 Locations for Bed Space Numbers in 2021

LOCATION	BED SPACE NUMBERS
1. London	49,584
2. Leeds	22,413
3. Nottingham	21,861
4. Sheffield	21,007
5. Cambridge	19,334
6. Liverpool	17,054
7. Newcastle	17,041
8. Birmingham	16,706
9. Manchester	15,852
10. Leicester	12,290

Geographic distribution of beds reflects locations with high student populations – Leeds, Nottingham and Cambridge more so because a university in each of these locations is also a member of the educational establishment code.

Table 4 shows the changes that have occurred over the previous five-year period.

Table 4: Comparisons of the Top 10 Locations since 2016

LOCATION	2016 BED SPACES (AND POSITION)	2017 BED SPACES (AND POSITION)	2018 BED SPACES (AND POSITION)	2019 BED SPACES (AND POSITION)	2020 BED SPACES (AND POSITION)
London	43,434 (1)	46,183 (1)	46,717 (1)	48,464 (1)	49,528 (1)
Leeds	19,426 (2)	18,722 (2)	19,295 (2)	19,596 (2)	19,857 (2)
Nottingham	17,032 (4)	17,204 (4)	17,520 (4)	18,178 (4)	18,847 (4)
Sheffield	11,208 (6)	11,919 (7)	12,808 (9)	14,137 (7)	16,931 (5)
Cambridge	17,987 (3)	18,231 (3)	19,039 (3)	19,388 (3)	19,480 (3)
Liverpool	13,703 (5)	13,673 (5)	14,911 (5)	15,485 (6)	14,149 (6)
Newcastle	8,142 (10)	12,094 (6)	14,012 (7)	16,045 (5)	13,900 (7)
Birmingham	10,195 (7)	10,506 (9)	14,090 (6)	13,507 (8)	13,483 (8)
Manchester	9,618 (8)	11,758 (8)	12,884 (8)	12,724 (9)	11,076 (10)
Leicester	8,285 (10)	8,474 (10)	9,665 (10)	10,521 (10)	NA[1]

[1] Glasgow replaced Leicester in the top ten in 2020

Number of Providers in Membership

The total number of private providers and educational establishments signed-up to both of the ANUK/Unipol Codes, as of the end of June 2021, was 155, which is eight fewer than reported for the same point in 2020.

The majority of members (107) belong to the Code for Non-Educational Establishments, with 48 belonging to the Code for Educational Establishments. However, within the membership of both Codes (although it's more apparent with the Non-Educational Establishment Code) there are significant discrepancies in terms of the size and spread of their operations. As with the league table for locations, the ten provider members have largely remained the same – certainly since 2016 – and only their position within those tables have altered. The same cannot be said of the bottom ten in 2021, but that is mainly due to the fact that several of the smaller operators had ceased to be members by that time.

Part of the reason for this decline is the decision of some former members not to renew when given the opportunity at the beginning of 2021, and they are regarded as having withdrawn from membership, but the number also includes some that were removed from membership as a result of a decision taken by the Tribunal. However, the 155 also includes providers who were granted membership at some point between the start of July 2020 and the end of June 2021 (see Table 5).

Table 5: New Members Joining and Withdrawals/Removals from Membership from July 1st 2020 to June 30th 2021

New Members	Members Withdrawn/Removed
APS Properties	Alpha Student Management Ltd (Withdrawn)
Boudicca One Ltd	Chapter Living (Withdrawn)
Nurture Student Living	Cleaves Hall (Removed)
Torsion Students	Fusion Students (Withdrawn)
True Student	Glenfern Student Lets (Withdrawn)
	Lewes Study Lodge (Withdrawn)
	Opto Living Ltd (Withdrawn)
	Portsmouth Student Accommodation (Removed)
	Purple Frog (Removed)
	Richmond and Hillcroft Adult and Community College (Withdrawn)
	Shumei Eiko Ltd (Withdrawn)
	Student Digs Management (Removed)
	YPP (Withdrawn)

Table 6 details both the top and bottom ten provider members, as of June 30th 2021, comparing numbers for 2021 with those for 2020 (in brackets), whilst Table 7 depicts the positions of these members over a five-year period from 2016.

Table 6: The Top and Bottom Ten Provider Members in 2021

Position	Provider	Bed Space Numbers (Numbers in 2020)
1	UNITE	73,855 (76,230)
2	Homes for Students	28,168 (20,647)
3	IQ Student	26,464 (23,112)
4	Student Roost	20,330 (19,352)
5	Fresh Student Living	19,787 (15,212)
6	CRM Students	16,202 (16,441)

7	Host Student	10,762 (8,901)
8	Campus Living Villages UK	9,592 (10,155)
9	Global Student Accommodation (to be renamed Yugo in 2022)	9,002 (8840)
10	Hello Student	8,913 (9,233)
146	Orange Living	69 (39)
147	Bay View Breeze	60 (60)
148	West Dean College	63 (63)
149	Herball Hill Ltd	50 (50)
150	Ashwell House	48 (50)
151	Backstage Academy	47 (47)
152	SCIO	43 (43)
153	Homelets Bath	32 (32)
154	Baaz Properties	26 (26)
155	Kelham Property Management	20 (127)

Fluctuations in bed space numbers from year to year is a common feature amongst PBSA suppliers in the top ten. This is usually as a result of the sale of buildings - especially those which may have been in operation for 10 to 15 years and which will require significant investment to ensure they remain attractive to students - or because the owners of the buildings (pension funds, banks, etc) believe they are able to get a better return by engaging the services of a different PBSA manager.

The same is less true of those in the bottom ten, and in the case of Kelham Property Management the dramatic decrease was the result of them ceasing to operate one of two buildings.

Table 7: Comparisons of the Top and Bottom Ten Providers Since 2016

Provider	2016 BED SPACES (AND POSITION)	2017 BED SPACES (AND POSITION)	2018 BED SPACES (AND POSITION)	2019 BED SPACES (AND POSITION)	2020 BED SPACES (AND POSITION)
UNITE	43,779 (1)	45,543 (1)	49,547 (1)	48,701 (1)	76,260 (1) [j]
Homes for Students	6,639 (9)	9,647 (8)	12,249 (5)	12,926 (7)	20,647 (3)
IQ Student	17,337 (3)[a]	18,072 (3)	19,970 (3)	20,912 (3)	23,112 (2)
Student Roost	NA [b]	NA	15,468 (4)	17, 287 (4)	19,352 (4)
Fresh Student Living	11,665 (4)	15,961 (4)	10,883 (6)	16,636 (5)	15,212 (6)

CRM Students	11,329 (5)	15,025 (5)	10,815 (7)	14,333 (6)	16,441 (5)
Host Student	10,684 (6)[c]	NA	6,151 (10)	9,864 (9)	8,901 (9)
Campus Living Villages UK	10,163 (8)	11,387 (7)	10,806 (8)	11,298 (8)	10,155 (7)
Global Student Accommodation	NA	6,281 (9)	6,514 (9)	NA	8,840 (10)
Hello Student	NA	NA	NA	9,126 (10)	9,233 (8)
Orange Living	NA	NA	NA	39 (154) [i]	39 (160) [k]
Bay View Breeze	NA	NA	NA [g]	NA	NA
West Dean College	NA	NA	54 (143) [h]	54 (148)	NA
Herball Hill Ltd	NA	NA	NA	NA	50 (155)
Ashwell House	NA [d]	50 (148) [f]	50 (144)	50 (149)	50 (154)
Backstage Academy	NA	NA	NA	NA	47 (157)
SCIO	40 (142) [e]	40 (152)	40 (147)	40 (152)	43 (158)
Homelets Bath	NA	NA	NA	NA	32 (161)
Baaz Properties	27 (146)	27 (155)	26 (150)	26 (157)	26 (162)
Kelham Property Management	NA	NA	NA	NA	NA [l]

[a] They were trading as the Vero Group; [b] This provider developed out of Derwent Students, taking on the operation of many of the buildings they had operated by 2018; [c] They were trading as Victoria Hall Ltd; [d] They were in membership but not small enough to be in the bottom ten at that time; [e] There were 147 members at that time; [f] There were 156 members at that time; [g] They joined in 2018 but had more bed spaces at that time; [h] There were 151 members at that time; [i] There were 157 members at that time; [j] They had taken over Liberty Living by this time; [k] There were 163 members at that time; [l] They joined in 2020 but had more bed spaces than in 2021

What is most noticeable from Table 7 is the way in which those members whose business is predominantly management-based, as opposed to ownership, have fared differently since 2016. The rise of Homes for Students is most striking, as is the fluctuation in the number of bed spaces operated by Fresh Student over a short period of time. The explanation for both is the frequency that PBSA sites change management from provider to provider on an annual basis, which is why such changes are always subject to a verification visits (see Section 4).

New Applicants in Progress

Membership of both Codes is open to any relevant operator of PBSA developments, and at any one time there are a number of applications being processed.

As of the end of June 2021 a total of 10 applications were progressing, and should all of them be successful then it would add an additional 9,219 bed spaces into the Code.

Table 8: National Codes Application Patterns Since 2016

YEAR	NUMBER OF NEW APPLICANTS	TOTAL BED SPACES TO BE ADDED	AVERAGE NUMBER OF BED SPACES PER APPLICANT
2021	10	9,219	922
2020	15	2,085	139
2019	17	3,397	199
2018	9	2,896	321
2017	8	1,562	195
2016	14	11,192	799

Location and Numbers of Developments

Analysis of the geographical spread of developments belonging to the Codes for the period 2020-2021 reveals that there were a total of 2,172 developments situated in 92 different locations in the UK, each of which had a different number of developments within them.

