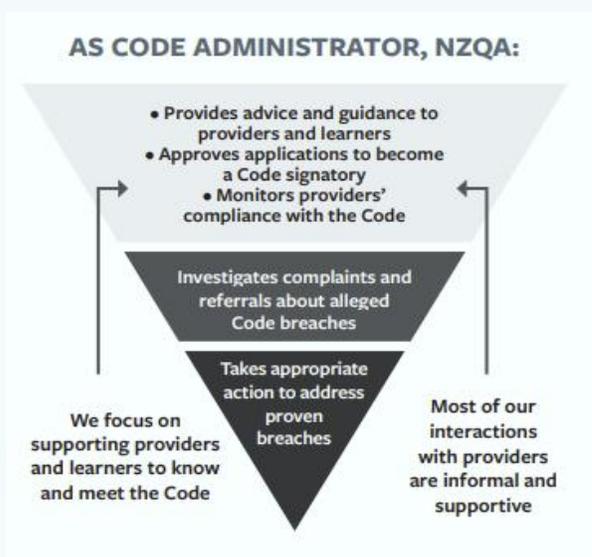# NZQA Code Administrator Report

About this report

This report provides an overview of our key activities for 2024/25 and an update on our Code priorities in 2025/26. It supports us in being transparent in our role as Code Administrator and offers assurance that providers are taking all reasonable steps to support learner wellbeing and safety.

As we transition to a new quality assurance framework and evolve how we undertake our role as Code Administrator, this report also includes an analysis of the sector's implementation of the Code from 2022 to 2024.

The analysis supports a better understanding of how the Code has been implemented and embedded across the tertiary sector and any emerging trends.

As Code Administrator, we monitor and support providers to ensure they comply with the Code. Our approach is outlined in the graphic below.

AS CODE ADMINISTRATOR, NZQA:

- Provides advice and guidance to providers and learners
- Approves applications to become a Code signatory
- Monitors providers' compliance with the Code

Investigates complaints and referrals about alleged Code breaches

Takes appropriate action to address proven breaches

We focus on supporting providers and learners to know and meet the Code

Most of our interactions with providers are informal and supportive

Our activities and priorities for 2025 and 2026

Our Code Administrator Plan outlined our ongoing priorities and activities for 2025 through to 2026. Our priorities were promoting the Code, monitoring and review, and capability building. The figures and information below share how we did this in 2025.

Twenty five workshops, webinars, and focus groups on various aspects of the Code were delivered and facilitated to the sector.

850 attendees from across the sector participated in our capability building activities, including TEOs, schools, and student leaders.

400 enquiries were received requesting information, support and advice on a range of topics, such as requests for specific workshops, Code attestation and managing issues raised by learners.

Review of homestay accommodation

We reviewed homestay accommodation requirements for both school signatories and tertiary providers. The review aimed to map the Code's requirements relating to homestays, better understand the needs of providers that offer or facilitate homestay accommodation for international learners, and support the development of fit-for-purpose resources.

The findings and an accompanying homestay accommodation handbook were published on our website in early 2026.

Delegation to Universities New Zealand (UNZ)

We delegate some of our Code monitoring responsibilities of universities to Universities New Zealand (UNZ). In 2024, all eight universities conducted a review of their policies and processes under Outcomes 1 to 4 of the Code and submitted summary assessment reports to UNZ for verification. A summary of UNZ's review of these reports provided insight into how the universities have implemented the Code and their progress in closing gaps and improving practice. A copy of this report can be found on our website.

All universities reported complaints data to UNZ (and published it on their respective websites). UNZ has noted that the number of formal complaints is very low. The most recent summary of the universities' complaints data reporting provided by UNZ can also be found on our website.

Code monitoring and review

In early 2025, we looked at TEO attestation data to understand how TEOs complied with the Code's publication and complaints data reporting requirements. We used this information to inform our capability building activities and future focus areas. We found:

94% of TEOs submitted attestations by 1 December 2024.

→ We followed up with TEOs with outstanding attestations and offered support where necessary.

55% of TEOs met the Code's requirements of publishing self-review reports in accessible formats on their websites.

→ Code self-review will be a part of TEO self-review under our new Integrated Quality Assurance Framework (iQAF) in 2026. We will work with TEOs to clarify how they can meet these requirements as part of the new process.

34% of TEOs met the Code's complaints data reporting requirements.

→ We collaborated with the dispute resolution scheme operator, Study Complaints, to deliver workshops to TEOs focused on handling learner complaints and clarified our expectations on reporting this data. We will continue monitoring how TEOs are meeting this requirement.

