

National Codes Annual Report

to the Ministry of Housing, Communities
and Local Government

2020



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Introduction and Background

This is the fourteenth 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 2019 to June 2020) in managing, developing and promoting the Codes. Also outlined are the benefits that have been derived from this method of regulation of this growing section of the student housing market, including the fact that members of the Codes (who play an active part in their on-going development) have agreed to meet higher than statutory standards *and* be accountable for their performance; a clear sign to student consumers that they are committed to provide the best service and standards.

The most significant feature of the work of the ANUK/Unipol National Codes over the 2019/2020 period has been how interventionist the Codes have needed to become as a result of two issues that, in different ways, posed a threat to the work of the Codes in providing students with assurances that the Codes offer them protection from being treated unfairly.

The first of these concerned the large number late developments that accommodation providers had been scheduled to have ready for the start of the 2019/2020 academic year and the negative impact that such delays were having on students. The second resulted from the imposition of the coronavirus pandemic lockdown in March 2020 and the guidance from Government to landlords with respect to acting fairly when releasing tenants from contracts and (as part of that process) returning rents to those tenants, which included investigating the activities of one member of the Code whose procedures for so doing created a substantially number of complaint contacts.

Full details of the actions undertaken by the Codes in relation to both of these matters are outlined in Section 4 of this report.

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 2019-2020, including details of all new members who have joined in the last year
- Governance of the Codes, a report on who has been involved in the decision making process and what changes, if any, have been made to the operations of the Codes
- Joint Codes Conference Report
- Meeting the Challenges of the fourteenth Year
- Assessment and Verification Procedures, focusing especially on the number of visits completed and the outcomes from these
- Complaints and Tribunal Procedures, including the number of complaints received and how they were dealt with
- Website Visits and Online Training Course, a new section providing some insights into the usage being made of the National Codes website
- Conclusion – including a list of challenges for the fifteenth year of operations

Simon Kemp
National Codes Administrator

Section 1: Membership Report 2019-2020

As of the 30th June 2020 there were a total of **360,773** bed spaces accredited under both the ANUK/Unipol National Codes, an increase on the numbers reported in the last edition of the report of 8.75%, almost entirely due to members adding new developments over the summer of 2019. The majority of these bed spaces fall within the Code for Non-Educational Establishments and, as a result of this, the ratio of bed space numbers between the Codes stands at 90:10, a slight change from the 89:11 figure that was given in the 2019 report.

The total number of private providers and educational establishments signed-up to both of the ANUK/Unipol Codes was 163. The majority of these (114) were members of the Code for Non-Educational Establishments, with 49 belonging to the Code for Educational Establishments.

The total bed space numbers registered under the Educational Establishment Code was 35,725, a decrease of just over 1,000 beds on the figures for the end of June 2019, and was mainly the result of many of the Cambridge Colleges reducing the amount of accommodation they provide. The Code for Non-Educational Establishments saw numbers increase by 29, 048 to stand at 325,048 bed spaces.

Over the course of 2019-20 a number of new providers joined the Codes and some either withdrew, were removed or suspended from membership.

Table 1: New Members Joining and Withdrawals/Removals from Membership in 2019-2020

New Members	Members Withdrawn/Removed/Suspended
ASN Capital Lettings Ltd	Asha House Management Company
Backstage Academy (Educational Code)	Cube Student
BoHo Management Ltd	Liberty Living
Fusion Students	Lutheran Council of GB
Gather Students Ltd	G Murphy Properties
Herbal Hill Ltd	Sharples Property Company
HomeLets (Bath)	Student Living
Kelham Property Management	Vafai Trust
Lincoln Property Company Ltd	Valeo USL Ltd
Opto Living Ltd	X1 Developments
Portergate Property Managemet	
Severns Ltd	
Superuni Housing	
Union House Management Co	

It is likely that future increases in membership will come either from smaller providers, many of whom are looking to offer well managed, but lower cost, accommodation than their larger competitors can or it will be from new management platforms that emerge to manage accommodation that is currently being managed by an existing platform.

The last few years have witnessed a relatively high turn-over in the operational management of developments, either between existing members or involving new applicants for membership. As it has been agreed that developments undergoing such changes of management platform cannot be registered under this Code until a re-verification visit has taken place (which in turn requires the new platform to be operating the site), the site 'falls out' of registration until a visit has occurred and the verifier has recommended that the development be re-registered. As of the end of June 2020, a total of 71 developments fell into this category, most of which comprised the former Liberty Living sites which had been taken over by UNITE.

In addition, and as a result of a decision by the Committee of Management that the National Codes Administrator actively monitors the number of additional bed spaces to be added by members as a result of them bringing new sites into operation, it can be reported that from September 2020 around an additional 20,000 bed spaces will be added once all of these new sites have been registered.

Analysis of the geographical spread of developments belonging to the Codes reveals that 94 different locations in the UK had at least one building signed-up to either Code, five more than in 2018-2019. Most of these are in England (77), but 10 are in Scotland, six in Wales and one was in the North of Ireland. Table 2 (below) details which locations outside of England currently have accommodation registered under the ANUK Codes

Table 2: Locations Outside of England with National Code Developments

Country	Location	Different Provider Numbers	Development Numbers	Bed Space Numbers
North of Ireland	Belfast	3	16	1,405
TOTALS		3	16	1,838
Scotland	Aberdeen	7	14	3,416
	Dornoch	1	1	40
	Dundee	4	5	1,721
	Edinburgh	16	32	6,796
	Elgin	1	1	40
	Fort William	1	1	40
	Glasgow	17	40	12,494

	Inverness	1	1	300
	Paisley	1	1	237
	St Andrews	2	2	368
TOTALS		25[1]	98	25,452
Wales	Aberystwyth	1	1	252
	Bangor	3	6	782
	Cardiff	9	17	5,361
	Newport	1	1	442
	Swansea	3	3	1,721
	Wrexham	1	1	156
TOTALS		13[1]	29	8,714

[1] These totals are for the different providers operating in the whole of these nations

In terms of the number of buildings registered under the two Codes, the total stood at 2,165 - a net increase of 169 on the figure reported in 2019.

