

National Codes Annual Report

to the Ministry of Housing, Communities
and Local Government

2018



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Introduction and Background

This is the twelfth 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 twelfth report references these objectives, it also focuses on activities that have taken place during the course of the year (July 2017 to June 2018) 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, and do, meet higher than statutory standards *and* be accountable for their performance as a clear sign to student consumers that they are committed to provide the best service and standards.

An example of where the sector has demonstrated this commitment can be found in respect of the vast majority of members re-joining for the next three year period (see Section 1 of the report), which runs from 2018 to the end of 2020. As the majority of the members fall within the Code for non-educational establishments, they receive no legislative advantages from their accreditation as members of the educational establishment Code do. It is also these members who contribute the largest proportion of fee income that enables the robust verification of the ANUK/Unipol National Codes. Given the rising costs of HMO licensing, in whatever form it takes, and the scattergun approach taken by local housing authorities to the awarding of discounts for the costs of such licences, the fact that so many providers within the purpose built student accommodation sector continue to want to be part of a voluntary accreditation scheme, is surely a sign of a commitment to meeting the highest standards.

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 2017-2018, 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 Twelfth 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 thirteenth year of operations

[Simon Kemp](#)

National Codes Administrator

Section 1: Membership Report 2017-2018

As of the 30th June 2018 there were a total of **301,761** bed spaces accredited under both the ANUK/Unipol National Codes, an increase on the numbers reported in the last edition of the report of 11%, almost entirely due to members adding new developments over the summer of 2017. The majority of these bed spaces fall within the Code for Non-Educational Establishments, although the percentage ratio of bed spaces between the two Codes remains at 87:13.

The total number of private providers and educational establishments signed-up to both of the ANUK/Unipol Codes was 151. The majority of these (103) were members of the Code for Non-Educational Establishments, with 48 belonging to the Code for Educational Establishments.

The total bed space numbers registered under the Educational Establishment Code was 36,572, an increase of just over a thousand on the figure for the end of June 2017. This was mostly due to some of the Cambridge colleges reporting additional bed space numbers. The Code for Non-Educational Establishments saw numbers increase by 29,189 up from 265,189.

A number of members previously signed-up to the Codes did not re-join: two members were suspended as a result of recommendations from the Codes Audit Panel following visits undertaken to sites operated by them during the first half of 2018. A significant number of members were subject to re-verification following changes in their management platform.

Table 1: New Members Joining and Withdrawals/Removals from Membership in 2017-2018

New Members	Members Withdrawn/Removed/Suspended
Alpha Student Management Ltd	Bloomsbury Hall Ltd
Beyond the Box Student Limited	Britannia Travel Services Ltd
Iconic	Carr Mills (D&B Property Management)
Lewes Study Lodge	Chapter 1
Student Roost	Ducane Housing Association Ltd
West Dean College	Fortis Student Living (S)
Winchester Student LLP	G Murphy Properties (S)
	Opto Living Limited
	Priestley and Co
	Sovereign Housing Association
	Student Letting Company
	Towers Lettings and Block Management
	Unity Lettings

Table 2: Changes of Management Platform Names in 2017-2018

Previous Name	New Name
Canto Court	Allman RP L2
The East Cliff Project	Bay View Breeze
TJ Thomas Ltd	BPS Developments
Juniperloch	Carr Mills Accommodation
Cotton Mills Management Company	Cotton House Management Company
12 Property FE Ltd	Oxford Court Student Village
Trent Pads	Six Degrees Nottingham Ltd
Lulworth Student Company	Wilson & Sharp Investments Ltd

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 2018, a total of 34 developments fall into this category.

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 2018 at least another 15,000 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 87 different locations in the UK had at least one building signed-up to either Code, one more than in 2016-2017. Most of these are in England (70), but 10 are in Scotland, six in Wales and one was in the North of Ireland. Table 3 (below) details which locations outside of England currently have accommodation registered under the ANUK Codes

Table 3: Locations Outside of England with National Code Developments

Country	Location	Provider Numbers	Development Numbers	Bed Space Numbers
North of Ireland	Belfast	2	2	569
TOTALS		2	2	569
Scotland	Aberdeen	7	15	3,119
	Dornoch	1	1	40
	Dundee	4	4	1,483
	Edinburgh	16	29	6,630
	Elgin	1	1	40
	Fort William	1	1	40
	Glasgow	16	35	8,809
	Inverness	1	1	300
	Paisley	1	1	237
	St Andrews	2	2	368
TOTALS		50	90	21,066
Wales	Aberystwyth	1	1	252
	Bangor	3	6	779
	Cardiff	6	19	6,283
	Newport	1	1	442
	Swansea	2	2	2,029
	Wrexham	1	1	156
TOTALS		14	30	9,941

In terms of the number of buildings registered under the two Codes, the total stood at 1,859 - a net increase of 33 on the figure reported in 2017.

Table 4 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 4: Top Ten Locations in the UK with Student Developments Covered by the Two ANUK/Unipol Codes

Position	Location	Provider Numbers	Development Numbers	Bed Space Numbers
1	London	37	160	46,717
2	Leeds	19	89	19,295
3	Cambridge	40	802	19,039
4	Nottingham	30	62	17,520
5	Liverpool	20	53	14,911
6	Birmingham	13	40	14,090
7	Newcastle	19	46	14,012
8	Manchester	13	43	12,884
9	Sheffield	17	45	12,808
10	Leicester	18	39	9,665

Although London continues to have the greatest number of registered bed spaces under these Codes, and there was a slight increase in them in comparison to 2016-2017, there was a decrease in the total number of developments compared with the period covered by the 2017 report; the cause of this was the loss of a number of members with sites in London. It is also of little surprise that so many different accommodation providers are operating in London: the only reason that Cambridge beats it is because the 31 Colleges are considered as different providers.

Bed space numbers also increased for all of the other locations in comparison with 2016-2017. This was most notable in Birmingham, where they rose by around 3,500 and this lifted that city up to sixth from the ninth place between 2017 and 2018.

Table 4 includes, for the very first time, details of the number of different providers operating in the given locations. Whilst the findings for both London and Cambridge have already been commented on above, the numbers operating in most of these cities is fairly similar - with the exception of Nottingham. Analysis of the 30 providers offering accommodation to students living there reveals that, in addition to many of the large suppliers listed in Table 5, there are also a number of locally based operators who are offering small scale purpose-built developments. This may be a reflection of Nottingham City Council's policy of encouraging the PBSA sector as a way of addressing concerns from local communities about the density of off-street student housing in certain parts of the city.

Differences between the 151 members of the Codes in terms of the number of bed spaces that they are operating is shown in Tables 5 and 6, 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 5: 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	49,547	130
2	Liberty Living	23,686	51
3	IQ Student	19,970	49
4	Student Roost	15,468	30
5	Homes for Students	12,249	55
6	Fresh Student Living	10,883	38
7	CRM Students	10,815	46
8	CLVUK	10,806	22
9	Global Student Accommodation	6,514	16
10	Host Student	6,151	22

The most significant finding from Table 5 is the emergence of two new PBSA suppliers into the top ten who have not previously appeared before - Student Roost and Host Student - as well as the decline in ranking of CRM Students and Fresh Student Living and the complete disappearance of Derwent Student and Sanctuary Students from the top ten altogether.

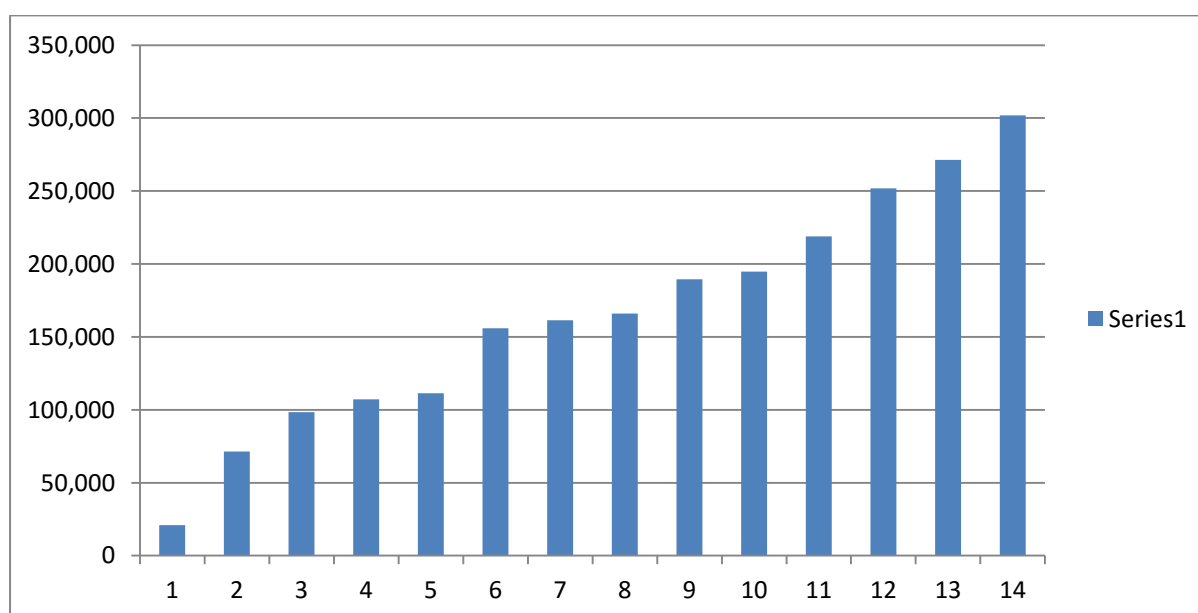
As was the case in the 2017 report, all of the top 10 suppliers are members of the Code for non-educational establishments. The largest universities in terms of bed space numbers are the University of Leeds (4,948 bed spaces) and the University of Hertfordshire (4,710 bed spaces), who are 15th and 16th respectively in the rankings.

