



University of Otago

Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021 Self-Review (Gap Analysis) Report

1 December 2021

New Zealand Universities Pastoral Care Code gap analysis template

This framework sets out the areas of practice you need to review in order to check your compliance with the Pastoral Care Code released in July 2021.

You can use this tool to help you:

- **Prepare** for self-review, by identifying the information you need to evidence your compliance with the interim domestic Code at each clause
- **Make sense** of your gathered information, by noting any gaps in your current practice and/or evidence of current practice.

KEY	
COMPLIANT	<ul style="list-style-type: none">• We have the required practices in place• We have sufficient evidence on which to make judgements about the effectiveness of our practices
GAP (in evidence)	<ul style="list-style-type: none">• We have the required practices in place but...• We have limited evidence on which to make judgements about the effectiveness of those practices
GAP (in practice)	<ul style="list-style-type: none">• We do not have the required practices in place

Evidence may include published policies and procedures, minutes of meetings, published documents, statistical data, etc.

In completing the gap analysis Providers should consider the following 'transversal' questions:

- how effectively is student voice captured and used in each of the elements;
- how does consideration of Te Tiriti o Waitangi contribute to inform processes and achieve outcomes;
- how does consideration of learner diversity contribute to inform processes and achieve outcomes;
- what culturally responsive practices are employed in meeting each of the processes and outcomes.

The document is in three sections:

- individual university context
- gap analysis
- issues impacting on code compliance that sit outside of the immediate control of the university.

Part 1 – University of Otago individual university context

Demographic profile of student community, institutional mission, purpose and programmes; whole of provider strategic approach to student pastoral care, mental health and wellbeing, distinctive characteristics and support needs (limit to no more than 2 pages).

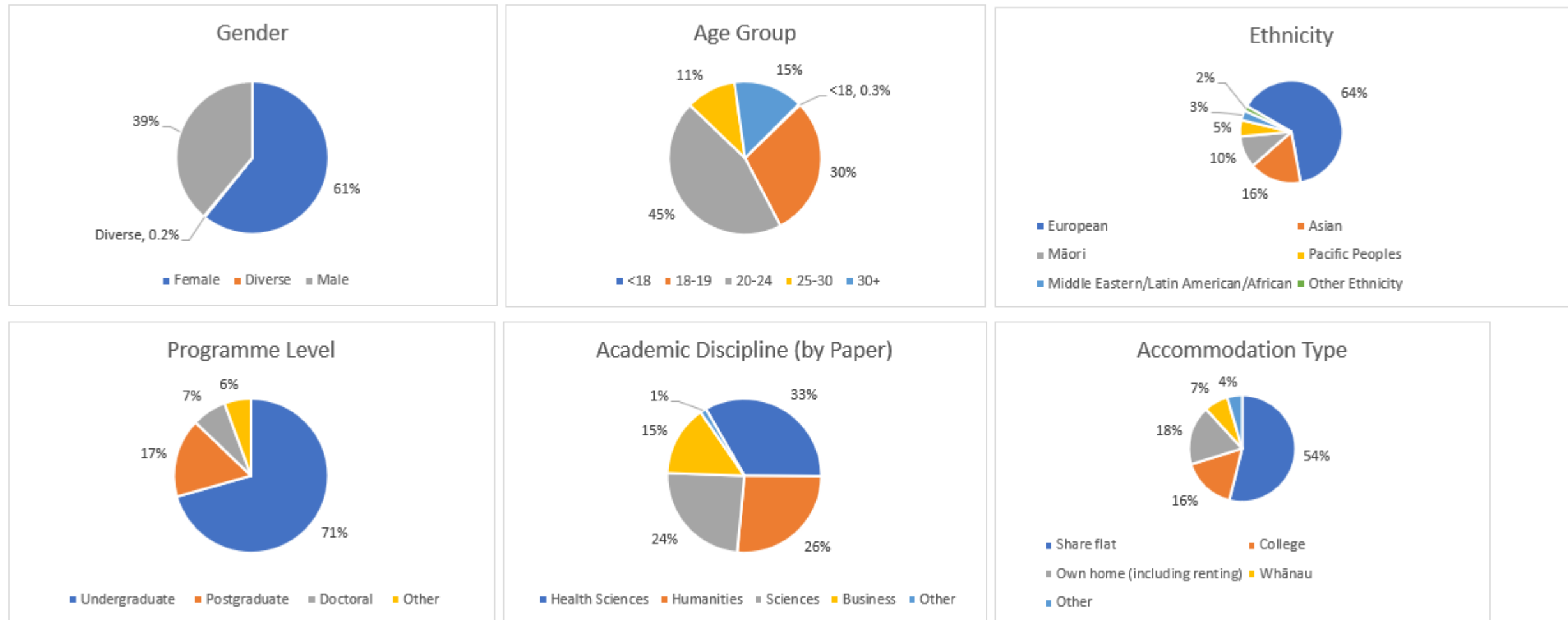
Founded in 1869, the University of Otago is New Zealand’s oldest University, providing a research-led learning environment with an international reputation for excellence. The University is currently undertaking a reset and review of *Strategic Vision 2020, Vision 2040*. Full information about the University of Otago’s current and future strategic direction and mission can be found here:

Strategic Vision 2020 <https://www.otago.ac.nz/otago053226.pdf> *Vision 2040* <https://www.otago.ac.nz/about/official-documents/otago743209.html>.

Structure and programmes

The University of Otago has approximately 21500 students enrolled across four academic divisions - Business, Health Sciences, Humanities and Sciences, each offering undergraduate, postgraduate, and doctoral study and qualification options. In early 2021 the University of Otago Pathway and English Language Centre, providing pre-Bachelor level study, was integrated in the University. Student-facing administrative, academic and pastoral support services are provided by a number of central service divisions including Academic, Shared Services, Campus and Collegiate Life Services (CaCLS), External Engagement and Research and Enterprise¹. The University has campuses in five main centres throughout New Zealand: Auckland, Wellington, Christchurch, and Invercargill, with the main campus located in Dunedin. The University also offers distance learning education and has responded in 2020 and 2021 to the COVID-19 pandemic by offering more offshore and online study options for those students unable to travel to New Zealand due to current border restrictions.

Student demographics



¹ https://www.otago.ac.nz/administration/service_divisions/

Distinctive characteristics and support needs

The University of Otago is distinct among New Zealand universities in being the country's foremost residential university, with 16% of students and over 85% of first year students² living in one of 14 residential colleges located on or near to the Dunedin campus, catering to over 3,500 students. Each residential college offers pastoral and academic support to residents that is in addition to on-campus support services³. The University also supports independent shared living and accommodation for postgraduate students and students with families at the University Flats and operates a Homestay service for students who prefer to live with a local Dunedin family. First-year students who are not living in a residential college can join the non-residential Locals programme which provides access to academic support, social, sporting and other opportunities⁴.

Most second-year students and above choose to flat privately and the large number of independent student flats located directly adjacent to the main Dunedin campus mean that a majority of Dunedin-based students live within 5-10 minutes' walk of the University. In recognition of the large numbers of students living both residentially and independently in North Dunedin, the University runs a 24-hour, 7 days a week safety patrol and pastoral support service, Campus Watch, to provide assistance and support student and community safety across the campus and wider North Dunedin area⁵. With Otago's student population contributing significantly to the overall Dunedin population of 130,000⁶, the University necessarily maintains close working relationships with community health and support services, including the Southern District Health Board, Dunedin Police and the Dunedin City Council, which enable partnership and collaboration on both significant student support initiatives and individual student care issues.

