



Education report: Changes to the code of practice after targeted learner and sector engagement (for CBC 12 July)

To:	Hon Chris Hipkins, Minister of Education		
Date:	9 July 2021	Priority:	High
Security Level:	In Confidence	METIS No:	1264425
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Messaging seen by Communications team:	No	Round Robin:	No

Purpose and summary

This paper seeks your feedback on proposed changes to the code of practice for pastoral care following targeted testing with learner and provider peak bodies. The purpose of this testing was to check the workability of the code and the changes made in response to consultation feedback.

You have lodged materials for Cabinet Business Committee (CBC) on Monday 12 July [METIS 1265208 refers]. As targeted engagement on the code with sector and learner peak bodies could not be completed before lodging, your office asked that we provide an amended version of the code (**Annex Two**) to consider presenting these changes to CBC on Monday so that CBC can review the final code.

Recommended actions

The Ministry of Education recommends you:

- note** the attached revised code of practice for the pastoral care of domestic tertiary and international learners, which incorporates changes following targeted engagement with learner and sector peak bodies and is due to be discussed at CBC on Monday 12 July
- indicate your agreement** to the following changes to the proposed code (as set out in detail in paragraph 9):

Description of change	Indicate agreement
Changes to align expectations in the code with legal requirements. This includes revisions to:	
1. Part 3, clause 7(1)(b) to mirror the wording in the Workforce Development Councils Orders in Council around Te Tiriti o Waitangi.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
2. Part 3, clause 8(2)(b) to address concerns about privacy issues in collecting data to inform strategic goals and plans.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
3. Part 3, clause 13(c)(iii) to better recognise that 'natural justice' is a fundamental right under the New Zealand Bill of Rights Act 1990.	<input type="checkbox"/> Yes / <input type="checkbox"/> No

Description of change	Indicate agreement
4. Part 5, clause 26(a) to address concerns about the legal basis for providers collecting information about prospective student accommodation employees.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
5. Part 8 Code Administrator processes, to address concerns about the legal authority for certain expectations and requirements in this section of the code.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
Changes to ensure consistency within the code and with earlier changes made based on sector feedback. This includes revisions to:	
6. Outcomes 2, 3 and 5 to increase clarity of expectations for providers in terms of what they 'must' do and/or could realistically achieve.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
7. Part 2, clause 5 to reframe the definition of wellbeing and safety to focus on what this is rather than the process to achieve it.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
8. Part 3, clause 7(3) to have less specific expectations for providers developing initial plans with learners.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
9. Part 3, clauses 10(3)(e) and (f)(ii) to clarify that the expectations apply to all 'relevant' staff rather than all staff, and to expect providers to inform learners of emergency processes before starting study (new subclause 10(3)(a))	<input type="checkbox"/> Yes / <input type="checkbox"/> No
10. Part 3, clause 13(f)(ii) to clarify reporting obligations for providers regarding complaints.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
11. Part 4, clause 16(1)(a), (b) and (c) to address concerns about potential tokenistic engagements with Māori.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
12. Part 4, clause 17(1) to address concerns about unreasonably restricting the academic freedom of learners.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
13. Part 4, clauses 18 (a), (b) and (c) to focus the code on future improvements to learning environments, rather than immediate changes.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
14. Part 6, clauses 37(c) and 41(1) to ensure consistency within the code regarding requirements to provide accessible, timely and accurate information ahead of and during study.	<input type="checkbox"/> Yes / <input type="checkbox"/> No
Minor and technical changes to improve clarity and remove/amend unnecessary wording. This includes five revisions that were suggested by different learner representative and sector peak bodies.	<input type="checkbox"/> Yes / <input type="checkbox"/> No

c. **agree**

EITHER (**recommended**)

- a. to table the attached revised code at CBC on Monday 12 July, after any amendments to reflect your decisions, subject to your decisions under recommendation b above

☐ Agree / ☐ Disagree

OR

- b. to make changes after CBC, within the authorisation the CBC paper proposes in its recommendation 8 for you to changes on issues of detail before release, subject to your agreement to recommendation b above

☐ Agree / ☐ Disagree

- d. **note** that we have provided a briefing note to your office to support your presentation of this item at CBC on 12 July, including talking points to support either decision in response to recommendation c above [METIS 1264495 refers]

- e. **forward** this report to the Honourable Kelvin Davis, Associate Minister of Education (Māori Education) and the Honourable Aupito William Sio, Associate Minister of Education, for their information

☒ Agree / ☐ Disagree

- f. **agree** to proactively release this report within 30 days of Cabinet policy decisions being made on the final code, dispute resolution scheme, and legislative proposals, with any redactions in line with the provisions of the Official Information Act 1982.

