



Codes of Practice 2008 - 2009 Annual Report to Communities and Local Government (CLG)

Accreditation Network UK/Unipol Codes of Practice of Student Accommodation Managed by Higher Education Institutions and for Student Accommodation Managed by Undertakings subject to HMO Licensing

Introduction and Background

This is the third Annual Report to Communities and Local Government (CLG) 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.

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 ongoing 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 third report makes reference to these objectives, now set some time ago (2005), its main focus is on activities that have taken place during the course of the year (July 2008 to June 2009) to manage, develop and promote the Codes.

Format of the Annual Report

The objectives set by the Government provides a framework when compiling an Annual Report and this report therefore includes the following sections:

- Membership Report 2008-2009
- Committee of Management Meetings 2008-2009
- Meeting the Challenges of the Third Year
- Publicity and Awareness Raising Activities
- Amendments and Additions to the Codes
- Assessment and Verification Process: Procedures and Visits
- Complaints and Tribunal Procedures: The number of complaints received and how they were dealt with
- Code Convergence and the ANUK/UUK Protocol
- Conclusion – to include a list of challenges for the fourth year of operations

Section 1: Membership Report 2008-2009

The total number of private providers and educational establishments signed-up to both of the ANUK/Unipol Codes as of 30th June 2009 is 61, of which 43 are members of the Code for non-educational establishments and 18 are members of the Code for educational establishments.

There has been a net increase in the number of providers signed-up to these Codes of 15 since June 2008 (a 32.5% increase). Two smaller providers who were members of the educational establishments Code did not rejoin in 2009 because they had ceased to be accommodation providers.

The increase in the number of private providers joining their dedicated Code reflects the continued expansion of the role of private providers in housing an increasing number of students and also reflects that as the role of the private sector continues to expand, the vast majority see membership of the Approved Code as a vital part of offering reassurance to consumers that they are meeting, and exceeding, legal standards and have a clear view of their management obligations.

The current economic climate may mean that the number of new developments that have been added to private providers' portfolios will plateau for the next two years but there will still be stock passing between educational establishments and private providers that may result in lower, but ongoing, growth.

The sale and rationalisation of some educational establishment stock has seen a small decline in the number of educational establishment bed spaces. However, it is likely that the newly revised Code for educational establishments will lead to some increased membership, which in turn will increase the number of bed spaces it covers across the 2009-2010 year.

In addition to the new providers who had been accepted into membership by the end of June 2009, applications have also been received from three other providers. Two had yet to complete the self-assessment questionnaire, whilst one was felt not to have met the necessary standards following a verification visit. The Audit Panel recommended that they not be awarded membership until they had demonstrated an ability to manage the development in line with the requirements of the relevant Code.

In terms of the total number of bed spaces covered by both Codes, the total at June 30th 2009 is 127,607 bed spaces - some 20,454 more than in June 2008 (an increase of 19% across the year).

The geographical spread of developments belonging to the Codes reveals that there are 53 different towns and cities that have a least one building signed-up to either Code, three more than in June 2008. As of June 30th 2009 there were a total of 449 large student developments in the UK covered by either of the two ANUK/Unipol Codes, 58 more than at the same time the previous year. Although the majority of these are in England (417), there were 10 in Wales and interestingly (where the Scottish Government has not implemented Approved Codes in respect of student accommodation) 22 in Scotland.

Section 2: Committee of Management Meetings 2008-2009

The Committee of Management (CoM), which is comprised of all the Codes' key stakeholders, has continued to be one of the Codes significant successes, providing an effective forum for members where information, good practice and any concerns can be raised in a mutually helpful and co-operative environment. The CoM also sets the fees to join the Code and approves an annual budget for running the Code. Fee are therefore set by those who pay them.

The CoM has continued to meet three times a year and meetings were held on 17th October 2008, the 18th March and the 24th June 2009. Attendance at these meetings was strong with 38 members attending over the year. Meetings generally last for two hours and the CoM is chaired by Mr John Daniels, who was appointed in October 2007 for a three year period. John has also represented the CoM at a number of external events and conferences throughout the year.

Members not attending more than three meetings sequentially are deemed resigned unless exceptional circumstances to justify absences exist.

The CoM continues to be hosted by members free of charge, so thanks need to be recorded to LACoRS, Unipol Student Homes and University College London.

Membership of the CoM has altered since the end of June 2008, with a turn-over in personnel representing both the providers and other interested groups. The current members and observers are:

Mark Allen (UPP Projects Ltd)
Jason Baines (Derwent Living)
Michael Ball (ASRA)
Martin Blakey (Unipol)
Nikoline Camaj (Nido Student Living) – co-opted to the CoM in June 2009
Jonathan Chandler (University of Greenwich)
Jeff Childs (Welsh Assembly Government) – Observer
Bob Crompton (Victoria Hall)
Rob Damiao (Unipol)
John Daniels (Chair) – appointed in October 2007 for a three year period
Gavin Duncan (Opal Group)
Ian Fletcher (ANUK)
Ruth Hammond-Laing (LACoRS)
Allan Hilton (Cass and Claredale)
Dennis Hopper (University of Leeds)
Paddy Jackman (CUBO)
Yvonne Jones (Carlton North Wales) – Co-opted to the CoM in June 2009
Helen McNeely (AMOSSHE)
Kerry Mattock (Mainstay) – appointed in March 2009 to replace Jane Carroll
Paul Rowlinson (Sanctuary Management Services)
Alan Russell (UNITE)

Robert Russell (AOC) - Observer
Mary Stallebrass (CLG)
Ama Uzowuru (NUS)
Terry Waide (Northern Ireland Housing Executive) – Observer
Geraldine Ward (University of Hertfordshire)
Sarah Wayman (NUS)
Brian Welsh (Liberty Living) – replaced Charles Marshall in March 2009
Keith White (CRM)

The following members of the CoM have left the Committee:

Chris Baines (Servite) - deemed to have resigned
Stuart Black (London Metropolitan University) - London Metropolitan University no longer manages any student accommodation and Mr Black has left the service of the University
Jane Carroll (Mainstay) – was replaced as their representative by Kerry Mattock
Charles Marshall (Liberty Living) – was replaced as their representative by Brian Welsh
Terence Treadwell – (Co-opted member) resigned in June 2009
Ama Uzowuru (NUS) – was replaced as one of their reps by Ben Whittaker

