Summary Report on Student Accommodation Monitoring

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NZQA

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Introduction

This paper summarises NZQA's student accommodation monitoring activities and findings between 2021 and 2023. It helps us and tertiary education providers[1] understand the student accommodation landscape in Aotearoa New Zealand, and the key practices[2] in place at tertiary education providers (excluding universities) to give effect to the **Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021 (the Code).** Similar monitoring activities for universities are referenced later in the report.

Learner Wellbeing and Safety in Student Accommodation

The Code defines learner wellbeing and safety as having a positive frame of mind, resilience, satisfaction with self, relationships, and experiences and progressing towards learning outcomes sought. It also means being healthy and feeling secure. The Code aims to enable learners' academic success through promoting wellbeing and safety. Student accommodation is covered in the Code.

All tertiary education providers and school signatories to the Code are required to foster learning environments that are safe and designed to support the positive learning experiences of diverse learner groups. They also need to support learners to manage their physical and mental health through information and advice and identify and respond to learners who need further support. The Code outlines additional wellbeing and safety practices that providers must have in student accommodation.

The Code defines student accommodation as "student accommodation which is exempt under the Section 5B of the Residential Tenancies Act 1986, including where there is a written agreement between the tertiary provider and the accommodation provider under section 5B(1)(b)(ii)". Based on this definition, there are accommodation facilities where many students live that are **not** considered as student accommodation under the Code, specifically:

- homestay accommodation
- accommodation where providers do not have formal contract(s) with education providers
- accommodation where providers have formal contract(s) with education providers, but where the accommodation is open to the public at the same time.

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[1] The term 'provider' is used to indicate non-university education organisations and aligns with the same term in the Code.

[2] The term 'practices' has the same definition as the Code and refers to the policies and processes implemented by the institution to realise the outcomes set out in the Code.

As Code Administrator, NZQA is responsible for processing applications from providers to become a signatory[3] to the Code, monitoring providers giving effect to the Code and sanctioning providers who breach the Code. The monitoring of student accommodation has been an important activity since the launch of the Interim Domestic Code in 2020. Monitoring helps us understand how and if providers with student accommodation are meeting the Code's requirements and complements our other quality assurance activities.

NZQA delegates some Code capability building and monitoring responsibilities to Universities New Zealand (UNZ) under a formal agreement. Both NZQA and UNZ followed a similar approach to student accommodation monitoring with NZQA attending university student accommodation site visits as an observer. At the time of publishing this report, all eight universities in New Zealand provide student accommodation under the Code and have been verified as compliant with the Code by UNZ. UNZ's report/summary can be found here.

Overall, based on monitoring and providers' self-review attestations in the past two years since the Code was launched, we found that tertiary student accommodation providers (excluding universities) have the necessary practices in place to meet the wellbeing and safety requirements outlined in the Code.

The following sections discuss the monitoring work from its background, our approach, focus areas, timeline and activities, overview of the sector, and key findings.

Background

Aotearoa New Zealand has had a Code of Practice focusing on the wellbeing and safety of international learners for more than two decades. On 1 January 2020, the Interim Domestic Code (IDC) came into force. This Code was the first for domestic tertiary learners and included student accommodation.

Two years later, the **Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021** (**the Code**) combined the IDC and Education (Pastoral Care of International Students) Code of Practice 2016 (2016 Code) and came into force on 1 January 2022. The issuing of this combined Code strengthened requirements around wellbeing and safety and revoked the previous two Codes. For student accommodation, Outcomes 7-10 of the IDC were carried into Outcomes 5-7 of the Code. At the same time, new clauses were introduced to emphasise learner wellbeing and safety in student accommodation. Table 1 summarises the changes.

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[3] Signatory means a provider that has been approved by the code administrator to enrol international learners.