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

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

Position	Location	Separate Provider Members	Development Numbers	Bed Space Numbers
1	London	39	169	49,528
2	Leeds	22	103	19,857
3	Cambridge	42	813	19,480
4	Nottingham	34	85	18,847
5	Sheffield	20	53	16,931
6	Liverpool	24	51	14,149
7	Newcastle	22	48	13,900
8	Birmingham	16	37	13,483
9	Glasgow	17	40	12,494
10	Manchester	14	41	11,076

London continues to have the greatest number of registered bed spaces under these Codes, and the numbers increased slightly in 2019-2020 from the previous years, as did the number of providers operating in that market and number of developments registered under the Codes. Indeed, bed space numbers increased slightly for all of the top four locations (which have remained the same since the report has been issued), however, some changes did occur with four of the six other places. Sheffield

rose from 7th to 5th spot, replacing Newcastle, and this is a reflection of the growth in the PBSA market in that city over the last 18 months. There was also a newcomer into the top ten, as Glasgow displaced Leicester altogether and relegated Manchester one space to tenth.

Differences between the 163 members of the Codes in terms of the number of bed spaces that they are operating is shown in Tables 4 and 5, which reveal who the top and bottom 10 providers are in respect of bed spaces as well as the number of developments that they operate.

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

Position	Provider	Total Number of Bed Spaces Operated	Total Number of Developments
1	UNITE	76,260	178
2	IQ Student	23,112	44
3	Homes for Students	20,647	106
4	Student Roost	19,352	52
5	CRM Students	16,441	68
6	Fresh Student Living	15,212	52
7	CLVUK	10,155	27
8	Hello Student	9,233	93
9	Host Student	8,901	35
10	GSA	8,840	24

The most significant finding from Table 4 is the domination within the PBSA market of UNITE since it acquired the whole of the Liberty Living portfolio. Otherwise, all of the other top ten providers have remained in a more or less similar position and Global Student Accommodation (GSA) has entered the list to fill the gap left by Liberty Living.

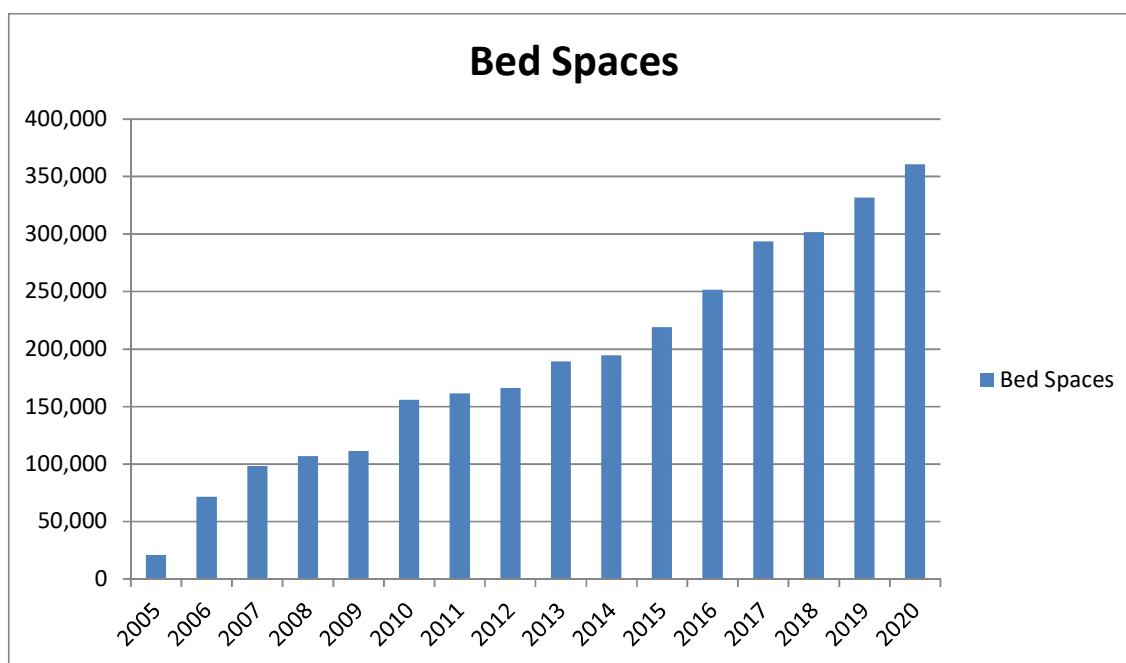
As was the case in the previous two editions of this report, all of the top 10 suppliers were members of the Code for non-educational establishments. The largest universities in terms of bed space numbers during 2019-2020 were the University of Leeds (4,958 bed spaces) and the University of Hertfordshire (4,709 bed spaces), who were 14th and 15th respectively in the rankings.

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

Position	Provider	Total Number of Bed Spaces Operated	Total Number of Developments
154	Ashwell House	50	1
155	Herball Hill Ltd	50	1
156	Richmond & Hillcroft College	49	2
157	Backstage Academy	47	1
158	SCIO	43	1
159	Congregational Federation	39	1
160	Orange Living	39	1
161	Homelets Bath	32	1
162	Baaz Properties	26	1
163	Shumei Eiko Ltd	16	1

There were three members of the Educational Establishments Code in the bottom 10, along with two religious-based charitable organisations belonging to the other Code.

GRAPH 1: Number of Bed Spaces Covered by the ANUK/Unipol Codes - 2005 to 2020



Graph 1 depicts the increase in the number of bed spaces covered by both Codes since 2005, when the Codes were first launched. From just over twenty thousand bed spaces registered when the Codes were first launched, the numbers then more than tripled in the second year to over 70,000. Over the following three years the increase slowed, however, there was a substantial rise in 2010 of 40% - which was caused mainly by the inclusion of all 31 Cambridge Colleges. Although the bed

space numbers have risen each year since 2010 the percentage increase has varied, ranging from as low as 2.7% to as high as 15%, the overall average rise was 8.9% per year.

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 important forum for members where information, good practice and concerns can be raised in a mutually helpful and co-operative environment. The CoM also sets the fees to join the Codes. The fees are set by those who have to meet them.

The CoM met on three occasions between July 2019 and the end of June 2020 - July 17th, 2019; November 14th, 2019 and March 10th 2020 - in order to operate the Codes in a transparent manner the minutes are freely available on the National Codes website.

Average attendance at meetings has decreased slightly over the last two reporting periods; it was down from 26 in 2017- 2018 to 25 in 2018 - 2019, and for 2019-2020 it was 24.