Section 3: Meeting the Challenges of the Third Year

The last Annual Report set a number of challenges for the third full year of the Codes operation. These included:

1. Recruiting more educational establishments to the revised Code
2. Establishing an annual National Codes conference, with an emphasis on training and networking for staff based in developments covered by the Codes
3. Improving the coverage of publicity relating to the Codes and ensuring that all members make reference to the fact that they are signed up to it in all their publicity materials and on their website
5. Developing additional benchmark standards which could be 'bolted on' to the existing ones, but relate to specific areas of provision/management, and for which a starred rating is awarded if being complied with
6. Continuing the assessment and verification procedure to ensure it promotes enhanced standards and recognises good practice

Although some of these challenges have either been met (or are in the process of being so), further work is ongoing on each of them.

Recruiting More Members to the Educational Establishment Code

A consultation exercise was carried out with key stakeholders in the HEI sector with the establishment of an Educational Establishments Code Review Group, and, following their input, the Educational Establishments Code was thoroughly reviewed in the light of that exercise.

A number of universities and colleges had stated that their main objections to joining the Code was the proscriptive nature of some of the requirements and the lack of direct input into the verification process by experts from within the educational sector itself. There was strong support for a comparable and transparent verification process rather than the use of an in-house audit that made comparative performance and the identification of good practice possible.

A thorough revision of the Educational Establishments Code updated the content of the Code to take into account recent legislation and saw new standards implemented that enables educational institutions to identify clear objectives to be achieved and set policies to meet that standards.

The newly revised Code also introduced the option of peer-to-peer review for those educational institutions who wished to co-operate with others to assess and verify each other, within the structure of the Audit Committee. Peer to peer review is designed to increase commitment to good practice and encourage co-operation throughout the sector in achieving high standards.

As part of this new system, the web site was redesigned (and work remains on going to give the whole site more of a consumer feel).

On the day that the new Code was officially launched, July 24th 2009, a press release was issued (see appendix 2). The launch took place at the University of Leeds and coincided with one of NUS' summer training events. The September 2008 edition of *The National Student* carried a report of the launch (see appendix 2a).

The Self-Assessment Questionnaire for the educational establishment Code was reviewed at the same time as that Code was revised. The Review Group which undertook the review process was keen to ensure that as well as linking with the various changes made to the Code, the self assessment questionnaire should cease to be paper-based and instead should be capable of being completed on-line. New verification software was designed that allows educational institutions to complete their self-assessments on line, rate their own performance and then track movement across the years in respect of that performance.

Although the verification process for the new Code was operational from the first day of the new Code, the software and technology was only completed in June 2009, to be used as an integral part of the Code from September 2009.

At that stage the new Code will be relaunched into the sector and already there is considerable interest in using this new Code as a management tool to improve performance and implement continuing improvement.

ANUK/Unipol would like to thank staff at CLG for the very considerable amount of work, undertaken in a short time, to revise the Code for Educational Establishments. Many of the gains from this revision will feed through into a planned revision of the private providers Code that is planned for 2009-2010 with any new Code coming into force in 2011. The new software developed is also likely to cross-feed into the private providers Code at that time.

The complaints and tribunal systems remained unchanged in the review, although much closer links were forged with the Office of the Independent Adjudicator (OIA) to share experiences and compare issues that arose through the complaints systems.

Establishing an Annual Conference and Training

Following the success of the first National Codes conference, held in December 2007 it was felt that it would be beneficial if an annual conference were to be held – especially a conference designed for staff based in developments covered by the Codes, not just members of the Committee of Management.

A second conference was held in December 2008, which attracted more than 30 delegates. The conference focused on the practicalities of the self-assessment and verification process and included contributions from CLG, staff at developments which had recently been subject to verification visits and a member of the verification team.

The feedback from this conference was very positive and included a number of helpful suggestions as to timings of future conferences and their content. Most participants felt that late November/early December was the most suitable time of year for the conference and most thought that the conference should focus on examples of good practice from within the sector, with contributions from staff active within the sector.

ANUK/Unipol have undertaken nine dedicated training events for members and a standard training module is being developed that members can use themselves when training and inducting their staff.

Developing Additional Benchmark Standards

One of the key recommendations made by the Review Group which was responsible for developing the revised Code for educational establishments was that some additional, voluntary, standards should be developed relating to certain aspects of the management of large student developments.

The Review Group identified four distinct headings under which these additional standards might be branded, each of which would attract a specific star rating if the requirements were met. These were:

- Security
- Sustainability
- Student Care
- Community Interface

It was agreed that the additional standards relating to these areas should be devised in consultation with a relevant body that had a particular interest and/or expertise in that area. For example, the Home Office was regarded as being an obvious organisation to work with in relation to security, whilst the Association of Managers of Student Services in Higher Education (AMOSSHE) appeared willing to play a role in developing standards relating to student care. However, some difficulties were foreseen in finding partners for the other two areas – especially the heading of community interface.

Priority this year has been given to reviewing the Code for Educational Establishments and in future years' partners will be identified to move forward these areas. ANUK/Unipol remains committed to developing these bolt on areas, (which will not necessarily fit within the Government approved Code but will be voluntary additions to it), but progress needs to be tempered with the realities of many stakeholders giving their attention to other matters because of the uncertainties and policy adjustments needed following the recent recession.

Initial ideas for progress will be presented at the next annual conference for discussion.

Section 4 – Publicity and Awareness Raising Activities

The Codes have begun to be cited more frequently by the media in advising students about finding accommodation but raising consumer awareness remains important. Considerable work is undertaken by the accommodation providers themselves, who increasingly make their tenants aware of their obligations under the Code.

As an example of media coverage, in August 2008 *The Independent* published an article by Lucy Tobin that was entitled “How to find digs that are a home from home: Helping your offspring to select a safe and secure place to live can reduce those sleepless nights spend worrying over their welfare” (see appendix 3). The article made reference to halls of residence and included a quote from NUS which read

“Regardless of who runs or owns your accommodation, they should be signed up to codes of practice... This means the accommodation should meet certain physical and management standards, and will give you an avenue to complain should it not meet those standards”.

