



Submission
of the
Victoria University of Wellington Students'
Association
on the
Inquiry into Student Accommodation

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VUWSA also wishes to present an oral submission.

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1. Introduction

Victoria University of Wellington Students' Association (VUWSA) advocate for and represent the 22,000 students of Te Herenga Waka- Victoria University of Wellington. VUWSA works in the best interest of our student members. It is VUWSA's mission to support students and to tell the story of student life at Te Herenga Waka- Victoria University of Wellington (*also referred to as 'the University' within this submission*).

The opportunity to make a written submission to the Education and Workforce Select Committee on Student Accommodation is welcomed by VUWSA, as VUWSA has fielded many issues within student Halls of Residence (Halls) over the years and host several concerns regarding pastoral care and business structure of Student Accommodation. We would like to thank the committee for making this inquiry happen and taking time to listen to our members.

In this submission we will focus primarily on Halls. However, these issues are not exclusive to Halls and are systemic in New Zealand's Student Accommodation.

Te Herenga Waka- Victoria University of Wellington has fifteen Halls with approximately 3000 student residents. Nine of these Halls are catered, while the other six are self-catered.

Living within Halls is different to tenancy in many ways. Most residents within university accommodation are first year students between seventeen to nineteen years old and, often, this is an individual's first time moving out of their family home. Unlike a flatting situation, residents have little choice regarding who they will be living with. Additionally, unlike bonds lodged between tenants and landlords, residents' bonds are not held by an entity independent to their accommodation provider.

Notably, the University frequently advertises their halls as "more than just a room", and this messaging is prevalent in many of their policies. This implies an experience different to that found in typical rental situations, with the inclusion of high-quality accommodation and pastoral care. These expectations are frequently undermined by unclear policies and processes and the power imbalance between students and accommodation providers. Subsequently, students are further

disadvantaged because the accommodation does not fall under the protective guidelines of the Residential Tenancies Act (RTA).

VUWSA believes there is a duty of care for tertiary accommodation providers to ensure that residents' wellbeing is protected. This is because the quality of accommodation and pastoral care provided by Halls directly impacts student's academic success, physical and mental wellbeing.

Students have long been affected by historic and systemic issues within Halls, and these have been exacerbated by COVID-19. To highlight the inadequacy of the current operations and lack of guidelines, we have included personal student experiences and accounts. We have also provided our recommendations of how these issues can best be mitigated.

2. What is currently wrong with Student Accommodation?

Nationally, the financial arrangement and purpose of Student Accommodation is disjointed and inconsistent. Many accommodation providers exist to generate profit for private interests, whether it is an offshore company or individual property investors, while others aim to generate a profit for the tertiary provider. Thus, financial gain determines accommodation providers priorities, meaning wellbeing is often neglected. VUWSA perceives this as the root cause of the majority of issues currently found in Student Accommodation.

2.1 The true purpose of Student Accommodation

VUWSA believes that the true purpose of Student Accommodation should be:

- A. To lower barriers and ease access to tertiary education;
- B. To acknowledge and mitigate the difficulties arising from the high school to university transition;
- C. To create a supportive community and holistic university experience for their residents.

2.1.1 Examples of Halls failing to deliver on these true purposes

Currently Halls are failing to lower barriers and ease access to New Zealand's tertiary education sector. At Te Herenga Waka- Victoria University of Wellington, Halls are operated in three separate ways. They are either:

- Owned and managed by the University;
- Owned by the University but managed by external companies, or;
- Owned and managed by external companies.

However, all Halls are advertised as 'university accommodation'. This can be misleading as residents are not informed of these differences in Hall operations and are under the expectation that Halls will have consistent standards and practices, which is not the case. For instance, the inconsistent complaint processes place the burden on residents to find the most appropriate avenue to address their concern.

In particular, Stafford House in Wellington, who is managed by UniLodge, has a business structure which makes it very difficult for students to be released from their contracts. It is unacceptable that a student experiencing significant financial hardship or health issues should be held to their contracts by Stafford House. Furthermore, each apartment in the Hall has individual contracts with the apartment owner. There is no transparency around how rooms are allocated. As such even if a student has left and their room subsequently filled, the initial student can be made to pay for the room for the entire period signed for.