The format for the July meeting is different from that of the March and November meetings. Whilst they are traditional business meetings, the summer one focuses only on the one topic - in this case it was issues facing disabled students when looking for PBSA accommodation and what the sector could do to assist such students. Members were required to bring with them to the meeting certain information about how their organisations make such provision (if any), OR they were permitted to send an alternate in their place who had a more detailed understanding of this topic. Following an initial presentation from a specialist on the topic, members worked in groups in order to discuss their own experiences and to share these with the larger meeting via a feedback session..

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 2019 and the end of June 2020 the following people ceased to be members - for a variety of reasons:

- Mandy Blackburn (Homes for Student) - replaced as the representative of that provider
- Eva Crossan Jory (NUS) - term of office finished
- John Ford (Student Roost) - replaced as the representative for that provider
- Darren Gardner (Hello Student) - left the business
- Claire Ody (Liberty Living) - the provider ceased operating
- Joanne Pollard (CLVUK) - left the business
- Graham Sheeran (Derwent Students) - the provider no longer qualifies for membership of the CoM
- Fay Sherrington (AMoSSHE) - replaced as the representative for the organisation
- Claire Sherlock (Vita Student) - replaced as the representative of that provider
- Susan Yoshikawa (Urbanest) - replaced as the representative of that provider

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:

- Tony Allen (Nido Student) - qualified for membership of the CoM
- Jason Andrews (Student Roost) - replaced John Ford
- Simon Dickenson (CLVUK) - replaced Joanne Pollard
- Simon Hedley (Urbanest) - replaced Susan Yoshikawa
- Nan Richards (Hello Student) - replaced Darren Gardner
- Michelle Singleton (Abodus) - qualified for membership of the CoM
- Chris Warrington (AMoSSHE) - replaced Fay Sherrington
- Georgina Weir (Vita Student) - replaced Claire Sherlock
- Simon West (Homes for Students) - replaced Mandy Blackburn

Current Members of the CoM:

Tariq Akbar (Downing Students)	Tony Allen (Nido Student)	Sarah Amer (MHCLG)	Jason Andrews (Student Roost)
Andy Attewell (Host Students)	Michael Ball (UniversitiesUK)	Stephen Battersby (Chair)	Alan Blackmore (Collegiate AC)
Martin Blakey (Unipol)	Richard Bolger (Student Living at Sodexo)	Laura Bryant (Chapter Living)	Karen Burke (ASRA)
Bryan Carroll (CUBO)	Linda Cobb (ANUK)	Jane Crouch (Fresh Student Living)	Cheryl Darnell-Hayes (Association of Colleges)
Nicola Dean (Co-opted)	Sim on Dickenson (CLVUK)	Wendy Evans (Cambridge Colleges)	Ian Fletcher (Deputy Chair)
Sue Green (University of Leeds)	Simon Griffiths (UNITE)	Paul Hardy (Sanctuary Students)	Claire Hartridge (University of Herts)
Linh Hawke (Co-opted)	Simon Hedley (Urbanest)	Stuart Henderson (GSA)	Allan Hilton (Co-opted)
Paddy Jackman (Audit Panel Chair)	Victoria Johnson (Co-opted)	Paul Milner (UPP)	Nan Richards (Hello Student)
Ian Robertson (Unipol)	Paul Rowlinson (IQ Student Accommodation)	Michelle Singleton (Abodus)	Richard Stott (Co-opted)
Chris Warrington (AMoSSHE)	Georgina Weir (Vita Student)	Sim on West (Homes for Students)	Keith White (CRM Students)
Dov Whittle (Co-opted)			

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 most recent being in April 2020. The following issues were amongst those that were discussed:

- Late buildings strategy
- Coronavirus responses from within the PBSA sector and verification visit arrangements
- Proposed alterations to the content of the Code for Non-Educational Establishments
- Proposed changes to the Audit Panel arrangements

Current Members of the Consortium

ANUK	NUS	UNIPOL
Linda Cobb (Decent and Safe Homes)	Vacancy	Martin Blakey (Chief Executive)
Ian Fletcher (British Property Federation)	Rory Hughes (Campaigns and Influencing Consultant)	Ian Robertson (Board Member)

Section 3: Joint Codes Conferences Report

The tenth Joint Codes Conference took place on November 15th, at the British Library in London, and was attended by 121 delegates and speakers. All delegates were invited to complete an evaluation form and the average of the evaluation ratings for the event are shown below in Tables 6 and 7 (1 equals poor, 2 equals average; 3 equals good; 4 equals very good. 5 equals excellent).

Table 6: General Ratings

Heading	Average Rating
Whole conference	3.8
Relevance to delegates' needs	4.1
Venue rooms	4.5
Location of Venue	4.5
Food	3.1
Unipol administration before the event	3.9
Unipol administration during the event	4.0
Overall Average	4.0

Apart from the usual excellent ratings for the work of the Unipol Training and Events Office, the venue and the conference as a whole scored significantly well amongst delegates, with only the quality of the food not receiving an excellent rating.

Table 7: Session Ratings

Session Title	Average Rating for Presentation	Average Rating for Relevance
Enabling Access for Disabled Students	4.5	4.6
Proposed Changes to the Code for Non-Educational Establishments	4.3	4.0
Preventing Students from Feeling Excluded	3.8	4.25
OIA Update: Handling Student Complaints and Appeals (1)	3.8	4.25
Innovation and Best Practice in Student Accommodation	3.6	3.6
Accommodating Disabled Students and Supporting Students with Mental Health Issues	3.6	3.6
Inclusion in Accommodation: Why it Matters and How to Achieve it	3.3	3.5
OIA Update: Handling Student Complaints and Appeals (2)	4.0	4.5
Tenancy Fees Legislation	4.6	4.5

The most notable finding from the above table is that delegates believed that the big picture issues - access for disabled students, tenancy fees legislation and the activities of the OIA - were of most relevance to them, and the least relevant were those sessions which involved actual examples of how accommodation providers had dealt with particular situations. The one and only session that had any relation to the Codes was rated between the other two.

These findings clearly reflect the interests of those delegates who attended the event and it could therefore be argued that they only selected to do so because the big picture issues were more

important to them than what would be described as more practical ones; perhaps if the content had been more focused on the latter it would have attracted a different group of delegates? However, from the evaluations completed at the last few Joint Codes Conferences there is some evidence to suggest that the big picture issues are of more interest, and they should form part of the agenda for this event in the future.