Table 6: Smallest Members (by bed spaces covered) in the Two ANUK/Unipol Codes

Position	Provider	Total Number of Bed Spaces Operated	Total Number of Developments
142	Varcity Living	60	1
143	West Dean College	54	5
144	Ashwell House	50	1
145	Richmond & Hillcroft College	49	2
146	Six Degrees Nottingham Ltd	46	1
147	SCIO	40	1
148	Congregational Federation	39	1
149	Student Living	35	1
150	Baaz Properties	26	1
151	Vafai Trust	16	1

There were two members of the Educational Establishments Code in the bottom 10, along with two religious-based charitable organisations belonging to the other Code. Three of the six commercial suppliers listed in Table 6 operate in Nottingham (Six Degrees, Student Living, and Congregational Federation).

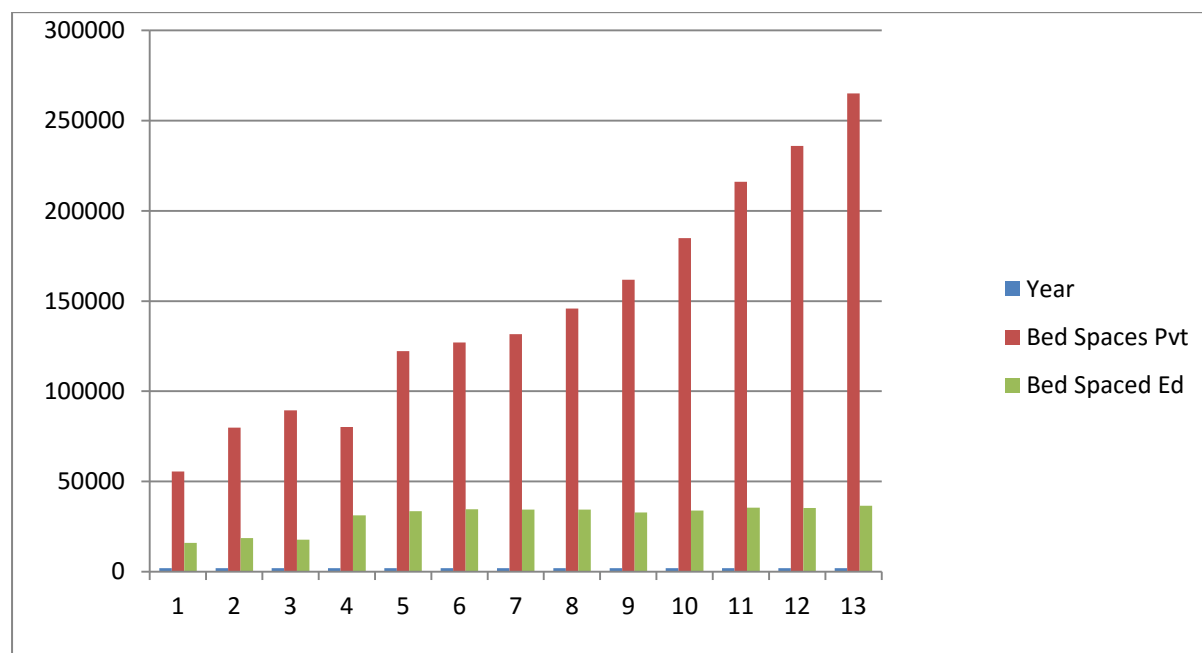
GRAPH 1: Number of Bed Spaces Covered by the ANUK/Unipol Codes - 2005 to 2018



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 National Codes Annual Report to the Ministry of Housing, Communities and Local Government 2018

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 8.7% per year.

GRAPH 2: Comparative Bed Space Coverage by Code - 2006 to 2018



Graph 2 shows the relative size of the two Codes in bed space numbers and serves to highlight the comparative changes in membership of the two Codes since 2006 - when the Code for Educational Establishments was first approved by the Government. The dominance of the private sector can be seen in this graph. Private sector bed spaces now exceed the total bed spaces being operated under the UUK Code.

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 2017 and the end of June 2018 - July 18th, 2017; November 16th, 2017 and March 5th 2018 - in order to operate the Codes in a transparent manner the minutes are freely available on the National Codes website.

Attendance at meetings increased from 19 in 2017 to 26 in 2018.

The next three meetings planned are:

Wednesday 18th July 2018 at 30 Euston Square in London

Thursday 15th November at The British Library in London

Monday 4th March 2019 at Unipol in Leeds.

The July 2018 meeting will mark a change in approach for these meetings in that it will focus on just one issue - in this case HMO Licensing - and it will also require members to actively contribute to the discussions via small group work.

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 2017 and the end of June 2018 the following people ceased to be members - for a variety of reasons:

- Tony Allen (Global Student Accommodation) - left the business
- Simon Griffiths (UNITE) - replaced as the representative for that provider
- Jo Hynes (University of Leeds) - replaced as the representative of that provider
- Izzy Lenga (NUS) - replaced as Vice President (Welfare)
- Robert Moyle (Campus Living Villages UK) - left the business
- Phoebe Rountree (Deputy Chair) - ceased working for the British Property Federation
- Rebecca Young (NUS) - her period of maternity cover came to an end

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.

Two new members - Student Roost and Vita Student - have been added to the CoM as a result of them registering 3,000 or more bed spaces under the Codes.

The National Union of Students have requested that they be represented at future meetings of the Committee of Management by their elected VP Welfare AND a representative from a students' union, instead of a member of NUS staff. The Consortium discussed this proposal when it met in June 2018 and agreed it.

Current Members of the CoM:

Tariq Akbar (Downing Students)	Karen Burke (Association for Student Residential Accommodation)	John Ford (Student Roost)	Clare Ody (Liberty Living)
Andy Attewell (Host Students)	William Bushby (Deputy Chair)	Sue Green (University of Leeds)	Rachel Ramella (Homes for Students)
Michael Ball (UniversitiesUK)	Bryan Carroll (Conference of University Business Officers)	Paul Hardy (Sanctuary Students)	Ian Robertson (Unipol)
Clint Bartman (Hello Student)	Linda Cobb (Accreditation Network UK)	Linh Hawke (Co-Opted)	Paul Rowlinson (IQ Student Accommodation)
Stephen Battersby (Chair)	Jane Crouch (Fresh Student Living)	Stuart Henderson (Global Student Accommodation)	Faye Sherrington (Association of Managers of Student Services in Higher Education)
Alan Blackmore (Collegiate AC)	Cheryl Darnell-Hayes (Association of Colleges)	Allan Hilton (Co-Opted)	Richard Stott (Co-Opted)
Martin Blakey (Unipol)	Mark Davies (Derwent Students)	Victoria Johnson (Co-Opted)	Steph Taylor (UNITE)
Richard Bolger (Student Living at Sodexo)	Nicola Dean (Co-Opted)	Eva Crossan Jory (VP Welfare, NUS)	Keith White (CRM Students)
Cynthia Brathwaite (Ministry of Housing Communities and Local Government)	Simon Dickinson (CLVUK)	Diane Kendrick (University of Hertfordshire)	TBC (Vita Student)
Laura Bryant (Chapter Living) Laura Bryant (Chapter Living)	Wendy Evans (Cambridge Colleges)	Paul Milner (Universities Partnership Programme)	

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 in 2015-2016 it was decided that an annual gathering would be beneficial - the first of which was held in August 2015, at Unipol Student Homes in Leeds.

Since then the Consortium has met on a number of occasions, the most recent being June 21st 2018, and that meeting discussed a number of issues including:

- The importance of checking claims made by members about the speed of their broadband provision
- The possible impact on the PBSA sector of changes to HMO Licensing arrangements
- The creation of a new framework for categorising issues which arise within developments between students, such as racism and drug taking
- Future representation of the National Union of Students on National Code governance bodies
- Proposed changes to the content of the ANUK/Unipol Code for Educational Establishments
- The content of the agenda for the July 2018 Committee of Management meeting
- The implications for the ANUK/Unipol National Codes of the Hackitt Review

Current Members of the Consortium

ANUK	NUS	UNIPOL
Linda Cobb (Decent and Safe Homes)	Eva Crossan Jory (VP Welfare)	Martin Blakey (Chief Executive)
	Fleur Priest-Stephens (Policy Consultant)	Ian Robertson (Board Member)

Section 3: Joint Codes Conferences Report

The eighth Joint Codes Conference took place on November 17th, at the Wellcome Collection in Central London, and was attended by 113 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 7 and 8 (1 equals excellent, 2 equals very good; 3 equals good; 4 equals average. 5 equals poor).

Table 7: General Ratings

Heading	Average Rating
Whole conference	1.9
Relevance to delegates' needs	2.0
Venue rooms	2.4
Location of Venue	1.7
Food	2.1
Unipol administration before the event	1.6
Unipol administration during the event	1.6
Overall Average	

Apart from the usual excellent ratings for the work of the Unipol Training and Events Office, the location of the venue and the conference as a whole scored significantly well amongst delegates. However, in contrast with the seventh Joint Codes Conference the results for relevance to needs, quality of the food and the rooms at the venue fell from 'excellent' to 'very good'. The ratings for the rooms at the venue were substantially down, reflecting the fact that the venue was unable to turn down the air conditioning on a day that turned out to be much colder than many had expected.