Table 1. Combination and comparison of IDC and the Code

IDC	The Code	New changes in the Code
Outcomes 7 & 8	Outcome 5	• align a whole-of-organisation approach to resident safety and wellbeing • provide for the welfare and safety of accommodation staff • involve residents in the creation of plans to support their personal and communal safety and wellbeing
Outcome 9	Outcome 6	• increase transparency of systems and promotional materials to allow prospective residents to make informed decisions regarding student accommodation • provide information to residents to help them understand their rights and obligations under the refund policy
Outcome 10	Outcome 7	• provide accessible spaces for a range of interests, activities and needs

Outcomes for Student Accommodation

Outcomes 5-7 establish requirements and processes for resident wellbeing and safety in tertiary student accommodation. Each outcome contains one or more processes focusing on different areas in student accommodation management.

The processes in Outcome 5 work to ensure student accommodation residents are well supported through information provided, accommodation staff, and their community.

The processes in Outcome 6 aim to ensure residents are clear on the nature of the accommodation and the support structure/s within it. It also ensures student accommodation is connected to the wider organisation, and the whole-of-organisation approach required in Outcome 1 of the Code.

The process in Outcome 7 works to ensure that providers support residents by considering, and responding, to their needs both in physical spaces and through the provision of services.

Our Approach

We used a three-step approach for our monitoring:
1) Desk evaluation
2) Engagement meeting with staff; and
3) Site visit, including meeting with residents.

1. **Desk evaluation**

   We evaluated documentation on student accommodation policies and processes from tertiary education providers with student accommodation. This step helped us understand the basic arrangements around providers accommodation management and the practices in place to support learners. It also helped us identify potential gaps and/or risks.

2. **Engagement meeting with staff**

   We met with each education provider's accommodation staff, listened to their experiences and presentations, and asked questions relating to their areas of work. This step helped us obtain practical insights into their policies and processes and understand how well the policies and processes were implemented. These meetings also provided an opportunity to clarify any potential gaps/risks we identified at the desk evaluation step. The engagement meetings were conducted face-to-face[4] or online.

3. **Site visit, including meeting with residents**

   We carried out site visits to each education provider's student accommodation including viewing their physical accommodation facilities. The most informative events for us during the visits were focus groups with student accommodation residents. This step provided us with real insights into student accommodation and student life on site.

Focus Areas

Our monitoring was based on all processes in Outcomes 5-7. Table 2 summarises the areas we looked at.
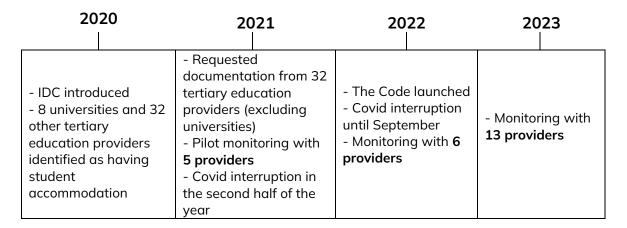
Table 2. Student Accommodation Outcomes

Outcome 5 A positive, supportive and inclusive environment in student accommodation	Process 1 Information and promotional activities	accommodation type/nature and available services
		transition plan
		communal living environment
		self-care and peer-care
		emergency management
	Process 2 Accommodation staff	ongoing training for staff
		managerial oversight at 24/7 for residents
		live-in staff
		wellbeing support for staff
	Process 3 Accommodation staff must be fit and proper persons	police vetting for staff supervising residents under 18 years old
	Process 4 Proactive monitoring of residents' wellbeing and safety and responsive	welfare management plan
		regular check on residents
		management for under 18s
		24 hours' notice for entering
		provider-wide system for residents' wellbeing

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[4] Meetings with accommodation staff were conducted face-to-face during the monitoring pilot in 2021. Monitoring was put on hold in 2022 due to Covid 19 restrictions. Any further meetings in 2022 and 2023 were held online.

	wellbeing and safety practices	critical incident and emergency procedures manual
	Process 5 A safe and inclusive residential community	house rules make sense to residents
		working with residents
Outcome 6 Accommodation, administrative practices and contracts	**Process 1** General principles	disclosing information on a provider's website
		a human resource strategy
	Process 2 Student accommodation contracts	adequate information
		review and update
		refund policy
		house rules and complaint process including the Dispute Resolution Scheme (DRS)
		complaints log
Outcome 7 Student accommodation facilities and services	**Process** Providers must ensure that student accommodation facilities and services:	respond effectively
		are physically comfortable
		support residential community

Monitoring Timeline and Activities

The below timeline provides an overview of our monitoring activities[5].