Whole of provider strategic approach to student pastoral care, mental health and wellbeing

Responsibility for student wellbeing at the University of Otago is shared by academic and professional staff, with all staff having access to professional development and training on topics such as mental health and wellbeing, student learning development, working with students' associations, disability information and support, sexual misconduct and critical incident response, designed to equip staff to work with diverse student cohorts and to respond safely and appropriately to a range of student issues⁷. Primary student pastoral and wellbeing support responsibility is shared by teams across Academic, Campus and Collegiate Life Services (CaCLS) and External Engagement Divisions, with the majority of student pastoral support services located in Student and Academic Services in the Academic Division, Student Health, Sport and Recreation and Residential Colleges in CaCLS, and International Student Services in External Engagement. Student support staff across divisions strive to work collaboratively to meet shared student wellbeing and safety objectives, and in 2019 a Wellbeing Coordinator was appointed within the Health and Safety team to operate as an umbrella role to coordinate the University's student support and pastoral care objectives.

Between 2015 and 2019 the University's Healthy University Advisory Group (HUAG) provided a range of high-level advice to the Vice-Chancellor and University leadership on student wellbeing, and HUAG recommendations continue to broadly inform the University's current approach to strategic student pastoral care, mental health and wellbeing. The University operates a Healthy Campus website⁸ and has coordinated a Healthy Campus Network for the past three years as a forum for student support areas to collaborate on student wellbeing and support initiatives and share emerging issues and themes in student wellbeing concerns. In mid-2021 the Acting Vice-Chancellor Helen Nicholson convened Healthy Campus Network participants, academic staff and student representatives into a Student Mental Wellbeing Working Group, focused on proactive support and continuous improvement to meet increasing student wellbeing and mental health needs as a result of the changeable COVID-19 environment. This group is currently focused on ways to support first year students to build wellbeing, independence and resilience skills during the transition to a tertiary academic environment.

Other recent University of Otago strategic pastoral care and wellbeing initiatives include: the implementation of Te Whare Tāwharau Sexual Violence Support and Prevention Centre in 2018⁹; the 2020 *Sophia Charter*, a collaborative agreement between the University, community and student stakeholders designed to enhance the safety and well-being of the student community in North Dunedin¹⁰; a Risk Intervention Team convened in 2020 to formally and collaboratively respond to student risk and safety concerns raised by members of the University community; ongoing community and whānau engagement to support academic and wellbeing success of Māori tauira and Pacific students through Te Huka Mātauraka Māori Centre and the Pacific Island Centre respectively; and academic and pastoral care initiatives through the Summer at Otago project, a collaborative response by the University and international student groups to support and engage international students unable to travel outside of New Zealand over summer academic breaks due to current border restrictions.

The University works closely with Otago University Students' Association (OUSA), and a number of pastoral care and support services (including several funded through the Compulsory Student Services Fee (CSSF)), are delivered by OUSA under the terms of a KPI-based Service Level Agreement (SLA). The services OUSA provides includes advocacy and support for academic, disciplinary, tenancy, financial and wellbeing issues and complaints, queer support, food support and a hardship fund. The SLA is updated annually with monthly reporting required. The Compulsory Student Services Fee Advisory Group, comprised of University and OUSA representatives, makes collaborative decisions on the allocation of CSSF funding across University services and OUSA service provision via the SLA, and also supports a range of student events and services to support OUSA student Clubs and Societies.

² Of the 3,500 students living in University of Otago residential colleges in any one year, the vast majority are first year undergraduate students. This presents a particular type of student demographic for colleges to cater for and support, which is somewhat different than the more diverse demographics overall that are enrolled in the University.

³ <https://www.otago.ac.nz/accommodation/residential-colleges/>

⁴ <https://www.otago.ac.nz/locals/index.html>

⁵ <https://www.otago.ac.nz/proctor/campuswatch/>

⁶ <https://profile.idnz.co.nz/dunedin/population-estimate>

⁷ <https://www.otago.ac.nz/humanresources/training/professional-staff/otago368601.html>.

⁸ <https://www.otago.ac.nz/healthy-campus/index.html>

⁹ <https://www.otago.ac.nz/te-whare-tawharau/index.html>

¹⁰ <https://www.otago.ac.nz/otagobulletin/news/otago741231.html>

Part 2 – Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021 Gap Analysis

Outcome 1: A learner wellbeing and safety system

Providers must take a whole-of-provider approach to maintain a strategic and transparent learner wellbeing and safety system that responds to the diverse needs of their learners.

Phase in the self-review process:		PREPARE	MAKE SENSE	
Key required processes	Information we can gather to use as evidence of our compliance with this clause	COMPLIANT	GAP (in evidence)	GAP (in practice)
<p>Process 1: Strategic goals and strategic plans Clause 7 (1). Providers must have strategic goals and strategic plans for supporting the wellbeing and safety of their learners across the organisation, including student accommodation, describing –</p> <p>(a) give effect to the outcomes sought and processes required by the code; and</p> <p>(b) contribute to an education system that honours Te Tiriti o Waitangi and supports Māori-Crown relations</p>	<p>The University of Otago maintains a number of strategic frameworks, policies and plans to support the wellbeing and safety of our students and give effect to the outcomes and processes required by the code, and to honour the principles of Te Tiriti o Watangi, such as:</p> <ul style="list-style-type: none"> - Māori Strategic Framework https://www.otago.ac.nz/administration/policies/plans-strategies/otago645445.pdf - Affiliated Colleges Statute https://www.otago.ac.nz/administration/policies/otago029956.html - Emergency Management Policy https://www.otago.ac.nz/administration/policies/otago014290.html - Equity and Diversity Policy https://www.otago.ac.nz/administration/policies/otago666398.html - Ethical Behaviour Policy https://www.otago.ac.nz/administration/policies/otago003161.html - Health and Safety Policy https://www.otago.ac.nz/administration/policies/otago003219.html - Sexual Misconduct Policy https://www.otago.ac.nz/administration/policies/otago711781.html - Student Code of Conduct 2020 https://www.otago.ac.nz/proctor/otago670687.pdf - Student Critical Incident Policy https://www.otago.ac.nz/administration/policies/otago045265.html 	<p>Full details of all Statutes, Regulations, Policies, Procedures, Guidelines and Codes of Conduct applicable to the University of Otago are available in the University's online Policy Library¹¹. All regulations and policies are applicable to students across the organization including those in residential accommodation.</p> <p>Between 2015 and 2019 the University's Healthy University Advisory Group (HUAG) provided a range of high-level advice to the Vice-Chancellor and University leadership on student wellbeing. This included the development of a draft Wellbeing Matrix to define wellbeing at the University and to map goals, initiatives and areas of support into one overarching wellbeing resource.</p>	<p>GAP IN EVIDENCE: Currently the University does not have a defined strategic learner wellbeing and safety vision or plan to consolidate goals and initiatives across the University.</p> <p>As a result, while our overall practice is compliant and gives effect to the outcomes sought and processes required by the code, without an overarching wellbeing and safety framework, some area-specific operations and initiatives may be more reactive than they could be, or processes/applications may be doubled up rather than shared consistently across support areas.</p> <p>In response to this, in 2022 the University is looking to undertake a stock take of current wellbeing and safety processes, operations, initiatives and needs, and to consider implementing a wellbeing vision/framework to support an all-of- University alignment with our student wellbeing and safety goals. This could include mapping current and future student wellbeing and safety goals and plans more clearly against the new code.</p>	
<p>Clause 7 (2). Providers must –</p> <p>(a) regularly review their learner wellbeing and safety strategic goals and strategic plans as described in subclause (1); and</p> <p>(b) make amendments to their learner wellbeing and safety strategic goals and</p>	<p>The University of Otago has no gaps in compliance with this clause as it relates to our current strategic goals and strategic plans.</p> <p>https://www.otago.ac.nz/administration/policies/otago690632.html https://www.otago.ac.nz/otago662075.pdf</p>			