In addition, during the COVID-19 lockdown the University told students they could break their hall contracts without penalty and that no one would be charged during lockdown. Stafford maintained that neither of these policies applied to their Hall. It was only by the University agreeing to pay Stafford that their residents could get repayment for the lockdown fees. Stafford

has continued not to allow students to cancel their contracts, even though many residents lost work and have had to move back home. Below are statements from residents of Stafford House:

- *“My experience with Stafford Hall has not been the best. What I didn't realize is that although they are listed on the Victoria accommodation page, they are actually run by a different company altogether, which allowed them to stay open during the pandemic, so whilst all the other halls stopped charging rent over the pandemic, Stafford continued to charge full rent from us, although we did later get a 1000 dollar rebate it was still less savings than other halls. I think it should come with a disclaimer that they are run by an independent company.”*
- *“I am currently a second year, and spent my first year at UniLodge Stafford House. My sister and I both lived there together, and encountered an array of issues whilst living there, which were most often ignored by the people working there when I asked for assistance e.g. upon arrival, my couch had multiple rips in it and I asked for it to be swapped, which the staff agreed to but never did. The room itself was filthy upon arrival. The agreement stated it would include kitchen items such as knives and forks, but there were missing cups, plates and bowls when we turned up on our first day. Once my stay at Stafford was over, my two roommates and I had a room inspection before our bonds were to be given back. One of my roommates was allowed by the staff to stay in the apartment for an extra week, and as a result there were some packets of food left in the kitchen cupboard, and soap in the bathroom. As a result of this, the staff decided that this meant our rooms were not spotless and thus they refused to give my sister and I our bonds back (we were moving out first). This was despite the inspector initially saying it was fine. They refused to give us back our full bond back for cleaning charges in November 2019. With the help of the student advisor Erica, we emailed Stafford to explain why they have no right to withhold our full bond money. The first email was sent in early February 2020. The customer service from Stafford has been atrocious. We sent numerous follow up emails as we had no reply. By May 22nd, we sent another follow up email as we still had no reply*

from Stafford. The manager gave a formal reply on 5th June, however this email did not address any substantive points we had made in the complaint. Then, later in June Stafford sent another email saying they would give my sister and I an ex gratia payment due to their poor reply speeds, confirming they would pay us on the 15th June. Today is the 29th June, and my sister and I have both been yet to receive a payment from Stafford. The customer service at Stafford has made me feel frustrated and ignored.”

Stafford House exemplifies that Halls are failing their purpose to lower barriers and ease access to tertiary education.

Additionally, there are general concerns regarding Halls management of bonds. The VUWSA Advocacy service has had many cases where Halls are slow to return bonds, with one student having to wait 11 weeks to have their bond released. Halls also deduct bonds in an unfair manner. Accommodation providers charge all students for any damage that cannot be attributed to an individual resident. As such, well-behaved residents are forced to pay for damage caused by others. This is grossly unfair. These students are also not told what damage the bond is deducted for and there is no transparency around bond deductions. When we have requested, for example, to see the damages claimed by Te Puni Village Hall, we are told this information cannot be released as the Hall is run by an external business and not covered by the RTA.

At Te Herenga Waka- Victoria University of Wellington, behavioral guidelines for students are found in the Student Code of Conduct and Accommodation Handbook. These documents offer no clarity of information to residents and Residential Advisors (RA) about governance structures, policies, complaints processes, or conflict resolution. This makes it difficult for residents to seek assistance on issues that arise, particularly ones where the accommodation provider is a complicit party.

Universities also claim that cost breakdowns of Student Accommodation are sensitive information and therefore, confidential. However, this refusal to be transparent means that students do not know where their money is going.