2020	2021	2022	2023
- IDC introduced - 8 universities and 32 other tertiary education providers identified as having student accommodation	- Requested documentation from 32 tertiary education providers (excluding universities) - Pilot monitoring with **5 providers** - Covid interruption in the second half of the year	- The Code launched - Covid interruption until September - Monitoring with **6 providers**	- Monitoring with **13 providers**

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[5] In late **2020**, we identified eight universities and 32 tertiary education providers providing student accommodation as defined by the Residential Tenancies Act 1986. In early **2021**, we requested attestation of self-review against the IDC requirements from all tertiary education providers and relevant information from 32 tertiary education providers (excluding universities) with student accommodation. The focus was on the areas of chief concern at the Select Committee Inquiry including accommodation contracts, management of accommodation staff, resident welfare management, a communal and cross-cultural living environment, critical incident and emergency procedures, house rules and guidelines, and accommodation complaints. As a pilot, we monitored five providers in 2021, evaluating documentation and conducting site visits to speak with staff and student residents on site. In **2022,** we monitored six providers. We met with accommodation staff online in advance of a site visit then met with student residents on site. In **2023,** we completed our monitoring work with 13 providers. We worked together with two Te Pūkenga staff members in 2022 and 2023 to monitor the business divisions of Te Pūkenga.

Overview of the Sector

In late 2020, 32 tertiary providers (excluding universities) were identified as having student accommodation facilities. Of these, five were not monitored due to the provider being deregistered or no longer having student accommodation facilities. Monitoring of three providers was postponed for various reasons including being impacted by Cyclone Gabrielle.

The first round of student accommodation monitoring covered 24 tertiary education providers (excluding universities) with student accommodation, comprising 9 Te Pūkenga business divisions and 15 private training establishments (PTEs). The PTEs came from a range of sub-sectors, including theological (6), aviation (3), business (3), and other industries (3).

These providers offered around 3000 beds between them with about half being provided by PTEs and half by Te Pūkenga. The number of beds offered each year can vary as providers contract beds from external accommodation providers. Table 3 shows more information about how accommodation facilities operate. While we traditionally think about student accommodation as large halls of residence on university or polytechnic campuses that they own and operate, there are different ownership and operating structures in use.

Table 3. Student accommodation ownership structures (excluding universities)

Most accommodation facilities	are owned and operated by providers themselves
	have single bedrooms
	offer accommodation to international students
Many accommodation facilities	have live-in staff or residential assistants at their student accommodation sites
	provide full and/or partial catering
Some accommodation facilities	are owned by providers but operated by third parties
	are owned by third parties but operated by providers
	do not have live-in accommodation staff but have emergency plans and 24-hour support in place
	have twin-share bedrooms
	admit learners under 18 years old
	provide single-sex arrangements
	offer alcohol-free areas
	offer accommodation to married students
Few accommodation facilities	are neither owned nor operated by providers themselves but have contracts with third parties
	have staff living on site who are not student accommodation staff
	provide accommodation to the public during summer holidays/breaks

Key Findings

Overall, no significant concerns were found during our monitoring of student accommodation. We provided feedback to each provider when we identified any areas that needed improvements during the monitoring process. All 24 providers were cooperative and acknowledged the benefits that they received through the process. Through the monitoring we identified areas of good practice and areas for improvement, these are summarised below.

Good practice:

- o **Pre-arrival and transition information:** good strategies and processes to provide as much information as possible to learners before they sign accommodation contracts and various activities are offered to support learners during their transition phase. For example, a Te Pūkenga business division provides the first two weeks of accommodation free. Learners may exit the accommodation if they do not like living there during the first two weeks.