These figures indicate that whilst in the previous five years the numbers of developments and locations grew significantly year on year, in 2020-2021 they either stagnated or decreased (as shown in Table 9) brought about by delivery difficulties caused by the pandemic.

Table 9: Development and Location Numbers Since 2016

YEAR	NUMBER OF DEVELOPMENTS	NUMBER OF LOCATIONS
2020	2,165	94
2019	1,996	89
2018	1,859	87
2017	1,826	86
2016	1,681	80

The growth in the number of locations with developments over the last five years reveals the expansion of purpose built accommodation beyond the major student cities into smaller university towns, as investor interest causes the sector to expand into new markets.

Perhaps not surprisingly, the locations with most developments correspond to the list of places with most bed spaces (see Table 3), however, and as shown in Table 10, they do not all occupy the same position when viewed with respect to developments instead of bed spaces.

Table 10: Top Ten Locations by Number of Developments in 2020/2021

Position	Location	Number of Developments
1	Cambridge	801
2	London	175
3	Nottingham	94
4	Leeds	88
5	Sheffield	63
6	Leicester	59
7	Liverpool	55
8	Newcastle	55
9	Manchester	46
10	Birmingham	43

Cambridge is somewhat of an anomaly at the head of this list, as it has many hundreds of smaller buildings operated by the colleges.

Section 2: Governance of the Codes

Committee of Management

The Committee of Management (CoM), which is comprised of all the Codes' key stakeholders, continues to provide an active and management forum for the everyday operation of the Codes where key information, good practice and concerns can be raised in a mutually helpful and co-operative environment. The CoM sets the fees to join the Codes, oversees reviews of the Codes and appoints the Tribunal Chair. The fees are set by those who have to meet them.

The CoM met on three occasions between July 2020 and the end of June 2021 – all of which took place virtually and on the following dates: July 15th, 2020; November 12th, 2020 and March 1st 2021 - in order to operate the Codes in a transparent manner the minutes are freely available on the National Codes website.

Attendance at meetings significantly improved this year, as the move to online meetings necessitated by the pandemic improved participation. Significantly, the average attendance of 31 people at each of these meetings was the highest ever recorded for a single calendar year, reversing what had been a steadily downward trend since 2016-2017(see table 11). A hybrid offer of online and in person meetings is likely to remain in place in future.

Table 11: Average Attendances of CoM Meetings Since 2016-2017

YEAR	NUMBER OF MEETINGS HELD	TOTAL NUMBERS ATTENDING	AVERAGE ATTENDANCE
2020 - 2021	3	85	28
2019 - 2020	3	73	24
2018 - 2019	3	75	25
2017 - 2018	3	77	26
2016 - 2017	2	54	27

Whilst the March and November meetings of the CoM traditionally deal with a range of matters relevant to the day to day operations of the National Codes, the July meeting focuses on one topic, enabling a more detailed discussion. In recent years the topics have been:

- 2020 – Preparing to welcome students during the pandemic
- 2019 – Provision for students with disabilities
- 2018 – HMO licensing and the PBSA sector

For these one-topic meetings, members are required to prepare to comment on the position of their own organisations and – in some cases – to provide answers to set questions. Where the CoM member is not the best person from the body they are representing to answer such questions – or

comment on the topic – then they are encouraged to nominate an alternate who can do so. This not only helps ensure that the discussions are well informed, it also introduces different people working within the PBSA sector to the work and function of the Committee of Management.

Just as significant churn has occurred in the operation of developments accredited under the Codes, the same is true with membership of the CoM. Between July 2020 and the end of June 2021 the following people ceased to be members - for a variety of reasons:

- Tony Allen (Nido Student) – ceased to qualify for membership as bed space numbers for the provider has fallen below the 3,000 threshold;
- Michael Ball (Universities UK Code) – stood down as Chair of their Sector Advisory Group;
- Laura Bryant (Chapter Living) – the provider failed to renew their membership at the start of 2021;
- Bryan Carroll (CUBO) – stood down as the representative of this organisation
- Cheryl Darnell-Hayes (Association of Colleges) – retired;
- Paddy Jackman (Chair of the National Codes Audit Panel) – stood down as Chair;
- Paul Rowlinson (IQ Student Accommodation) – retired;
- Georgina Weir (Vita Student) – took maternity leave;
- Keith White (CRM) – replaced as their representative

In each case the Committee of Management thanked these individuals for their contributions to the work of the Codes and wished them all the best for the future.

A number of people also joined (or in some cases, re-joined), or in some cases returned to, the CoM in the last year and they were:

- Claire Baxter (Co-Chair of the National Codes Audit Panel) – partially replaced Paddy Jackman;
- Hillary Gyebi-Adabio (NUS) – an elected officer with responsibility for student accommodation;
- Richard Kington (Co-Chair of the National Codes Audit Panel) – partially replaced Paddy Jackman;
- Andrew Maxwell (Student Castle) – newly qualified for an automatic place on the CoM;
- Steve McCarthy (CRM) – nominated replacement for Keith White
- Helen McGlashan (UUK Code) – nominated replacement for Michael Ball
- Claire Sherlock (Vita Student) – temporary replacement for Georgina Weir
- Neil Smith (Scape Student) - newly qualified for an automatic place on the CoM
- Dean Spears (CUBO) – nominated replacement for Bryan Carroll
- Philip Tranfield (IQ Student Accommodation) – nominated replacement for Paul Rowlinson

Current Members of the CoM

Chair

Stephen Battersby

Deputy Chair

Ian Fletcher

Co-Chairs of the Audit Panel

Claire Baxter

Richard Kington

Nominated organisations

Association of Colleges (AOC) - TBC

The UK Student Services Organisation (AMOSSHE) - Chris Warrington

Association of Student Residential Accommodation (ASRA) - Karen Burke

Chartered Institute of Environmental Health (CIEH) - Stephen Battersby

College and University Business Officers (CUBO) – Dean Spears

Communities and Local Government (CLG) - Sarah Amer

UUK – Helen McGlashan

Consortium members

Accreditation Network UK (ANUK) - Linda Cobb and Ian Fletcher

National Union of Students (NUS) - Hillary Gyebi-Ababio and a vacancy

Unipol Student Homes - Martin Blakey and Ian Robertson

One member nominated from any owner with 3,000 or more bed spaces covered by the Codes:

Abodus - Phil Lockett

Cambridge Colleges - Wendy Evans

Campus Living Villages - Simon Dickenson

Collegiate AC - Alan Blackmore

Corporate Residential Management Limited (CRM) - Steven McCarthy

Downing Students - Tariq Akbar

Fresh Student Living - Jane Crouch

Global Student Accommodation - Stuart Henderson

Hello Student - Wesley Brown

Homes for Students - Simon West

Host - Andy Attewell

IQ Student Accommodation Services Ltd - Philip Tranfield

Sanctuary Students - Paul Hardy

Scape - Neil Smith

Student Castle - Andrew Maxwell

Student Living at Sodexo - Richard Bolger

Student Roost - Jason Andrews

Unite - Susie Stringer

UPP Projects Ltd- Paul Milner

University of Hertfordshire - Claire Hartridge

University of Leeds - Sue Green

Urbanest - Simon Hedley

Vita Student - Claire Sherlock

Co-opted members

Nicola Dean - Mansion Student

Linh Hawke - Optivo

Allan Hilton - Cass and Claredale

Victoria Johnson - Leeds Beckett University

Joanne Pollard - Prime Student Living

Richard Stott - Kexgill

Dov Whittle - Guy Chester Centr

The Codes' Consortium

Ownership of the Codes rests with the Codes' Consortium, which consists of representatives of the three organisations which first devised the Codes - The Accreditation Network UK (ANUK); The National Union of Students (NUS); and Unipol Student Homes. All proposed alterations to the content of the Codes, as well as the procedures that govern their operation, have to be endorsed by this body. Previously it was felt that the Consortium should only meet as and when it was necessary, i.e. following the completion of a review of the content of one of the Codes, but since 2015-2016 it has met at least a couple of times a year.

The Consortium most recently met in August and September 2020, where the topic for discussion in both cases was the proposed changes to be made to the content of the Code for Non-Educational Establishments.

Current Members of the Consortium

ANUK	NUS	UNIPOL
Linda Cobb (Decent and Safe Homes)	Hilary Gyebi-Adabio (VP Higher Education)	Martin Blakey (Chief Executive)
Ian Fletcher (British Property Federation)	Vacancy	Ian Robertson (Board Member)

Section 3: The Review of the Code for Non-Educational Establishments

Background

When the National Codes received Government approval in 2006, one of the conditions set was that the content should be subject to a review once every five years. As the last time that the Code for Non-Educational Establishments had revisions made to it was in 2016, its quinquennial review process was due to take place in 2021 (although, in fact, it started in 2020).

A Review Group was set up in early 2020 and invited to consider what aspects of the Code ought to be altered in order to ensure that it both referenced any changes to legislation/regulation over the previous five-year period and also reflected current management practices within the PBSA sector. On the basis of the suggestions made by that Review Group, the National Codes Consortium met in both August and September 2020 in order to refine these, as well as to add in additional changes that it felt were necessary. At one of those meetings of the Consortium it was agreed that the format of the Code document should be refreshed, as it had not changed since it was first created in 2005, and so the services of a professional editor were procured to undertake that process.

In May 2021 the Codes Consortium agreed the final draft and authorised its release to MHCLG for their comments, ahead of a planned four-week consultation process. Apart from some helpful suggestions for additional information, MHCLG raised no concerns about the final draft, and thus the consultation process was launched on July 5th, 2021.