Table 8: Session Ratings

Session Title	Average Rating for Presentation	Average Rating for Relevance
Developments with the Codes and Plans for the Year Ahead	2.1	2.0
An Introduction to the Three Codes of Practice for New Delegates	2.1	2.4
The New National Codes Website	2.0	2.3
The Challenge of Accommodation Open Days	1.8	1.7
Dealing with Disasters in Student Housing Management	2.1	1.9
Fire Safety in the PBSA Sector Post Grenfell	1.7	2.2
Is Residence Life the Way Forward?	2.5	2.6
Tenants and Mental Health: Some Strategies for Coping	1.8	1.9
Sharing Best Practice - Discussion Group	2.5	2.4
Sharing Best Practice - Feedback	2.8	2.8

Two of these sessions were rated as 'excellent' for both presentation and relevance. One delegate commented as follows about *The Challenge of Accommodation Open Days* session "A very good insight to common problems"; whilst another said "A very interesting and relevant session in the current climate" in respect of the session entitled *Tenants and Mental Health: Some Strategies for Coping*. One other session stood out in terms of being rated as excellent for the presentation and that was *Fire Safety in the PBSA Sector Post Grenfell*; the one reason it may not have been seen the same in terms of relevance was that the event was not only addressing matters of concern to the PBSA sector.

Overall the sessions at the conference were related no less than 'very good', suggesting that once again those attending had found the event useful. The one big difference between the seventh and eighth Joint Codes Conferences was the response rate by delegates to the evaluation form. In 2016 (the seventh), 38% of them completed the form, but in 2017 (the eighth) the figure was only 18%. The reason for this significant difference is probably best explained by one further comment made by a delegate to the eighth Joint Codes Conference who stated "Some rooms very cold, not enough WCs".

In terms of how this event compares (in evaluation terms) with the previous conferences, Tables 9 and 10 reveal the ratings for the aspects it is possible to show comparisons with.

Table 9: Average Ratings for General Aspects by Conference and Year

Aspect	2nd Joint (2011)	3rd Joint (2012)	4th Joint (2013)	5th Joint (2014)	6th Joint (2015)	7th Joint (2016)	8th Joint (2017)
Overall Rating	2.50	2.21	2.14	2.23	1.8	1.8	1.9
Overall Relevance	2.20	2.51	2.30	NA	2.0	1.9	2.0
Rating of Venue	2.90	2.62	1.88	1.66	2.0	1.7	2.4
Location of Venue	2.20	2.05	1.69	1.35	1.7	1.4	1.7
Rating for Food	2.80	2.71	2.30	1.97	2.50	1.9	2.1

Table 9 would appear to confirm the view that the 2017 event was slightly less successful than the year before in a number of aspects, although - with the exception of the venue - not significantly so. However, the findings for the venue have meant that a different one has been selected for the ninth joint codes conference.

Table 10 re-iterates the above findings of a general decline in ratings for sessions at the eighth joint codes conference, but in comparison with earlier years they remain high.

Table 10: Average Combined Scores for Different Sessions at the Last Seven 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

Finally, the evaluation forms asked two further questions: 1) Did you feel that the subject matter, as advertised, was fully covered? and 2) Did you have a specific reason for attending this conference?

In terms of question 1, 15 out of the 17 delegates who answered it replied 'yes' - 88% of respondents, in comparison to the 95% who responded to the same question in 2016 (although the sample size at that event was significantly greater).

12 out of the 17 delegates who replied to question 2 responded 'yes' - 70%, slightly higher than the 68% from the year before. The reasons they gave were as follows:

- To improve my understanding of the UUK Code
- To increase my knowledge of the CoP and relevant information
- Networking and keeping up to speed with UUK etc
- New to sector - wanted to actively engage with the Code
- To meet other student housing professional and keep my knowledge of the sector up to date
- To understand the Code better and meet similar private accommodation providers
- Planning on signing up to the Code
- From a member institution
- To attend the session about inclusion in student accommodation, so annoyed it was cancelled
- Fire safety information
- A general ANUK up-date
- To get an update on any changes, to do some networking and best practice sharing.

Section 4: Meeting the Challenges of the Twelfth Year

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

- Provide guidance on fire safety risk assessments for members with high rise developments
- Identify on a database the number of high rise buildings and type of cladding system used
- Instigate a review of the content and suitability of the existing management test
- Implement a feasible Fit and Proper person test
- Consider the possibility of including a five yearly HHSRS inspection within the verification procedures
- Discuss the addition of a clause within the Deposits section of the Code that requires members who protect deposits to do so within a given period of time
- Complete the review of the Code for Educational Establishments
- Complete the redesign of the website in early 2018
- Finalise the changes to the draft verification report template and implement reforms to the online system which allow verifiers greater access to historical material
- Identify ways of continuing to raise the profile of the Codes, both amongst members as well as students, parents and politicians, with a specific emphasis on the use of social media
- Ensure that updated SAQs have been received from all existing members of the Codes
- Prepare revised versions of the Codes declaration forms in time to begin the process of asking providers to sign-up for the next three year membership period (2018-2020) and also amend the property schedule so that it allows for the collection of additional data about developments, such as the number of storeys.

Most of these objectives were either achieved, or are in the process of being so, but it may be helpful to provide some more detail on each of these areas of work.

Fire Safety Risk Assessments

One of the actions that the Codes' Committee of Management recommended following the Grenfell Tower fire was that providers who operate high rise developments ought to ensure that not only did they check their fire risk assessments on an annual basis, but that they also checked to make sure that whoever conducted the FRA was qualified to do so. The Chair of the CoM provided a helpful link detailing how such checks could be made, which the National Codes Administrator circulated to members.

Identify High Rise Buildings with Cladding and the Type in Use

In the immediate aftermath of the Grenfell Tower fire it was agreed that all members should be contacted and asked to inform the NCA as to whether any of their developments - especially those that were 18 metres or taller - were clad and, if so, whether the type used was ACM. A total of 54 such developments were reported, of which just 48 were located in England.

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Members were asked whether they had sent any of the cladding for testing, undertaken a revised fire risk assessment, and what information about their fire systems they had supplied to students living in the accommodation. Follow up work (relating to removal or remediation) with the providers who reported having some type of cladding will be undertaken over the summer of 2018.

Add Additional Requirements on Deposits

The Codes Consortium agreed to a proposal that the Code for non-educational establishments ought to be amended the next time it is reviewed so that members are required to protect any deposits taken within the time limits prescribed by the scheme operators.

In the meantime, the National Codes Audit Panel instructed the verification team to undertake checks of all members who take a deposit to make sure these are being protected within these.

Complete the Review of the Educational Establishment Code

The Review Group established to undertake the work of reviewing the content of this Code met on three occasions between September 2017 and February 2018, hosted kindly by Unipol Student Homes, IQ Student Accommodation, and Churchill College in Cambridge.

In addition to recommending a number of minor wording changes and additions, the Review Group argued for the inclusion of some completely new sections covering such matters as Wi-Fi provision and student wellbeing.

The proposed wording of the revised Code has been circulated to members of this Code for comment on two occasions, and both times only some minor alterations were suggested. The draft has also been provided to MHCLG and a response is awaited. Assuming there are no significant objections from the Ministry, the new Code will become operational from September 1st 2018.

Complete the Redesign of the Website

This has been an on-going process throughout the 2017-2018 period, mainly because this work has been undertaken in conjunction with an external partner and the operation of the site requires additional training to be completed.

A launch of the site will take place before the Christmas break in 2018.

Identify Additional Ways of Raising the Profile of the Codes

The Codes Audit Panel has proposed that some materials be produced which set out the advantages for students of renting from suppliers of purpose-built accommodation who are members of the approved codes, a position supported by the Codes' Consortium.

It has been suggested that it would be better to wait until after the start of the academic year before embarking on such a project, such as in November, and that the initiative should coincide with the period during which many students unions operate housing fairs.

Ensure all Members have Completed Revised SAQs

This is also work that has been on-going for most of 2017-2018, as many existing members become due for their three-yearly visit and need to be reminded that the last version of the self-assessment questionnaire that they completed has now been altered to take account of additional requirements.

Prepare Revised Declaration Forms and Property Schedules for the 2018-2020 Membership Period

The Committee of Management agreed new draft versions of these documents in November 2017, which were subsequently distributed to members shortly after it met.

Changes were made to the declaration form, showing the increased fee levels for members who pay at the per-bed-space fee level and enhanced costs for visits to developments that were newly built or which had been subject to a change of operational management.

The property schedule, which asks members to list all of the sites that they are operating, was re-designed and a question asking for the number of storeys of developments was added.

Challenges Which Remain to be Met

A total of four challenges from the twelfth year are outstanding and these are:

- Instigate a review of the content and suitability of the existing management test
- Implement a feasible Fit and Proper person test applicable to corporately held assets and management
- Consider the possibility of including a five yearly HHSRS inspection within the verification procedures
- Finalise the changes to the draft verification report template and implement reforms to the online system which allow verifiers greater access to historical material

The final one of these is awaiting the outcomes of some design changes, which are not expected to have been completed until the end of 2018, whilst the others will need to be added to the challenge list the thirteenth year of the operations of the Codes.

Additional Achievements of the Twelfth Year

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

Enhanced Verifier Involvement Within the Location Wide Visits

In previous years, the focus of the series of location wide visits that are undertaken as part of the general verification programme has been set by the National Codes Administrator. However, for the visits undertaken to Sheffield in May 2018, verifiers were provided with copies of each of the relevant provider's most recent self-assessment questionnaire ahead of the visit dates and, along with a briefing session the afternoon before the first of the two days of planned visits, they were asked to - in pairs - plan what the focus of each of the visits allocated to them should be.