- o **Supporting a communal, cross-cultural living environment:** policies and processes in place to promote diverse cultures and support resident-led events at their accommodation facilities. For example, a PTE supports regular resident-led karaoke nights with formal attire (in general or ethnic styles).

- o **Accommodation staff oversight:** good policies and procedures to manage accommodation staff and staff know clearly about their responsibilities and reporting processes. For example, a Te Pūkenga business division has a detailed escalation procedure and categorised incidents into four levels. Behind the procedure, there was a comprehensive training programme for Resident Assistants (RAs), which supports RAs to understand different types of residents' issues and concerns.

- o **Resident welfare checks:** policies and processes in place, with closer check-ups for learners who are under 18 years old. For example, a PTE has a multiple-layer checking system including a buddy scheme (pairs a senior learner with a first-year learner), staff and students have lunch together, lecturers are responsible for following up unexplained absences, and then Academic Deans provide oversight of learner welfare.

- o **Crisis response and emergency management:** the emergency practices and important contact lists are detailed in the providers student handbooks and/or on accommodation information noticeboards. For example, a PTE detailed its check lists into immediate, medium, and long-term actions to take and included major Embassies/High Commissions' contact information on its external agency list.

Areas for improvement:

- o **Information and promotional activities:** some providers did not have enough information available about complaints processes in their house rules and guidelines. This includes information on making a complaint to NZQA as the Code Administrator and the Dispute Resolution Scheme (DRS)[6].

- o **Accommodation staff training and support**: at some providers more policies and processes are needed to support ongoing accommodation staff training, especially mental health training.

- o **Student accommodation contracts**: some providers do not have a process to consider learners' views when the contract is reviewed and updated.

- o **Promotional information:** some providers do not have any information on student accommodation ownership structure and operator details, or the wellbeing and safety practices offered at the student accommodation facilities.

Data on Student Accommodation through Attestation

Under the Code, providers are required to regularly complete a self-review to identify how well their learner wellbeing and safety goals, plans and practices deliver the outcomes required by the Code. Subsequently, providers must regularly attest that they have completed a self-review of their performance against the Code requirements.

Attestation results show that most student accommodation providers consider they meet the requirements of the Code. We have summarised the student accommodation data from attestation submissions in 2022 and 2023 in Table 4.

Table 4. Student Accommodation Attestation Data

	Well-implemented		Implemented		Developing		Early stage	
	2023	**2022**	**2023**	**2022**	**2023**	**2022**	**2023**	**2022**
Outcome 5	62.5%	62.9%	33.3%	28.6%	4.2%	8.5%	0	0
Outcome 6	62.5%	51.4%	29.2%	42.8%	8.3%	2.9%	0	2.9%
Outcome 7	62.5%	62.9%	33.3%	31.4%	4.2%	5.7%	0	0
Overall rating	**62.5%**	**59.1%**	**31.9%**	**34.3%**	**5.6%**	**5.7%**	**0**	**2.9%**

From Table 4, we can see the number of providers who self-identify as being at the **Early stage** and **Developing** stages of implementation decreased (from 8.6% in 2022 to 5.6% in 2023). On the other hand, providers who self-identified as **Well-implemented**

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[6] There were two Dispute Resolution Schemes operating before 1 January 2024: I-student and Tertiary Education Dispute Resolution (TEDR). On 1 January 2024, the two schemes were combined into a single scheme known as Study Complaints – Ngā Amuamu Tauira: https://www.studycomplaints.org.nz/

increased (from 59.1% in 2022 to 62.5% in 2023). These self-assessed ratings aligned with our monitoring where we found effective practices were in place at student accommodation.

What's next?

As Code Administrator, NZQA is responsible for working with providers so that learners living in student accommodation are safe and well. Based on our monitoring, we are satisfied with how the accommodation sections of the Code are being implemented. Our future activities will include:

- monitoring tertiary education providers' student accommodation through self-review and/or attestation.
- continuing to include learner voice in any future student accommodation monitoring (to understand the perspective of diverse learners).
- working with providers whose monitoring was postponed.
- working with providers to ensure any new student accommodation arrangements are fit for purpose.