¹¹ <https://www.otago.ac.nz/administration/policies/>

strategic plans within a reasonable timeframe following the review				
<p>Clause 7 (3). Providers must work proactively with learners and stakeholders (and document this work) when –</p> <ul style="list-style-type: none"> (a) developing their learner wellbeing and safety strategic goals and strategic plans described in subclause (1); and (b) reviewing their learner wellbeing and safety strategic goals and strategic plans described in subclause (2). 	<p>Policy Drafting, Review and Approval Guidelines https://www.otago.ac.nz/administration/policies/otago690632.html</p>	<p>The University of Otago is generally compliant with this clause.</p> <p>The University's <u>Policy Drafting, Review and Approval Guidelines</u> set out the University's requirement for consultation with key stakeholders and groups and lists students as one of the groups that may be consulted with¹².</p> <p>The policy guidelines direct policy makers to document all parties formally consulted with in preparing or reviewing the policy document. These details are for the information of the Approval Body and are not included when the policy document is published in the Policy Library¹³.</p>	<p>GAP IN EVIDENCE: While the University is compliant with this requirement in practice, it may be necessary to review our policy guidelines to more clearly make reference to and align with the requirements in the code to co-develop learner wellbeing and safety strategic goals and plans with students.</p>	
<p>Process 2: Self review of learner wellbeing and safety practices Clause 8 (1).</p> <p>Providers must use strategic goals and strategic plans described in clause 7(1) to regularly review the quality of their learner wellbeing and safety practices to achieve the outcomes and practices of this code, at a frequency or by a date determined by the code administrator.</p>	<p>The University of Otago has no gaps in compliance with this clause.</p>			
<p>Clause 8 (2).</p> <p>Providers must review their learner wellbeing and safety practices using –</p> <ul style="list-style-type: none"> a) input from diverse learners and other stakeholders; and b) relevant quantitative and qualitative data (including from learner complaints) that is, as far as practicable, and consistent with the provider's obligations under current privacy legislation, disaggregated by diverse learner groups. 	<p>The University of Otago has no gaps in compliance with this clause.</p>			
<p>Clause 8 (3)</p> <p>Providers must, in a timely manner, following a review described in subclauses (1) and (2) take</p>	<p>The University of Otago has no gaps in compliance with this clause.</p>			

¹² <https://www.otago.ac.nz/administration/policies/otago690632.html>

¹³ <https://www.otago.ac.nz/administration/policies/otago690632.html>

appropriate action to address any deficiencies in learner wellbeing and safety practices.				
<p>Process 3: Publication requirements Clause 9.</p> <p>Providers must make the following information readily available, in accessible formats, to learners, staff and the general public, including on their websites (where available) –</p> <ul style="list-style-type: none"> a) strategic goals and strategic plans for supporting the wellbeing and safety of learners described in clause 7(1); and b) revisions to strategic goals and strategic plans for supporting the wellbeing and safety of learners described in clause 7(2); and c) self-review reports on the quality of their learner wellbeing and safety practices described in clause 8. 	<p>University of Otago Policy Library https://www.otago.ac.nz/administration/policies/</p>	<p>The University of Otago is generally compliant with this clause.</p> <p>The University's strategies, plans and policies, including revisions and amendments where relevant, are all publicly available on the University website.</p>		<p>GAP IN PRACTICE: Strategies and plans for supporting the wellbeing and safety of learners are published on the University's website but are currently not presented in a way that links them to the code, or that easily specifies their relevance to learner safety and wellbeing outcomes under the code or with the University's goals for student wellbeing. Some solutions to this may be to make a separate learner wellbeing and safety section within the current Policy Library headings to better align these specific plans and policies with the code, or preferably to work towards a Learner Wellbeing and Safety landing page within either the existing Health Campus webpage or a new section of the website focused on the code.</p> <p>(c) Pre-2021, the University's code self-reviews have been shared with Otago University Students' Association (OUSA) student representatives but have not been publicly published on the website – this will be addressed in 2022.</p>
<p>Process 4: Responsive wellbeing and safety systems Clause 10 (1).</p> <p>Providers must gather and communicate relevant information across their organisation (including student accommodation) and from relevant stakeholders to accurately identify emerging concerns about learners' wellbeing and safety or behaviour and take all reasonable steps to connect learners quickly to culturally appropriate social, medical, and mental health services.</p>	<p>Student and Academic Services https://www.otago.ac.nz/student-services/index.html</p> <p>Student Critical Incident Policy https://www.otago.ac.nz/administration/policies/otago045265.html</p> <p>Student Support Services – References for Staff https://www.otago.ac.nz/student-services/otago745165.pdf</p>	<p>The University of Otago is generally compliant with this process.</p> <p>The University utilizes a range of systems and processes to gather and communicate information about student wellbeing and safety.</p> <p>The Proctor's Office is the University's main security and campus welfare service, focused on managing the safety of students and staff and maintaining a healthy learning environment for all¹⁴. The Proctors Office takes and responds to welfare notifications from all areas of the University, records student complaints and safety concerns, is the key point of contact for student critical incidents and maintains strong working relationships with emergency and community services.</p> <p>A recently developed Risk Intervention Team, chaired by the Proctor and made up of Student and Academic Services staff and relevant academic and support area representatives, was developed in 2020 to identify any potential or</p>	<p>GAP IN EVIDENCE: Not all student-facing services, academic departments and pastoral support areas across the University and its campuses utilise one consistent, documented protocol for identifying emerging concerns and referring students to relevant services.</p> <p>In practice, however, the University maintains responsive safety and wellbeing systems that work very well due to excellent internal networks, initiatives to bring a range of staff together on a regular basis to discuss emerging concerns, such as the Healthy Campus Network, and the Student Health, Colleges, and International quarterly consultation with DHB mental health services, among others.</p> <p>The <u>Support Services – References for Staff</u> reference sheet¹⁵ gives staff an idea of who to contact for assistance but we may need to consider further work on documented protocol for identifying and escalating concerns, as well as increased training for staff on this process.</p>	<p>GAP IN PRACTICE: Different tools for recording student engagement and different protocols for what is recorded exist across different pastoral support work groups.</p> <p>For example, Residential Colleges and the Accommodation Office use a robust purpose-built student management system, StarRez¹⁶, to document the student residential journey and associated wellbeing and welfare concerns. Similarly, some other services such as the Proctor's Office, Student Health and Disability Information Services, have bespoke incident and case management systems that are specific to the individual work area.</p> <p>Conversely, however, other pastoral and student support areas do not have access to a bespoke, University-wide system, but instead use generic record keeping systems.</p> <p>This is largely a systems issue where the range of different student engagement tools being utilised across the University by various pastoral and</p>