In terms of how this event compares (in evaluation terms) with the previous conferences, Tables 8 and 9 reveal the ratings for the aspects it is possible to show comparisons with. However, it should be noted that the scoring system for all of the previous conferences was different from the 2019 event, as 1 equated to excellent and 5 poor under the previous system.

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

Aspect Event	Whole Conference	Relevance	Venue/Rooms	Location of Venue	Food
2nd Joint (2011)	2.5	2.2	2.9	2.2	2.8
3rd Joint (2012)	2.2	2.5	2.6	2.0	2.7
4th Joint (2013)	2.1	2.3	1.8	1.6	2.3
5th Joint (2014)	2.2	NA	1.6	1.3	1.9
6th Joint (2015)	2.0	2.0	2.0	1.7	2.5
7th Joint (2016)	1.8	1.9	1.7	1.4	1.9
8th Joint (2017)	1.9	2.0	2.4	1.7	2.1
9th Joint (2018)	1.6	1.8	1.4	1.5	2.4

Table 8 would appear to confirm the view that the 2018 event was probably the most successful of all, but the ratings for the sessions in 2019 (albeit given the different scoring system) were equally as good.

Table 9: Average Combined Scores for Different Sessions at the Last Eight Joint Conferences

Year	Presentation Rating	Relevance Rating
2011	2.60	2.42
2012	2.62	2.57
2013	2.22	2.34
2014	2.64	NA
2015	2.35	2.02
2016	2.09	2.11
2017	2.14	2.22
2018	2.00	2.10
2019	3.90	4.10

Section 4: Meeting the Challenges of the Fourteenth Year

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

- Revise the Management Test (appendix 1 to the Codes in order to better reflect the key elements that indicate who has control of the day to day management of buildings;
- Discuss whether there is a need for providers who cease to operate buildings to make available to the incoming management platform certain information and documentation relating to that site or sites;
- Complete the review of the Code for Non-Educational Establishments;
- Develop a standard set of information that can be provided to new members, that could include advice on where to display the Code logo, and also include the membership certificates and publicity posters;
- Review Code publicity posters and materials to ensure that they are relevant, and launch an online newsletter and blog that encourages members to share information with one another;
- Recruit a Complaints Investigator;

The first three bullet points fall under the general heading of the Code review and, as such, were on-going as of the end of June 2020. The Review Group which had been established to undertake the process of reviewing the Code discussed both of the first two bullet points as part of its deliberations, and whilst it was supportive of a proposal to decrease the number of points awarded in the management test for the tenancy agreement, and increase them for others - such as health and safety routines, it rejected the notion that out-going operators should be made responsible for the production of documentation as it felt the focus should always be upon the incoming manager and their responsibility to evidence the fact that they were compliant with the Codes.

Progress with bullet points four and five has been more mixed. The publicity posters, first issued in 2012, for both Codes were updated with the current website colour scheme and wording altered slightly. Discussions have been held about the production of a regular newsletter that will be available online and which Code members can register an interest in, but there has been no progress with materials for new members.

The final challenge for the fourteenth year was successfully accomplished in October 2019, with the appointment of Victoria Peckitt.

Additional Achievements of the Fourteenth Year

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

Investigation of the Extent of Problems Resulting from Late Developments and the Causes of them

The ANUK/Unipol National Codes identified a substantial number of new developments, scheduled for occupation by students from mid-September 2019 onwards, where the opening of them had been delayed for a number of reasons, and this included not just those being operated by private providers but also by a number of educational establishments who were members of the UUK Code of Practice.

Analysis of the extent of the problem revealed that somewhere around a third of these new buildings were occupied at a later date than had been advertised to students who had booked to live in them and, as a result, it was agreed that some investigations be undertaken with the relevant providers to determine whether the actions that they had taken following these problems met with the protocol which the ANUK/Unipol Codes had issued to members when confronted by such situations.

The work was conducted by Elizabeth Goddard, an external consultant appointed by the Codes, and undertaken throughout October 2019. Her conclusion was that in most cases the members of the Code had followed the protocol, and in some cases they had exceeded it by offering compensation packages to the students which were very generous. However, she also concluded that a review of the procedures would be useful and that particular attention should be paid to three aspects: 1) Cessation of marketing of developments as soon as a Code member is aware that a property is late; 2) Provision of accurate information to students who have booked the accommodation that is late running about the situation and likely timescales for final occupation of the building; 3) The making of an offer to release students from contracts where delays are likely to be significant.

The protocol operated by the ANUK/Unipol Codes was updated to include references to all three of the above recommendations, and it is likely that these will be re-enforced within the requirements of the Codes as well when they are next revised.

Whilst it was clear that problems had arisen for a number of private sector accommodation suppliers with late buildings, there was also evidence to indicate that educational establishments had experienced similar issues, but there had been little adverse publicity about it. Following work by a journalist from *The Independent* newspaper, who had issued a freedom of information request, it transpired that educational establishments covered by the UUK Code had experienced a similar number of late buildings at the start of the 2019/2020 academic year.

Production of an Updated New/Refurbished Development Protocol

Following issues resulting from the substantial number of new and refurbished buildings that were delivered late in the autumn of 2019, the Codes took the decision that the protocol for how members should be dealing with these should be updated - pending additional requirements that might be included within the revised Code for non-educational establishments. This work, which included enhancing the requirements for members to communicate any likely delays with the delivery of a building to tenants who had booked it, was completed in early June 2020.

Expansion of the Complaints Procedures and Investigation of Abodus

Between the outbreak of the pandemic in the UK and the end of March 2020 the National Codes received a significant number of enquiries from students, parents and other agencies asking whether members of the National Codes were required to simply release students from their tenancy agreements, especially once educational establishments had taken the decision to cease face-to-face tuition and (initially) advised students to return to their parental home. At around that same time, MHCLG issued some general advice that indicated both landlords and tenants were expected to continue to abide by existing contractual arrangements, with tenants continuing to pay rent and landlords delaying any possession proceedings on the grounds of unpaid rent.

The formal National Codes' response to the questions concerning rent payments was to make reference to Government advice as well as to advise that contractual matters (other than breach) were not covered by the Code. Students, parents and others were advised to make direct contact with providers in order to come to an acceptable arrangement, as per Government advice.