Summary of the Proposed Changes to the Code

Apart from the different format, some minor wording changes, the addition of an introduction, and the inclusion of a glossary in the annexes, the most significant suggested changes to the content of the Code are as follows:

- Two new clauses have been added to the General section that will require the transfer of operational documentation from one member to another when changes of operational management occur, and also that members should respond to any enquiries from the National Codes Administrator or nominee within 5 days;
- The Equality and Diversity section has been amended substantially from the current version of the Code;
- Section 3, that was entitled Marketing Prior to Letting Property to Tenants has been rebranded to read Before Occupants Move In. References to booking fees, rent liability and the state of repair have been removed, whilst the number of clauses relating to late construction have been expanded;
- In section 4, additional clauses have been included with respect to HMO Licensing and a new sub-section relating to changes of operational management added;

- The wording and layout of the Health and Wellbeing section has been revised, but the only substantive differences between the current version of the Code and the revised one is the addition of a 12 week timescale by when managers should have been provided with appropriate training by, and the deadline of May 1st 2021 for the completion of training removed;
- The titles of sections 6 and 7 have reverted back to the pre-2021 situation, with Health and Safety once again becoming section 6 and Occupant Satisfaction section 7;
- References to relevant legislation and regulation have been updated where necessary within the Health and Safety section, but some additional requirements have been included within the fire safety sub-section;
- What were previously two separate sections (9 and 10) covering disputes and complaints have been merged into one (a new section 9) and this has been re-titled Managing Conflict. Some new clauses have been added into this merged section, covering both disputes and complaints;
- Finally, the declaration form has been amended to make it a requirement of membership that payments as detailed within the revised section 3 of the Code are made, and also that members/applicants agree to being enrolled into the Friends of Unipol Training scheme.

More Detailed Information Concerning the Changes

Although reference has been made to the nature of the changes in the previous summary heading, in order to be fully able to comprehend what is being proposed in the revised Code, more detailed information about some of the more significant changes that are being proposed may be helpful.

Equality and Diversity

One of the most fundamental difference between the previous edition of the Code and the proposed new one is apparent in the section relating to Equality and Diversity. This is because all of the clauses have been revised, and the requirements laid out in the section now set some very different standards for members to follow. The wording of the revised clauses is shown in full below.

2.1 In allocating accommodation, Members will use procedures that fully comply with the [Equality Act 2010](#).

2.2 In accordance with the protected characteristics set out in the Equality Act, Members will not treat any applicant or group of applicants for accommodation less favourably than any other applicant or group of applicants. As part of their commitment to supporting disabled students, Members shall not levy charges for rooms adapted for use by any disabled students which exceed the normal room rate for that development.

2.3 In accordance with the duty established in Part 2, Chapter 2 of the Equality Act, Members will make adjustments to meet the needs of disabled students, where needs identified through an appropriate assessment process are reasonable, as defined in the Act.

2.4 Charges for rooms that have been designed and significantly adapted for students with mobility/physical impairment should not exceed the lowest room rate available in the Member's portfolio within the relevant local authority area.

2.5 Members shall complete any adaptations for disabled students within a reasonable timescale of them being requested.

2.6 Where communal toilet facilities are publicly available within a development, Members should make some level of gender-neutral provision.

Late Construction

This sub-heading, which was added into the Code between the review processes as a response to a particular problem with late buildings within the PBSA sector, has been substantially augmented in the revised version and now includes prescriptive requirements in respect of payments to student occupants in the event of a late building, along with additional sanctions. The most radical of the proposals can be summarised thus:

- 1) Where it is not possible to provide the alternative room in line with 3.15 above, the Member shall endeavour to source this provision through other suppliers within: the same local housing authority area; or a 20-minute walk of the student's main study location. Where this is not possible, the Member should contact the NCA immediately for further advice;
- 2) Where rooms are not ready for occupation, the Member will make sure occupants are not disadvantaged. As a minimum: the Member will give the affected students seven days to decide whether they want to leave the contract; they will not impose any financial penalty for cancellation on students who do decide to opt out;
- 3) If a student is unable, 10 weeks after the beginning of the academic year, to occupy the room that they booked, the Member will not charge them rent and will give them the option to leave the occupancy agreement with no financial penalty for cancellation;
- 4) Members will make the following payments per student: £200 for each week within the first four weeks that a room is late (applicable even if the student leaves the contract); £500 for each subsequent month (or part of month) that a room is late after that; and £100 each time a notified moving-in date is postponed. It's being proposed that these charges would be operational from September 1st 2022.

HMO Licensing

From having just the one clause pertaining to local authority licensing, it is being proposed that the revised Code will contain a total of three covering this area:

- 4.1 Members must be able to demonstrate that they have satisfied themselves whether or not any form of local authority property licensing applies to any developments that they are operating.
- 4.2 Members must be able to demonstrate that they have satisfied themselves whether or not any form of local authority property licensing applies to any developments that they are operating.
- 4.3 Members shall notify the occupants of the building within five days of the transfer being agreed, and shall include in this notification information on any implications for the occupants.

Changes of Operational Management

Because there continues to be significant churn within the PBSA sector in the management of buildings, it was felt that the Code needed to both reflect this and set some common standards for the way in which the process occurred. As such, a new specific sub-heading has been included within the proposed new code, the full wording of which is given below:

4.4 Members will report all [changes of operational management](#) of buildings to the NCA within five days of the change of management by the new operator, unless that operator has been a Member of this Code for less than 12 months.

4.5 Members shall notify the occupants of the building within five days of the transfer being agreed, and shall include in this notification information on any implications for the occupants.

Fire Safety Additions

The most significant proposals relate to fire risk assessments and buildings with ACM cladding.

1) Members will have fire risk assessments (FRAs) reviewed annually by a competent person, as defined by the Fire Risk Assessment Competency Council, and will provide the NCA with a copy of the FRA within five days of them requesting one. Members will also provide the NCA with electronic copies of FRAs for all high-risk buildings (18 metres and above) as well as for buildings which are subject to verification visits.

2) Members will ensure that Type 3 FRAs are undertaken when the development is first occupied, and are then reviewed annually. A replacement Type 3 FRA must be prepared when considered necessary by the assessor, for example following a [change of operational management](#) or where substantial alterations are made to the building fabric or existing alarm systems.

3) Members will: notify the NCA of any building of theirs which contains ACM (aluminium composite material) cladding; make a declaration on the percentage of the building that is ACM-clad; and provide the NCA each year with the FRA, which will reference the arrangements made in respect of the cladding.

Additions to Disputes and Complaints Section

Four specific changes have been made to the requirements placed on members in what is, now, a conflated section covering both issues:

1) they provide occupants with a way(s) to raise matters of concern in confidence;

- 2) Where an occupant's parent makes a complaint, for the Codes Complaints Investigator to recognise the legitimacy of their role, the occupant will have to confirm in writing that this parent is their nominated representative.
- 3) Where a complaint cannot be resolved through the Member's own system, or the Complaints Investigator needs to contact them, the Member will give the Investigator a named contact for communication purposes in connection with the investigation of the complaint. The Member will supply a named contact within 48 hours of receiving the request.
- 4) The Member will accept and, within set timescales, comply with any directives given to them by the National Codes Audit Panel, which oversees the operation of the Code's assessment and verification system.

Completion of the Consultation Process

The consultation process was initially scheduled to remain open until August 2nd, but was extended by two weeks to the 16th in order to allow members and stakeholders additional time to respond by. Once closed, the National Codes Consortium will discuss the outcomes from it and agree a final draft of the revised Code based on the responses received. MHCLG will then be invited to submit the document for the Secretary of State's approval.

Section 4: Meeting the Challenges of the Fifteenth Year, Including Responding to the Pandemic

The last annual report set a number of challenges for the fifteenth full year of the Codes' operation, and progress on these is detailed below each of the points, in italics:

1. Complete the review of the Code for Non-Educational Establishments, which will include changes to the Codes' management test, and consult with all members and stakeholders on the proposed changes.

Section three of this report has already detailed the proposed changes to be made to the content of the code.

The management test was not altered as part of the review. As it was devised in conjunction with what was then MHCLG and UniversitiesUK, any changes to it would have required the agreement of those other parties and this was not thought a priority during the pandemic. However, as part of the consultation process it is possible that members and stakeholders may indicate a need for the content of the test to be altered and if that is so then discussions with the relevant bodies will be arranged

2. Re-launch the Code for Non-Educational Establishments as an online document, and alter the layout of its requirements to focus on three specific aspects - buildings, policies and procedures, and student satisfaction.

The new Code document has been reformatted by a professional editor and it will appear online in due course.

Whilst a review of the way in which the Code document is ordered was included within the brief given to the professional editor who was engaged to undertake the re-formatting work, with particular attention to be given to a focus on buildings, policies and student satisfaction – as opposed to the tenancy lifecycle – their view was that such a change would be unhelpful. However, an attempt has been made to ensure that it was much easier to navigate as an online document, rather than simply a paper-based one.

3. Submit the final version of the revised Code for Non-Educational Establishments to MHCLG for re-approval.

Although the final draft of the revised Code will be submitted to MHCLG once the consultation period has ended and the Codes Consortium has agreed its content, discussions with the Ministry over the content of the review have already occurred ahead of the consultation starting.

4. Start the process of updating the Codes' online Self-Assessment system, both the content and format of the questionnaire and also the reporting process.

Whilst some initial thought has been given to what changes will be required to the self-assessment systems that the Codes operate, any new system will need to take into account the revised requirements of the Code, and that work can only begin once the review process has concluded.