¹⁴ <https://www.otago.ac.nz/proctor/index.html>

¹⁵ <https://www.otago.ac.nz/student-services/otago745165.pdf>

¹⁶ <https://www.starrez.com/>

		<p>serious, threatening or concerning behaviour by students or others where the safety of any member of the University community is apparent and receive reports from any member of the University or wider community of the above, however arising.</p> <p>The University is currently phasing in a CRSM system which will integrate with current student management systems and potentially allow better tracking and alerts (privacy requirements notwithstanding) amongst relevant student-facing services to identify emerging wellbeing and academic concerns and facilitate proactive response to these.</p>		<p>student services support teams may mean that it is more difficult for information about students to be directly shared and accessed by all relevant support areas when needed</p> <p>As a first step of addressing this potential issue, the University Information Systems Group is currently undertaking a strategic assessment of the various systems to record student engagement to understand if there is a widespread problem and make recommendations on how this may be remedied (from a systems position).</p>
<p>Clause 10 (2). Providers must provide staff with ongoing training and resources tailored to their roles in the organisation, in relation to -</p> <p>(a) Te Tiriti o Waitangi; and (b) the provider's obligations under this code; and (c) understanding the welfare issues of diverse learner groups and appropriate cultural competencies; and (d) identifying and timely reporting of incidents of racism, discrimination, and bullying; and (e) physical and sexual violence prevention and response, including how to support a culture of disclosure and reporting; and (f) privacy and safe handling of personal information; and (g) referral pathways (including to local service providers) and escalation procedures; and (h) identifying and timely reporting of incidents and concerning behaviours; and (i) wellbeing and safety awareness and promotion topics, including –</p> <ul style="list-style-type: none"> • safe health and mental health literacy and support; and • suicide and self-harm awareness; and • promoting drug and alcohol awareness; and • promoting healthy lifestyles for learners. 	<p>Higher Education Development Centre (HEDC) https://www.otago.ac.nz/hedc/staff/index.html</p> <p>Human Resources Learning and Development Programme https://www.otago.ac.nz/humanresources/training/professional-staff/otago368601.html</p> <p>Te Whare Tāwharau workshops on disclosure and consent https://www.otago.ac.nz/te-whare-tawharau/workshops/</p>	<p>The University of Otago is generally compliant with this clause.</p> <p>In addition to role-specific and on the job training, University of Otago academic, professional and services staff have access to a wide range of training on the majority of topics listed in Clause 10 (2) (see Gap in Practice for details). Training is delivered on a regular and revolving schedule and utilizes the expertise and cultural knowledge of a wide range of internal and external trainers. Training is designed to equip staff with knowledge and tools to work with varied student cohorts and other stakeholders.</p> <p>Residential Colleges' leadership teams and other staff involved in delivering student pastoral support within Colleges undertake compulsory training in all topics listed in Clause 10 (2).</p>		<p>GAP IN PRACTICE: With the exception of staff at residential Colleges, much of the training offered by the University is undertaken by staff on an opt-in, rather than compulsory, basis. To meet full compliance in this outcome it may be necessary for the University to look at more clearly tailoring specific training requirements to particular position descriptions and/or including more compulsory training as part of staff induction.</p> <p>(b) Information and introductory training on the International Pastoral Care Code of Practice has previously been delivered by International Student Services to staff undertaking training through HR and HEDC, and on the Interim Domestic Code for Colleges staff. Initial sessions on the implementation of the new code have been delivered, but the development of an ongoing training programme on the University's obligations under the new 2021 code has not yet been developed and implemented. This will be addressed in 2022 once NZQA guidance around the new code has been more fully developed¹⁷.</p>
<p>Clause 10 (3) Providers must have plans for assisting learners, and responding effectively, in emergency situations in the learning or residential community (whether localised or more widespread), including –</p> <p>(a) making these plans readily available to</p>	<p>Risk Management Framework https://www.otago.ac.nz/administration/policies/plans-strategies/otago658065.pdf</p> <p>Emergency Management Plan https://www.otago.ac.nz/administration/policies/otago025109.html</p>	<p>The University of Otago is generally compliant with this outcome.</p> <p>A range of policies and plans relating to emergency management and response are readily available on the University's website.</p> <p>The University's <u>Emergency Management</u></p>		<p>GAP IN PRACTICE: (g) Critical incidents are recorded and reported on annually to senior University leadership. While some information is accessible via OIA requests, information about critical incidents has not historically been reported publicly to learners, external stakeholders or the code administrator.</p>

¹⁷ Note that at the time of this self-review guidance to assist with code implementation is still being developed by NZQA, in consultation with providers and learners.
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<p>learners when they begin their study; and</p> <p>(b) ensuring that there are suitably prepared staff members available to be contacted by a learner, or learners, in the event of an emergency; and</p> <p>(c) co-ordinating decision-making across the provider when responding to emergencies; and</p> <p>(d) disseminating timely, accurate, consistent, and accessible information to learners and staff during emergencies; and</p> <p>(e) ensuring all relevant staff are aware of the indicators of imminent danger to a learner or others and what action they can reasonably provide to help make them safe; and</p> <p>(f) keeping a regularly updated critical incident and emergencies procedures manual which guides staff involved in emergency situations which contains the immediate and ongoing actions required including –</p> <ol style="list-style-type: none"> a. engaging with relevant government agencies (e.g., the New Zealand Police, Ministry of Health, New Zealand Qualifications Authority, Tertiary Education Commission); and b. the follow-up de-briefing processes to support all learners and relevant staff; and <p>(g) recording critical incidents and emergencies and reporting these back annually (at an aggregate level and, as far as practicable, disaggregated by diverse learner groups) to provider management, learners, other stakeholders, and the code administrator.</p>	<p>Health and Safety Policy https://www.otago.ac.nz/administration/policies/otago003219.html</p> <p>Incident Reporting Policy https://www.otago.ac.nz/administration/policies/otago057410.html</p> <p>Student Critical Incident Policy https://www.otago.ac.nz/administration/policies/otago045265.html</p>	<p>Plan¹⁸ sets out the arrangements for coordinated action by the University in response to an emergency on campus. It also provides information on activities the University engages in to ensure preparedness in case of an emergency.</p> <p>The University publishes an <u>Emergency Procedures Handbook</u> and Flipchart¹⁹, which is made available at prominent locations around campus and throughout residential Colleges.</p> <p>Students in residential Colleges are inducted into emergency response procedures at the beginning of their stay and reminded of these throughout the year.</p> <p>The Proctor’s Office and Campus Watch operate a 24-hour CCTV control room to monitor the campus and adjacent neighbourhood²⁰. Campus Watch is available to liaise with community emergency services 24/7 and escalate incidents to other areas of the University as required, and the Campus Cop is a sworn member of the New Zealand Police located within the Proctor’s Office and operating as a vital link between the Police, University students/staff and the community²¹.</p>		<p>The University will look at how to adapt our current critical incident reporting processes to meet code compliance, noting that the usually low number of critical incidents per year may mean caution is required to avoid breaching privacy, even where information is aggregated.</p>
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¹⁸ <https://www.otago.ac.nz/administration/policies/otago025109.html>

¹⁹ The Emergency Procedures Handbook was most recently revised in 2021.