The National Code Website, however, stressed the importance of the concept of fairness with a level of burden-sharing being an appropriate course of action. Those suppliers, both HEI and private providers who had offered either rent reductions or waivers, were listed. Considerable resources continue to be used to update this summary of the sector's response and the advice listed, together with NUS's call for refunds, has been significantly influential in getting a better deal for tenants. Work is on-going to identify major suppliers who have not given any refunds.

The National Codes Website has become an increasingly useful and used portal particularly by our private sector PBSA members (but also many others in the sector) for summarising what is happening in the PBSA accommodation sector. The link can be found at <https://www.nationalcode.org/news/information-and-advice-on-coronavirus-in-student-accommodation-for-housing-suppliers>

The Consortium also agreed some alterations to the Codes Complaints procedures to make it possible for complaints relating to contractual matters to be investigated, and the following wording has been 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.

Abodus Investigation

Not long after the imposition of lockdown in March 2020 the NCA began to receive a large number of complaint contacts from tenants of this provider who wished to raise concerns about them not having had rental payments returned or cancelled as a result of them having left the accommodation. Initially it was difficult for the Codes to do more than suggest these students attempt to agree a settlement with Abodus, as had been stated in Government guidance, however, following further investigations AND the amendments to the complaints proceedings allowing the Complaints Investigator to refer matters where tenants felt they had not been treated fairly to the provider, it became possible to investigate these further.

A significant number of complaint contacts were received and Abodus were asked initially to review whether these students should have been released from contracts and/or had their rental payments returned. Although Abodus at first were of the opinion that their tenancy release procedures were fair, when confronted with additional information by the students who had been refused this option, the company re-investigated the matters and all but about two were given a release and a rental refund (where appropriate).

Greater Use of the National Codes Website to Communicate with Members

Since the 23rd March 2020 the website has been used to post regular updates on issues relating to the coronavirus and the impact that it has had on providers of purpose-built student accommodation. As and when the content of the page has been altered, Code members have been notified: they have in turn be encouraged to provide information about the approaches that there were taking to matters such as rent refunds and preparations for the start of the next academic year in light of social distancing and related regulations. The feedback from members has been very positive and is likely to lead to even greater use of the website as the main tool with communicating with members.

Recruitment of a National Codes Officer

The Committee of Management, when it met in November 2019, discussed the idea of recruiting an additional member of staff to assist the NCA with administration of the Codes. Unfortunately, progress with this was delayed by the covid-19 pandemic and it was not until the very end of June 2020 that Jess Carrier was appointed.

Section 5: Assessment and Verification Activities

Verification Visits and Re-Visits

A total of 219 verification visits were completed between the beginning of July 2019 and the end of June 2020.

As can be seen from Table 10 (below), the downward trend in the number of visits being undertaken that was identified in 2017-2018 can be considered to have been a 'blip', as the numbers for 2019-2020 exceeded those undertaken in any previous year. The main reasons for the increase were a combination of a large number of new developments and also the three-yearly visits were due to the 31 Cambridge Colleges

Table 10: Verification Visits Undertaken By Year

Year	Totals
2008-2009	43
2009-2010	48
2010-2011	62
2011-2012	64
2012-2013	77
2013-2014	120
2014-2015	131
2015-2016	135
2016-2017	158
2017-2018	142
2018-2019	202
2019-2020	219

An analysis of the number of visits that have been undertaken since the 2008-2009 period in comparison with the total number of developments that members have registered under the Codes is reflected in Table 11 (see next page). This table shows very clearly the increase year on year in the number of developments that are registered under the Codes, as well as the attempts that have been made to undertake more visits in order to ensure the percentage is consistent with previous years.

Table 11: Percentage of Registered Developments Visited By Year

Year	Total Number of Visits	Total Number of Developments Registered	% of Registered Developments Visited
2008-2009	43	395	10.88
2009-2010	48	484	09.91
2010-2011	62	1,243	4.98
2011-2012	64	1,257	5.09
2012-2013	77	1,357	5.67
2013-2014	120	1,425	8.42
2014-2015	131	1,472	8.89
2015-2016	135	1,682	8.02
2016-2017	158	1,682	9.39
2017-2018	142	1,827	7.77
2018-2019	202	1,996	10.12
2019 - 2020	219	2,165	10.11

Table 12 details the different types of verification visit that have been undertaken in the past two academic years and compares them with each other.

TABLE 12: Visits by Type, 2018-2019 to 2019-2020

Category	Totals 2019-2020	Totals 2018-2019
New Applicants	21	17
Existing Members	27	21
Cyclical Re-Visits	52	16
Change of Operational Management	22	65
New Developments	79	67
Complaints	0	1
Chair's Action (Audit Panel)	8	12
Revisits	10	3

As can be seen in Table 12, there were significantly less change of operational management visits in 2019-2020, but these were compensated for with the greater number of cyclical re-visits, as a result of the need to visit all of the Cambridge colleges over that time. There were also a great deal more revisits last year than in the previous one

As in all previous years since the introduction of the verification procedures, visits took place to providers belonging to both of the ANUK/Unipol Codes during 2019-2020. However, the main focus of these was on the Code for Non-Educational Establishments - as can be seen from Table 13.

Table 13: Number of Visits Undertaken by Code and Category, July 2018 to June 2019

Non-Educational Code Category	Number of Visits	Educational Code Category	Number of Visits
New Applicant	20	New Applicant	1
Existing Member	25	Existing Member	2
Cyclical Revisit	16	Cyclical Revisit	36
Change of Operational Management	22	Change of Operational Management	0
New Development	78	New Development	1
Complaints	0	Complaints	0
Chair's Action (Audit Panel)	8	Chair's Action (Audit Panel)	0
Revisits	10	1st Revisit	0
Totals	179	Totals	40

The reason so few educational establishments had visits in 2018-2019 was because not many of those members were scheduled for a cyclical re-visit at that time. However, it is interesting to note that some of these members did add new developments and, as such, it was necessary for them to be visited so that they could be registered under the educational establishments' accreditation.

The table clearly reflects the extent to which visits due to the creation of new developments dominate the reasons as to why visits are undertaken as part of the verification procedures as they apply to members of the Non-Educational Establishment's Code, however, what it does not reveal is how many visits were undertaken to different members of this Code and whether those providers required visits under a number of different categories. That information is detailed in Table 14.