5. Update the online training courses that pertain to each of the ANUK/Unipol Codes and recommend to all development managers who have previously completed the course to take them once again.

Although some minor alterations have been made to the online training courses, specifically in terms of references to types of documentation that will help ensure members remain compliant, these still require significant work in order for them to fully reflect the requirements of the Codes. Clearly, until the review of the Non-Educational Establishment Code has been completed, it would be unwise to begin to update the course pertaining to it. However, some amendments and additions could be undertaken ahead of then.

6. Re-sign existing members of both of the Codes for the next three year membership period, 2021 to 2023.

Members of both of the Codes were invited to indicate whether they wished to re-join for the next three yearly membership period, which began in January 2021, and the majority did so by the given deadline (which was the end of January 2021).

Whilst accommodation providers who are part of the Code for Educational Establishments will now continue in membership until the end of 2023 (at which point their Code will be due for review), those who are part of the other Code were notified at the time of the renewal process that because the Code they are members of was subject to a review they would be invited (once that was completed) to make clear whether they wished to remain members beyond the end of 2021. All members of the Code for non-Educational Establishments will therefore be contacted in the autumn of 2021 and invited to complete the revised declaration form, which will then tie them into membership until the end of 2023.

Additional Activities of the Fifteenth Year – Pandemic Response

As well as addressing the challenges set for the fifteenth year, some other activities are worth reporting on.

Provision of COVID-19 Information and Advice

As was noted in the 2020 Annual Report, the news section of the National Codes website has – since May of 2020 – displayed information and advice on COVID-19 related issues which is thought to be of use to both accommodation providers and students. The page has been updated at least monthly since that time and, as will be detailed in Section 7 of this report, remains popular amongst users of the website.

Establishing the UK Student Accommodation Forum

Early in the pandemic, the UK Student Accommodation Forum was established as a free online event where members of the Codes could share information, discuss government guidance and reflect on how the sector could best manage in the interests of students, and this continued throughout 2020-2021. To date, 26 webinars have been hosted by Unipol Student Homes with over 1,181 delegates attending. These forums have played a role in helping members consider the shifting guidance in the context of student care, and helped to ensure that, on the whole, members responded in a sympathetic, supportive, way to the needs of student tenants.

Establishment of Regular Meetings with MHCLG

Following an online meeting between the ANUK/Unipol National Codes and the Ministry in early 2021, a regular two-monthly catch-up session has been inaugurated, the most recent of which took place in late June 2021. It is expected that these will provide a useful means for the Codes to keep up-to-date with the Government's direction of travel with respect to student accommodation matters, as well as a way for the Codes to provide the Ministry with useful feedback on developments from within the PBSA sector.

Contact Made with the Scottish and Welsh Governments

In January 2021 the National Codes Administrator was invited to take part in an online meeting of a Steering Group set up to facilitate the Scottish Government's planned review of PBSA provision within the country. Following on from this, the NCA encouraged those Code members with developments in Scotland to respond to a survey which had been issued in order to illicit relevant feedback from the PBSA sector, and also submitted a response on behalf of the National Codes to that survey.

The Scottish Government issued the findings of its review in May 2021 and, on the basis of that, the National Codes have requested a meeting with the relevant officials in order to discuss on-going collaboration and involvement with any subsequent initiatives that may result from the PBSA review.

In addition, the National Codes have made contact with the Welsh Assembly and it is hoped that further engagement will occur in the coming year.

Provision of Data to Public Health England on Occupancy of Student Accommodation

One of the issues identified by Public Health England in the first few months of the pandemic in 2020 was uncertainty over the number of students who remained living within their term-time accommodation. The National Codes, through a survey of its members, were able to assist Unipol Student Homes to provide PHE with a much clearer picture of occupancy levels.

Section 5: Assessment and Verification Activities

Verification Visits

Each year the National Codes Audit Panel sets a programme of verification visits to be undertaken between the start of July in one calendar year and the end of June in the next, which roughly equates with the cycle of an academic year. The visits are then allocated to a team of verifiers, who are employed by the Codes on a consultancy basis, and they submit a report detailing the outcomes from them once they have been completed.

A total of 226 verification visits were completed between 1st July 2020 and the 30th June 2021, a slight increase on the number completed in 2019-2020. A risk assessment and a number of mitigations were implemented in summer 2020 that enabled verification activity to continue relatively uninterrupted during the pandemic. As Table 12 reveals, this confirms a steady increase in numbers over time, with the exception of the 2017-2018 period, and the reason for that is best explained with reference to the types of verification visits that are undertaken.

Table 12: Number and Percentage Increases of Verification Visits Undertaken Since 2013-2014

PROGRAMME YEAR	NUMBER OF VISITS	PERCENTAGE DIFFERENCE
2013 - 2014	120	+ 55.8
2014 - 2015	131	+ 7.5
2015 - 2016	135	+ 3.0
2016 - 2017	158	+12.6
2017 - 2018	142	- 10.1
2018 - 2019	202	+42.2
2019 - 2020	219	+ 8.4
2020 - 2021	226	+3.2

Verification Visit Types

There are currently eight different categories of verification visits undertaken as part of the visits programme, each of which is triggered for different reasons. A list of these, along with an explanation as to what they mean, is given below:

1) New Applicant – Whenever an application is made for membership of either of the ANUK/Unipol National Codes, the final stage of the process requires a visit be made to at least one development that is operated by that provider [NB where a provider operates more than five developments then more than one site will be visited);

2) Cyclical Revisits – Once membership has been granted, all providers have a development visited at least once every three years. Where they only operate one site then it is re-visited, but where they have more than that then a different one will be visited 3 years later;

3) Existing Members – Because some members of the Codes operate a significant number of bed spaces, the Audit Panel took the decision some years ago that they should have a different building visited annually. This applies to those with 3,000 or more bed spaces at the point when the programme is devised for a given period;

4) Revisits – Where any type of visit undertaken reveals significant actions, and where it is deemed necessary by the Audit Panel, then that same building can be subject to a re-visit;

5) Changes of Operational Management – When a building is subject to a change of management to another member, then the incoming operator is obliged to notify the National Codes Administrator of this so that a visit can be arranged to that building once it is under the new operator;

6) New Developments – As a result of serious concerns being identified in 2017-2018 over the ability of the PBSA sector to deliver new developments on time, and without adversely impacting on the students who were moving in, it was agreed that from the 2018-2019 programme all new buildings opened by Code members should be visited, and that these should occur as soon as possible after the in-coming occupants had (or were due to) begin their occupation;

7) Complaints – Should a member of the Code be subject to a significant number of formal complaints, then the Audit Panel can approve a recommendation that one or more sites operated by that provider be visited;

8) Chair's Action – Both the Chair of the Tribunal or the Co-Chairs of the Audit Panel possess the powers to require additional visits be made to a Code member, should they believe that such visits will help determine matters of concern that they may have about that provider's ability to properly comply with the requirements of the Codes;

9) Location-Wide Visits – Since 2014, the Codes have undertaken visits in different locations around the UK that ensure every member operating within that city has at least one of their buildings visited. These series of visits have tended to take place over a period of two days and the number completed varies depending on the amount of Code members operating in those locations.

Table 13: Numbers of Visits by Type Since 2018-2019

CATEGORY	TOTALS 2020-2021	TOTALS 2019-2020	TOTALS 2018-2019
New Applicants	18	21	17

Cyclical Re-Visits	25	52	16
Existing Members	3	27	21
Revisits	9	10	3
Change of Operational Management	94	22	65
New Developments	65	79	67
Complaints	0	0	1
Chair's Action	12	8	12

The consistency in the number of new applicants visited within each programme is interesting, as are the similarities in the number of Chair's Action and New Development visits that have taken place in each of the last three programmes. The most significant differences relate to the visits required with regard to Existing Members and Changes of Operational Management, which require some specific comment.

Whilst the number of visits generated as a result of changes of operational management were substantial in 2018-2019, their decline the following year may be a result of the early impact of the Coronavirus pandemic. This event could also help explain why there was a considerable increase in these during 2020-2021, as a number of deals in the sector resulted in significant changes of ownership occurring.

The decline in the number of visits undertaken to existing Code members during 2020-2021, in comparison with the previous two programmes, is most striking and requires explanation. Previously, those members with substantial portfolios would have had at least one site visited annually, instead of once every three years. However, because it was precisely these members who were bringing on new developments and/or were taking over operational management of sites from others, it was felt that the necessary additional site visits were being undertaken, just under different headings.

Location-Wide Verification Visits

Alongside the visits undertaken as part of the verification and assessment programmes referred to above, since 2014 the Codes have embarked on an annual series of visits to buildings within the same location and over a short period of time (generally 2 days), during which ALL Code members with a building in that location have at least one development visited. These are designed to be snapshot inspections, as opposed to the more detailed assessments that verifiers complete when undertaken their other visits, focusing on their immediate assessments as to the physical condition of the building, the adequacy of the provider's management policies and procedures, and the levels of satisfaction of the students living in the building. They are also an opportunity for Code verifiers, who work alone for the rest of the year, to undertake visits in teams and therefore to share knowledge and best practice.

Table 14: Cities and Numbers of Buildings Visited as Part of the Location-Wide Visits

YEAR	LOCATION	NUMBER OF BUILDINGS	NUMBER OF DIFFERENT CODE MEMBERS VISITED
2014	Bradford	10	9
2015	NA	NA	NA
2016	Liverpool	16	16
2017	Newcastle	16	16
2018	Sheffield	13	13
2019	Glasgow	16	16
2020[1]	NA	NA	NA
2021	Bristol	16[2]	15

[1] Due to the Coronavirus pandemic it was not possible for these visits to take place

[2] This included a second building operated by the same provider

The original reason for devising these visits was in order to be able to identify whether market conditions in a given location were having an adverse impact upon the ability of Code members operating in those places to adhere to the requirements of the Codes. Bradford was identified as a city in which there was an over-supply of PBSA provision, whilst Bristol was chosen for the exact opposite reason. The other four cities were targeted because all of them had experienced a rapid increase in the number of PBSA buildings which had opened within them and, as such, this raised questions about the impact of that expansion on provision.