☒ Agree / ☐ Disagree



Julie Keenan
Policy Director
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9 / 07 / 2021



Hon Chris Hipkins
Minister of Education

10 / 7 / 2021

Background

1. You have lodged materials for Cabinet Business Committee (CBC) on Monday 12 July [METIS 1265208 refers]. As targeted engagement on the code with sector and learner peak bodies could not be completed before lodging, your office asked that we provide an amended version of the code (**Annex Two**) for CBC on Monday so your colleagues can review and approve a final code.

Approach to the revised code of practice

We have completed targeted sector and learner engagement on the revised code

2. We shared the proposed code with learner and sector peak bodies in confidence for testing [METIS 1265208 refers].¹ This was to:
 - a. assess the workability of the proposed code, following the changes we made in response to public consultation; and
 - b. test whether the changes we made created any new issues.
3. Feedback was positive. All the learner associations are supportive of the revised code, noting that much of their feedback has been reflected in the revised draft. Peak bodies, in particular from the universities and private training establishments, welcomed the increased clarity of the flexibility of the code.
4. Both learner and provider representatives reiterated the feedback they had provided through public consultation. Providers expressed that the code was still too prescriptive in some areas (largely due to the usage of the word 'must'). Several providers had questions about how the code would work for and cover different kinds of provision (including work-based, distance, and off-shore learning).
5. We have received no further feedback from Te Taihū o Ngā Wānanga. Te Pūkenga also had no specific additional feedback on the code but signalled an interest to work with the New Zealand Qualifications Authority (NZQA) on implementation matters. PTE peak bodies were also eager to work closely with NZQA on guidance material that is specific to the PTE sector.

We have updated the code based on this feedback

6. We have carefully considered the feedback received this week through targeted engagement. We do not propose to make all the changes that were suggested. However, we have given effect to key comments (but only where these changes do not impact other groups' interests that were already carefully balanced in the code). In particular, this includes addressing legal or implementation issues, mostly in response to detailed feedback from UNZ (including from universities legal counsel).
7. These changes all affect meaning and implications of the code for providers and learners. They sit across two primary categories:
 - a. aligning expectations in the code with legal requirements; and

¹ This included the New Zealand Union of Students' Associations (NZUSA), Te Mana Ākonga (TMĀ), Tairā Pasifika, the National Disabled Students' Association (NDSA), and the New Zealand International Students' Association (NZISA), as well as Te Pūkenga, Universities New Zealand (UNZ, including university legal counsel), Te Taihū o Ngā Wānanga (Te Taihū), English New Zealand (English NZ), Independent Tertiary Education New Zealand (ITENZ) and Quality Tertiary Institutions (QTI).

- b. ensuring consistency within the code and with earlier changes made based on sector feedback.
- 8. We have also made a handful of minor and technical changes in response to specific suggestions to improve clarity. Specifically, these changes remove and/or amend clauses where they were unnecessary or overstepping an appropriate level of expectations.
- 9. The table in **Annex One** outlines the changes in detail. We have attached clean and tracked changes versions of the code (**Annex Two**).

We do not propose to make all changes suggested and consider that some of the feedback can be addressed through the guidelines

- 10. We received a range of additional feedback that we do not propose you include. Many points can be addressed through:
 - a. Guidance that responds to providers' choices and contexts (for example, the expectations for providers regarding offshore or distance students; or what accessibility means in different contexts).
 - b. The future law changes that clarify the empowering provisions of the code and the functions and powers of the code administrator (for example, the investigation and information sharing expectations of the administrator; or the inclusion of offshore students).
- 11. Other points suggested by stakeholders were considered in the consultation feedback, particularly feedback that would change the balance between learners and providers through changes to engagement and consultation expectations, terminology, or transparency requirements. For example:
 - a. the concepts 'learner voices' (not 'learner voice') and 'partnerships with learners';
 - b. being explicit that student associations as representatives of the voices of learners are a stakeholder separate to learners (there are currently no examples in this definition, and the code already refers to "and others who share a meaningful interest in the wellbeing and safety of learners");
 - c. removing obligations to provide information that enables learners to meet their cultural or spiritual needs (this expectation does not require providers to take active steps to meet these needs beyond providing information on existing supports); or
 - d. removing obligations on providers to publish their strategic goals and plans for learner wellbeing (as these could contain commercially sensitive information, if providers include it).