Location-Wide Verification Visits

These were scheduled to take place in Bristol in May 2020, but were postponed until; the same period in 2021 as a result of the lockdown procedures.

General Verification Visit Outcomes

The next issue that needs to be reported on is the outcomes that have arisen from the completion of the general verification visits that were undertaken as part of the 2019-2020 visits programme, especially the extent to which they indicate adequate levels of compliance with the Codes.

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

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

Table 14: Visits Where No Action Points Were Identified Compared with Overall Number of Visits Completed 2014-2015 to 2019-2020

Year	Number of Visits with No Action Points	Total Number of Visits Completed	Percentage of Visits with No Actions
2014-2015	16	131	12.25%
2015-2016	36	135	26.67%
2016-2017	34	158	21.51%
2017-2018	47	142	33.09%
2018-2019	36	202	17.82%
2019 - 2020	47	219	21.46%

Table 14 reveals that there has been some consistency over the last five years in terms of the overall number of visits completed for which no action points were identified by members of the verification team, even if that's not reflected with respect to the percentage of visits completed each year with no action point outcomes.

In terms 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. In addition, verifiers make clear in the reports the deadline by when the works should be completed by. In the early years of the operation of the verification system these deadlines were left completely to the verifier's discretion, but since the beginning of 2017 - apart from in the case of urgent actions relating to certain health and safety matters - verifiers are required to choose one of the following quarter dates: 31st March; 30th June; 30th September or the 31st December.

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

Most Common Action Points Identified at Verification Visits

Because verifiers report which specific clauses of the Codes they believe a provider to be in breach of, it's possible for an assessment to be made of the most common aspects of non-compliance with the Codes. Table 15 indicates which clauses of the Code for Non-Educational Establishments were cited in reports for 20 or more visits undertaken to members of that Code during 2019-2020. It also indicates the number of times the same clause was cited in the 2018-2019 visits period.

Table 15: Clauses of the Non-Educational Establishment Code Which Members Were Found Not to be Complying with Most Following Visits in 2019-2020 Compared to 2018-2019

Clause	Number of Visits Cited for in 2019-2020	Number of Visits Cited for in 2018- 2019
The design of appropriate fire safety measures are determined in compliance with a fire safety risk assessment and the relevant requirements under the Regulatory Reform (Fire Safety) Order 2005 and in consideration of the local authority's HMO standards (6.13)	74	81
Information will be available about the minimum level of bandwidth that residents can expect within the WiFi system being provided to them (3.20)	57	59
In consultation with the Local Authority, and in having regard to any guidance that they may provide applicable to buildings of this type, buildings are maintained and managed so to ensure that the risks of potential health and safety hazards, based on the Housing Health and Safety Rating System (HHSRS) are reduced to as low a level as is reasonably practical and cost effective, and no HHSRS Category 1 hazards remain (6.0)	47	47
Suitable precautions are taken to prevent or control the risk of exposure to legionella (6.33)	39	38
The Manager of each site will complete the online training course within 8 weeks of being appointed (1.2)	29	30
Tenants (and prospective tenants) are made aware of our equality and diversity policies as part of the information provided in marketing and tenant information (2.4)	28	-
A satisfaction survey of their student tenants is carried out at least every 24 or 36 months (5.0)	27	31
We provide our tenants at the outset of the tenancy with full details of the times of cleaning and maintaining communal areas, either in writing or displayed on appropriate notice boards within the residential development (4.17)	25	-
The building has a security plan detailing an appropriate level of management to maintain security standards and this plan can, on request, be shown to tenants. The plan should also stipulate what security information will be supplied to tenants (6.24)	24	41
All staff should be aware of our Emergency and Disaster Management plan (6.27)	23	33

The satisfaction survey will ask whether residents know that the development is part of the Code (5.12)	22	24
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There are a number of features to Table 15 that require comment. To begin with, in comparison to the number of clauses cited 20 or more times in the 2019 version of this report, there are considerably less listed in the 2020 edition - 11 as opposed to 15. This is significant as more visits were actually completed during the period covered by the 2020 report than the previous one.

The same three Code clauses that were cited most in the 2019 report are found at the top of the 2020 version, which should come as little surprise as they have been a main focus for verifiers over the last few years. Of more interest is the appearance of two different clauses in the table - one concerning equality and diversity policies and the other to do with the communication of cleaning times.

In general, however, the number of times these clauses have been cited is showing a downward trend in the 2020 report from the previous one, a sign that members are becoming more aware of these matters.

The Audit Panel

The Audit Panel met on four occasions between the start of July 2019 and end of June 2020. Two were hosted by Unipol Student Homes, in Leeds, one was hosted by Newnham College, Cambridge, and the other was held remotely via video conferencing due to lockdown

The membership of the Audit Panel has changed slightly since the last annual report, with Victoria Tolmie-Loverseed returning from maternity leave and replacing Nikki Verity. NUS have once again become an active player within the Audit Panel, having appointed Rory Hughes in a consultancy position.

The National Codes Administrator estimates that at least 137 visits will need to be completed before the end of June 2021, 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 were postponed from May 2020. In terms of the types of visits to be undertaken, they break down as follows:

New Applicants	= 2
Existing Member	= 3

Cyclical Re-Visits	= 36
Change of Operational Management	= 24
New Developments	= 65
Re-Visit	= 7

The current membership is as follows:

Mr Paddy Jackman, Chair
Ms Elizabeth Beattie - Verifier
Ms Mary Bright - Verifier
Ms Wendy Evans - Cambridge Colleges
Mr Derek Goss - Verifier
Mr Rory Hughes - NUS
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

Section 6: Complaints and Tribunal Procedures

Code Complaint Contacts

Table 20: National Code Complaints Received, by year and status

Year	Total No. contacting the NCA	No. of formal complaints submitted	No. of formal complaints referred to the Tribunal
2005	1	0	0
2006	5*	0	0
2007	5*	2	1
2008	20*	3	2
2009	21	7	7
2010	17	3	1
2011	27	6	2
2012	45	18	5
2013	40	14	4
2014	41	8	3#
2015	62	7	4#
2016	70	14	6#
2017	88*	16	3
2018	83	15	5#
2019	103	13	8
2020	127 (to end of June)	11	2
TOTALS	776	137	53

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

= one complaint was dealt with by the Full Tribunal

Table 20 indicates clearly the extent to which the Codes' complaints procedures have been accessed since the Codes were first launched, and provides a sense of the increased awareness amongst tenants (and their representatives) about the Codes and the complaints process that pertains to them.