The main purposes for this change of approach was to give the verification team more of an idea of how to make use of information that is supplied by members within their SAQs, and for them to learn from each other's differing skill sets.

From discussions with the verifiers over the course of the two and a half days that were taken up with these visits, it was evident that they had valued the experience and a similar approach is therefore likely to be taken as part of the location-wide visits that occur in 2019.

Implementation of Paired Verification Visits

As part of an on-going process initiated by the Chair of the Audit Panel to improve the consistency of approach that is taken by verifiers when completing visits, for the first time since the visit system was first implemented in 2007 verifiers undertook a number of visits in pairs.

The NCA was instructed to devise a programme that would pair different members of the verification team with one another, based on their perceived skills sets, and that would allow - where possible - verifiers to work with each member of the team.

Following some initial trepidation from some long-serving members of the team who had become used to working solo, the feedback from verifiers to this process has been positive. Equally, the members of the Codes who have been on the receiving end of such paired visits have not expressed any negative comments about their experiences of them.

Section 5: Assessment and Verification Activities

Verification Visits and Re-Visits

A total of 142 verification visits were completed between the beginning of July 2017 and the end of June 2018 period. [NB: this figure does not include those visits undertaken as part of the location-wide series of visits that were conducted in May 2018].

As can be seen from Table 11 (below), the trend for an increased number of visits being undertaken year on year came to an end. The main reason for this decline is the reduction in the number of changes of operational management visits that were required between July 2017 and the end of June 2018. As can be seen in Table 12 only 18 such visits occurred then, as opposed to the 62 required for the same period in 2016-2017, and even with the introduction of a new requirement to visit all newly opened developments, overall visit numbers dropped for the first time ever. However, Table 12 also reveals that the number of visits for the other existing categories also decreased in comparison with 2016-2017.

Table 11: 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

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 12.

Table 12: Percentage of Registered Developments Visited By Year

Year	Total Number of Visits	Total Number of Developments Registered
2008-2009	43	395
2009-2010	48	484
2010-2011	62	1,243
2011-2012	64	1,257
2012-2013	77	1,357
2013-2014	120	1,425
2014-2015	131	1,472
2015-2016	135	1,623
2016-2017	158	1,682
2017-2018	142	1,827

Table 13 details the different types of verification visit that were undertaken in the 2017-2018 period.

TABLE 13: Visits by Type, July 2017 to end of June 2018

Category	Totals
New Applicants	9
Existing Members	8
Cyclical Revisits	30
Change of Operational Management	18
New Developments	70
Complaints	4
Chair's Action (Audit Panel)	1
1st revisits	2
2nd revisits	0
Totals	142

All new applicants for membership continue to be subject to a verification visit before they can be accredited under the relevant Code, with visits taking place within two months of the application being made. The number of new providers who had a visit made to one of their sites during 2017-2018 as part of the application process was significantly down on the 19 which were conducted in 2016-2017,

possibly indicative of a decrease in the creation of new management platforms within the PBSA sector.

Existing members with a medium to large portfolio of student developments are subject to annual verification visits, usually to sites which have not previously been subject to a visit. However, the number of these which had a site visited in 2017-2018 was much less than the 29 which received a visit in 2016-2017, and this was mainly because a number of these members had newly built developments which required a visit, and therefore it was not deemed necessary to look at any of their already existing sites as well.

The number of cyclical revisits carried out in 2017-2018 visits scheduled as part of the three year cycle that all members are subject to - reflects the number of providers who were either first granted membership in 2014-2015, or who were last subject to a visit in that period and who remained in membership. The number conducted was less than the 45 that occurred in the previous period, indicative of the fact that fewer new members joined in 2014-2015.

In circumstances where an existing member takes over the operational management of a development that was previously managed by another member of the Codes, arrangements are made to verify that development as a matter of course, regardless of whether the development was recently verified under the previous provider. Table 12 suggests strongly that although the degree of 'churn' taking place previously within the sector has not disappeared completely, it did at least decrease substantially in 2017-2018. It will be interesting to see whether this decline is replicated in 2018-2019.

Table 13 also includes the new category of 'new development', one which has been created in response to the decision taken by the Codes Consortium that all new buildings should be subject to a verification visit before they can be registered under the relevant operational platform. It was intended that such visits should focus on just a few aspects related to the condition of the building at the point it is occupied and the levels of tenant satisfaction with it at the time the visit takes place. The majority of such visits will occur during the July to December period, although occasionally (as was the case here), and where the development is occupied before the usual autumn start dates, they may happen earlier. Whilst 80% of the 70 visits that took place to new developments occurred during either September or October 2017, it was not possible to undertake five of these until early or mid-2018 due to late completion of them.

The Audit Panel agreed, in the light of a discussion relating to the frequency of complaints made about the same building operated by a member, that where either three or more complaints were received about the same building during the course of an academic year, OR a complainant alleged that a significant breach of health and safety has been identified at a given site, that development should be visited to ensure that the matters identified within the complaint had been addressed. Table 13 reveals that there was a very significant increase in the number of such visits that took place

during 2017-2018, up from the single occurrence from the previous period. Two of the four visits were triggered by the findings of a persistent level of complaints about one site operated by the same provider, whilst the others were due to concerns raised by the content of a complaint as well as the findings from a verification visit.

One other new category of visit was added to the list in 2017-2018 and that was for those triggered by the Chair of the Audit Panel, and deemed to be separate from mere re-visits resulting from the outcomes of other types of visits. The Chair of the Audit Panel raised some concerns about the operations of a development in Nottingham where the national press had reported alleged incidents of racist bullying between tenants. It was therefore agreed that a visit be scheduled to check on elements relating to the requirements of the Code itself, as opposed to investigating the incident - which was at that stage the subject of a policy investigation.

Decisions about whether it is necessary for a member or applicant to be re-visited following the initial verification visit are determined by the verifier concerned, in consultation with the Audit Panel and the National Codes Administrator. Only in situations where action points are identified during a verification visit would it be necessary to consider such a revisit and, even then, the verifier may deem it appropriate for the provider concerned to offer documentary evidence that the points have been addressed, rather than there being a need for the verifier to check this in person. However, verifiers are charged with ensuring that action points have been addressed within their given timescales and they can determine how soon after the original visit any re-inspection should occur. As with the 2016-2017 period only one such visit took place in 2017-2018, however, it should be reported that as the Audit Panel agreed to give verifiers greater discretion over whether certain ought to be subject to more frequent visits, the frequency of re-visits is likely to increase in the future.

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 2017-2018. However, the main focus of these was on the Code for Non-Educational Establishments - as can be seen from Table 14.

Table 14: Number of Visits Undertaken by Code and Category, July 2017 to June 2018

Non-Educational Code Category	Number of Visits	Educational Code Category	Number of Visits
New Applicant	9	New Applicant	0
Existing Member	8	Existing Member	0
Cyclical Revisit	20	Cyclical Revisit	10
Change of Operational Management	18	Change of Operational Management	0
New Development	68	New Development	2
Complaints	4	Complaints	0
Chair's Action (Audit Panel)	1	Chair's Action (Audit Panel)	0
1st Revisit	2	1st Revisit	0
2nd Revisit	0	2nd Revisit	0
Totals	130	Totals	12

Despite the clear disparity between the Codes in terms of visits, the ten that were undertaken to members of the Code for Educational Establishments means that 25% of the total membership of that Code received a visit in 2017-2018.

The same calculation for the percentage of members of the Code for non-educational establishments who received a visit is a little more complex, as some received more than one visit covering one or more different visit categories. Table 15 lists which members of the non-educational Code were visited, the number of developments that they had looked at and the number of different categories that these visits fell into.

Table 15: Non-Educational Establishment Code Members Visited, July 2017 to June 2018

Provider	Number of Developments Visited	Number of Categories of Visit
A2 Dominion	1	1
Allman RP L2	2	2
Alpha Student Management	1	1
Ashwell House	1	1
Axo Student	1	1
Beyond the Box	1	1
<i>Britannia Student</i>	1	1
Campus Living Villages UK	1	1
CityBlock	2	1
Collegiate AC	7	2
CRM Students	17	2
Downing Students	2	1
FD Asset Management	1	1
Fresh Student Living	12	2
<i>Fortis Student Living</i>	2	2
<i>Glenfern Student Lets</i>	1	1
Global Student Accommodation	2	2
Guy Chester Centre	1	1
Hello Student	4	2
Homes for Students	7	3
Host Student	2	1
Iconic	1	1
IQ Student Accommodation	2	2
Kexgill	1	1
Lewes Study Centre	1	1
MARA Inc	1	1
Mezzino	2	1
<i>G Murphy Properties</i>	1	1
Liberty Living	5	1
Lutheran Council of GB	1	1
Niche Homes	1	1
The Nido Collection	1	1
<i>The Neighbourhood Management Ltd</i>	1	1
Omnia Estates	1	2
Parklane Properties	1	1

Prime Student Living	1	1
Scape	2	1
Shumei Eiko Ltd	1	1
St Modwyn	1	1
The Stay Club	1	1
Student Castle	2	2
<i>Student Digs Management</i>	1	1
Student Facility Management	1	1
Student Roost	4	2
Study Inn	2	2
Unipol Student Homes	1	1
UNITE	7	2
Universal Student Living	2	1
UPP Nottingham	1	1
Urbanest	1	1
Varcity Accommodation	1	1
Vita Student	4	1
Whitfield Estates	1	1
Winchester Student No 2	1	1
YPP	1	1
Zone Management	1	1

The Table above reveals that visits were made to 56 different members of the non-educational establishment Code during 2017-2108, however, as six of these (shown in italics) were not within membership as of the end of June 2018, this means that 48.5% of the members of that Code had at least one visit during this period.