<10% of TEOs are reporting two or more complaints per year, suggesting that complaints processes may not yet be fully accessible or well-understood across all providers.

→ Our complaints workshops also focused on sharing good practice for effectively managing learner complaints, including how TEOs can make their process accessible for learners. We will continue to work with Study Complaints in 2026 to lift TEO capability around handling learner complaints.

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Code implementation across the tertiary sector

Our approach to implementation

The Code came into effect on 1 January 2022 and took an outcomes-based approach to the systematic support of learner wellbeing and safety, and applied to all tertiary learners generally. This required a strong focus on implementation, education and supporting provider capability.
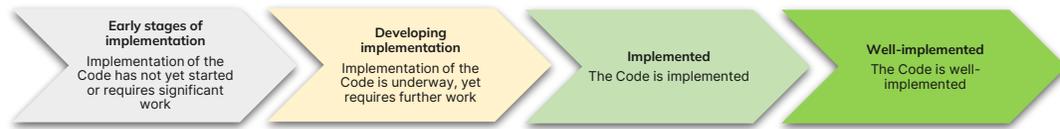
We supported TEOs' understanding of their obligations under the Code, our expectations for implementation, and that the Code's required processes were well-implemented across the sector. We did this through regular engagement with TEOs, liaising with relevant government agencies and peak body groups on matters related to learner wellbeing and safety, and a strong focus on capability building.

We now have three years of TEO attestation responses to show us how the Code has been implemented across the tertiary sector.

Code implementation continuum

The Code requires tertiary providers to regularly review the quality of their learner wellbeing and safety policies and processes and attest to NZQA that a self-review has been done.

To understand how the Code was being implemented and embedded across the sector, providers were asked to self-report their stage of implementation for each outcome, and overall, based on the continuum below.

Early stages of implementation
Implementation of the Code has not yet started or requires significant work

Developing implementation
Implementation of the Code is underway, yet requires further work

Implemented
The Code is implemented

Well-implemented
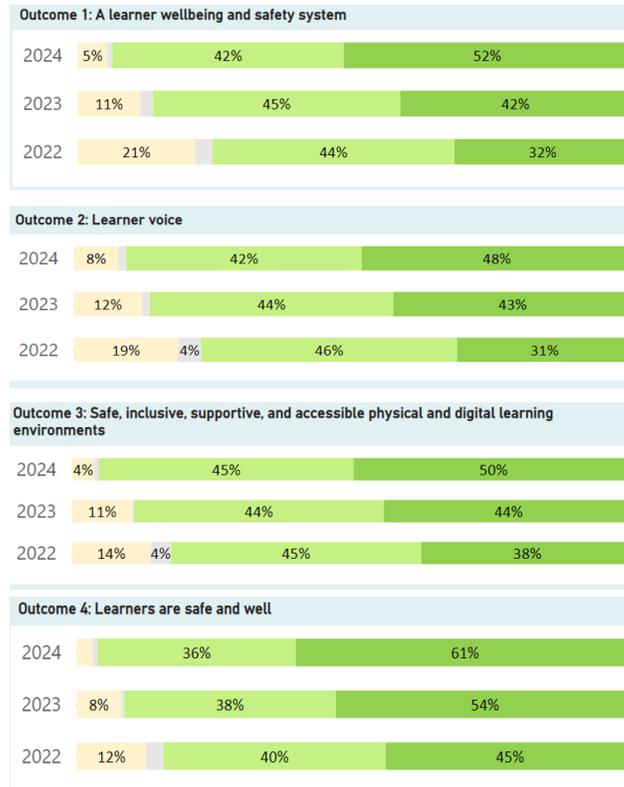The Code is well-implemented

As of 2024, 46% of TEOs reported having *well-implemented* Code practices, up from 26% in 2022. This reflects an improvement in providers' overall capability to meet the Code's requirements.

Overall stage of Code implementation (TEOs) – 2022 to 2024

Year	Early Stages of Implementation	Developing implementation	Implemented	Well-implemented
2022	4%	21%	49%	26%
2023	1%	13%	51%	35%
2024	1%	7%	46%	46%

Stage of Code implementation (TEOs) – Outcomes 1-4

Outcome 1: A learner wellbeing and safety system

2024	5%	42%	52%
2023	11%	45%	42%
2022	21%	44%	32%

Outcome 2: Learner voice

2024	8%	42%	48%
2023	12%	44%	43%
2022	19% 4%	46%	31%

Outcome 3: Safe, inclusive, supportive, and accessible physical and digital learning environments

2024	4%	45%	50%
2023	11%	44%	44%
2022	14% 4%	45%	38%

Outcome 4: Learners are safe and well

2024	36%	61%	
2023	8%	38%	54%
2022	12%	40%	45%

What we're seeing

- ❖ Outcome 1: A learner wellbeing and safety system had the highest percentage increase in **well-implemented** practice between 2022 and 2024, up 20%. Outcome 1 focuses on the strategic approach providers must take to support a responsive learner wellbeing and safety system. It was a key focus for providers as they implemented the Code.