Advertising space has been booked in two future editions of *Education Today Supplement*, although the exact content for each of the ads has still to be agreed.

A LACoRS initiative is also under way to provide guidance to Local Authorities about the purpose and operation of the Codes and an initial draft of that guidance is currently being amended. The final guidance is likely to be issued towards the end of 2009 and ANUK/Unipol welcomes this initiative that will raise awareness of the Codes amongst local authority staff.

Marketing and Publicity Working Party

The first meeting of this working party took place in January 2009. The main item of discussion was the creation of a new logo for the Codes and it was agreed that the new design should convey the message – both to students and their parents – that by renting from a provider signed-up to the Codes they were buying some assurance that the provider was reliable and competent.

It was proposed that the existing logo be replaced by one depicting a raised thumb above a closed hand (see appendix 4), with the words National Codes of Standards written underneath. The design will also incorporate the phrase “Assured Accommodation”.

It is intended that the new logo will be adopted from January 1st 2010.

National Codes Website

The website is a ‘work in progress’ and the next stage of its development is to make it much more ‘student friendly’, but it is easier to navigate than the previous one and the key documents are all easily available. The site also includes photos of various developments covered by the Codes, provided by various providers.

Section 5 – Amendments/Additions to the Codes

At the June 2009 meeting of the Committee of Management it was agreed that the deposits section in the Code for non educational establishments needed to be revised, especially to bring it into line with the requirement of the tenancy deposit protection legislation.

The CoM also considered making alterations to both Codes in respect of no-smoking signage, but decided that as this was already a legal requirement it was not necessary to do so.

Section 6 – Assessment and Verification Procedures

Self-Assessment Questionnaires

During the year the Committee of Management decided to tighten the membership criteria of the Codes by requiring all new applicants for membership to complete the relevant self-assessment questionnaire before "provisional membership" was granted. A successful verification then must take place within 12 weeks of the assessment being received before membership is granted.

A small number of applicants in the last year have failed to complete and return the self-assessment within the 28 day time period allowed. If they again fail to do so following a subsequent reminder from the National Code Administrator, their application for membership is deemed to have lapsed and members of the Committee of Management are informed of this. The initial payment then made is forfeited and their earlier failure is taken into account in considering future membership.

Verification Visits

A decision was taken during the year that buildings should only be verified when they had reasonable occupancy levels of students because it was difficult to assess management performance in an empty building. As a result, verification visits have been compressed into shorter periods of the year when students are present (but not when they are taking examinations).

Two rounds of verification visits have been completed since the start of July 2008, which included some re-visits to developments first seen in 2007 where action points were identified.

Between October and December 2008 a total of 16 developments belonging to 14 different providers received a visit from a member of the verification team. Although all but two of these developments were deemed as having some action points which needed to be addressed, all of the providers concerned were regarded as being worthy of membership or on-going membership of the Codes – assuming they agreed to address any action points that had been identified.

Two of the providers verified during the first round of visits subsequently withdrew from membership of the Codes. It's suspected that one provider did so because they were unwilling or unable to carry out some or all of the action points identified by the verifier. The relevant Local Authority was informed of this and they may plan their own inspection.

An additional round of visits occurred between February and June 2009. A total of 27 visits took place and included: 14 developments belonging to 11 new applicants for membership, four developments belonging to three existing members which had not previously been visited, and nine re-visits to developments that were last verified in 2007 to see whether the action points identified last time had been addressed.

All but one of the new applicants visited met the standards of the Codes and were recommended for membership, although in a few cases it was thought necessary that they be re-visited within 12 months to ensure the action points had been fully addressed. The one new applicant who was not accepted immediately was given an eight week period to demonstrate that they were meeting the standards, if so then they would be permitted to become full members.

The visits to developments operated by the existing members revealed no significant problems. However, a number of the re-visits to developments first seen in 2007 produced evidence that not all of the action points previously identified had been addressed. In these cases the Audit Panel recommended a variety of responses, including follow-up visits within given time periods to check for completion and these will now take place.

Table One: Number of Verification Visits Undertaken

YEAR	Number of Developments Visited	Number of Members Visited
2007	38	26
2008	37	31
2009	27*	22*

* A further 16 visits to 12 members have been planned for the autumn of 2009.

Table Two: Outcomes from Verification Visits, by Code, to June 30th 2009

Code	Number of Developments Visited	Number without action points identified	Number with one or more action points identified
Educational Establishments	20	1	19
Non Educational Establishments	82	33	49

When the planned verification visits take place in the autumn of 2009 then there will have been a substantial increase in the work-load of the verification team. This reflects both the growth in membership of the Codes and the requirement that all new applicants have at least one development verified before they are permitted to become full members.

Although the outcomes table suggests that members of the educational establishment Code are significantly less likely to be fully compliant with the Code's requirements (hence the need for action points to be identified), this is more likely to be a reflection of the fact that the developments themselves are older than those operated by members of the other Code. As Table 3 (below) shows clearly, the majority of the action points relate to the overall fabric of the building rather than the management procedures employed.

Table Three: Most Frequent Issues Identified as Action Points for Educational Establishments

Category	Number of Times Reported as an Action Point
Fabric of the Building	29
Management of the Building	23
Health and Safety	6

In 2009-2010 the Audit Panel intends to follow up all action plans that have been established and report on positive outcomes and changes achieved and these will form an important part of the next Annual Report. It is clearly important that that Code assessment and verification systems, as well as encouraging good practice and driving up standards, can identify where real change has been affected as part of the drive towards continuous improvement.

Audit Panel

The Audit Panel has met on two occasions since July 2008, both times to consider reports from members of the verification team, receive responses from the providers concerned and to make recommendations as to whether the provider should be permitted to join or remain a member of the Codes.