Next steps

- 12. We recommend you forward this paper to your colleagues, the Honourable Kelvin Davis – Associate Minister of Education (Māori Education), and the Honourable Aupito William Sio – Associate Minister of Education, for their information.
- 13. You are taking materials to CBC on Monday 12 July to seek policy approvals for package of learner wellbeing and safety proposals [METIS 1265208 refers]. This includes the new code of practice.
- 14. Subject to your feedback on the changes outlined in this paper, you could either:

- a. table the amended version of the code (**Annex Two** or a further update) at CBC on Monday so CBC can review and approve a final code; or
 - b. make changes to the code after CBC, under recommendation 8 of the CBC paper, which provides for you to take decisions of detail in finalising the code.
15. We have separately provided talking points that support either approach [METIS 1264495 refers].

Annexes

Annex One: Table outlining the changes we have made to the revised code in response to feedback from targeted engagement

Annex Two: Revised code of practice (tracked changes and clean versions)

Annex One: Table outlining the changes we have made to the revised code in response to feedback from targeted engagement

Changes to the revised code based on feedback from targeted sector and learner engagement			
Type of change	Old wording	New wording	Rationale
Aligning expectations in the code with legal requirements	Part 3, clause 7(1)(b) honour and give effect to the Te Tiriti o Waitangi.	Part 3, clause 7(1)(b) contribute to an education system that honours Te Tiriti o Waitangi and supports Māori–Crown relations.	UNZ commented that this subclause read like a goal rather than applying Te Tiriti o Waitangi to the context of learner wellbeing. We have revised the wording to mirror that in the Workforce Development Council Orders in Council.
	Part 3, clause 8(2)(b) relevant quantitative and qualitative data (including from learner complaints) that is, as far as practicable, disaggregated by diverse learner groups.	Part 3, clause 8(2)(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.	UNZ and QTI expressed concerns about privacy issues in collecting data on diverse learner groups to inform self-reviews against the provider's strategic goals and plans. We have revised the wording to ensure consistency with privacy legislation.
	Part 3, clause 13(c)(iii) include the provision of culturally responsive approaches that consider traditional processes for raising and resolving issues (for example, natural justice and restorative justice) ...	Part 3, clause 13(c)(iii) & new (iv) (iii) include the provision of culturally responsive approaches that consider traditional processes for raising and resolving issues (for example, restorative justice); and (iv) comply with the principles of natural justice; and ...	UNZ noted that natural justice is a fundamental requirement guaranteed under the New Zealand Bill of Rights Act 1990. We have removed 'natural justice' as an example of a process and instead added a new subclause as shown on the left.
	Part 5, clause 26(a) is a person of good character having regard to the person's criminal history in New Zealand or in another country, any history of behavioural problems or misconduct and any complaints made in relation to the person's previous employment; and ...	Part 5, clause 26(a) is suitable for employment in student accommodation; and ...	UNZ raised concerns that providers do not have a legal basis for collecting information on the history of behavioural problems or misconduct of prospective student accommodation employees. We have amended this subclause to refer to the suitability of a person for employment in student accommodation.
	Part 8 – Code administrator Clause 88(3) In investigating a complaint or referral, the code administrator may assist the person making the complaint or referral (or refer that person to assistance) if assistance is necessary for facilitating	Part 8 – Code administrator Clause 88(3) In investigating a complaint or referral, the code administrator may assist the person making the complaint or refer that person to someone who is able to provide	This responds to concerns raised by UNZ about the legal authority for certain expectations and requirements set out in this section. We have reworded clause 88(3) to be clear that it falls under section 534 of the Education and Training Act 2020.