Location-Wide Verification Visits

The National Codes Consortium, which determines both the content of the Codes and the procedures that govern their operations, decided when it met in January 2016 that verifiers should be required annually to undertake a series of visits to developments belonging to ALL members that are located in one town/city (to be specified by the Consortium), at the same time. The purpose of such visits is to assess general levels of compliance as well as to assist the verifiers to moderate their approach to the undertaking of such visits.

The Consortium took this decision on the basis of evidence from an initial location-based series of visits that were undertaken to developments in Bradford ,which occurred in the late spring of 2014. This exercise was welcomed by both the providers concerned, who because all sites were being looked at on the same day did not feel as if they were being singled out, as well as the verification team.

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In total there have been four sets of location wide visits undertaken by verifiers since that initial exercise (see Table 16), and on each occasion at least one development operated by members of the Codes in those locations has been subject to a visit by one or more members of the verification team.

Table 16: Destination and Extent of Location-Wide Visits

Year	Location	Percentage of Members Visited	Percentage of Developments in that Location Inspected
2014	Bradford	100	100
2016	Liverpool	100	29
2017	Newcastle	100	45
2018	Sheffield	100	39

The original visits in Bradford were conducted on the same day, but because there were at that time just 10 developments in the whole of the city it was possible for the team of verifiers to inspect them all. Two years later, in Liverpool (and even with the addition of more verifiers and another day), it was not logistically possible to visit all 56 developments, therefore a selection was made of one per member with a contingency of a visit to another of their sites in the city on the second day should it be required. In 2017, whilst verifiers were able to inspect a greater percentage of the 38 developments operating at that time in Newcastle over the two day period allocated, it was not feasible to cover everything.

Sheffield was the selected location for the 2018 visits and the Audit Panel agreed that at least one site of each Code member operating within the city should be visited - a total of seventeen - and that as these visits were to be undertaken (where possible) by pairs of verifiers, and the most that could be completed in a day was three, the process was scheduled to take two days; the majority of members were to have a site completed on the first day, with the remainder undertaken on day two.

Day two was also when any additional visits that were deemed necessary to one or more of the members' developments -due to the finding of any significant Code breaches when visiting the initially selected site/s - were timetabled to take place.

As it was, none of the visits on either of the two days resulted in a need to go to a second site of the same provider. Although the verifiers were able to identify a number of action points at the various sites, their overall recommendations where that was the case was that the provider was sufficiently compliant with the Code not to need an immediate follow-up visit - although several came close to it and they may well be required to undergo just such a visit if they do not meet the given deadlines for completion of the action points that were identified.

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 completed as part of the 2017-2018 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 17 details how common it has been for verifiers (over the last five 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 17: Visits Where No Action Points Were Identified Compared with Overall Number of Visits Completed 2012-2013 to 2017-2018

Year	Number of Visits with No Action Points	Total Number of Visits Completed	Percentage of Visits with No Actions
2012-2013	25	77	32.50%
2013-2014	25	120	20.75%
2014-2015	16	131	12.25%
2015-2016	36	135	26.67%
2016-2017	34	158	21.51%
2017-2018	47	142	33.09%

Although there appears to be little evidence from Table 17 of any specific pattern developing with the non-identification of action points, other than some years have higher percentages than others, the likely explanation for the significantly larger number of visits where no actions were identified during 2017-2018 is that those undertaken to newly built developments were less likely to find evidence of any actions required than those of other categories of visit, a fact supported by the breakdown of visits shown in Table 18.

In terms of the outcomes from verification visits where action points are identified, verifiers make clear within the draft reports exactly which clauses of the Codes were not being complied with. In addition, verifiers make clear on the reports the deadline by when the works should be completed by. In previous years these deadlines have been 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.

Table 18 gives details of the outcomes from all visits completed during 2017-2018, by visit type, it also compares these with the outcomes from the 2016-2017 period (figures shown in brackets).

Table 18: Outcomes from Verification Visits Undertaken between 1st July 2017 and June 30th 2018, by Category (figures for same period in 2016-2017 shown in brackets)

Category of Visit	Number With No Actions	Number With Between 1 and 4 Actions	Number With Between 5 and 9 Actions	Number With 10 or More Actions	Totals
New Applicants	2 (0)	3 (7)	0 (4)	4 (8)	9 (19)
Existing Member	1 (7)	5 (14)	0 (4)	3 (4)	9 (29)
Cyclical Revisit	2 (10)	11 (15)	7(11)	10 (9)	30 (45)
Change of Operational Management	3 (15)	8 (29)	3 (10)	4 (8)	18 (62)
New Developments	38 (1)	30 (0)	1 (0)	1 (0)	70 (1)
Chair's Action (Audit Panel)	1 (NA)	0 (NA)	0 (NA)	0 (NA)	1 (NA)
Complaints	1 (0)	0 (1)	3 (0)	0 (0)	4 (1)
Revisits	0 (0)	1 (1)	1 (0)	0 (0)	2 (1)
Totals	47 (33)	58 (67)	15 (29)	22 (29)	142 (158)
% of Visits	33 (21)	41 (42)	11 (18)	15 (18)	

The overall findings from Table 18 not only support the evidence that half of the visits to newly built developments identified no action points, but indicate that as a result of these visits the overall percentage at which no actions were identified rose significantly during 2017-2018 compared with the previous period. Also, the proportions of visits completed for which any actions were identified, especially those with five or more action points, fell by a roughly similar percentage. However, what Table 17 also shows is some differences in the outcomes depending on the type of visit it was.

It is not unusual for a larger number of new applicants to be found to have a lot of action points and, as with the previous year, most of these were identified as having 10 or more. As of the end of June 2018 six out of the nine new applicants that applied and were visited during 2017-2018 had been granted membership, the other three had still to convince the relevant verifiers that they should be permitted to join.

Whilst the evidence from Table 18 suggests that visits to existing Code members were less likely to detect ten or more action points, if the findings for existing member and cyclical revisits are combined (the latter are only conducted to providers who are already Code members anyway), a very similar number of such visits in the two periods being compared revealed that verifiers had identified ten or more actions. The members concerned varied from those with just one small development in one location, to some medium and large suppliers of PBSA - one of whom was suspended from membership in May 2018 as a result of these findings.

A quarter of the visits undertaken to developments which had been subject to a change of operational management were also found to contain ten or more actions, and analysis of those suggests that as three out of the four sites were being taken over by providers who were relatively new to the sector or had not previously experienced such a process. One of those providers clearly took on board the comments from the verifiers quickly and was able to convince them that sufficient progress has been made with the action points to recommend that the sites now be registered under them.

The revelation that exactly half of the newly built developments were found to have no action points ought to be seen in the context of the fact that both the duration and the focus of such visits vary from those undertaken for other purposes. For example, no self-assessment questionnaires are issued to verifiers for these visits, instead they have been asked to answer five specific questions: 1) Was the development occupied on the advertised date or, if not, was action taken to notify students about this and when was it done; 2) Were all amenities as advertised to students when they signed the contract available on the site at the point they moved in and, if not, what was missing; 3) Had the development received relevant regulatory approval and was the provider able to show evidence that this was so; 4) Was there evidence of any on-going building work taking place on site and, if so, was this having an impact upon tenants being able to make use of any or all amenities; 5) Were the tenants satisfied with the way the site was being managed at the time of the visit and, if not, why. The report template (which differs from other general visits) used for these visits then invites the verifier to make a recommendation as to whether the site be registered or not, it also allows them to identify any necessary actions that they have identified and to set a deadline for their completion.

The one newly built development for which more than ten action points were identified was reported to the relevant local housing authority, which quickly followed-up with a visit and they issued some conditions of their own. The Audit Panel is working with the LHA to ensure compliance is achieved, and the site is yet to be registered.

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 19 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 2017-2018. It also indicates the number of times the same clause was cited in the 2016-2017 period.

Table 19: Clauses of the Non-Educational Establishment Code Which Members Were Found Not to be Complying with Most Following Visits in 2017-2018 Compared to 2016-2017

Clause	Number of Visits Cited for in 2017-2018	Number of Visits Cited for in 2016-2017
Tenants are informed of the minimum bandwidth that they can expect (3.20)	32	37
The tenant satisfaction survey will cover both qualitative and quantitative elements including - do residents know the developments is part of the Code(5.3)	30	30
Managers are required to complete the online training course (1.2)	25	35
The extent of Wi-Fi coverage is made clear within marketing and tenant information (3.19)	21	25
A waste disposal plan is exists for the building (6.35)	21	23
All staff should be aware of our Emergency and Disaster Management plan (6.27)	20	34

There are two significant features to Table 19 that require comment. The most obvious one is the decrease in the frequency of which these Code clauses were cited by verifiers in visit reports during 2017-2018 (with one exception) compared with the earlier period. The second feature, which is not immediately clear from this table, is that the number of different clauses cited in 20 or more visit reports decreased during 2017-2018 from the 10 listed in 2016-2017, to six.

The fact that two clauses relating to the sub-section of the Code for Non-Educational Establishments entitled *Wi-Fi Provision* - 3.19 and 3.20 - have featured prominently in a list of aspects of this Code that members are not all complying with two years' running suggests a problem that needs attention. Although there is evidence to show that members have become better at meeting these particular Code requirements, it may be that members require further assistance to ensure clauses don't appear in the same table three years' in succession. The Audit Panel has proposed that some joint work be undertaken with the various internet service providers (ISPs) who supply the sector with the aim of ensuring that the advertising of such amenities is as accurate as possible and that managers of developments have a better understanding of what the ISPs are able to deliver. The Codes

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Consortium has supported this initiative and the revised Code for Educational Establishments will, for the first time, include a section entitled *Wired Network Connection and/or Wi-Fi Provision*, which aims to reflect perceived best practice in the delivery and description of these services to occupants of purpose-built student accommodation.