There have been no changes to the membership of either the Panel itself or the verification team since 2008 which consists of:

Neil Marsden, Chair (National Landlords Association): verifier

Dr Stephen Battersby - Chartered Institute of Environmental Health (CIEH): verifier

Ian Fletcher (ANUK and British Property Federation)

Philip Moxon - independent environmental health consultant

Nick Stanton - independent management consultant: verifier

Sarah Wayman - National Union of Students: verifier

Peer-to-Peer Verification System

All current members of the Code for Educational Establishments were offered, when they re-signed for 2009, the choice of being verified via the existing arrangements - i.e. a member of the verification team undertakes a visit – OR to be verified via a peer-to-peer system. Despite the incentive of a reduced rate fee for members opting for the peer-to-peer system, all have so far requested to continue with the existing arrangements.

This situation is unlikely to continue into 2009-2010 as several new and potential members have stated their intention to make use of the peer-to-peer option.

This means that a different team of verifiers will need to be recruited (who will operate in a similar way to the existing team) from within the educational sector, who will be trained in skills assessment, how to conduct visits and compile the necessary reports for forwarding to the Audit Committee.

Section 7 – Complaints and Tribunal Procedures

Code Complaints

Although the Codes have been operating since 2005, very few formal complaints have been received (see Table 4 below). Equally, there have been remarkably few enquires from tenants/former tenants or representatives of these groups concerning problems experienced with accommodation providers who are members of these Codes; although the number received has increased over the years.

Table 4: National Code Complaints Received, by year and status

Year	Total Received	Formal Complaints	Complaint Enquiries
2005	1	0	1
2006	5	0	5
2007	5	2*	3
2008	20	3	17
2009	8 (to end of June)	2	6

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

Full details of the outcomes from the one legitimate formal complaint received in 2007 were included in the 2008 Annual Report, along with a description of the outcomes of the first one issued in 2008 (where no referral was made to the Tribunal Chair for adjudication because the former tenant informed the National Code Administrator that a settlement had been agreed with the accommodation provider after the formal complaint was submitted).

This leaves four formal complaints – two from 2008 and two from 2009. Two of these complaints were referred to the Chair for adjudication (details of the cases have been posted onto the National Code website and appear as appendix 5) and a summary of each is given below. The two from 2009 are currently being investigated and a response to the allegations is awaited from the provider concerned.

The Tribunal Chair remains the barrister John Martin, an acknowledged expert in the field of housing law. Ms Ama Uzowuru, NUS Vice President for Welfare will be stepping down from the Tribunal after two years in July 2009 and will be replaced by Mr Ben Whittaker, the newly elected VP with responsibilities for welfare. Mr Rob Damiao (Unipol), having served on the Tribunal for a year will also be stepping down in June to be replaced over the summer.

The other membership remains the same as:

Gavin Duncan (OPAL)

Keith White (CRM)

Mark Allen (UPP)

Paul Rowlinson (Sanctuary Property Management).

Case 1: This was brought by the former tenant of a development in London. He alleged that the provider had breached two particular aspects of the Code for non-educational establishments: 2.00 Misrepresentation of Marketing Information and 6.02 Honouring agreements/settlements within given periods of time. The Chair felt that there was insufficient evidence to uphold the first part of the complaint and (as the provider supplied evidence to support a claim that some compensation had been paid) he did not uphold the second part either.

Case 2: This was brought by a representative of a former tenant who had resided in a development in Salford. It was alleged that the provider had breached sections of the Code for non-educational establishments relating to the return of deposits and dealing with disputes. The Chair concluded that there were no grounds for up-holding the complaint in relation to the deposit return but did feel there were some grounds to uphold parts of the complaint relating to the way in which the provider dealt with the dispute.

Given the paucity of formal complaints to date it has not been necessary to convene a specific hearing of the Tribunal Panel. However, as the Standing Orders require that the Panel meets at least once annually, a meeting was convened in October 2008 (following the Committee of Management Meeting) to receive a report from the National Code Administrator on the number and type of complaints that had been received and to be provided with details of adjudications made by the Chair.

Section 8 – Code Convergence and the ANUK/UUK Protocol

The consultation document which paved the way for the three existing Codes to become ‘approved’ by the Government originally envisaged that the two Codes for educational establishments would converge over a three year period. A protocol agreement, signed by ANUK/Unipol and Universities UK/SCOP, included a commitment that “After three operational years from the date of this Protocol being agreed, both UUK/SCOP and ANUK/Unipol will formally consider whether full convergence can be achieved”.

Since that time CUBO have taken responsibility for co-ordinating the UUK Code’s and its Management Committee and the steer from CLG has been very much away from the notion of convergence of the Codes to one of co-existence. Indeed, the review that was undertaken earlier in the year of the new ANUK/Unipol Code for Educational Establishments confirmed this.

In terms of the operation of the Protocol, since the departure of the staff who oversaw the initiation of the UUK Code it has not been possible to arrange a meeting with the UUK staff member with notional responsibility for the Code. Whilst the Protocol is still in existence it is currently dormant following the lack of response from UUK to activate it and this is disappointing.

On a more productive note, the ANUK/Unipol link with CUBO has considerably strengthened and their involvement in the Code review mentioned earlier was much appreciated. With the shift of emphasis away from UUK and towards CUBO there have been a number of operational areas of co-operation that have blossomed and, as development of any "add on" codes are concerned these will almost certainly be worked on jointly for all approved Codes.

It is reassuring that CLG's involvement in the Codes' Committees of Management is continuing in line with the assurances they gave to the House of Lords Merits of Statutory Instruments Committee (HL Paper 158) in 2006 and their continued interest in the development of the Codes (both the ANUK/Unipol and UUK/CUBO codes) remains important.

Section 9 – Conclusion

Achievements in the Third Year:

- membership of both the ANUK/Unipol Codes has increased and now exceeds more than 125,000 bed spaces.
- there are an increasing number of 'smaller' private providers, often with just one development in one geographical location
- the verification process has become tighter and all new applicants (with a completed building) for membership are being verified within 12 weeks of applying
- an annual conference has been established, aimed specifically at staff who manage developments.
- a major review of the Code for Educational Establishments has been completed and a new Code approved
- an on-line version of the self assessment questionnaire for members of the educational establishment Code has been completed
- a peer-to-peer verification system has been approved.