Changes to the revised code based on feedback from targeted sector and learner engagement			
Type of change	Old wording	New wording	Rationale
Aligning expectations in the code with legal requirements	<p>the investigation (for example, assistance to overcome a barrier, or support for their wellbeing and safety during the complaints process).</p> <p>Clause 89(3) may include (but is not limited to) the following steps by the code administrator</p> <ul style="list-style-type: none"> (i) requesting from the tertiary education provider (or the accommodation provider) or school signatory any information the code administrator considers appropriate to fulfil its monitoring or investigation roles; and (ii) issuing a notice requiring a tertiary education provider or school signatory to provide to the code administrator, by a date specified in the notice (which must be within a reasonable time), an attestation of their giving effect to all or any part of this code and/or of ongoing self-review, using the attestation form published on the code administrator's website; and (iii) making a site visit; and (iv) inspecting relevant documents held by the tertiary education provider (or the accommodation provider) or school signatory; and (v) interviewing staff and students as appropriate. 	<p>assistance, if such assistance is reasonably necessary to adequately respond to, or investigate the complaint in a fair and impartial manner (for example, by overcoming a language barrier, or supporting that person's wellbeing and safety during the complaints process).</p> <p>Clause 89(3) (now split into clauses (3) and (4)) (3) The code administrator's monitoring and investigation roles may be undertaken either on the code administrator's own initiative or as a result of information provided to it, including a complaint or referral of a code outcome, process or other code requirement not being met. (4) The code administrator, for the purpose of monitoring and investigating compliance with the code, may –</p> <ul style="list-style-type: none"> (a) request a tertiary education provider or school signatory to provide to the code administrator, by a date specified in the notice (which must be within a reasonable time), an attestation of their giving effect to all or any part of this code and/or of ongoing self-review, using the attestation form published on the code administrator's website; and (b) request access to any of the provider's facilities or premises; and (c) request access to relevant documents held by the tertiary education provider (or the 	<p>We have reworded clauses 89(3), (4) and (5) to remove any inference of new compulsory obligations that do not have legal authority.</p> <p>This is done by focussing on the purpose the Act sets out for this element of the code, which is to describe the process the code administrator will use in administering the code.</p> <p>Forthcoming law changes address the powers and functions of the administrator.</p>

Changes to the revised code based on feedback from targeted sector and learner engagement			
Type of change	Old wording	New wording	Rationale
Aligning expectations in the code with legal requirements	<p>Clause 89(4) A tertiary education provider or school signatory must comply with –</p> <ul style="list-style-type: none"> (a) requests by the code administrator under subclause (3)(b)(i) of this clause; and (b) a notice issued by the code administrator under subclause (3)(b)(ii) of this clause; and (c) providing, in a timely manner, access to any information, staff and students the code administrator considers appropriate to fulfil its roles. 	<p>accommodation provider) or school signatory; and</p> <ul style="list-style-type: none"> (d) request access to interview staff and students as appropriate. <p>Clause 89(5) (formerly (4)) A tertiary education provider or school signatory must –</p> <ul style="list-style-type: none"> (a) provide all reasonable assistance to a code administrator in the course of monitoring or investigating compliance with the code; and (b) respond in a timely manner to requests by the code administrator under subclause (4) of this clause; and (c) provide reasonable access to any site, staff and students the code administrator considers necessary in relation to monitoring and investigating compliance with the code. 	
Ensuring consistency within the code and with earlier changes made based on sector feedback	<p>Outcome 2 Providers must understand and respond to diverse learner voices and wellbeing and safety needs in a way that upholds their mana and autonomy.</p> <p>Outcome 3 Providers must maintain learning environments that are safe and designed to support positive learning experiences of diverse learner groups.</p> <p>Outcome 5 Providers must ensure that the student accommodation is a supportive and inclusive community which supports the wellbeing and safety of residents.</p>	<p>Outcome 2 Providers understand and respond to diverse learner voices and wellbeing and safety needs in a way that upholds their mana and autonomy.</p> <p>Outcome 3 Providers must foster learning environments that are safe and designed to support positive learning experiences of diverse learner groups.</p> <p>Outcome 5 Providers must ensure that student accommodation promotes and fosters a supportive and inclusive community which support the wellbeing and safety of residents.</p>	<p>We have reframed the lead sentence in each of these outcomes. This was in response to suggestions from UNZ to be clearer about expectations of what a provider 'must' do (or could realistically achieve).</p>