Complaint contacts, which had been growing steadily since 2011, exploded in both 2019 and the first half of 2020, and thus those two years in particular are worthwhile analysing.

2019 Figures

Whilst the number of complaint contacts received in this year were the highest ever (at that time) in reality they were made against a very small proportion of the overall membership of the Codes - just 33 members, so around 20% of the total number of providers signed-up to the ANUK/Unipol Codes. More significantly, perhaps, is the finding that if those members against whom just one compliant contact was received were ignored, then the number of members being complained about falls to 16. Interestingly, all but one of these 16 members have representation on the Committee of Management and the

explanation for the number of complaint contacts is most likely to be a reflection of the fact that they have made their tenants aware of the fact that they are signed-up to the Codes.

Most of the complaint contacts concerned providers with substantial portfolios (50 or more properties), but only two of those members received more than one complaint contact about that related to multiple sites, and even then there was no evidence to suggest that the same reasons for the complaints being made were the same. The most common reason cited for a complaint to be made in 2019 was disrepair, followed by concerns over the way in which the provider dealt with a dispute over whether the Code had been breached or not.

2020 Figures

Analysis of the complaint enquires received to the end of August 2020 reveals that these related to 36 members of the Codes only, so not too dissimilar from the numbers for the whole of 2019. However, of these, 25 had more than one complaint, and, as with the findings from 2019, the majority of these members were represented on the Committee of Management.

Whilst disrepair remained a key reason for why complaints were made about providers in 2020, there were two other issues which have featured heavily in the complaint contacts made with the Codes, especially since the start of April. They are contractual matters, which although covering a range of issues most often relates to perceptions that a provider should have brought an end to a contract once lockdown had been imposed (and the tenant concerned had left the accommodation) as well as allegations that the provider did not return rent that had been paid for the final part of the contractual agreement (again, for a period in which the accommodation was not being occupied).

Table 20 also makes clear that less than 20% of all the complaint-related contacts made over the years have developed into formal complaints, defined as complaints either issued on the prescribed complaints form or deemed as requiring a reply from the relevant member as a result of information provided by the complainant.

In terms of the number of formal complaints that it has been necessary to refer to the Tribunal, less than 40%, and in four cases the Tribunal Chair determined that the complaints were sufficiently serious to warrant a meeting of the Full Tribunal. As for the proportion of formal complaints that it has been necessary to refer to the Tribunal, this has tended to fluctuate in the last few years but there is no evidence to suggest that the increase in the number of formal complaints issued has led to a rise in the number of referrals made.

Whilst Table 20 is helpful in depicting the volume of complaints that have been received and processed, it does not convey any sense of the level of complaints in comparison with the size of the sector as a whole. Following a request from the Committee of Management in November 2016 for some analysis to be made of the number of complaint contacts received in terms of the number of bed spaces being registered under the Codes, the National Codes Administrator compiled this information - the details of which are shown in Table 21.

Table 21: Ratios of National Code Complaint Contacts s Received Compared to Overall Bed Space Numbers Registered

Year	Total No. contacting the NCA	No. of Bed Spaces Accredited (to nearest 1,000)	Ratio of Complaint Contacts Made (to nearest 1,000)
2005	1	21,000	1 in 21,000
2006	5	72,000	1 in 14,000
2007	5	99,000	1 in 20,000
2008	20	107,000	1 in 5,000
2009	21	112,000	1 in 5,000
2010	17	156,000	1 in 9,000
2011	27	162,000	1 in 6,000
2012	45	166,000	1 in 4,000
2013	40	190,000	1 in 5,000
2014	41	195,000	1 in 5,000
2015	62	219,000	1 in 4,000
2016	70	252,000	1 in 4,000
2017	88	271,000	1 in 3,000
2018	83	301,000	1 in 3,000
2019	103	338,000	1 in 3,000

The picture that emerges clearly from Table 21 is that, leaving aside the first three years of the Codes' operations, levels of dissatisfaction with accommodation providers who are members of these Codes are very low. The decline in the ratios to 1 in 3,000 since 2017 are indicative of the increase in complaint contacts that have been made, a fact that is echoed by the small number which translate into formal complaints. Even so, the percentage of occupants of purpose built student accommodation who could be argued to have been sufficiently dissatisfied to want to make a complaint was just 0.34%.

Relationship Between the Audit Panel and Tribunal

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

Whilst these bodies exercise their right to remove and suspend members, they have previously not done so in relation to the same provider. However, during the 2017-2018 period both groups - independently of each other - questioned whether a member ought to remain within the Code as a result of failings identified through visits to a site and the outcomes from complaints received. It is therefore likely that some discussions will be had between the two bodies to agree how best that provider (currently suspended from membership) should be dealt with.

The powers of both bodies are likely to be augmented in the future to include the ability to suspend individual buildings from membership of the Code

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.

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 Chairs are Mr Keith White (CRM Students), nominated by the providers, and Ms Eva Crossan Jory, the elected Vice President (Welfare) at NUS. Mr White was re-appointed in 2018 for a three year period, whilst Ms Crossan Jory will serve until the end of her term of office.

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

Ms Jane Crouch (Fresh Student Living)

Mr Alan Hilton (Cass and Claredale)

Mr Rory Hughes (NUS)

Ms Nikki Verity (Unipol)

M Paul Rowlinson (IQ Student Accommodation)

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, that situation has been reversed and the site had its most ever visits during 2019-2020, with almost a fourfold increase in visits in comparison to the previous year, and a similar finding in the case of the number of visitors to the site and of the pages viewed.

The most likely reason to explain the substantial increase in use of the site is the C19 pandemic, a fact supported by the findings shown in Table 25 as which pages of the site have attracted the most viewings.

Table 24: National Codes Website: Visits, Visitors and Pages Viewed, 2011-2012 to 2019-2020

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%

In terms of how people chose to access the website, Table 24 confirms the decreasing trend in the use of desktops and a considerable increase in the numbers doing so with their mobiles. On the basis of the evidence that students are more likely to access websites using mobiles or tablets, Table 24 suggests that more than half of all users of the site during 2019-2020 were students , a significant increase from previous years.