²⁰ <https://www.otago.ac.nz/proctor/cctv/>

²¹ <https://www.otago.ac.nz/proctor/campuscop/>

Outcome 2: Learner voice

Providers understand and respond to diverse learner voices and wellbeing and safety needs in a way that upholds their mana and autonomy.

Phase in the self-review process:		PREPARE	MAKE SENSE	
Key required processes	Information we can gather to use as evidence of our compliance with this clause	COMPLIANT	GAP (in evidence)	GAP (in practice)
<p>Process 1: Learner voice Clause 12.</p> <p>Providers must have practices for –</p> <ul style="list-style-type: none"> (a) proactively building and maintaining effective relationships with diverse learner groups within their organisation; and (b) working with diverse learners and their communities to develop, review, and improve learner wellbeing and safety strategic goals, strategic plans and practices; and (c) providing formal and informal processes for actively hearing, engaging with, and developing the diverse range of learner voices and those of their communities; and (d) providing timely and accessible resources to learners to support them and their learner communities to develop the necessary skills to enable them to participate fully in decision-making processes; and (e) providing timely and accessible information to learners to increase transparency of providers' decision-making processes. 	<p>The University of Otago has no gaps in compliance with this process.</p>			
<p>Process 2: Learner complaints Clause 13.</p> <p>Providers must –</p> <ul style="list-style-type: none"> a. work with learners to effectively respond to, and process complaints (including appropriate engagement with support people); and b. inform learners on how the complaint will be handled and how it is progressing; and c. handle complaints in a timely and efficient way, including having practices that – <ul style="list-style-type: none"> i. are appropriate to the level of complexity or sensitivity of the complaint; and ii. consider the issues from a cultural 	<p>Appeals Statute 2011 https://www.otago.ac.nz/administration/policies/otago029949.html</p> <p>International student complaints processes https://www.otago.ac.nz/international/otago005566.html</p> <p>Key policies relating to complaints, grievances, and misconduct https://www.otago.ac.nz/administration/policies/key-policies-for-groups/otago633493.html</p> <p>Residential Colleges complaints https://www.otago.ac.nz/accommodation/apply-for-accommodation/terms-and-conditions/index.html</p>	<p>The University of Otago is generally compliant with this process.</p> <p>Information about how to resolve issues and complaints, as well as different areas of the University that can support students with complaints are available on a Student Grievances webpage²², which also links to the relevant formal complaints policies, processes and mechanisms within the University.</p> <p>Students can also choose to be independently supported and assisted through University complaints processes by OUSA Student Support²³, and OUSA Student Support is regularly referred to as a support option within University policy and student information.</p>	<p>GAP IN EVIDENCE: (d) Complaints processes and potential outcomes are often embedded in formal policies, meaning that this information may not be as clear or accessible to all learners as it may need to be to ensure consistent understanding.</p> <p>While the Student Grievances webpage links to other support areas, as do policies where specific support areas are named, it is not always clear from the currently available published information how formal and informal complaints processes will work once a student accesses these support systems.</p> <p>As a resolution to the potential gap above, work</p>	<p>GAP IN PRACTICE: (e), (f) Not all complaints that are raised through the University's formal complaints processes are recorded and reported on. This may partially be the result of internal processes, for example, academic grievance procedures are addressed and managed at a Departmental or Divisional level, rather than by one centralised office. The <u>Student Academic Grievance Procedure</u>²⁵ is not explicit on recording all student complaints made in relation to the policy, other than if a complaint is directed against a University staff member.</p> <p>The Proctor's Office, which handles many non-academic student complaints through the <u>Student Code of Conduct</u>²⁶, does record and report</p>

²² <https://www.otago.ac.nz/study/student-grievances.html>

²³ OUSA Student Support is a third-party provider contracted to the University via the CSSF-funded SLA <https://www.ousa.org.nz/support>

²⁵ <https://www.otago.ac.nz/administration/policies/otago002982.html>

²⁶ <https://www.otago.ac.nz/proctor/otago670687.pdf>

<p>perspective; and</p> <p>iii. include the provision of culturally responsive approaches that consider traditional processes for raising and resolving issues (for example, restorative justice); and</p> <p>iv. comply with the principles of natural justice; and</p> <p>d. ensure that the complaints process is easily accessible to learners (and those supporting them), including having practices for –</p> <p>i. providing learners with clear information on how to use the internal complaints processes (including the relevant people to contact), and the scope and possible outcomes of the processes; and</p> <p>ii. addressing barriers to accessing this information (for example, due to language, lack of internet access, fear of reprisal, desire for anonymity), such as providing alternative ways of raising a complaint; and</p> <p>iii. providing an opportunity for a support person or people (who can be chosen by the learner) to guide and support the learner through the complaints process; and</p> <p>iv. providing the opportunity for groups of learners to make joint complaints; and</p> <p>e. record complaints; and</p> <p>f. report annually to provider management, learners, other stakeholders, and the code administrator (including on provider websites where available) on –</p> <p>i. the number and nature of complaints made and their outcomes (at an aggregate level and, as far as practicable, disaggregated by diverse learner groups); and</p> <p>ii. learner experience with the complaints process and the outcome of their complaint; and promote and publicise complaint</p>	<p>Student and Academic Services Complaints https://www.otago.ac.nz/studentservices/otago834632.docx</p> <p>Student grievances webpage https://www.otago.ac.nz/study/student-grievances.html</p>	<p>Residential Colleges publish information on how to make a complaint and resolve issues within the College in their individual College Handbook²⁴.</p>	<p>can be done on the Student Grievances webpage to better take into account user experience with complaints processes and different levels of student ability in navigating formal University procedures.</p>	<p>regularly on complaints to senior University leadership. However, this information is not currently provided at aggregate or disaggregate level to students, stakeholders or the code administrator, and it is not made publicly available via the University's website.</p> <p>Complaints that are raised directly through informal processes, for example, via the AskOtago central information hub, will generally be referred to the appropriate area in the University to resolve.²⁷ Anonymous complaints raised through forums such as student surveys will be assessed by relevant areas according to the type and recurrence of the complaint. These informal complaints are not consistently collected or formally reported on across all areas of the University.</p> <p>The University does not currently, formally or otherwise, collect comprehensive information on the learners' experience with the complaints process and the outcome of their complaint, although individual students' experiences may be taken into account when reviewing and adapting complaints procedures.</p>
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²⁴ As an example, the Arana College Handbook includes instructions about making a complaint <https://www.otago.ac.nz/arana/otago696235.pdf>

²⁷ In the example of AskOtago, informal complaints are recorded against the student's name, or anonymously, depending on the student's preference, but generally for the primary purpose of ensuring complaints are referred on correctly. For example, a complaint about unclean toilets made to AskOtago would be referred to Property Services, with follow up by AskOtago on the status of the complaint triggered by the AskOtago record. Information about AskOtago is here: http://otago.custhelp.com/app/answers/detail/a_id/2183/~/contact-askotago

<p>and dispute resolution processes available to learners including, but not limited to, the provider's internal complaints process, the education quality assurance agency complaints process, the code administrator's complaints process, and the Dispute Resolution Schemes; and</p> <p>(g) promote and publicise complaint and dispute resolution processes available to learners including, but not limited to, the provider's internal complaints process, the education quality assurance agency complaints process, the code administrator's complaints process, and the Dispute Resolution Schemes; and</p> <p>(h) advise learners, on the next steps available to them if the provider does not accept the complaint (or the learner or provider perceives that the provider does not have the cultural competency to deal with it), or the learner is not satisfied that the provider has made adequate progress towards resolving the complaint, or the learner is not satisfied with the provider's internal complaints process or outcome, including –</p> <ul style="list-style-type: none"> a. how to seek resolution of a contractual or financial dispute by way of a complaint or referral to an appropriate body or agency depending on the subject matter of the dispute, for example, the code administrator, the Dispute Resolution Scheme, the Disputes Tribunal, the Human Rights Commission or the Ombudsman; and b. how to make a complaint to the code administrator if a learner believes that the provider is failing to meet the outcomes or requirements of this code. 				
<p>Process 3: Compliance with the Dispute Resolution Scheme Clause 14.</p> <p>Providers must ensure they are familiar with the relevant Dispute Resolution Scheme rules for domestic and international learners and ensure compliance with those rules in a dispute to which it is party.</p>	<p>The University of Otago has no gaps in compliance with this process.</p>			

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

Providers must foster learning environments that are safe and designed to support positive learning experiences of diverse learner groups.