Changes to the revised code based on feedback from targeted sector and learner engagement			
Type of change	Old wording	New wording	Rationale
Ensuring consistency within the code and with earlier changes made based on sector feedback	<p>Part 2, clause 5</p> <p>wellbeing and safety means the safe and healthy conditions in a provider's learning environments that are necessary for learners to maintain or develop a positive frame of mind and resilience, and have satisfaction with self, relationships, and experiences and progress towards the learning outcomes sought.</p>	<p>Part 2, clause 5</p> <p>wellbeing and safety means having a positive frame of mind, resilience, satisfaction with self, relationships, and experiences and progressing towards learning outcomes sought. It also means being healthy and feeling secure.</p>	<p>UNZ questions how safe and healthy conditions "are necessary" for learners to achieve things.</p> <p>We have reframed the definition to focus on what wellbeing and safety is rather than the process to achieve it.</p>
	<p>Part 3, clause 7(3) Providers must work proactively with diverse learners and stakeholders (and document this work) when ...</p>	<p>Part 3, clause 7(3) Providers must work proactively with learners and stakeholders (and document this work) when ...</p>	<p>UNZ considered the inclusion of the word '<i>diverse</i>' in the lead sentence potentially unhelpful because they would need to consult with a broad range of learners. However, clause 8(2)(b) still requires input from diverse learners in self-reviews so their input is not lost in the process of continuous improvement of practices.</p> <p>We have removed the word '<i>diverse</i>' from the lead sentence.</p>
	<p>N/A</p> <p>Part 3, clause 10(3)(d) ensuring all 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>Part 3, clause 10(e)(ii) the follow-up de-briefing process to support all learners and staff; and ...</p>	<p>Part 3, new subclause 10(3)(a) making these plans readily available to learners when they begin their study; and ...</p> <p>Part 3, clause 10(3)(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>Part 3, clause 10(3)(f)(ii) the follow-up de-briefing processes to support all learners and relevant staff; and ...</p>	<p>In response to a suggestion by NDSA, we have included a new obligation to ensure learners know their providers' emergency plans when they begin study.</p> <p><i>Note that because of this change Part 3, clause 10(3)(d) is now 10(3)(e) and clause 10(3)(e)(ii) now is 10(3)(f)(ii).</i></p> <p>In response to suggestions by UNZ and English NZ, we have clarified that the expectations and processes around emergency procedures apply to all 'relevant' staff rather than all staff.</p>

Changes to the revised code based on feedback from targeted sector and learner engagement			
Type of change	Old wording	New wording	Rationale
Ensuring consistency within the code and with earlier changes made based on sector feedback	Part 3, clause 13(f)(ii) learner satisfaction with the complaints process and the outcome of their complaint; and ...	Part 3, clause 13(f)(ii) learner experience with the complaints process and the outcome of their complaint; and ...	UNZ expressed concerns that 'satisfaction' is too subjective (i.e. it is likely that those who are successful will be happy and vice versa). We have replaced this with 'experience' to clarify reporting obligations for providers regarding complaints.
	Part 4, clause 16(1)(a)(b) and (c) Providers must have practices for – (a) reducing harm to learners resulting from discrimination; and (b) working with learners and staff to recognise and respond effectively to discrimination, racism, bullying, harassment and abuse; and (c) empowering learners and staff to have an authentic relationship with Māori and be responsive to Māori culture; and ...	Part 4, clause 16(1)(a)(b) and (c) Providers must have practices for – (a) reducing harm to learners resulting from discrimination, racism (including systemic racism), bullying, harassment and abuse; and (b) working with learners and staff to recognise and respond effectively to discrimination racism (including systemic racism), bullying, harassment and abuse; and ...	We have removed former subclause 16(1)(c), and included the intent (reducing and responding to systemic racism) in 16(1)(a) and (b) instead. This was in response to feedback from different groups: TMĀ representatives expressed concern that this might lead to providers engaging with Māori in a tokenistic way. English NZ thought it antiquated and colonial. We expect that the guidelines will provide clarity that providers should engage with Māori whānau, hapū and iwi as appropriate.
	Part 4, clause 17(1) Providers must provide learners with safe opportunities to – (a) actively participate and share their views in their learning environment; and ...	Part 4, clause 17(1) Providers must provide learners with opportunities to – (a) actively participate and share their views safely in their learning environment; and ...	UNZ expressed concerns that this conflicts with academic freedom in that it may be an unreasonable restriction on the academic freedom of learners. We have removed the word 'safe' from the lead sentence and placed it in subclause (a), to address this concern.
	Part 4, clause 18 (a), (b) and (c) Providers must have practices for– (a) ensuring the health and safety of learning environments; and (b) removing access barriers to provider facilities and services; and (c) enhancing the physical design of learning environments; and ...	Part 4, clause 18 (a) and (b) Providers must have practices for– (a) providing healthy and safe learning environments; and (b) identifying and, where possible, removing access barriers to provider facilities and services; and ...	Regarding subclauses (a) and (b): UNZ expressed concerns that the way this clause was previously worded was not workable for providers. We have changed the wording to improve workability for providers. Regarding former subclause (c): UNZ commented that this was unnecessary detail. We have removed subclause (c). The broad intent would still be met through subclauses 18(d) and (e).