In late 2015, and following discussions by the National Codes Consortium on the value of the visits undertaken to Bradford, it was agreed that these should become an annual event (it was, however, too late at that stage to arrange any such visits in 2015). The Consortium also agreed that these should entail a visit to one site operated by each Code member with a building in that location, but to also reserve the right to have another of theirs visited should the results from the first indicate serious levels of non-compliance. This happened for the first time in 2021, when an initial visit to an operator in Bristol revealed some concerns that it was felt should be followed-up by a visit to a second site operated by that provider.

As can be seen from Table 14, from 2016 until 2020 exactly the same number of developments as providers were visited in those locations, but in 2021 it was determined that one Code member should have a second site in Bristol visited due to concerns about their ability to comply with important health and safety related issues. This in turn resulted in a meeting between the Codes and the provider concerned in order to ensure that they were taken action to rectify those matters swiftly.

Verification Visit Outcomes

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

Table 15 details how common it has been for verifiers (over the last five years) to identify no action points and the extent to which this has been the case in comparison with all visits undertaken during that particular visit period.

Table 15: Visits Where No Action Points Were Identified Compared with Overall Number of Visits Completed Since 2016-2017

YEAR	NUMBER OF VISITS WITH NO ACTION POINTS	TOTAL NUMBER OF VISITS COMPLETED	PERCENTAGE OF VISITS WITH NO ACTIONS
2016-2017	34	158	21.51%
2017-2018	47	142	33.09%
2018-2019	36	202	17.82%
2019 - 2020	47	219	21.46%
2020 - 2021	39	226	17.25%

Table 15 reveals a decrease in both the number and percentage of the visits undertaken during the 2020 – 2021 visits programme for which no actions were identified, however, this fall is consistent with the findings from previous programmes.

In terms of the verification visits where action points were identified, verifiers make clear within the draft reports exactly which clauses of the Codes were not being complied with and a record is kept of these, along with the deadline dates given for their completion. Verifiers are required to liaise with the providers for whom actions have been identified and report to the Codes administrators once they are content that the action has been completed. A report is then prepared for each of the Audit Panel meetings detailing which, if any, providers have failed to complete actions by the given dates, so that decisions can be taken about how such failings should be dealt with.

The number of actions identified at visits varies, but it is possible to present details of the total numbers recorded for each visit programme and – on that basis – to report on the average numbers per visit (see Table 16). As can be seen from it, there has been a gradual reduction in both the

number of actions being identified over the last three visit programmes and in the average number per visit.

Table 16: Total and Average Numbers of Action Points Since 2018 – 2019

YEAR	TOTAL NUMBERS	AVERAGE PER VISIT
2018 – 2019	1.042	5
2019 - 2020	991	5
2020 - 2021	850	4

[NB The average is calculated to the nearest whole number]

It is also possible to make a determination of the number of visits undertaken that were found to have more than the average number of action points and those that were on or below it, as well as whether those Code members with more than 3,000 bed spaces were more or less likely to exceed the average (see Table 17).

Table 17: Profile of Visit Outcomes

YEAR	TOTAL NO OF VISITS	NUMBER ABOVE AVERAGE	NUMBER BELOW AVERAGE	NUMBER OF 3000+ MEMBERS ABOVE AVERAGE
2018 - 2019	202	61	141	30
2019 - 2020	219	62	157	19
2020 - 2021	226	117	109	30

One possible explanation for the substantial increase in the number of visits that exceeded the average during the 2020 – 2021 visit programme is that the average fell from 5 to 4. However, what Table 17 does indicate clearly is that visits to those members with 3000 bed spaces or more are less likely to result in a significant number of action points being identified.

Most Common Action Points Identified at Verification Visits

As well as being able to determine the number of action points cited per visit, it is also possible to glean from the reports compiled by members of the verification teams which aspects of the Codes are most frequently listed as requiring rectification by the provider being visited. Table 18 provides details of the findings from the visit reports completed during the 2020 – 2021 visits programme, and on the basis of the relevant clause numbers included within the self-assessment questionnaires submitted by each provider, which in some cases differ slightly from the clause numbers within the Code document itself. As such, and to ensure the relevant Code requirement is clear, the wording of the relevant question has also been included.

Table 18: The Top 20 Clauses from the Non-Educational Establishments Code Most Frequently Cited as Requiring Action During 2020 - 2021 Visits Programme

Section Title	SAQ Question Number	Wording of Question	Number of Visits Where Cited (% of Total Visits)
Health and Safety	6.13	We have designed appropriate fire safety measures which are determined by a fire safety risk assessment and the relevant requirements under the Regulatory Reform Order 2005 and in consideration of HMO standards	92 (49)
Marketing Prior to Letting	3.16	We make clear in all are marketing materials and all relevant information what is the minimum level of bandwidth that residents can expect, as well as whether any limits exist on the number of different wireless devices that can be registered	41(22)
Health and Safety	6.0	In consultation with the local authority, and having regard for any guidance available for buildings of this type, we maintain and manage our buildings based on the Housing Health and Safety Rating System to ensure that the risk of potential health and safety hazards are reduced to as low a level as reasonably practicable and cost effective and that no category 1 hazards remain	36 (20)
Health and Safety	6.32	We have taken suitable precautions to prevent or control the risk of exposure to legionella	33 (18)
Equality and Diversity	2.3	Staff are trained and have sufficient knowledge of equality and diversity practice....	23 (12)
Tenant Satisfaction	5.0	We carry out a satisfaction survey of our tenant population at least every 24...or 36 months, which covers both qualitative and quantitative elements and allows benchmarking against previous years.	22 (12)
Health and Safety	6.23	The building has a security plan which details the level of management necessary to maintain security standards and also stipulates the information to be given to tenants and is available to be seen on request by the tenants.	20 (11)
Marketing Prior to Letting	3.15	We make clear what sort of Wi-Fi provision is being made available to	18 (10)

		users, especially whether any 'free' elements only cover a base service and a charge is made to enhance this service	
Health and Safety	6.29	A central log is maintained recording any times that a lift/lifts were non-operational.	17 (9)
Health and Safety	6.34	A waste disposal plan has been prepared for all waste facilities that are used by more than 10 tenants....	17 (9)
General Requirements	1.3	Managers of all sites are required to complete the online training course within 8 weeks of being appointed	16 (9)
During the Tenancy	4.0	We possess HMO licenses for all our buildings that require them and comply with the conditions relating to those schemes.	16 (9)
Health and Safety	6.5	All electrical installations are in satisfactory condition and possess a current periodic inspection report (based on appendix 6 of BS7671) carried out by a competent electrical engineer.	15 (8)
Health and Safety	6.14	We maintain fire alarm and fire alarm systems in proper working order and test these systems regularly and an annual inspection and test of the entire system is carried out by a suitable qualified engineer in accordance with BS5839-1:2013	15 (8)
Tenant Satisfaction	5.12	Whether residents know the development is part of the National Code.	14 (8)
Marketing Prior to Letting	3.9	Our membership of the Code is prominently displayed...	13 (7)
Marketing Prior to Letting	3.14	We make clear whether Wi-Fi provision is included within the rent or is an additional cost, and where within and around the development such coverage is available.	13 (7)
During the Tenancy	4.8	We confirm that tenants are not subject to an internal fining system....	13 (7)
Tenant Satisfaction	5.13	Our surveys also provide an overall measurement of how tenants rate our management, value for money, whether they would recommend the accommodation to a friend, and overall satisfaction.	12 (6)

Health and Safety	6.12	We provide all our residential developments with properly maintained fire safety installations, in accordance with current legislation, necessary to enable tenants to safely evacuate the buildings in the event of a fire	11 (6)
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Table 19: Comparisons Over A Three Year Period

SAQ Question Number	Number of Visits Cited in 2020 - 2021 (% of total)	Number of Visits Cited in 2019 - 2020 (% of total)	Number of Visits Cited in 2018 - 2019 (% of total)
6.13	92 (49)	74 (34)	44 (26)
3.16	41 (22)	57 (26)	44 (26)
6.0	36 (20)	47 (22)	31 (18)
6.32	33 (18)	39 (18)	35 (21)
2.3	23 (12)	11 (5)	21 (12)
5.0	22 (12)	27 (12)	30 (18)
6.23	20 (11)	24 (11)	27 (16)
3.15	18 (10)	19 (9)	22 (13)
6.29	17 (9)	16 (7)	17 (10)
6.34	17 (9)	13 (6)	25 (15)
1.3	16 (9)	29 (13)	27 (16)
4.0	16 (9)	14 (6)	13 (8)
6.5	15 (8)	14 (6)	11 (7)
6.14	15 (8)	16 (7)	6 (4)
5.12	14 (8)	22 (10)	28 (17)
3.9	13 (7)	8 (4)	21 (12)
3.14	13 (7)	16 (7)	12 (7)
4.8	13 (7)	8 (4)	16 (9)
5.13	12 (6)	15 (7)	22 (13)
6.12	11 (6)	19 (9)	22 (13)

Table 19 shows that the same clause of the Code (6.13) has been the most often cited by verifiers in each of the last 3 years, and that the three following it have also featured in the top four over the same period of time, and that most of the four clauses that come after those (2.3 to 3.15) have been identified in 10% of the visits undertaken in each year since 2018.