The University of Otago has no gaps in compliance with this outcome.

Outcome 4: Learners are safe and well

Providers must support learners to manage their physical and mental health through information and advice, and identify and respond to learners who need additional support.

Phase in the self-review process:		PREPARE	MAKE SENSE
Key required processes	Information we can gather to use as evidence of our compliance with this clause	COMPLIANT	GAP (in evidence) / GAP (in practice)
<p>Process 1: Information for learners about assistance to meet their basic needs. Clause 20 (1).</p> <p>Providers must have practices for enabling all learners and prospective learners to identify and manage their basic needs (the essential material requirements to support wellbeing and safety including housing, food and clothing), including providing accurate, timely and tailored information on how they can –</p> <ul style="list-style-type: none"> (a) access services through the provider or through community and public services that will help them maintain reasonable standards of material wellbeing and safety; and (b) access suitable accommodation and understand their rights and obligations as a tenant in New Zealand; and (c) maintain a healthy lifestyle. 	The University of Otago has no gaps in compliance with this process.		
<p>Clause 20 (2).</p> <p>If food is made available by the provider on campus or in student accommodation, the provider must ensure that the food available includes a range of healthy food options that is obtainable at a reasonable cost.</p>			
<p>Process 2: Promoting physical and mental health awareness. Clause 21.</p> <p>Providers must have practices for –</p> <ul style="list-style-type: none"> (a) providing opportunities and experiences for learners that improve their physical and mental health and wellbeing and safety; and (b) promoting awareness of practices that support good physical and mental health that are credible and relevant to learners; and 	The University of Otago has no gaps in compliance with this process.		

<p>(c) supporting learners' connection to their language, identity, and culture; and</p> <p>(d) providing accurate, timely information and advice to learners about –</p> <ol style="list-style-type: none"> how they can access medical and mental health services through the provider or through community and public services, including culturally responsive services; and how they can report health and safety concerns they have for their peers; and how to respond to an emergency and engage with relevant government agencies; and how they can make positive choices that enhance their wellbeing. 				
<p>Process 3: Proactive monitoring and responsive wellbeing and safety practices. Clause 22 (1).</p> <p>Providers must have practices for –</p> <p>(a) requesting that domestic learners 18 years and over provide a name and up-to-date contact details of a nominated person; and</p> <p>(b) describing the circumstances in which the nominated person referred to in paragraph (a) should be contacted in relation to their wellbeing and safety; and</p> <p>(c) contacting the person nominated by domestic learners 18 years and over, in the circumstances described in accordance with paragraph (b), or where the provider has reasonable grounds for believing that the disclosure is necessary to prevent or lessen a serious threat to the student's life or health; and</p> <p>(d) enabling learners to communicate health and mental health needs with staff in confidence, including accommodation staff, so that the provider can proactively offer them support; and</p> <p>(e) providing opportunities for learners to raise concerns about themselves or others in confidence; and</p> <p>(f) identifying learners at risk and having clear and appropriate pathways for assisting them to access services when they need it; and</p> <p>(g) identifying learners who are at risk of harming others, and</p>	<p>General conditions of residence in a University Managed Residential College https://www.otago.ac.nz/accommodation/apply-for-accommodation/terms-and-conditions/index.html</p> <p>Policy on Access to, and use of, Personal Information https://www.otago.ac.nz/administration/policies/otago037003.html</p> <p>Privacy of Student Information https://www.otago.ac.nz/administration/privacy/</p>	<p>The University of Otago is generally compliant with this process.</p> <p>Students are asked to upload personal and emergency contact details directly into the University's eVision student management system as a first step of applying to the University of Otago.</p> <p>Students consent to residential Colleges contacting parents or other nominated contacts in the <u>General conditions of residence in a University Managed Residential College</u>²⁸.</p>		<p>GAP IN PRACTICE: (b), (c)</p> <p>The University is currently not explicit in describing the circumstances in which the nominated emergency contact of students 18 years and over might be contacted by us. The Privacy of Student Information statement, however, which is signed by students as part of the enrolment process, does make reference to possible disclosure of student's personal information, when necessary, as permitted under the Privacy Act 2020.²⁹ In case of a need to make contact with a student's nominated emergency contact person in relation to their wellbeing and safety, the Proctor's Office and Campus Cop will generally escalate this to New Zealand Police.</p>

²⁸ <https://www.otago.ac.nz/accommodation/apply-for-accommodation/terms-and-conditions/index.html>

²⁹ <https://www.otago.ac.nz/administration/privacy/>

<ul style="list-style-type: none"> a. having clear and appropriate pathways for assisting them to access services when they need it; and b. protecting learners and staff who experience harm from other learners and/or staff, including sexual assault; and (h) making arrangements with disabled learners or those affected by health and wellbeing difficulties to accommodate learning needs, including for study off-campus; and (i) responding to disruptive and threatening behaviour in a way that is sensitive to a learner's situation; and (j) supporting learners whose study is interrupted due to circumstances outside their control, and providing inclusive, accessible re-entry processes for their transition back into tertiary study. 				
<p>Clause 22 (2).</p> <p>Providers must have up-to-date contact details and next of kin for domestic tertiary learners under 18 and international tertiary learners.</p>	<p>The University of Otago has no gaps in compliance with this clause.</p>			
<p>Clause 22 (3).</p> <p>Providers must contact the next of kin for domestic tertiary learners under 18 years and international tertiary learners if there is concern regarding the wellbeing or safety of a learner.</p>	<p>The University of Otago has no gaps in compliance with this clause.</p>			
<p>Clause 22 (4).</p> <p>Providers must maintain a record of reported risks, including any concerns raised in relation to the effective administration of this code.</p>	<p>The University of Otago has no gaps in compliance with this clause.</p>			

Outcome 5: a positive, supportive and inclusive environment in student accommodation

Providers must ensure that student accommodation promotes and fosters a supportive and inclusive community which support the wellbeing and safety of residents.