The one aspect of this Code that members were found to have not been complying with at the same levels in both of the periods looked at is that of the need to add into tenant satisfaction surveys a reference to the provider being a member of the Code. This clause was added to this Code when it was last reviewed in 2015-2016, and therefore one of the reasons why it should continue to feature as an action point in verification reports is that it takes some time for providers to alter what they ask in such surveys - especially where these are undertaken by or with external companies. The most common partner used by PBSA suppliers for their survey work is Red Brick, who have recently announced that they will be up-dating the national survey they issue to reflect updated requirements within the National Codes, including the need to ask whether students were aware of their accommodation provider's Code status. It will therefore be interesting to see what impact this has on the outcomes of the 2018-2019 visits.

Although the number of verification reports submitted in 2017-2018 that included an action point requiring site managers to complete the online training course was significantly less than the period before it, the fact that it still appears in this table indicates a clear lag between when a requirement is added to the Code (as this one was when it was last reviewed) and when members can be seen to have implemented it. Anecdotally there is a feeling amongst the verification team that members are becoming more responsive to the need for staff to complete this training; whether this IS the case will be a matter looked at in more detail in Section 7 of this report.

The final two Code clauses that feature in Table 19 both refer to the lack of evidence found that members have sufficiently addressed the need to possess or raise awareness of certain plans, and although the number of reports in which these were cited had decreased in 2017-2018 from the period before it, they persist as common action points. There are two likely reasons why this should be so.

Because the Code does not prescribe what should be contained in a waste disposal plan, verifiers reach their own conclusions about what these ought to have within them and, as such, where that perception does not match with what the member does have, an action point results. In order to foster a more consistent approach by verifiers to such areas of the Code the Audit Panel has implemented a series of moderation exercises, which aim to reach a consensus as to what policies of this type ought to have within them. This may account for the small decrease in the number of times this clause was cited in 2017-2018.

In terms of the clause requiring members to ensure that staff are made aware of their own emergency and disaster management plans, verifiers often comment at meetings that although the provider clearly has such a policy (and provided them with a copy of it ahead of the visits taking place), when they question site managers about what they know of the policy they discover that they have either no knowledge or understanding of it. Whilst the Code does not set out to dictate to members how they ought to communicate with their own staff, it IS the role of the verification process to identify where important requirements of the Code are not being complied with and the Audit Panel has the right to make clear what implications such failings might have on that provider's membership of the Code.

Finally, it might just be worthwhile noting the four clauses which were cited in 20 or more visit reports during 2016-2017 but did not appear as action points in as many visits conducted in 2017-2018. These were: 5.0 - A tenant satisfaction survey is carried out; 6.23 - Occupants of ground floor rooms to be given security information; 6.24 - The building has a security plan; and 6.25 - An emergency and disaster management plan has been drawn up. Whilst it was not the case during 2017-2018 that these particular clauses ceased to be listed in verifier's reports, the frequency of citations for them all fell.

Table 20: Clauses Which Members of the Educational Establishment Codes Were Found Not to be Complying with Most Following Visits Completed in 2017-2018

Clause Number	Clause Requirement
4.11	We provide our tenants with details of the times for cleaning and maintaining communal areas
5.01	Results of [Tenant Satisfaction Surveys] are analysed, published and communicated to tenants
6.09	All developments are provided with properly maintained fire safety installations
6.18	We have drawn up an Emergency and Disaster Management Plan

The reason that Table 20 does not contain any indication of the frequency that such actions were identified by verifiers when visiting members of this Code (unlike for the other Code as shown in Table 18), is because only these four clauses were listed in reports more than once. As was reported earlier in this section of the report, just 12 visits were made to members of this Code in 2017-2018, therefore it is not possible to report visit outcomes for this Code in exactly the same way as the other, but the focus remains on frequency that a clause has been cited.

Analysis of the verifier's reports on visits to educational establishment Code members in 2017-2018 reveals that the highest number of actions related to clause 6.09. Four out of the twelve visits

(33.34%) reported that members were required to take action on this clause, and in all but one of these cases the verifiers have reported that the work was completed within the deadlines as set.

The three other clauses were cited just twice in reports from the 12 visits to members of these Codes and analysis shows that these were all addressed within the set deadlines.

There will be a better opportunity over the next two years to gauge compliance with this Code as the Cambridge Colleges, which account for almost two-thirds of the membership of it, are scheduled for their next round of visits in 2019. Whilst these are likely to occur over two different reporting periods (2018-2019 and 2019-2020), the increase in the number of visits should make it easier to identify any obvious trends.

The Audit Panel

The Audit Panel met on four occasions between the start of July 2017 and end of June 2018. Two were hosted by Unipol Student Homes, in Leeds, whilst the other two were held at Helen Graham House, in London and hosted by Optivo.

The membership of the Audit Panel has changed since the last annual report, with the addition of a new verifier - William Wilson - and the return from maternity leave of Victoria Tolmie-Loverseed. Another key difference is in respect of representation from NUS, who have requested that a member of NUS staff attends just two out of the four scheduled meetings a year.

The National Codes Administrator estimates that at least 114 visits will need to be completed before the end of June 2019, and that does not include any to providers who completed their SAQ after the start of July 2018 OR any planned changes of operational management/opening of new buildings that were not previously notified to the NCA before that same date. In terms of the types of visits to be undertaken, they break down as follows:

New Applicants	= 5
Existing Member	= 18
Cyclical Re-Visits	= 17
Change of Operational Management	= 21
New Developments	= 53

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 Richard Lord - Verifier
Mr Philip Moxon - Verifier
Mr Jakub Pietruszewski - Verifier
Ms Fleur Priest-Stephens - NUS
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 21: 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	32(to end of June)	8	4
TOTALS	474	106	42

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

= one complaint was dealt with by the Full Tribunal

Table 21 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.

Since 2016 it has been the task of a Complaints Investigator to record all contacts made by students (or their representatives) who live (or were living) in developments covered by the Codes which may be regarded as a complaint about a member not complying with the relevant Code. As can be seen, the number of such contacts steadily increased between 2005 and 2009, and then (with the exception of 2010) significantly increased after that - with 2017 having received the most number of tenant contacts in anyone year so far.

The number of complaint contacts made with the Codes during the first half of 2018 is significantly less than the number recorded in 2017 (when 45 had been made). Whilst it is not possible to predict the exact final number of complaint contacts that will be received in 2018 on the basis of the half-

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yearly figure alone, some analysis of the trend since 2012 (when contacts last began to rise substantially) suggests that, in percentage terms, the first six months have accounted for 50% or more of the final number of complaint contacts on three occasions, and less than 50% on the other three. There was a noticeable downward trend from 2014 to 2016, but it rose again in 2017. The fact that the percentages have not exceeded 50% in any consecutive years suggests that more contacts will be received in the second half of 2018.

Table 21 also makes clear that only around 22% 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, 40% have been referred, and in three cases the Tribunal Chair determined that the complaints were sufficiently serious to warrant a meeting of the Full Tribunal. As for the proportion of formal complaints that it has been necessary to refer to the Tribunal, this has 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 21 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 22.

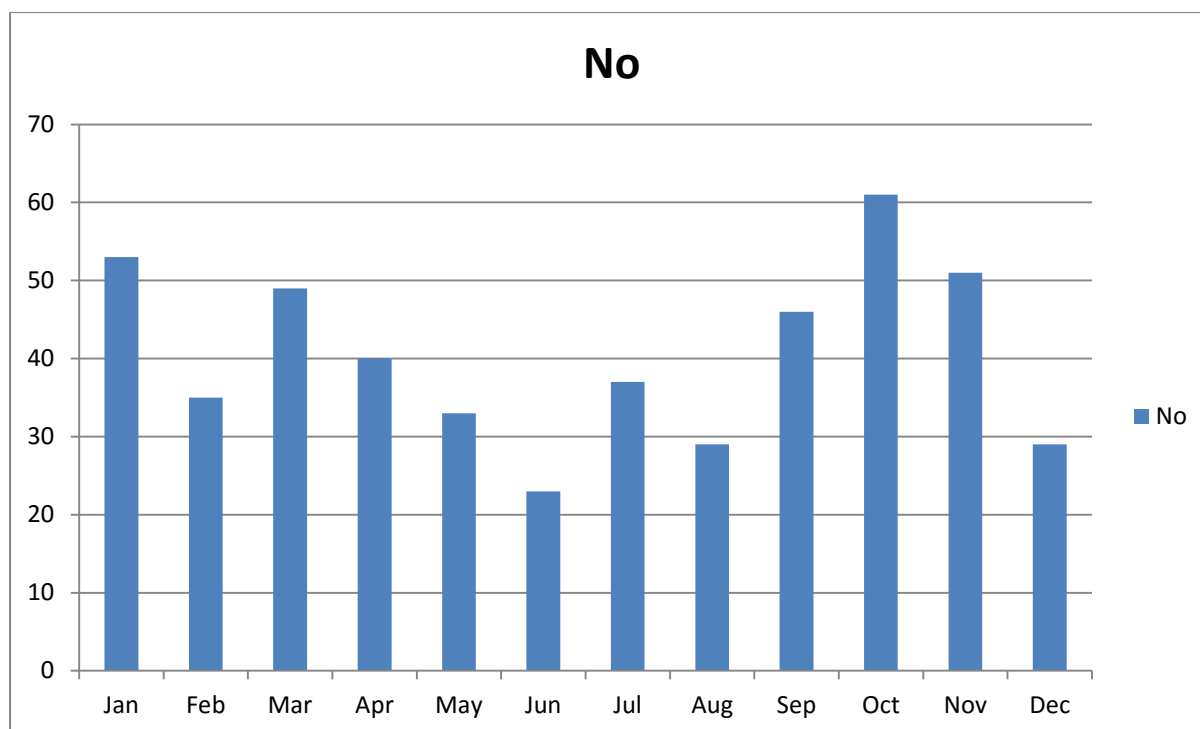
Table 22: Ratios of National Code Complaint Contacts s Received Compared to Overall Bed Space Numbers Registered

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	32 (to end of June)	301,000	1 in 9,000

The picture that emerges clearly from Table 22 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. Even in 2017 when the ratios fell to 1 in 3,000, 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%.