Fire Risk Assessment matters (6.13) are an aspect of the Code that verifiers have been asked to pay particular attention to and that may partially explain why it features so often in the list of actions that providers are asked to address. The importance of this issue can clearly not be underestimated, hence the decision to prioritise a discussion on how verifiers can check such issues when undertaking remote visits, and it is very much a feature of reports on visits made to newly built developments.

Issues relating to Wi-Fi (3.16), specifically bandwidth, have clearly begun to feature less over the last three years and this trend is likely to continue as the focus of the Code shifts to a requirement that providers are able to demonstrate that advertised speeds are achievable.

Also apparent from Table 19 is that clause 6.0 (HHSRS) has featured in 1 in 5 of verification reports on average over the last three years and this suggests a clear need for some training to be offered to providers on the topic, as has previously been suggested.

Water treatment issues (clause 6.32) are another constant feature of verification reports over the last three years'. The figures suggest that they are becoming less common, however, this may simply be due these buildings experiencing a period of low or non-existent occupation over the first couple of months of 2021 due to local or national lockdowns.

As for the educational establishments Code, with just seven inspections of developments within it being included in the visits programme for 2020 - 2021 it is difficult to draw any meaningful conclusions from those. However, if the findings from the 35 visits undertaken in 2019 - 2020 findings are added they become a little more meaningful (see Table 20)

Table 20: Top ten Clauses from the Educational Establishments Code Most Frequently Cited as Actions During the 2019-2020 and 2020-2021 Visits

Section Title	SAQ Question Number	Wording of Question	Number of Visits Where Cited (% of total visits)
Health and Safety	6.26	By October 2019 we will have drawn up and implemented a Business Continuity Plan, which will be reviewed annually	10 (24)
During the Occupancy	4.23	We formally monitor the satisfaction of occupants with the mail handling system and we record any feedback (positive or negative) from our occupants and take remedial action as appropriate	10 (24)
Equal Opportunities	2.1	We have developed an equality access statement (or its equivalent) in respect of our accommodation	9 (21)

General Requirements	1.6	Those designated as responsible managers of our sites complete the National Codes online training within eight weeks of having been appointed	9 (21)
Occupant Satisfaction	5.10	[The survey covers] Details of Code membership	8 (19)
Health and Safety	6.24	We have drawn up an Emergency and Disaster Plan covering all properties which is in use and updated annually	7 (17)
Occupant Satisfaction	5.1	We carry out a satisfaction survey of our occupants at least annually covering both qualitative and quantitative elements	7 (17)
Occupant Satisfaction	5.4	[The survey covers] Mail handling arrangements	7 (17)
Occupant Satisfaction	5.12	We analyse, publish and effectively communicate the results of these surveys to our tenants and use them to focus further improvement activities	7 (17)
Health and Safety	6.1	We maintain our buildings in compliance with Part 1 of the Housing Act 2004 and the Housing Health and Safety Rating System	5 (12)

The majority of the verifier reports relating to clause 6.26 related to visits undertaken in 2019, and in some cases the visits will have occurred before the given October deadline for compliance. It is possibly significant, therefore, that only one verification report from 2020 cited this clause.

It is also significant that of the top ten clauses identified in Table 20, half relate to issues of relevance to occupant satisfaction levels – either directly as clauses within section 5 of that Code OR because the clause requires that occupant satisfaction with some aspect of the provision is being monitored (4.23). Verifier's reports from both years feature action points for these clauses and so this may be a matter that the Audit Panel wishes to discuss further at a future meeting – and certainly before the next round of Cambridge college peer to peer visits are due to take place in 2022.

Proposed Actions Arising from the Outcome Findings

For the seven clauses of the Code for Non-Educational Establishments, where the percentage of visits that they were cited in verifiers' reports had increased since 2018 OR had remained the same, the following actions have been proposed by the Audit Panel

2.3 – Offer some training to managers of PBSA developments on the provisions of the Equality Act 2010, as the revised Code is likely to include a requirement that members have a clear understanding of this.

3.14 – Advise members of the outcomes from the National Code Co-ordinator's review of Wi-Fi/internet provision once it has been completed.

4.0 – Provide guidance to members on current HMO and other forms of local authority licensing requirements.

6.0 – Develop a training programme on HHSRS that is specific for managers of PBSA developments.

6.5 – Seek advice from both the NICEI and ECA on the latest regulations with respect to electrical installations and circulate it to members.

6.13 – Develop a training programme on Fire Risk Assessment and fire alarm systems that is specific for managers of PBSA developments

6.14 – See above.

As for the issues identified by visits to members of the Educational Establishments Code, the two most common sections that are cited in verifiers' reports are Occupant Satisfaction and Health and Safety (they constitute 70% of the top ten clauses).

For the matters relating to the Occupant Satisfaction section, it was felt that these could be addressed through the giving of some specific guidance on what members needed to do in order to fully comply with these aspects of the Code. The same was true of most of the issues concerning health and safety matters, although the HHSRS requirement would fit in with the previous proposal to develop a specialist training programme.

The Audit Panel

The Audit Panel met on six occasions between the start of July 2020 and end of June 2021. This increase in frequency by the National Codes Consortium in order to speed up the process of addressing any areas of non-compliance that had been identified as a result of visits undertaken. All of these meetings occurred online, via Zoom.

In addition to the move to six meetings a year, with the resignation of the previous Audit Panel Chair – Paddy Jackman – it was agreed to appoint two Co-Chairs, as it was felt that the increased frequency of meetings might make it difficult for a single Chair to be able to attend every one. The new Chairs are Claire Baxter, a consultant with expertise in local government and the not for profit sector (who also Chairs the Audit Panel covering the Unipol Code for shared student houses in Nottingham) and Richard Kington, formerly the Director of Residential Accommodation at the University of Edinburgh.

The Co-Chairs now take turns to Chair meetings but, where possible, both are present in order to assist with continuity between them. Two other changes have occurred to the membership of the Audit Panel that need to be reported: Rory Hughes has left the National Union of Students and discussions are on-going with them as to a replacement; Darren Smith has joined Wendy Evans as a representative of the Cambridge Colleges, which is part of a hand-over process from Wendy to Darren that will conclude at some point in 2022.

The National Codes Administrator estimates that at least 88 visits will need to be completed before the end of June 2022, and that does not include any to providers who completed their SAQ after the start of July 2020; any planned changes of operational management/opening of new buildings that were not previously notified to the NCA before that same date, OR the location wide visits that are scheduled to take place in May 2022. In terms of the types of visits to be undertaken, they break down as follows:

New Applicants	= 2
Existing Member	= 1
Cyclical Re-Visits	= 29
Change of Operational Management	= 8
New Developments	= 47
Re-Visit	= 1

The current membership is as follows:

Ms Claire Baxter and Mr Richard Kington, Co-Chairs (to serve until October 2023)

Ms Elizabeth Beattie - Verifier

Ms Mary Bright - Verifier

Ms Wendy Evans and Mr Darren Smith - Cambridge Colleges

Mr Derek Goss - Verifier

Mr Richard Lord - Verifier

Mr Philip Moxon - Verifier

Mr Jakub Pietruszewski - Verifier

Mr David Robertson - Verifier

Mr Nick Stanton - Verifier

Ms Victoria Tolmie-Loverseed - Unipol

Mr William Wilson – Verifier

Vacancy – National Union of Students

Section 6: Complaints and Tribunal Procedures

The Codes' complaints and tribunal procedures are an essential part of these voluntary accreditation schemes as, alongside the verification process, they provide a means of ensuring that members are remaining fully compliant with the requirements of the schemes that they have signed-up to.

Code Complaints Procedure

Members of both Codes agree to abide by a complaints procedure which has a number of stages to it.

In the first instance, any allegation that a member is not complying with one or more aspects of the Code should be notified to that member and be subject to their own internal complaints processes.

Where, following that stage, the allegations are either not resolved or are contested, then the matter can be referred to the complaints procedures operated by the Codes, and will be subject to review by the Complaints Investigator. They will seek written evidence from the parties concerned and, on the basis of that, establish whether a resolution of the complaint is possible.

The final stage would be for the complaint to be referred to an independent tribunal, made up of a Chair, two Vice Chairs, and representatives of both the Codes' Consortium and the Committee of Management. Such referrals would be sent 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 – which would then mean the Consortium and Committee of Management representatives were called upon, along with other representatives from the relevant students' unions, educational establishments and local authorities. The Tribunal, in whichever form it met, is empowered to make the final determination on whether a breach of the Code has occurred – thus upholding the complaint – or not and, where it has, what sanction should be applied against that member.

Numbers and Types of Complaint Contacts 2005-2006 to 2018-2019

Until the 2019-2020 period, the Codes recorded complaint contacts on the basis of three separate categories: 1) Contacts – which covered anything relating to a suggested or possible breach of the Code; 2) Formal Complaints – specific allegations of non-compliance; 3) Tribunal Referrals – complaints which were deemed to require some determination from the Tribunal as they had not previously been resolved.

As is clear from Table 21, the number of contacts steadily increased over time as more people became aware of both the existence of the National Codes and its complaints process, but the number that could be considered as formal complaints requiring further investigation OR which were deemed to require the involvement of the independent Tribunal remained relatively stable.