- ❖ TEOs report modest increases in Outcome 2: Learner voice between **implemented** and **well-implemented** practice. The focus on learner voice requires providers to work closely and proactively with learners to understand and respond to their needs. It also requires providers to effectively handle learner complaints. Providers have shared the challenges they experience in capturing learner voice and supporting learners through complaints processes.

- ❖ TEOs report **consistent progress** in implementing Outcomes 3 & 4. These outcomes focus on providers creating safe learning environments for learners and supporting their wellbeing and safety needs to enable achievement.

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Our insights

Learner Complaints

We are responsible for receiving and investigating complaints or referrals of alleged breaches of the Code. In August 2025, we updated our approach on receiving and managing learner concerns.

Under this approach, learners, their whānau and the public can inform us of concerns they have regarding their education provider by completing a form on our website. We assess all concerns we receive, but we are unable to investigate all of them. We prioritise investigating issues that have the greatest risk and impact on educational quality and learner wellbeing and safety.

We worked with TEOs to notify them of our updated approach in 2025 and updated information on our website to help learners understand what they can do when they have concerns about their provider.

Complaints data – 2022 to August 2025
Formal Code-related complaints received by NZQA peaked in 2022/23 (a total of 16) and eased as of 2024/25 (a total of 9). We have not identified any systemic issues relating to providers' adherence to the Code based on complaints received. Complaints have focussed on individual learners' dissatisfaction with TEO enrolment processes, administration, complaint and academic appeals processes, and the perceived impacts of these processes on their wellbeing.

The figures below offer insight into trends we have seen in the complaints submitted to us.

41 Code-related formal complaints were received. **Seven** were investigated. **Two** breaches were found.

→ These were technical breaches of the Code related to internal complaints processes and the provision of information and advice to international learners. We worked with the providers to offer support and clarify expectations. We reviewed the steps they took to address gaps and improve practice. No further action was needed to remediate concerns.

61% of complainants were **domestic tertiary learners**, compared to international learners (37%).

71% of complainants were referred **back** to their provider or to **another** agency or service, such as Study Complaints or the Ombudsman.

→ Providers are best placed to address issues directly. Most complainants who were referred back to their provider or another service did not subsequently return to us.

The Code and international learners

Providers approved by NZQA to enrol international learners (signatory providers) must also meet requirements under Parts 6 and 7 of the Code. These requirements ensure international learners studying in New Zealand are safe, supported, and protected.

→ **Seven** PTEs were approved as new signatories in 2024/25. This brought the total number of TEO Code signatories to 186.

TEO signatories enrolling international learners self-report year-on-year progress towards better implementation of outcomes 8-12. The requirements were largely the same under the International Code (with the exception of Outcome 8).

Code Signatory Schools

→ **Twenty** schools were approved as new signatories in 2024/25. This brought the total number of school signatories to 741.

→ The outcomes and requirements of the current Code remained the same for international school learners as in the previous International Code. This means that school signatories did not have to implement new policies or processes under this current Code.

→ In a desk review of school signatory Code self-review reports in 2024, we found that most schools were still referencing the old International Code in their policies, processes, and self-reviews. We also found that schools varied in their approaches to conducting self-review, even when using self-review templates from NZQA or peak body groups. How effectively a school manages its self-review processes is an indicator to us on how they manage their performance under the Code. We delivered webinars on effective self-review practice exclusively for school signatories to address these.

→ We heard from school signatories that high-staff turnover during the COVID-19 pandemic due to the loss of international enrolments led to a loss of institutional knowledge of the Code within schools. This knowledge gap is closing, but continues to inform our capability building activities.

→ We facilitated webinars on the Code and international school learners for school signatories to support capability within the schooling sector. Our 'Code 101 for School Signatories' in May 2025 had over 200 participants from across the school sector. We also engaged with newly approved school signatories to offer support and resources during their first year of enrolment to support capability. This will be a continued practice and focus area for 2026.