In terms of the pages of the National Codes sites that have been viewed (excluding the Home Page), the top ten most looked at pages during 2019-2020 are listed in Table 25. However, because some of the page titles were either changed or new ones created for the new website, it has not been possible in all cases to compare these figures with the same number of viewings for the previous period.

Table 25: The Top Ten Most Viewed Pages 2019-2020, Compared with 2018-2019

Page Title	Number of Page Views 2019-2020	Number of Page Views 2018-2019
Information and Advice on Coronavirus	66,273	-
Code Download	6,785	3,838
Members List	3,853	2,544
Online Training Course	3,129	1,243
How to Complain	2,315	642
Which Developments are in the Code?	1,461	844
Why we Exist	1,367	1,350
Contact Us	1,300	-
Making a Complaint	1,234	-
London Development List	359	

The considerable rise in the number of occasions that the Codes were downloaded is probably explained by the equally large increase in the number of Code complaint contacts received, especially in the early part of 2020, as people checked to see whether providers were in breach of the Codes. This is supported by the substantial rise in the number of times the page relating to how to complain was viewed.

However, whatever the reasons as to why people visited the National Codes site, it's obvious that the usage has substantially increased on previous years and, as such, the Codes will make a great deal more use of it to disseminate information to both Code members as well as anyone else who wants information about the Codes.

Online Training Course

The online training course has been available for use since 2010, and up to the end of June 2020 almost 8,000 users had either started or completed the course. Overall, usage of the online course has varied over time, as shown in Table 26, with the levels steadily increasing from 2011 to 2013, almost doubling in 2014, falling back in 2015, before then massively expanding in 2016 and 2017. Numbers then decreased a little in 2018 but 2019 witnessed the largest ever number of users, with a slight decrease in the first half of 2020.

The first of these increases was due almost entirely to the change that was made to the Code for non-educational establishments in May 2016 that managers of sites should complete the course as a requirement of membership, as opposed to this merely being a recommendation. As a similar requirement was included within the Code for educational establishments from September 2018, which has once again led to a rise in the numbers making use of the course.

Table 26: Numbers Making Use of the National Codes Online Training Course

Year	Number of Users
2010	53
2011	241
2012	352
2013	398
2014	785
2015	380
2016	630
2017	1,199
2018	983
2019	1,597
2020	1,490

Section 8: Conclusion

Achievements of the Fourteenth Year

- Publicity posters have been updated
- A Complaints Investigator was recruited
- An extensive investigation into reasons for late developments and the responses to this of the providers concerned was undertaken and outcomes fed into the existing and future operations of the ANUK/Unipol National Codes;
- The protocol for new and refurbished developments was revised
- The complaints procedures have been varied to allow the Complaints Investigator to consider a wider range of issues than simply whether one or more specific aspects of the Codes have been breached
- Significantly greater use has been made of the National Codes website to disseminate information to members and others
- A National Codes Officer has been recruited to assist with the day to day operations of the ANUK/Unipol National Codes

Challenges for 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 as an online document, 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
- 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
- Re-sign existing members of both of the Codes for the next three year membership period, 2021 to 2023

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
Richmond and Hillcroft Adult Community College
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
Wolfson College, Cambridge

The Non-Educational Establishment Code

A2 Dominion Group Ltd
Abodus
Alpha Student Management Ltd
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
Chapter Living
City Block Ltd
Cityheart Living (Scotland) Limited
Cleaves Hall
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
Fusion Students
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
Notting Hill Genesis
Omnia Estates Ltd
Openarch Properties
Optivo
Orange Living
Parklane Properties
Portergate Property Management
Portsmouth Student Accommodation
Prime Student Living
Primo Property Management
Purple Frog Group
Realstar Management (UK) Limited
Reed Residential Ltd
Sanctuary Students
Scape Student Living Ltd
Severns Limited
Shumei Eiko Ltd
The Stay Club Limited
Stoney Street Ltd
Student Beehive
Student Castle Ltd
Student Cribs
Student Digs Management
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
YPP (Yorkshire Prosperity)
Zebra Housing Association
Zone Management

APPENDIX 2: Visits Undertaken in 2019-2020 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.

Abodus (The Elements, Sheffield)
Churchill College, Cambridge
Cityblock (Marton Street, Lancaster)
Clare College, Cambridge
Corpus Christi, Cambridge
CRM Students (City Heights, Cardiff)
CRM Students (The West Wing, Cardiff)
CRM Students (Peterson Hall, Dundee)
CRM Students (The Coal Yard, York)
Downing Students (City Point, Coventry)
Emmanuel College, Cambridge
Federation for International Education (Metrogate, London)
Fresh Student Living (Between Towns Court, Oxford)
Fresh Student Living (Riverside Quay, Stirling)
Gather Students Limited (Agnes Jones House, Liverpool)
Girton College, Cambridge
Global Student Accommodation (Bailey Point, Bournemouth)
Global Student Accommodation (Belaton House, Bournemouth)
Global Student Accommodation (Anglia House, Cambridge)
Global Student Accommodation (Clifford House, Exeter)
Global Student Accommodation (The Curve, London)
Hamstead Campus Ltd (Hamstead Campus, Birmingham)
Hello Student (James House, Bath)
Homes for Students (Toy Box, Birmingham)
Homes for Students (Hythe Mills, Colchester)
Homes for Students (The Croft, Derby)
Homes for Students (Ironbridge Studios, Exeter)
Homes for Students (Renslade House, Exeter)
Homes for Students (Base, Glasgow)
Homes for Students (Symons House, Leeds)
Host Students (Hope St Apartments, Liverpool)
Kaplan (Liverpool)

Lee Abbey (Lexham Gardens, London)
Mansion Student (Mansion Point, Manchester)
Newnham College, Cambridge
Nido Student (Boyce House, Glasgow)
Prime Student Living (Trinity View, Coventry)
Queens' College, Cambridge
The Stay Club (Kentish Town, London)
Student Living by Sodexo (Hythe Mills, Colchester)
Student Roost (University Walk, Aberdeen)
UNITE (Horizon Heights, Liverpool)
University of Hertfordshire (De Havilland Campus, Hatfield)
U Student (Willowbank Road, Aberdeen)
Vita Student (Circle Square B9, Manchester)
Zone Management (New developments, Leicester)