Table 21: National Code Complaints Received, by Academic Year and Status

Year	Total No. contacting the NCA	No. of formal complaints submitted	No. of formal complaints referred to the Tribunal
2005-2006	4	0	0
2006-2007	7*	2	1
2007-2008	13	2	1
2008-2009	19*	4	5
2009-2010	20	5	3
2010-2011	19	4	1
2011-2012	44	16	7
2012-2013	38*	13	2
2013-2014	39	13	5#
2014-2015	50	6	2#
2015-2016	66	14	8#
2016-2017	92	12	2
2017-2018	64	15	7
2018-2019	113	17	9#
TOTALS	607	123	53

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

= one complaint was dealt with by the Full Tribunal

It is not possible to explain the sudden doubling of complaint contacts during 2011-2012, but the fact that similar numbers were subsequently received from then on – which only then increased – suggests that there was more awareness of the existence of the Codes. At the same time there was a substantial increase in the number of formal complaints, however, unlike subsequent contacts their numbers did not grow larger. Perhaps the most significant finding from Table 21 is the fact that the number of complaints which were deemed to require referral to the Tribunal in each academic year never exceeded 10 for the whole of the 2005-2006 to 2018-2019 period.

In terms of the aspects of the Codes which were being alleged in the complaints to have been breached the findings for 2018-2019(see Table 22) can be said to be representative of the same reasons given in previous academic years, as are their proportions.

Table 22: The Ten Most Common Alleged Breaches of the Codes in 2018-2019

POSITION	CATEGORY	NUMBER
1	Repairs	43
2	Management of Disputes	18
3	Contractual Issues	10
4	Accessing Rooms	9
5	Late Buildings	8
6	Inter-Tenant Disputes	6
7	Misleading Advertising	6
8	Pest Infestations	4
9	Security Concerns	4
10	Wi-Fi Provision	3

Although the list of categories given in Table 22 contains the sort of aspects one would expect to see with any type of private rented sector landlord/tenant relationship – repairs, disputes and contractual issues – the others are clearly more specific to the nature of the PBSA sector.

Because the developments covered by the ANUK/Unipol National Codes tend to be staffed full time, it is more likely that managers will access flats or individual rooms than an off-street landlord. Whilst there are usually reasons for them to do so, where the tenant believes no advanced notice has been given for it then they are likely to raise a question about it.

Late buildings are also a more likely feature of PBSA provision, which is what led to the creation of these Codes to begin with in the early 2000s. Until about 2017 it was thought that such problems had been overcome, however, they returned with something of a vengeance and have remained a matter of concern to tenants of Code developments ever since.

Whilst it is not unknown for landlords of off street properties to make use of misleading advertising when seeking to attract new tenants, it is more likely for those who are interested in such properties to view the property itself before committing themselves to any contractual arrangement. The same cannot be said for PBSA developments as they tend to attract students who have still to locate to the area the buildings are situated in and – as such – they rely to a greater degree on the content of the marketing materials that have been produced for information about what they are buying into.

One of the perceived features of PBSA developments, in comparison to off street houses, is that they will offer greater levels of security. However, and whilst such provision is very common, it is the case that for some tenants whatever is being offered does not meet with either their expectations or those of their parents. In these instances, a Code complaint often results.

Wi-Fi provision, whilst not unique to the PBSA sector, has grown in importance since the Codes were first devised and now surely ranks alongside hot water and a flushing toilet in terms the essential amenities that students expect to have available to them. Where PBSA developments are concerned, not only is the provision of Wi-Fi expected it is also assumed that it will be sufficient to ensure every resident living within that development will have the same access to it, whenever they require it, which can prove to be a challenge in a building with a significant number of residents. When connectivity difficulties arise within these developments, they generally impact upon more than one person, and therefore the likelihood of a complaint being raised is greatly increased.

Numbers and of Types of Complaint Contacts Since 2019-2020

The difference between the period before and since 2019-2020 in terms of the number and, to a certain extent, the type of complaints is stark, but they are overwhelmingly due to the impact of the global pandemic on the PBSA sector. These circumstances have also resulted in the need to make some changes to the way in which enquires and complaints are categorised.

In 2019-2020 a total of 250 enquires and complaints were received, more than twice the number recorded for 2018-2019. Those numbers then increased even further in 2020-2021 to 306, a rise of 22% on the previous academic year alone.

In order to more fully understand the reasons for the increases, one only needs to look at the reasons why enquires and complaints were made during these two academic years, which are set out in table 23.

***Table 23: Complaints and Enquiries Received by Category September 2020 to July 2021
(figures for 2019 to 2020 are shown in brackets)***

Category	Number of Complaints
Seeks Release / Refund	170 (149)
Repairs	26 (19)
Condition upon Arrival	14 (13)
Contract / Rent	14 (9)
Unprofessional Behaviour	12 (8)
Deposit	10 (6)
Noise/ASB/Tenant Friction	8 (6)
Discrimination	7 (2)
COVID Restrictions	6 (6)
Many and Various Breaches	6 (4)
Possessions Disposed Of	6 (5)

COVID Release 2019-2020	5 (4)
Construction Work	4 (3)
COVID ASB Risks	4 (3)
Pests / Rodents	4 (4)
Damp / Mould	2 (1)
Misselling	2 (1)
Access Notification	1 (2)
ACM Cladding	1
Late Building	1 (1)
Security	1
Short-Term Holiday Lets (non-students)	1
Wi-Fi	1
TOTAL	306 (250)

The predominance of the one issue relating to tenancy release/refund is to be expected for both periods, as is the fact that it was more pronounced during the academic year in which the global pandemic first occurred. Prior to 2019/2020 the most common facet of the enquires and complaints received was an alleged failure to undertake repairs, so it's continued appearance in the list of reasons as to why contact was being made with the National Codes is – in some respects – reassuring.

Whilst it is difficult to predict the impact that COVID-19 will have going forward into the 2021-2022 academic year, it would be a mistake to assume that tenants of PBSA developments will suddenly no longer be anxious about aspects of the provision of their accommodation and, as a result, seek to be released from their agreements and/or request a rent refund. One possible challenge for the Codes complaints procedures for the coming period will be how to respond to such enquires and complaints at a time when the steer from Government is towards a return to normal contractual relationships and away from attempts to broker compromise agreements.

Adjustments to the Complaints Procedures Since 2019-2020

Up until March 2019 the Codes complaints procedures deliberately made an effort not to address matters which were considered to relate to the contractual relationships between landlord and tenant, mainly as these were deemed to be the province of the law courts. However, and within a very short space of time after the imposition of the first COVID-19 lockdown, it became apparent that it would be difficult for the complaints procedures to maintain such a position and that the Codes would need to take a view on certain contractual matters.

As reported in the 2020 Annual Report, the catalyst for this change of approach was the investigation undertaken into Abodus Student during the summer of that same year. This member was the subject of a significant amount of complaints from its tenants who were dissatisfied with the way in which the provider had handled the process of releasing the students from their agreements and returning rent money. Because of the volume of contacts made with the Codes by their tenants, it was decided that Abodus should be invited to review their decisions and, as a result, almost all of those who appealed were allowed to be released and awarded a rent refund.

In the light of this action the Codes' Consortium agreed to make some alterations to the Codes Complaints procedures so that it was possible for complaints relating to a limited number of contractual matters to be investigated. This resulted in the following wording being added to the procedures:

Members will know that the Codes complaints system can and has been used in the following areas:

- *Matters relating to mis-selling or not providing contracted services*
- *Setting unreasonable conditions for tenancy options. This would particularly be the case if a room had to be vacated in a period when Government "stay put" advice was in place*
- *Unnecessarily rigid and inflexible conditions being set by a supplier in matters relating to the tenancy which fail to appreciate the individual circumstances of the complainant.*

Anyone making a complaint in this area is asked if they think they have any exceptional circumstances where their case should be considered individually by a supplier. If the Codes Complaints Investigator feels that the exceptional circumstances merits individual consideration these have been forwarded to the supplier for further consideration and it is expected that these representations will be properly considered and responded to in a timely manner by the supplier.

An additional consequence of the above decision was that the categories under which enquires and complaints received by the National Codes were recorded needed to be changed, and the results of that work can be clearly identified in Table 23.

Tribunal Membership

The current Tribunal Chair, Mr John Martin (a Barrister and acknowledged expert in the field of housing law) has been in post since the Tribunal first came into operation, and he was re-appointed in September 2018 for a three-year period. It is likely that John will seek to be re-appointed for a further period, taking him through until 2024.

The Chair is supported by two Vice Chairs, who are also appointment on a regular basis. One of these is nominated by the National Union of Students, whilst the other is nominated from the provider membership that is represented on the Committee of Management. The current Vice Chair nominated by the providers is Mr Keith White (CRM Students), however, it is uncertain as to whether he will

continue in this role when his term of office expires in October 2021. The other Vice Chair post is held by the current Vice President (Higher Education), Hilary Gyebi-Adabio, who will serve in that role until the summer of 2022.

There are a further six members of the Tribunal, nominated by provider members of the CoM as well as by the Codes Consortium, each of whom have a three-year period of office. As of the end of June 2021 only half of this posts were filled and those in post are:

Ms Jane Crouch (Fresh Student Living)

Mr Alan Hilton (Cass and Claredale)

Ms Nikki Verity (Unipol)

Section 7: Website Visits and Online Training Course

National Codes Website

The National Codes website was revamped in the summer of 2018, mainly due to the decline in usage that was being made of it. As can be seen from Table 24, whilst there was a significant increase in use made of the website in 2019-2020, the numbers dropped off for the last academic year. However, in comparison with the previous periods, usage during 2020-2021 was significantly greater.