Phase in the self-review process:	PREPARE	MAKE SENSE		
Key required processes	Information we can gather to use as evidence of our compliance with this clause	COMPLIANT	GAP (in evidence)	GAP (in practice)
<p>Process 1: Information and promotional activities Clause 24 (1).</p> <p>Providers must ensure student accommodation has practices for –</p> <ul style="list-style-type: none"> (a) ensuring residents receive clear, sufficient, accurate and transparent information and advice about the type and nature of student accommodation and services provided; and (b) using information provided by prospective residents at the time of application, to help plan their transition into student accommodation; and (c) working with residents to develop and provide information and tools that help residents understand their responsibilities within a communal living environment, including those relating to diversity; and (d) providing residents with learning and peer support, and information on – (e) self-care and positive wellbeing and safety; and (f) how to access wellbeing services on campus and in the community; and (g) how to provide peer support to other residents; and (h) providing residents with information and advice on what action to take in an emergency and the mechanisms for reporting incidents and raising health and safety concerns. 	<p>The University of Otago has no gaps in compliance with this process.</p>			
<p>Clause 24 (2).</p> <p>The information required by this clause must be readily available, accessible, and promoted to residents.</p>				
<p>Process 2: Accommodation staff Clause 25.</p> <p>Providers must ensure that –</p> <ul style="list-style-type: none"> (a) accommodation staff are provided with ongoing training and resources that are appropriate for their role as set out in clause 10(2); and (b) the experience and training of accommodation staff is appropriate for the type and nature of accommodation that is being provided; and (c) there is managerial oversight of 	<p>The University of Otago has no gaps in compliance with this process.</p>			

<p>accommodation staff at all times (24 hours a day, 7 days a week) so that issues can be escalated when they occur; and</p> <p>(d) the level of live-in accommodation staffing provides appropriate oversight and support for residents based on the type and nature of accommodation (for example, a higher level of staffing for halls of residence primarily intended for first-year learners); and</p> <p>(e) there is ongoing wellbeing support for accommodation staff.</p>	
<p>Process 3: Accommodation staff must be fit and proper persons Clause 26.</p> <p>Providers must take all reasonable steps to ensure that each member of the accommodation staff –</p> <p>(a) is suitable for employment in student accommodation; and</p> <p>(b) are the subject of a Police vet where required under the Children’s Act 2014 if the accommodation includes learners who are under 18.</p>	<p>The University of Otago has no gaps in compliance with this process.</p>
<p>Process 4: Proactive monitoring of residents’ wellbeing and safety and responsive wellbeing and safety practices. Clause 27 (1).</p> <p>Providers must ensure student accommodation has practices for –</p> <p>(a) working with residents to evaluate their needs and planning how these can be reasonably and practicably met and monitored; and</p> <p>(b) having clearly defined processes within the student accommodation for –</p> <p style="margin-left: 20px;">a. residents, staff, or visitors to be able to report a cause for concern about a resident’s behaviour; and</p> <p style="margin-left: 20px;">b. referring and responding to instances of resident behaviours that are a risk to self or others; and</p> <p>(c) having appropriate welfare safeguards, including –</p> <p style="margin-left: 20px;">a. developing and implementing a welfare management plan for residents assessed as being at risk, that includes welfare checks and which could include referral to external services; and</p> <p style="margin-left: 20px;">b. systems to regularly check that residents continue to be active within their student</p>	<p>The University of Otago has no gaps in compliance with this process.</p>

<p>accommodation and, if a resident is identified as being at risk, developing and implementing a welfare management plan; and</p> <ul style="list-style-type: none"> c. appropriate arrangements for residents under 18, including for effective communication with a parent or legal guardian regarding wellbeing and safety; and d. welfare checks, which may be undertaken where reasonable in the circumstances (this information must be clearly set out in the house rules for residents); and e. routine checks providing 24 hours' notice to a resident if staff members will be entering a resident's room. 	
<p>Clause 27 (2).</p> <p>Providers must have a link between student accommodation and its organisation's wider information gathering and communication system described in clause 10(1), to report any emerging concerns about a resident's wellbeing or their behaviour, so residents can be connected quickly to the appropriate services.</p>	
<p>Clause 27 (3).</p> <p>Providers must ensure that there is a critical incident and emergency procedures manual in student accommodation which –</p> <ul style="list-style-type: none"> (a) is consistent with the provider's wider organisational manual described in clause 10(3)(e); and (b) includes plans for residents when it becomes unsuitable or unsafe for them to remain in student accommodation in an emergency. 	
<p>Process 5: A safe and inclusive residential community Clause 28.</p> <p>In addition to the requirements described in outcome 3, providers must ensure student accommodation has practices for –</p> <ul style="list-style-type: none"> (a) ensuring that house rules are clear, reasonable, and accessible to residents, and that they promote and encourage – <ul style="list-style-type: none"> a. resident safety; and b. a sense of community and association with fellow residents; and c. learning and personal growth; 	<p>The University of Otago has no gaps in compliance with this process.</p>

<p>and</p> <ul style="list-style-type: none">d. residents and staff working together to ensure a positive and respectful community; and <p>(b) working with residents to –</p> <ul style="list-style-type: none">a. develop and improve house rules; andb. develop and maintain appropriate initiatives to build a sense of community within student accommodation; andc. promote responsible social behaviour and academic success.	
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Outcome 6: Accommodation administrative practices and contracts

Providers must ensure that student accommodation contracts and practices are transparent, reasonable, and responsive to the wellbeing and safety needs of residents.

Phase in the self-review process:		PREPARE	MAKE SENSE	
Key required processes	Information we can gather to use as evidence of our compliance with this clause	COMPLIANT	GAP (in evidence)	GAP (in practice)
<p>Process 1: General principles Clause 30.</p> <p>Providers must ensure that student accommodation providers have practices that include –</p> <p>(a) disclosing on its website –</p> <ol style="list-style-type: none"> a. the ownership structure and operator details of its student accommodation arrangements; and b. the details of the wellbeing and safety practices offered at each student accommodation facility; and <p>(b) a human resource strategy which –</p> <ol style="list-style-type: none"> a. requires the job descriptions for all accommodation staff to clearly describe – <ol style="list-style-type: none"> i. the duties and responsibilities of the role in relation to the learner wellbeing and safety; and ii. the relevant competencies and attributes that a person must demonstrate to be able to fulfil that role, and the ongoing training that will be available to develop these competencies; and b. sets out the support services that are available to ensure the wellbeing and safety of accommodation staff in carrying out their duties and responsibilities. 	<p>The University of Otago has no gaps in compliance with this process.</p>			
<p>Process 2: Student accommodation contracts. Clause 31 (1).</p> <p>Providers must ensure that a student accommodation contract with a resident –</p> <ol style="list-style-type: none"> (a) is clear, accessible, and concise; and (b) sets out the responsibilities of the provider and the resident; and (c) advises residents of the requirements for – <ol style="list-style-type: none"> a. information sharing across the provider; and 	<p>The University of Otago has no gaps in compliance with this clause.</p>			