Challenges for the Fourth Year

- to re-launch the educational establishment Code and to organise some seminars to explain how the new Code will operate
- to recruit more educational establishments to the revised ANUK/Unipol Code
- to increase the appeal of the annual ANUK/Unipol Codes Conference as a significant training and networking opportunity for the accommodation sector and to widen out in-house training to suppliers to ensure their staff know how to achieve their obligations under the Code
- to improve consumer awareness of the Codes and implement a better public information policy with a punchier logo
- to redesign the web site with an increasing consumer focus
- to conclude the work of developing benchmark standards in respect of enhanced security, sustainability and other issues that are important in the management of larger developments
- to undertake the initial review of the ANUK/Unipol code for non-educational establishment providers by consulting widely in the sector before feeding this into CLG's proposed review in 2011
- to increase transparency by publishing information on the website relating to verification visits, specifying which developments have been verified and when
- To recruit a team of verifiers for the peer-to-peer system and undertake a skills assessment for peer-to-peer review
- to develop a members pack and an annual newsletter
- to update the standard display panel that is used by all members in lobbies of developments to promote the Codes
- to develop a standard presentation on the Codes for use by members when training their own staff in the procedures of the Code.

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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Annual Report to Communities and Local Government (CLG)

Appendix 1: The National Codes Budgets 2007-8, 2008-9 and 2009-10.

	2007-08 Budget £	2007-08 Actual £	Variance £	Annual 2008-09 Budget £	YTD period 9 2008-09 Actual £	Variance £	2009-10 Budget £
INCOME							
Funding	5,000	10,000	(5,000)	5,000	0	5,000	0
Fee income	69,000	93,502	(24,502)	76,000	108,854	(32,854)	115,000
Interest	0	0	0	450	37	413	450
TOTAL	74,000	103,502	(29,502)	81,450	108,891	(27,441)	115,450
EXPENDITURE							
Office costs	8,640	7,079	1,561	8,525	7,383	1,142	16,254
Staff costs	31,984	33,370	(1,386)	35,335	26,537	8,798	40,286
Travel costs	1,750	1,523	227	400	809	(409)	1,500
Publications	6,150	2,333	3,817	3,768	7,100	(3,332)	3,487
Merchandising	2,750	0	2,750	2,750	0	2,750	2,500
Consultancy	11,250	50,696	(39,446)	4,000	18,868	(14,868)	20,000
Verification	0	0	0	17,000	11,676	5,324	15,000
Tribunal exps	0	1,140	(1,140)	6,000	960	5,040	6,000
Miscellaneous	2,500	1,988	512	4,000	383	3,617	5,000
PR	8,000	9,400	(1,400)	0	2,658	(2,658)	0
VAT	0	(4,462)	4,462	0	(3,239)	3,239	0
Depreciation	954	834	120	1,000	749	251	1,077
TOTAL	73,798	103,901	(29,923)	82,778	73,884	8,894	111,104
Surplus/(Deficit)	22	(399)	(421)	(1,328)	35,007	(36,335)	4,346

Financial Commentary

Note: Unipol are the secretariat for the ANUK/Unipol Code and the information presented is audited, as a separate management account by Unipol's auditors within Unipol's general audit.

Unipol's financial year runs from August 1st to July 31st and the fee for the ANUK/Unipol Codes are levied on an annual calendar year basis from January 231st to December 31st. The Annual Report therefore covers two financial years, the previous year 2007-2008 and the current financial year 2008-2009. The actual performance for the 2008-2009 year is taken from the third quarter results, but is likely to be an accurate reflection of the final year result on July 31st 2009.

2007-2008

Income rose from an anticipated £69K to £94K as the number of bed spaces under the Codes increased. As a consequence of this growth, the cost of running the Codes also increased. The major item of expenditure was the commissioning of a new self assessment methodology and software as part of the review of the Educational Establishments Code. Members were content to see a small fee rise take place to fund this review.

This was the final year in which previous grant aid from CLG was expended on enhanced publicity connected with the start-up of the Codes.

2008-2009

Fee income again increased from the £76K budgeted (the budget was set before the higher fee income was known in the previous year) to £109K. Again, the additional income was used on increased verification and consultancy where an additional £19K was spent on project work.

Office and staff costs increased in direct proportion to the additional effort involved in managing and servicing a larger number of suppliers.

2009-2010

Next year's budget anticipates that although the cost of fees will remain at the previous year's level (with only small providers seeing the minimum fee increase) the sum raised from fees will increase to £115K. Again staff costs and office costs have increased as the Code grows.

Next year it is anticipated that additional funding will be spent on the redesign of all the publicity connected with the Code and that each tenant of a Code room will be written to (either electronically or paper based) so that they are fully aware that they are within the Code. The cost of this is within the office overhead. It is also anticipated that project work under consultancy and verification will increase as the amount of verification work rises from £21K to £35K, despite consultancy generally becoming cheaper on a daily fee basis.

Any surplus will be redirected towards enhanced publicity.

Conclusion

The fees generated by the Codes membership are sufficient to ensure that the Codes are maintained and reviewed on a regular basis, that information can be kept up to date, that publicity (at a certain level) can be produced and that the self assessment, verification and development of verification can be undertaken, as required by the membership to ensure standards are being met. The fees are also sufficient to enable the Audit Panel, the complaints system and the Tribunal to be properly and efficiently managed and co-ordinated. The current system is fully financially sustainable with the support of the Codes membership.

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Annual Report to Communities and Local Government (CLG)**

Appendix 2: Press Release Launching the Revised Code for Educational Establishments

Press release

ANUK/Unipol launch new code of standards for student accommodation

The Accreditation Network UK (ANUK) and Unipol Student Homes have today (Thursday 24 July 2008) launched a new code of standards to ensure that student accommodation is managed to the highest possible standards.

The new code, which has been created following a review and consultation process with representatives from across the education sector, aims to provide new and current students with a clear indication of the quality of student accommodation. The new code builds on an existing scheme operated by ANUK/Unipol for the education accommodation sector and incorporates changes and improvements specifically designed to ensure that the code is relevant to universities and colleges. All universities and colleges are now able to sign up to the new code and can do so free of charge until January 2009. For information on joining procedures or to obtain a copy of the new code, please visit www.anuk.org.uk/LargeCode or contact Simon Kemp, National Code Administrator on 0113 205 3406.