Changes to the revised code based on feedback from targeted sector and learner engagement			
Type of change	Old wording	New wording	Rationale
Ensuring consistency within the code and with earlier changes made based on sector feedback	<p>Part 6, clause 37(c) ensuring that prospective international tertiary learners receive, as a minimum, up-to-date and timely information about the following ...</p> <p>Part 6, clause 41(1) Signatories must have practices that ensure prospective international tertiary learners (or the parents or legal guardian of international students under 18 years) receive, as a minimum, information about the following before entering into a contract with the learner ...</p>	<p>Part 6, clause 37(c) ensuring that prospective international tertiary learners receive, as a minimum, up-to-date accessible and timely information about the following ...</p> <p>Part 6, clause 41(1) Signatories must have practices that ensure prospective international tertiary learners (or the parents or legal guardian of international students under 18 years) receive, as a minimum, accurate, timely and tailored information about the following before entering into a contract with the learner ...</p>	<p>These changes ensure consistency within the code of requirements to provide accessible, timely and accurate information ahead of and during study.</p> <p>Representatives from the NDSA suggested the revisions to Part 6, clause 37(c) to ensure consistency with the obligations during study set out elsewhere in the code (e.g. Part 3, clauses 10, 12 and 13).</p> <p>NZISA suggested the revisions to Part 6, pointing out that it would be consistent with obligations elsewhere in the code (e.g. Part 4, clause 20(1)).</p>

Changes to the revised code based on feedback from targeted sector and learner engagement			
Type of change	Old wording	New wording	Rationale
Minor and technical (improving clarity and removing or amending unnecessary clauses)	Part 1, clause 3(1) This code specifies the role of providers in ensuring the organised and formal provision of practices to care and assist the wellbeing and safety of ...	Part 1, clause 3(1) This code specifies the role of providers in ensuring the organised and formal provision of practices to support the wellbeing and safety of ...	Suggestion by ITENZ. (Replaced ' <i>care and assist</i> ' with ' <i>support</i> ').
	Part 3, clause 13 (e) record complaints (in written and digital forms); ... Part 5, clause 31 (5) Providers must ensure that accommodation providers keep a written and digital log of complaints received ...	Part 3, clause 13 (e) record complaints; and ... Part 5, clause 31 (5) Providers must ensure that accommodation providers keep a log of complaints received ...	In response to a suggestion by UNZ and English NZ, we have removed the requirements for 'written and digital records'. How these complaints are recorded will depend on the capacity of the institution.
	Part 5, clause 33(1)(b) provide accessible spaces for a wide range of interests, activities and needs; and ...	Part 5, clause 33(1)(b) provide accessible spaces for a range of interests, activities and needs; and	UNZ considered this obligation to be very wide and therefore meaningless. We have removed the word ' <i>wide</i> ' from the requirement to provide spaces for learners to undertake <i>a range</i> of interests, activities, and needs.
	Part 6, clause 37(c)(v) estimated study and living costs for international tertiary learners; and ...	Part 6, clause 37(c)(v) estimated study and living costs for international tertiary learners, including any additional fees or levies that are on top of the basic tuition fee; and ...	Suggestion by UNZ. We have clarified that information on study costs should also include any additional fees or levies that are on top of the basic tuition fee.