<p>b. the regular processes for checking on residents; and</p> <p>(d) sets out the deposit, bond components, fees, refund policy and penalties; and</p> <p>(e) sets out the complaints, conflict resolution, and disciplinary processes in relation to residents.</p>				
<p>Clause 31 (2).</p> <p>Providers must ensure that the student accommodation contract used with residents is reviewed and updated regularly to ensure it remains fit for purpose in relation to wellbeing and safety matters, taking into account the views of learners and their representative bodies.</p>	<p>The University of Otago has no gaps in compliance with this clause.</p>			
<p>Clause 31 (3).</p> <p>Providers must ensure student accommodation refund policies –</p> <p>(a) are reasonable; and</p> <p>(b) provide residents (or a parent or legal guardian of residents under 18 years) with sufficient information to understand their rights and obligations under those refund policies.</p>	<p>The University of Otago has no gaps in compliance with this clause.</p>			
<p>Clause 31 (4).</p> <p>Providers must ensure student accommodation providers give prospective residents a copy of the house rules, and information about the complaints process and the Dispute Resolution Scheme before they sign the accommodation contract.</p>	<p>The University of Otago has no gaps in compliance with this clause.</p>			
<p>Clause 31 (5).</p> <p>Providers must ensure that accommodation providers keep a log of complaints received from residents concerning a breach or breaches of this code in relation to student accommodation and make this log available to the residents.</p>	<p>StarRez https://www.starrez.com/</p>	<p>The University of Otago is generally compliant with this clause. University student accommodation providers use the StarRez system to record resident information, including financial records, case management of student interactions and complaints received from residents.</p>	<p>GAP IN EVIDENCE: Although Colleges currently record complaints from residents, some inconsistencies have been identified amongst the University's 15 residential Colleges regarding which complaints are recorded and the information included in the record. Complaints which relate to a breach or breaches of the code are not currently made available to the residents. A working group was formed to address this in October 2021, with an aim to achieve full compliance by early 2022.</p>	

Outcome 7: Student accommodation facilities and services

Providers must ensure that student accommodation facilities and services are maintained to a standard sufficient to support residents' wellbeing and safety and educational success.

Phase in the self-review process:	PREPARE	MAKE SENSE		
Key required processes	Information we can gather to use as evidence of our compliance with this clause	COMPLIANT	GAP (in evidence)	GAP (in practice)
<p>Process 1: Clause 33 (1).</p> <p>Providers must ensure that student accommodation facilities and services –</p> <ul style="list-style-type: none"> (a) respond effectively to the diverse needs of residents and make necessary adjustments where practicable; and (b) provide accessible spaces for a range of interests, activities and needs; and (c) are secure, clean, dry, warm, comfortable, accessible, and is conducive to study and a variety of learning styles; and (d) provide utilities, services and other facilities that are adequate and appropriate for the character and size of the residential community; and (e) have appropriate insurance cover; and (f) are funded adequately to carry out strategic goals and strategic plans for student accommodation, including repairs, replacement, and improvements; and (g) have adequate and appropriate controls in place to ensure accountability for financial processes including – <ul style="list-style-type: none"> a. providing receipts for all financial transactions with the resident; and b. providing residents with up-to-date information on what they owe to the accommodation provider. 	<p>The University of Otago has no gaps in compliance with this process.</p>			
<p>Clause 33 (2).</p> <p>Providers must ensure that any alterations, maintenance and repairs to student accommodation are undertaken in a timely manner that minimises interference with the quiet enjoyment of the residents.</p>				

Outcome 8: Responding to the distinct wellbeing and safety needs of international tertiary learners

Signatories must ensure that practices under this code respond effectively to the distinct wellbeing and safety needs of their diverse international tertiary learners.

The University of Otago has no gaps in compliance with this outcome.

Outcome 9: Prospective international tertiary learners are well informed

Signatories ensure that prospective international tertiary learners receive clear, accessible, accurate and sufficient information, and make informed choices about the study and services a signatory provides before they begin their study.

The University of Otago has no gaps in compliance with this outcome.

Outcome 10: Offer, enrolment, contracts, insurance and visa

Signatories must have practices for enabling learners to make well-informed enrolment decisions in relation to the educational outcomes being sought by the learner and ensuring that all relevant parties are clear about their interests and obligations prior to entering into the enrolment contract.

The University of Otago has no gaps in compliance with this outcome.

Outcome 11: International learners receive appropriate orientations, information and advice

Signatories must ensure that international tertiary learners have the opportunity to participate in well-designed and age-appropriate orientation programmes and continue to receive relevant information and advice to support achievement, wellbeing and safety.

The University of Otago has no gaps in compliance with this outcome.

Outcome 12: Safety and appropriate supervision of international tertiary learners

Signatories ensure that international tertiary learners are safe and appropriately supervised in their accommodation and effectively communicate with the parents or legal guardian of learners under 18 years.

The University of Otago has no gaps in compliance with this outcome.

Part 3 – Issues impacting on code compliance that sit outside of the immediate control of the university

Summary details of exogenous constraints that adversely impact/limit the university's ability to meet the code requirements e.g., government policies, funding constraints etc.

1) Mental health systems under-resourced

New Zealand mental health systems are under-resourced and under pressure, and University Student Health services have seen student mental health and wellbeing issues increase as result of the COVID-19 pandemic. While the University of Otago has good systems in place for providing short-term mental health support and counselling to Otago students on the Dunedin campus, and through the Pūawaitanga service for other campus-based students³⁰, we are neither resourced nor tasked to provide acute mental health care for the growing numbers of students who require ongoing case management or non-emergency psychiatric care. These students should be able to access public and community mental health services as needed, yet in many cases these services are also running at capacity, and it has fallen back to the University to attempt to fill gaps in mental healthcare for students in the Dunedin community. Quarterly meetings between Southern District Health Board mental health and addiction services and University of Otago pastoral support, Student Health and residential accommodation teams have helped in addressing local issues and building collaborative working relationships. However, the key issue remains that DHB services are under resourced, private and community mental health services are also burdened by an increase in community need, but the University Student Health and pastoral support systems cannot function in place of all public, private and community mental health and acute care services for our students simply because they are enrolled with us. The lack of support for students with acute mental health issues is an ongoing concern that has been raised previously with the Ministry of Health through Universities New Zealand.

2) Resourcing the Learner Voice

Outcome 2: Learner Voice requires providers to work in authentic partnership with our learners to meet the goals and standards of all parts of the code, and the University of Otago and our current student representatives are satisfied that our current systems are largely compliant with the fundamental requirements of the code for learner consultation and inclusion³¹. However, our student representatives reported concern that the requirements in the new code for students to engage with providers in consultation, feedback, development, and review with do not take into consideration the large amount of time, effort, and interest that students must commit to these tasks. Students' associations and clubs rely largely on voluntary student work and membership, and student leadership roles often change on an annual basis, with students reporting various levels of engagement when trying to recruit new incumbents for these roles. While the University of Otago has traditionally attempted to compensate for and encourage student contribution where appropriate (e.g., through koha, vouchers, provision of kai etc.), the new code's expectation on learners to have agency in the safety and wellbeing systems provided by universities must also be recognized and resourced by the code administrator and New Zealand government, in order to facilitate and safeguard a credible and properly engaged learner voice.

3) Cost of living and accommodation shortages

Clause 20 (1) of the code says that *Providers must have practices for enabling all learners and prospective learners to identify and manage their basic needs (the essential material requirements to support wellbeing and safety including housing, food and clothing), including providing accurate, timely and tailored information on how they can – [...] (b) access suitable accommodation and understand their rights and obligations as a tenant in New Zealand;*

For the majority of students who live in flatting or other private living situations the University has no influence or ability to control cost and availability of housing that may be "suitable" for our students. The University of Otago's Accommodation Office provides advice and information to students about private living arrangements, and OUSA Student Support operates a tenancy support service for students.

³⁰ <https://www.otago.ac.nz/studenthealth/services/otago020535.html>

³¹ Collected through consultation with student representatives from Dunedin, Wellington, and Christchurch campuses, and across domestic, international, undergraduate, and postgraduate cohorts for the purposes of the 2021 self-review gap analysis.