Further development of the new code is planned for later in 2008 which is intended to give institutions the opportunity to achieve a star rating for provision of a range of additional features of interest to both students and their parents, such as sustainability and security. Educational institutions that score highly in these areas will have an advantage over others, so we can expect to see universities and colleges step up their marketing activity to promote their new and improved ratings to customers in what has become an extremely competitive marketplace.

Dennis Hopper, Chair of the review group, said: "This new code is a positive step forward for universities and colleges throughout the UK. Student accommodation is a key factor in the recruitment and retention of students, with many students keen to ensure that where they will be living is safe and secure and managed to the highest standards".

Ama Uzowuru, Vice President (Welfare) at NUS, said "The new code is an important step forward for students as it sets out, in one document, exactly what standards they should be expecting from their accommodation provider and tells them what action they can take if the standards are not being met. The new code has been welcomed by the educational sector and the Department for Communities and Local Government (DCLG) and it is anticipated that it will receive 'approved' status under the 2004 Housing Act by October 2008.

-ENDS-

Notes to editors:

The new code was launched on Thursday 24 July at the University of Leeds.

ANUK was formed in May 2002 to publicise, promote and share good practice in accreditation and is administered by UNIPOL Student Homes based in Leeds.

'Approved' status means that all or some accommodation owned and managed by that provider which is listed under membership of the code is exempted from the need to apply for a separate license from the local housing authority.

For further information please contact:

Emma Leonard or Sarah Chadwick at MCGPR on 0113 268 5000 or email

emma.leonard@mcgpr.co.uk

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Annual Report to Communities and Local Government (CLG)**

Appendix 2A: Report of Educational Establishment Code Launch from The National Student



ANUK/Unipol launch new code of standards for accommodation

IN JULY The Accreditation Network UK (ANUK) and Unipol Student Homes launched a new code of standards to ensure that student accommodation is managed to the highest possible standards.

The new code, which has been created following a review and consultation process with representatives from across the education sector, aims to provide new and current students with a clear indication of the quality of student accommodation. The new code builds on an existing scheme operated by ANUK/Unipol for the education accommodation sector and incorporates changes and improvements specifically designed to ensure that the code is relevant to universities and colleges.

All universities and colleges are now able to sign up to the new code and can do so free of charge until January 2009.

Further development of the new code is planned for later in 2008 which is intended to give institutions the opportunity to achieve a star rating for provision of a range of additional features of interest to both students and their parents, such as sustainability and security.

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Appendix 3: Article in The Independent

How to find digs that are a home from home

Helping your offspring to select a safe and secure place to live can reduce those sleepless nights spent worrying over their welfare, writes Lucy Tobin

Sunday, 10 August 2008

It's a milestone moment when children become students, especially when they fly the nest to attend university in another part of the country, and most parents foster concerns about the transition. Accommodation choices are one of the most important decisions for a fresher to make, affecting issues as wide as security, food, finances and new friends.

Helping them to make the right decision might lessen the number of sleepless nights you spend wondering if your child has got home safely or worrying whether they are living in a secure environment. Sarah Wayman, student welfare officer at the National Union of Students (NUS), says that researching accommodation choices can reap huge benefits.

"It's really important that new students feel happy with where they're living in the first year at university. The roof over a fresher's head can have a really big impact on studies and social life."

The vast majority of freshers opt to live in university owned halls of residence. These often provide security and welfare services that might keep the parental mind at rest, too. Bedrooms are often organised according to shared interests or year (many, for example, are exclusively for first years). As a result, halls can provide an instant social life. Other, practical advantages include the usual option of inclusive utility bills and internet, contents insurance covering the whole building and on-site laundries, which can ease your teenager's transition.

Brooke Morris, 19, from London, has just finished her first year studying international hospitality management at Oxford Brookes University. "I decided to live in halls during my first year at uni, and I loved it. I chose university-owned accommodation, mainly because of the price and the nearby facilities," she says.

"My mum was keen for me to go to university, and preferred the idea of me living in halls because it would allow me to lead an independent lifestyle in Oxford. I think I made the right decision because I really enjoyed my first year."

Prices at halls vary widely across the country: the NUS reports that average student rents are between £40 and £100 a week. Most halls are owned by universities, but there are an increasing range of private providers. "Regardless of who runs or owns your accommodation, they should be signed up to codes of practice," says Wayman. "This means the accommodation should meet certain physical and management standards, and will give you an avenue to complain should it not meet those standards."

Check out Universities UK (www.universitiesuk.ac.uk) for accommodation managed by universities or Accreditation Network UKANUK for accommodation in colleges or private halls (www.anuk.org).

Private housing might seem much cheaper than halls at first glance, but remember that a tenancy with a private landlord will tend to last 12 months, while in halls you will usually pay for term-time rent only. You will also have to add the cost of utility bills, which the NUS estimates to be around £10- £15 extra per week. There will also be added hassles of splitting household bills like water, gas, internet and electricity bills, which can be problematic when flatmates are busy trying to settle in and make friends at the same time. It is real life though.

If possible, try to get a property recommendation from another student, as they will be able to advise you on the landlord and management standard as well the house or flat itself.

The student union may also be able to help. Try to use an estate agent who is approved by one of the three accreditation bodies: ARLA, NALS or NAEA. If you're worried about a private landlord, the first place to go is the local council, who may have a list of approved members. On move-in day, remember to take photos of the property, especially damaged areas, with the date digitally stamped on the photo, to avoid difficulties with getting the deposit back. The NUS recommend asking letting agents whether they belong to The Dispute Resolution Service, which offers extra guarantees for deposit security.

Important features to look at, whether you decide to lease halls or private accommodation, are monthly inclusions in the rent (watch out for internet surcharges, for example) and location. Look at the property's situation, not just in relation to the main campus but also to department buildings, libraries, clubs and cafés.

A nearby supermarket is vital if you're in self-catering accommodation, especially if you don't have a car. If you opt for selfcatering, check how many students share each kitchen, and what cooking facilities are provided. Some halls will have disabled access and wheelchair accessibility, others may adapt facilities such as kitchens for certain religious requirements. You might want to check the contract for a clause that allows you to be released should you decide to leave the course.