In terms of when during the year complaint contacts are made, Graph 4 reveals some interesting patterns of spikes and troughs. There are significant spikes in October, January and March, which can be explained in terms of the cycle of the tenancy. The October contacts usually relate to dissatisfaction with the property conditions when the students moved in; those in January may relate to problems that had previously existed but which were perceived not to have been resolved during the Christmas vacation, e.g. proposed maintenance work; whilst March is the time of year that many private providers set as the date for their final rent instalment, and this may trigger complaints from those who wish to pursue long-running grievances and/or make a bid to claim a rent reduction. The troughs seen in June coincide with the end of the letting period for many students, whilst the slight spike in July is linked to dissatisfaction about end of tenancy arrangements, as well as representing a notion that it is a final opportunity to make long-held grievances known and - increasingly - to stake a claim for some compensation. There is then a small decline during August, followed by a considerably higher rate in September as new students arrive.

Graph 4: Complaints/enquiries received by month since 2005



Complaint Outcomes

The Codes' complaints procedures require that students raise any alleged breaches of these Codes with their accommodation provider directly and permit them time to address these. Where a complainant deems that the issues have not been resolved by the provider, they are then able to submit a formal complaint to the operators of the Codes and - at this stage - the provider will then be contacted formally and asked to respond, making clear what actions (if any) they took in respect of the allegations that they had breached the relevant Code. Should the matters not be resolved following that intervention, or where a dispute is reported to exist between the provider and the student over the allegations, then a referral will be made to an independent Tribunal that is empowered to adjudicate in respect of the complaint.

As can be seen from Table 21, 367 out of the 474 complaint contacts (77%) never progressed to the second stage of the procedures, and Table 23 sets out why this was the case.

Table 23: Outcomes from Non-Formal Complaint Contacts

Outcome	Numbers
The complaint had not been raised with the provider in the first instance	127
Complainant reported the provider had resolved the issue/s	86
Complainant made no further contact with the Codes	148
The complaint concerned non - members of the Codes	6
Total	367

Table 23 illustrates that most non-formal complaints had either not been dealt with by the provider's own complaints procedures at the time they were raised with the Codes, OR, having raised the concerns, the student/s did not decide to pursue matters any further. In a smaller number of cases evidence was available to show that the provider, having been made aware that a problem had occurred, resolved the situation without the need for it to be taken to any formal stage. Analysis suggests that this particular category was the most common reason for complaint enquires not to progress during the 2017-2018 period, reflecting the ability of a full time Complaints Investigator to have the time to chase up outcomes from those making the contacts in the first place. Finally, some contacts were received about providers who were not members of the Codes and which, therefore, could not be dealt with.

In terms of the outcomes of the 107 complaints that have been processed through the Codes' procedures, Table 24 details clearly what happened with those.

Table 24: Outcomes from Formal Complaints

Outcome	Numbers
Referred to Tribunal and Upheld	27
Referred to the Tribunal and NOT Upheld	14
Resolved by Provider before the matter was referred to Tribunal	23
NOT referred as no additional information was provided to support the complaint	26
NOT referred as the matter had not been subject to the provider's own complaints procedure	14
On-going	2
Total	106

Most of the formal complaints received were not referred to the Tribunal at all, and the main reason for this was a failure on behalf of the complainant to provide additional information as requested by the operators of the Code, although it was also possible that either the matters had not been raised directly with the accommodation provider in the first instance OR the provider was able to resolve the complaint following the second stage of the complaints procedure.

Table 24 also confirms that whilst the majority of complaints that get referred to the Tribunal are upheld, a little over a third of them are not. The main reason why this may be so is because of the nature of the Tribunal system itself, particularly the fact that it provides a means for both parties to a complaint to get a final (and non-challengeable) decision on whether the Codes have been breached.

Over the 2017-2018 period a total of five complaints were referred to the Tribunal; three were upheld and two were not. The reasons given by the Tribunal Chair for not upholding the two complaints were varied, however, in both cases the providers had suggested to those making complaints that they refer the matter to the Tribunal in order to get closure on the issues concerned. It was also the case that both providers paid out compensation to the students because they believed the service provided to them was not what they would have wanted it to be.

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.

Tribunal Membership

The current Tribunal Chair, Mr John Martin (a Barrister and acknowledged expert in the field of housing law) has been in post since the Tribunal first came into operation, and he was re-appointed in September 2015 for a 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 recently elected Vice President (Welfare) at NUS. Mr White was re-appointed in 2015 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)

Ms Liz Hodgen (Unipol)

MR Paul Rowlinson (IQ Student Accommodation)

Ms Fleur Priest-Stephens (NUS)

Ms Victoria Tolmie-Loverseed (ANUK)

Section 7: Website Visits and Online Training Course

National Codes Website

The current National Codes website has been operational for more than five years and, as can be seen from Table 25, the usage that has been made of it over that time has varied.

Table 25: National Codes Website: Visits, Visitors and Pages Viewed, 2011-2012 to 2017-2018

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%

The most obvious findings to comment on is the continuation of the decline in the number of visits made to the site, the number of visitors using it and the number of pages viewed since they peaked in 2015-2016. However, the decrease in use in comparison with the decline between the two previous periods (2015-2016 and 2016-2017) was not as great.

In terms of how people chose to access the website, Table 25 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 25 suggests that more than a quarter of all users of the site during 2017-2018 were students, a slight increase from the 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 2017-2018 are listed in Table 26, alongside a comparison with the same findings from the 2016-2017 period. It is worth noting that the ten most visited pages were exactly the same as during the previous period, and the top three were in exactly the same order. However, the significant difference in 2017-2018 was that there was evidence that some of these pages had received more visits than the previous period, most notably the ones providing details about how to complain.

Table 26: The Top Ten Most Viewed Pages 2017-2018, Compared with 2016-2017

Page Title	Number of Page Views 2017-2018	Number of Page Views 2016-2017
Members List	2,821	3,832
For Students and Parents	2,557	2,552
For Members	2,050	2,039
Code Download	1,530	1,455
Scheme Overview	1,498	1,507
ANUK Overview	1,064	1,125
Contact Us	850	794
What Kinds of Accommodation do the Codes Cover	776	677
How do the Codes Work?	730	692
How to Complain	707	656

Online Training Course

The online training course has been available for use since 2010, and up to the end of June 2018 a total of 4,541 users had either started or completed the course. This is an increase on the figure reported in the last edition of this report of 1,046 (up 30%). Overall, usage of the online course has varied over time, as shown in Table 27, 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, and similar levels of use are likely to occur by the end of 2018.

The latter rise is 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 is to be included within the Code for educational establishments from September 2018, this should mean a similar or even greater level of use will be made of the on-line training course from that point.

Table 27: 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 (to the end of June)	503

Section 8: Government Response to the Consultation on Houses in Multiple Occupation and Residential Property Licensing Reforms

In December 2017 the Government issued its response to a consultation held in October 2016 where it had specifically raised the regulatory treatment of purpose built student accommodation and it seems appropriate to report the views expressed in that consultation in this report.

The consultation was important because, for the first time since the Housing Act 2004 was promulgated, it looked as though the Government had recognised Purpose Built Student Accommodation (PBSA) as a defined category of housing with specialist regulatory requirements. In the event the Government response to the consultation failed to properly recognise PBSA and its special characteristics it has, even though it now houses over 600,000 students and continues to grow quickly, releasing pressure on the hard pressed and lower quality off street housing stock. By moving more PBSA towards licensing and by introducing the new categories of “converted building” and “purpose built” it has created a muddled and uneven regulatory system that initial indication shows has also caused confusion within Local Authorities as to how to administer the new system.

The consultees (83%) reflected the view that current local authority regulatory intervention was minimal in PBSA, buildings were thought to have good management structures in place with suppliers providing an effective procedure for addressing student complaints.

Consultees were asked whether the approved Codes of Practice ensured acceptable management practices and standards. 71% of those responding thought they did and broadly endorsed the Codes of Practice. The Government asked whether the Secretary of State should approve a Code of Practice which is currently the position and 80% agreed, which provided a considerable endorsement of the current Codes.

After all these positive endorsements 60% of consultees thought respondents should be entitled to discount on any standard licensing fee. The Government did not analyse this response further but no doubt those arguing against a discount consisted mainly of Local Authorities would receive the fees.

The Government rejected any discounting arrangements arguing that following the tragic fire at Grenfell Tower local authorities would wish to be more pro-active in ensuring licensing conditions in PBSA. The argument for applying discounts was not about discouraging local authority intervention. Intervention did increase after Grenfell, particularly on high rise buildings, but this was carried out very much under Part I of the Housing Act 2004 and not under licensing. In most cases licensing does not cover the general communal areas of complexes such as the entrance lobbies, lifts, stairwells and access corridors. In high risk buildings the Hackitt Report later stressed that fire prevention and risk

assessment should take place on a “whole building” basis, rather than by licensing individual flats within a building.