Table 24: National Codes Website: Visits, Visitors and Pages Viewed, 2011-2012 to 2020-2021

Year	Visits	Visitors	Pages Viewed	Desktop	Mobile	Tablet
2011 - 2012	9,406	7,476	29,808	94.96%	3.14%	1.90%
2012 - 2013	16,464	13,142	44,594	89.20%	5.59%	5.21%
2013 - 2014	18,657	15,010	48,108	83.48%	8.50%	8.03%
2014 - 2015	20,239	16,919	48,249	85.88%	8.02%	6.10%
2015 - 2016	23,526	19,968	59,724	82.32%	12.77%	4.91%
2016 - 2017	17,973	14,583	43,401	75.22%	19.15%	5.63%
2017 - 2018	17,455	14,167	42,434	71.56%	22.45%	6.0%
2018 - 2019	23,933	18,451	54,327	68.49%	26.66%	4.85%
2019-2020	82,618	64,189	132,221	47.07%	48.95%	3.99%
2020-2021	65,981	49,242	108,374	48.00%	49.00%	3.00%

In terms of how people chose to access the website, Table 24 indicates that the decreasing trend in the use of desktops reversed slightly in 2020-2021 and possibly is a reflection of the fact that the site was more likely to be accessed by Code members looking for updated information of Covid-19 issues as opposed to students searching out information on the Codes. This is because, from our previous experience, students are more likely to access the site via mobiles and tablets, but the validity of this assumption may be tested by the findings in Table 25.

Table 25: The Top Ten Most Viewed Pages 2020-2021, Compared with 2019-2020

Page Title	Number of Page Views 2020-2021	Number of Page Views 2019-2020
Information and Advice on Coronavirus	44,766	66,273
Code Download	6,700	6,785
Members List	3,692	3,853
Online Training Course	3,051	3,129
How to Complain	2,636	2,315
Making a Complaint	2,269	1,234
Which Developments are in the Code?	1,383	1,461
Why we Exist	1,319	1,367
Contact Us	1,287	1,300
Benefits for Students	865	-

Although the number of times that the Covid 19 information and advice page was viewed in the last academic year was considerably less than in 2019-2020, it remained the most popular. As the information was mainly intended for Code members, this suggests that it was they who accessed the site more often than students. However, given the noticeable increase in viewings of the pages covering the issue of complaints, along with the appearance in the top ten of the page dealing with the benefits of the Codes to students, it would be incorrect to assume that the website was also not being visited by the consumers of the accommodation, or those that were paying for it.

As highlighted in Section 6 of this report, there was a substantial increase in the volume of complaint enquires and contacts during 2020-2021 and this helps explain why the pages on the website associated with such an issue were more attractive to visitors. One question to ask with respect to this might be whether it was students themselves visiting or those more likely to be paying for the accommodation – their parents/guardians. The slight increase in the use of desktops to access the site may be indicative of greater use by the latter.

Online Training Course

The online training course, which has been available for use since 2010, is a free to access facility that is aimed at providing staff working within the PBSA sector with a grounding in the requirements of the two ANUK/Unipol National Codes.

When these Codes were both last updated members were required to ensure that all development managers should complete the online course within eight weeks of being appointed, and, not surprisingly, this resulted in a substantial increase in the numbers who registered to use the courses. Table 26 reveals the number of people who have enrolled over the last 3 academic years.

Table 26: Numbers Enrolled on the National Codes Online Training Courses 2018-2019 to 2020-2021

Year	Number of Users
2018-2019	2,666
2019-2020	3,783
2020-2021	3,360

Whilst numbers dipped in the last academic year, they were greater than in the 2018-2019 period, which indicates that the courses remain in some value to members and their new managers. There is anecdotal evidence to indicate that some Code members have required managers to complete the courses annually, which is not a requirement of the Code, and this may therefore account for the seeming popularity of them.

Having now been offered for more than a decade, and in the same format, the time may have come to undertake a review of them. The content has been updated since 2010 – as and when the requirements of the Codes change – but the means of delivering the information and the assessment process associated with the courses could do with some updating.

Section 8: Conclusion

Achievements of the Fifteenth Year

- Complete the review of the Code for Non-Educational Establishments, which will include changes to the Codes' management test, and consult with all members and stakeholders on the proposed changes
- Re-launch the Code for Non-Educational Establishments and alter the layout of its requirements to focus on three specific aspects - buildings, policies and procedures, and student satisfaction
- Submit the final version of the revised Code for Non-Educational Establishments to MHCLG for re-approval
- Start the process of updating the Codes' online Self-Assessment system, both the content and format of the questionnaire and also the reporting process
- Re-sign existing members of both of the Codes for the next three year membership period, 2021 to 2023

Challenges for the Sixteenth Year

- Review and update the National Codes online training courses so that they reflect accurately the requirements of the Code and are user-friendly
- Complete the changes to the self-assessment system, incorporating both the content of the revised Code for Non-Educational Establishments as well as the alterations to the way in which visits are reported
- Plan out the timetable for the review of the Code for Educational Establishments, due to be completed in 2023
- Undertake a review of the Codes' governance arrangements in order to determine if they are fit for purpose
- Discuss with MHCLG how the Codes' complaints process could be accepted as a recognised Redress Scheme
- Engage with both the Scottish and Welsh Governments with respect to recognition of the National Codes
- Begin preliminary discussions concerning the appointment of the next Chair of the Committee of Management from November 2022 until 2025
- Increase training for members on areas where action points are most commonly found

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

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

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

The Educational Establishment Code

Backstage Academy
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 Non-Educational Establishment Code

A2 Dominion Group Ltd
Abodus
Aparto
Ashwell House
ASN Capital Lettings Ltd
Axo Student Living
Bay View Breeze
Baaz Properties
Beyond the Box Student Limited
BoHo Management Ltd
BPS Developments
Campbell Property
Campus Living Villages
Cass and Claredale
Cataylst
City Block Ltd
Cityheart Living (Scotland) Limited
Clever Student Lets
Cloud Homes
Code Student Accommodation
Collegiate AC Ltd
Condor Properties
Cotton House Management Company
CRM Students
Derwent Students

Digs Student
Downing Students
Dwell Student Living
Fawleybridge Student Accommodation
FHP Student Living
FD Asset Management Ltd
Fresh Student Living
Gather Students Ltd
Glenfern Student Lets
Global Student Accommodation
Goodenough College
Guy Chester Centre
Hamstead Campus Ltd
S Harrison Group Ltd
Hello Student Management
Herbal Hill Ltd
Homelets Bath
Homes for Students
Host Student
Iconinc
INTO Newcastle University
INTO UEA
IQ Student Accommodation Services Ltd
Kaplan NT Ltd
Kelham Property Management
Kexgill
Lee Abbey London
Lewes Study Lodge
Lincoln Property Company Ltd
LIV Student
Manor Villages
Mansion Property Management
MARA Inc. London Ltd
McComb Students
Mears Student Life
Megaclose Ltd
Mezzino
Nido Student
Njoy Student Accommodation
Omnia Estates Ltd

Openarch Properties
Optivo
Orange 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
Severns Limited
The Stay Club Limited
Stoney Street Ltd
Student Beehive
Student Castle Ltd
Student Cribs
Student Facility Management Limited
Student Living by Sodexo
Student Roost
Study Inn
SuperUni Housing
Unilife
Uni2rent Ltd
Union House Management Co
Unipol Student Homes
UNITE
Universal Student Living
UNINN Student Accommodation
UPP Broadgate Park Ltd
UPP Nottingham Ltd
Urbanest UK Ltd
U Student Group Ltd
Vita Student Management Ltd
West One Student Accommodation
Winchester Student LLP
Yara Capital Limited
Zebra Housing Association
Zone Management

APPENDIX 2: Visits Undertaken in 2020-2021 at Which No Action Points Were Identified

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

Clare College (St Regis, Cambridge)
Cloud Homes (Tudor Studios, Leicester)
Cloud Homes (The Foundry 1&2, Loughborough)
Cloud Homes (Q Studios, Stoke on Trent)
Collegiate AC (Dashwood Studios, London)
CRM Students (The Quarry, Falmouth)
CRM Students (Westway, Oxford)
Derwent Students (University of Essex Campus, Colchester)
Fresh Student Living (Alma Court, Canterbury)
Fresh Student Living (West Wing, Cardiff)
Fresh Student Living (Tudor Place, Chester)
Fresh Student Living (Eden Square, Coventry)
Fresh Student Living (The Depot, Exeter)
Fresh Student Living (Base, Glasgow)
Homes for Students (Dean Street Works, Bristol)
Homes for Students (Hythe Mills, Colchester)
Homes for Students (Fontnoy Apartments, Liverpool)
Homes for Students (Slade Park, Oxford)
Homes for Students (Plymouth Cross, Plymouth)
Homes for Students (Tramshed, Preston)
Homes for Students (Beton House, Sheffield)
Host Students (Northfield House, Exeter)

Host Students (Northernhay House, Exeter)
Host Students (Magdalene Street, Leicester)
Iconinc (Gravity, Lincoln)
IQ Student Accommodation (Weaver Place, Coventry)
IQ Student Accommodation (Redness Street, York)
Mezzino (The Junxion, Lincoln)
Newnham College (8 Clare Road, Cambridge)
Nido Student (Barnard Point, London)
Student Castle (Brighton)
Student Castle (Asa Briggs, Leeds)
Student Castle (Sharman Court, Sheffield)
Student Roost (The Oaks, Coventry)
True Student (True Manchester, Salford)
UNITE (Studios 58, Bristol)
UNITE (White Rose View, Leeds)
UNITE (Former Liberty Living Sites, Leeds)
UNITE (Former Liberty Living Sites, Sheffield)
Vita Student (Portland Place, Leeds)