There are niche accommodation options available around the UK's campuses too. At collegiate universities like Oxford, Durham and Cambridge, many students live in college- owned accommodation for every year of their course. Meanwhile, at Lancaster University there are new "Eco-Residences". The properties were built with sustainable materials and include energy-saving devices as well as on-site recycling and bike storage, dual-flush toilets and heat recovery systems. There is townhouse accommodation, costing £72.80 per week, and "cluster flats" with six en-suite bedrooms and a shared a kitchen/living space for £89.25 per week. More projects like this are planned at Leeds Metropolitan and Kent Universities.

Another popular option among students are new developments of "luxury" halls of residence and flats. Providers of private halls of residence around the UK include Cosmopolitan, Jarvis UPP, Unite and Liberty Living. These tend to be more expensive, but usually feature more modern designs and extra facilities. Prices again depend on location, but as an example, Victoria Hall offers ensuite rooms with amenities such as satellite TV in Birmingham, Nottingham and Manchester with rates starting at £79 per week. Unite has properties in 23 locations around the country.

In London, their top range studios include a cleaner, a flat-screen TV, high-speed internet, and a concierge service to arrange things like taxis and dry cleaning, but you pay for the privileges: a whopping £292 a week. Alixandra Hayhurst, who is 19 and from Bournemouth, is starting a degree in fashion PR at the London College of Fashion. She's moving into one of Unite's studio properties in September.

"Going off to university is a huge deal and I want it to be a memorable and happy experience," she says. "I chose the Unite property because I wanted to be in the heart of London's social scene, and I think you get a lot for your money. Security is a key factor, especially the CCTV, concierge and swipe card entry to all buildings. I like to know that I am safe."

Of course, the cheapest option for freshers is to live at home; if the campus is near enough, many students chose this option to save money. It does, however, mean missing out on a key component of student life, and may make it harder to make friends. And that's why you can look forward to some extra considerate teenagers around the house in the coming weeks, offering free cleaning in the hope you'll let them live away from home.

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Appendix 4: Draft of revised Code logo



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Appendix 5: Complaints Tribunal Chair's Adjudications

Adam Khun, a tenant of Nido Kings Cross, has made a complaint against his accommodation provider. His email of 7th February 2007 to Terence Treadwell refers principally to noise disruption, but there are some other matters raised, which are not referred to subsequently.

When Mr Kuhn complained formally under the National Code's complaints procedure he did so under two clauses, briefly as follows:

2.00 Misrepresentation because certain facilities that were described on the web-site were not actually working;

and

6.02 Not changing his room within 3 weeks of agreeing to do so, as he actually had to wait 3 months for the room change.

Mr Treadwell responded by email promptly.

On 2.00 he accepted that there should be an improvement in accuracy on the website. He asserted that the gym, café and screening room were operational when Mr Kuhn moved in or shortly after, with only the external Courtyard and Fitness Studio not available.

Mr Kuhn's responded by saying the café and screening room did not open till the middle of February; as for the gym, there was no lock and he had to pay a fee to gain access.

On 6.02 Mr Treadwell accepted that there were noise problems and referred to email exchanges with Mr Kuhn. He says that there was no alternative room available until April 9th, when it was offered to Mr Kuhn, who accepted it on 14th April. As to noise disruption generally, some compensation had been paid for this to NYU to redistribute. NYU also allowed residents to move out of Nido, but Mr Treadwell did not know if Mr Kuhn had been made aware of this by NYU.

Mr Kuhn responded by saying he was never offered compensation by NYU but said he would follow this up. As for the room change offer, he confirms it was made and accepted within 5 days, but said he had to wait from February to April for the offer.

2.00 Misrepresentation: Nido have acknowledged that the website should be accurate with regard to the facilities available and they say that they have taken steps to ensure that this is better managed in the future. There still remains a relatively minor factual dispute about what was available when, which cannot be resolved without further evidence. I note that Mr Kuhn did not mention the café and

screening room in his email of 7th February, though he mentioned a problem with the gym temperature, tvs being off and the position of running machines. This is not conclusive, however, and he does say there is another email.

Because I cannot decide on the evidence available exactly what facilities were misrepresented and for how long, I am not prepared to find a breach of the Code, but I express the wish that Nido will ensure that there will be no basis in the future for the sort of complaint made by Mr Kuhn on this ground.

6.02 Prompt honouring of agreement/settlements: Mr Kuhn's complaint is more accurately that it took some months for Nido to come to an agreement about changing his room. When they did offer alternative accommodation he was able to take this up quickly. To that extent I do not see how this clause of the Code was breached.

Nido have acknowledged that there was a problem with noise and it does seem that Mr Kuhn has a legitimate grievance, which took time to sort out. I note, however, that compensation was paid to NYU to redistribute, which Mr Kuhn has said he will look into. Once again, there is a problem about lack of evidence which means I cannot make a finding that there has been a breach of the Code, but I will say that Nido seem to have done their best to make amends by the compensation paid and the alternative accommodation eventually offered. It seems to me that this was a sensible solution in the face of what were certainly real problems.

JOHN MARTIN
CHAIR OF THE CODE OF STANDARDS TRIBUNAL

NATIONAL CODE OF STANDARDS COMPLAINT

FLAT 2B, BRONTE HOUSE, SALFORD

TENANT: SIMON BLEASDALE

LANDLORD: CORPORATE RESIDENTIAL MANAGEMENT LTD

THE COMPLAINT

This tenancy began on 7th September 2007 and ended on 13th June 2008. At the end of the tenancy CRM deducted £185 from the tenant's deposit of £200, returning £15 to him with a remittance advice dated 30th June 2008, which simply states *Deposit Return*. In a letter to the tenant's mother, Mrs Cheek, of 18th October the Regional Head of Student Management, Mr Cummings, enclosed a *schedule of the works actually undertaken showing the actual cost of decorating your son's room 2b, the corridor and the kitchen in your son's flat*. A copy of the decorator's invoice was also enclosed.