The argument that discounts should apply was based on the fact that these are modern buildings that the vast majority of consultees felt were run well and were tenant-responsive despite only minimal activity at the time by Local Authorities: the buildings in the Approved Codes are a far cry from the “beds in sheds” run by “rogue landlords”.

The Government disappointingly missed a significant opportunity to recognise the work and commitment of those that had joined the Approved Codes and also failed to reflect the current regulatory framework which applies to higher risk HMOs that comprise student accommodation. Many PBSA suppliers felt that the responses to the consultation showed a system that was working and that the Government then dismissed those views in determining its response.

In taking this view the Government also rejected the representations and views of the National Union of Students and ASRA (the Association for Student Residential Accommodation, the leading representative organisation for student accommodation professionals throughout the UK and Ireland).

It is also curious that PBSA that is controlled and managed by educational institutions (which are exempt from HMO licensing) should be deemed safer and worthy of no intervention at all from local authorities compared to those responsible private sector providers who comply with the Approved Codes. It would be difficult for a student to see that two tower blocks of similar design and construction, one owned by a private sector approved Code landlord and the other owned by a University should fall under two separate regulatory systems and be dealt with in different ways.

In a response to a Parliamentary Question on 26th March 2018 the Government said “Educational establishments have a duty of care defined by statutory obligations, for example through the Health and Safety at Work Act 1974, that they must fulfil, both in the provision of education and accommodation to its students. They are also subject to regulation by an independent regulator, the Office for Students. However, private companies are not subject to the same levels of regulation and therefore should not be exempted from House in Multiple Occupation licensing.”

This was, at best, a spurious answer. The Health and Safety at Work Act applies equally to all employers, including the private sector. The Office for Students outlines the full set of conditions which providers must meet to be registered with the Office for Students in the Regulatory Framework published in February 2018 (<https://www.officeforstudents.org.uk/advice-and-guidance/regulation/the-regulatory-framework-for-higher-education-in-england/>) and student accommodation is not within that regulatory framework.

This is not an argument for not regulating student accommodation but is an argument for recognising the specialist regulatory requirements of the PBSA sector and ensuring that regulation is effective and covers the whole student experience in a reassuring and transparent manner. The quest to establish a specialist system of regulation fit for purpose for this relatively new category of buildings will continue and the Codes of Practice should have a significant role to play in that.

Section 9: Conclusion

Achievements in the Twelfth Year

- Implemented a protocol for use by members who manage developments for third parties;
- Provided guidance on fire safety risk assessments for members with high rise developments;
- Identified the number of PBSA developments with ACM cladding;
- Set in place arrangements to alter the sections of the Code relating to deposits so as to deal with the issue of the date they were protected from (where necessary);
- Completed the review of the Code for Educational Establishments;
- Agreed a scheme for continuing to raise the profile of the Codes;
- Completed collection of up-dated self-assessments from members;
- Revised the core documentation for use by those applying for membership as well as existing members applying to remain within it for a further three year period.

Challenges for the Thirteenth Year

- Appoint a Tribunal Chair, Vice Chair and Provider Representatives;
- Agree new standards of student care and training for providers in response to the rise in mental health and wellbeing issues being experienced by students evidenced in recent research;
- Gather information from members who reported that they possessed developments containing ACM cladding on what actions they have undertaken as a result of that since the summer of 2017, to include details of whether the cladding has been removed or retained;
- Discuss with members a proposal that would require them all to commission independent Housing Health and Safety Rating System checks to be made of all of their sites;
- Evaluate the consistency of approach taken by members of the National Codes verification team when preparing, conducting and reporting on visits, via a questionnaire to be sent to the relevant providers;
- Introduce the revised version of the Educational Establishment Code;
- Revise the online self-assessment questionnaire to take into account the changes made to the Educational Establishment Code;
- Begin the process of reviewing the Code for Non-Educational Establishments;
- Assess the effectiveness of existing methods of communications with members of the Codes and investigate means of enhancing this.

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.

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

The Educational Establishment Code

Blackpool and Fylde College
Chichester College
Christ's College, Cambridge
Churchill College, Cambridge
Clare College, Cambridge
Clare Hall College, Cambridge
Corpus Christi College, Cambridge
Darwin College, Cambridge
Downing College, Cambridge
Emmanuel College, Cambridge
Fitzwilliam College Cambridge
Foundation for International Education
Girton College, Cambridge
Gonville & Caius, 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
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 Bradford
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
Aldwyck Housing Group
Allman RP L2
Alpha Student Management Ltd
Asha House Management Co
Ashwell House
Atelier Property Asset Management Ltd
Axo Student Living
Bay View Breeze
Baaz Properties
Beyond the Box Student Limited
BPS Developments
Campbell Property
Campus Living Villages
Carr Mills Accommodation
Cass and Claredale
Chapter Living
City Block Ltd
Cityheart Living (Scotland) Limited
Clever Student Lets
Code Student Accommodation
Collegiate AC Ltd
Condor Properties
Congregational Federation

Cotton House Management Company
CRM Students
Derwent Students
Digs Student
Downing Students
Dwell Student Living
FD Asset Management Ltd
Fortis Student Living (Suspended in May 2018)
Fresh Student Living
Global Student Accommodation
Guy Chester Centre
Hamstead Campus Ltd
Hello Student Management
Homes for Students
Host Student
Iconic
INTO Newcastle University
INTO UEA
IQ Student Accommodation Services Ltd
Kaplan NT Ltd
Kexgill
Lee Abbey London
Lewes Study Lodge
Liberty Living
Linthorpe Property Management
Lutheran Council of GB
Manor Villages
Mansion Property Management
MARA Inc. London Ltd
Mears Student Life
Megaclose Ltd
Mezzino
G Murphy Properties (Suspended April 2018)
Niche Homes Ltd
Nido Collection
Notting Hill Housing Trust
Omnia Estates Ltd
Optivo
Oxford Court Student Village
Parklane Properties

Parrish Court Developments Ltd
Prime Student Living
Primo Property Management
Purple Frog Group
Reed Residential Ltd
Sanctuary Students
Scape Student Living Ltd
Shumei Eiko Ltd
Six Degrees Nottingham Ltd
St Modwen SAC 2 Ltd
The Stay Club Limited
Student Beehive
Student Castle Ltd
Student Cribs
Student Facility Management Limited
Student Living
Student Living by Sodexo
Student Roost
Study Inn
Unilife
Uni2rent Ltd
Unipol Student Homes
UNITE
Universal Student Living
UPP Broadgate Park Ltd
UPP Nottingham Ltd
Urbanest UK Ltd
U Student Group Ltd
Vafai Trust
Varcity Living Ltd
Vita Student Management Ltd
West One Student Accommodation
Whitfield Estates
Wilson and Sharp Investments Ltd
Winchester Student LLP
X1 Developments
Yara Capital Limited
YPP (Yorkshire Prosperity)
Zebra Housing Association
Zone Management

APPENDIX 2: Visits Undertaken in 2017-2018 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.

Beyond the Box (Avon Way, Colchester)
CityBlock (Penny Street, Lancaster)
Collegiate AC (Ernest Place, Durham)
Collegiate AC (Clifton Place, Exeter)
Collegiate AC (Crown House, Sheffield)
CRM (Livin, Cardiff)
CRM Students (Canterbury Student Manor, Canterbury)
CRM Students (Palamon Court, Canterbury)
CRM Students (Vibe, Kingston)
CRM Students (Urban Study, Newcastle)
Downing Students (City Village, Coventry)
Downing Students (New Park, Edinburgh)
Fresh Student Living (Home Park, Bournemouth)
Fresh Student Living (Towpath, Chester)
Fresh Student Living (The Mill House, Edinburgh)
Fresh Student Living (Dobbie's Point, Glasgow)
Fresh Student Living (Foundry Courtyard, Glasgow)
Fresh Student Living (The Shield, Newcastle)
Fresh Student Living (The Tramshed, Preston)
Fresh Student Living (Hampton Square, Southampton)
Fresh Student Living (St David's, Swansea)
Girton College, Cambridge
Hello Student (The Frontage, Nottingham)
Homes for Students (Fraser House, Aberdeen)
Homes for Students (88 Bromsgrove, Birmingham)
Homes for Students (Oxley Hall, Leeds)
Host (The Foundry, Leeds)
Host (Vincent Place, Southampton)
International Lutheran Student Centre (London)
IQ Student Accommodation (Elgin Place, Glasgow)
Loughborough College (New Gables, Loughborough)

Prime Student Living (Albert Place, Newcastle)
Student Castle (Bath)
Student Roost (Corner House, Sheffield)
Student Roost (Laycock Studios, Sheffield)
Study Inn (Burgess House, Coventry)
Study Inn (Pillar Box, Coventry)
St Modwen (Bay Campus, Swansea)
Unipol Student Homes (Norwich Union House, Nottingham)
UNITE (Old Printworks, Edinburgh)
UNITE (Salisbury Court, Edinburgh)
UNITE (Beech House, Oxford)
Universal Student Living (Botanic Studios, Belfast)
Universal Student Living (New Kepier Court, Durham)
University of the Arts (Gardens House, London)
Winchester Student (Riverside Way, Winchester)
UNITE (Beech House, Oxford)
Universal Student Living (Botanic Studios, Belfast)
Universal Student Living (New Kepier Court, Durham)
University of the Arts (Gardens House, London)
Winchester Student (Riverside Way, Winchester)