In the same letter he wrote *As a matter of course a breakdown of deductions is sent out with Deposit Payments, I apologise if you did not receive this. I have enclosed a copy*. This is actually headed RETURN OF DEPOSIT FORM and is dated 24th June 2008. In the original letter of complaint, dated 16th July 2008, from Mrs Cheek, there is no mention of this form. Mrs Cheek refers there to a phone conversation with Shirley Omerod at CRM, in which she seems to have been given some explanation for the deduction, including paying a share for replacing the hall carpet and redecorating the kitchen and *Hall walls*, which is given as one figure of £45. The bulk of the deduction was to redecorate the tenant's bedroom.

The letter of 16th July seems to be the first time the complaint was put in writing to CRM. That letter should be read as part of this adjudication. Mrs Cheek apparently wrote further letters to CRM but I have not seen them. On 3rd September Mrs Cheek wrote to the National Code Administrator. He replied on 5th September accepting her letter as a formal complaint about some aspects of the claim. The complaint was more formally made on the Code of Standards complaints form dated 6th October.

The issues are not fully dealt by CRM with until Mr Cummings' letter of 18th October.

THE RELEVANT PARAGRAPHS OF THE CODE OF STANDARDS

The complainant relied on the following sections of the Code, either explicitly or by implication:

- 5.03 Where monies from deposits have been retained to offset costs incurred, any remaining balance is returned within the timescale set out in paragraph 5.02 together with a written statement of account providing details of all and any deductions that have been made. (5.02 states that the timescale is within 4 weeks of the end of the tenancy.)

Where disputes arise with tenants, managers will ensure that:

- 6.00 They respond reasonably and promptly to tenants or their representatives
[...]

- 6.01 They make written response to any correspondence from tenants or their representatives within 3 weeks of its receipt.
- 6.03 They maintain courteous professional relations with tenants during any dispute.
- 7.0 Managers will ensure that within 4 weeks of receipt of any written complaint from a tenant (or their representative), they rectify any breach of this Code of Standards or, where any allegations are contested, enter into correspondence with the tenants or their representatives.

ANALYSIS AND FINDINGS

1. On the evidence which I have it is not possible to conclude whether the RETURN OF DEPOSIT FORM dated 24.06.08 was actually sent with the Remittance Advice dated 30.6.08, but it is clear that Mrs Cheek spoke at some stage to Sally Omerod at CRM and that she was not satisfied after that conversation and in consequence wrote the letter of complaint to them dated 16th July.
2. In my view, CRM's response to this letter fell short of what was required of them in 6.01 and 7.00 of the Code. Mrs Cheek made this written complaint on 16th July but the issues she raised were not adequately dealt with in writing till Mr Cummings wrote to her on 18th October. The written response was not within 3 weeks; CRM did not enter into correspondence with Mrs Cheek within 4 weeks of her letter of July 16th.
3. Mrs Cheek and her son obviously felt that 6.00 and 6.03 were breached as well. It seems to me that CRM did not respond reasonably or promptly to the complaint letter of 16th July, if only because they did not respond in line with 6.01 and 7.00.
4. I therefore find that CRM breached the Code of Standards in respect of 6.00, 6.01 and 7.00.
5. The annoyance of the tenant and his mother at the delay in dealing with the complaint is understandable, but I do not have sufficient evidence that CRM failed to maintain courteous professional relations with them during the dispute and I think more would be required than mere delay, which Mr Cummings has acknowledged, explained and apologised for. I do not uphold any complaint of breach of 6.03.
6. Mr Cumming's letter of 18th October to Mrs Cheek (which should also be read as part of this adjudication) is a prompt response to the National Code Administrator's letter to him of 13th October. Mr Cummings accepted that there were shortcomings in responding to the initial written complaint and apologised for this delay. In a letter of the same date to the Code Administrator he acknowledged that their standard holding letter did not go out as it should have done. He has taken steps to ensure this is done in future within 7 days.

7. Mr Cummings further acknowledged the delay to the Administrator and confirmed CRM's commitment to improvement and in particular that the issues raised by this complaint were currently being reviewed to ensure that this problem would not arise again.
8. With regard to paragraph 5.03, Mr Cummings' letter of 18th October to Mrs Cheek gave full details of the circumstances surrounding the deduction from the deposit, including photographs. His explanation is clear and careful and deals in an exemplary way with the questions raised by Mrs Cheek. A letter like this should have been sent more promptly and in any event in line with the time-scale provisions in paragraph 6 of the Code. 5.02 stipulates that a written statement of account providing details of all and any deductions made should be sent to the tenant within 4 weeks of the end of the tenancy.
9. As I wrote at the start of 1 above, it is not clear whether the written statement of account which Mr Cummings, in his letter to the Code Administrator, says is sent to all residents as a matter of course, was actually sent on this occasion to the tenant. Mrs Cheek in her letter of 16th July does not refer to it specifically, but this does not mean it was not sent and received. I cannot resolve the issue on the evidence I have, and it would not be fair to either party to make any finding.
10. It seems to me that the purpose of 5.03 is to provide the tenant (within 4 weeks and in writing) with sufficient information as to why a deduction has been made, such that it is not arbitrary or unexplained and can be challenged by the tenant if there is a disagreement whilst the matter is still relatively fresh.
11. Delay has been acknowledged, and steps taken to ensure that such delay does not happen in the future, but a very full and clear account has now been given to the tenant as to why there was a deduction from the deposit. Because I cannot be sure that the RETURN OF DEPOSIT FORM dated 24.6.08 was *not* sent with the remittance advice I am not prepared to uphold the complaint on 5.03. I feel this is a fair way to deal with the complaint about 5.03 for two reasons:
 - i) because Mr Cummings, in his letter of 18th October, has given a very full explanation for the deduction, which amply meets the information/ability to challenge purpose of 5.03; and
 - ii) I have already sufficiently made the point about delay in dealing with the other aspects of the complaint and it is clear from Mr Cummings' response to the Administrator that CRM fully intend to improve their procedures on delay in the future.

CONCLUSION

The complaint is upheld as regards paragraphs 6.00, 6.01 and 7.00 of the Code of Standards.

JOHN MARTIN

ANUK is administered by Unipol Training, an arm of the national student housing charity, Unipol Student Homes. Registered Office: 155/157 Woodhouse Lane, Leeds LS2 3ED. Registered in England and Wales No. 3401440. Registered Charity No. 1063492. VAT Registration No. 698 8456 49.