If the purpose of Student Accommodation is to create community, the lack of wellbeing and pastoral care fail in this regard. A student at a hall at VUW called their year in the hall a “*truly isolating experience*” as they “*didn’t get along with the people on my floor and felt like I was locked in hell for an entire year*”. This experience is not uncommon in Student Accommodation, due to a number of factors. Another similar experience:

- *“I was in halls in 2019, at Joans Stevens. The main problem I have with halls is the unhealthy conditions. We paid top dollar just to put money in the pocket of some offshore owner who couldn't care less about the people they were providing a home and lifestyle to. First year of uni is a really difficult time to start with, and being abandoned in a hall with no real pastoral care to speak of (my RA avoided us like the plague) we were left to our own devices. Some of my friends spiralled down into a depression where they were left unchecked by anyone except us, their peers, and they turned to substance abuse and developed dependencies on drugs to deal with it. Not that that was because of the hall but the conditions definitely didn't help...”*

2.2 Residential Assistants and pastoral care

Residential Assistants (RAs) are part-time staff at Student Accommodation and halls that live on-site and fulfil the role of supporting and looking out for residents. RAs are normally tertiary students at the same tertiary provider. RAs are expected to perform the role of a Youth Worker, despite the concerns that most RAs are not adequately paid, trained, or supported in their roles, and there is no consistency or set of guidelines for the role across the sector.

It is unacceptable that RAs are the first responders for crises at halls. They are students themselves, not much older than the residents they are supposed to be looking over. The training, pay and support they currently receive is insufficient for their roles. Additionally, there is no consistency or set of guidelines for the role across the sector.

Examples of RAs receiving insufficient support, or being thrust into situations they were inadequately prepared for include:

- *“In the aftermath of the death of the student at Canterbury, our deputy head of hall asked us to do wellbeing checks on all of our residents within 24 hours. This could be up to 50 residents, which is simply unrealistic. We were also told to do so as quickly as possible, so we weren’t allowed to work in pairs in case we found a resident in critical condition.”*
- *“I was an RA in 2019, in a hall where the four senior members of staff – head of hall, deputy head of hall, night manager, and student support coordinator – were all men. This meant that the three girls on the team bore the brunt of the disclosures from residents of sexual assault within the halls. When we reported it to higher management, we didn’t know what, if anything, was being done to deal with it.”*

It is unfair that the individual RAs bear the burden of criticism from residents and their whanau at these situations. They are students themselves. It is also unacceptable that RAs are required to pay exorbitant prices of rent in order to work.

Residential Assistants are a vital component of halls – they role model behaviour, initiate fun activities and provide support to students. We firmly believe RAs are important – we just think that they are asked to do far too much, and there need to be additional support staff and counsellors at halls.

Additionally, for most of the year the University’s halls have had only two Student Support Coordinators. These staff are expected to provide counselling support for all the students in the University’s halls. Last year there were four coordinators, and we do not understand why the University would reduce this kind of support when they are charging much higher fees than last

year. Now there are three of these staff, but we feel these staff are being asked to do far too much with too little resource.

Recommendation:

- That there needs to be a specific number of RAs and Student Support Coordinators in ratio to the number of residents and that this number needs to be appropriately low.

2.3 Sexual violence

There is a lack of clarity of what the processes are of dealing with disclosures, how victims are supported, and how perpetrators are handled. More often than not, this falls down to the victim's RA, or their friends to provide support. This is unacceptable. One resident said that:

- *“Myself and other girls were sexually assaulted in the hall and in the end after over 3 months of going through Vic uni complaint process, I lost. He moved out but on his own accord but he has faced no repercussions which is not fair...”*

Additionally, students in tertiary accommodation are not explained concepts such as consent at the beginning of the year, and how this relates to alcohol.

2.4 Racism

Student Accommodation staff often struggle to handle issues of racial or other discrimination, reflecting a lack of understanding of cultural diversity, and leaving students to feel unwelcome or unsafe in what is supposed to be their home.

International students in particular are vulnerable when it comes to Student Accommodation. Often, they live in self-catered halls, and are not only extremely isolated, but staff are not adequately trained in cultural competency.

- *“I was told to apologise to boys that were making fun of my culture because I told them that was inappropriate and insensitive, and I had to apologise for making them uncomfortable. I then had other boys make racist comments towards me, they then got in trouble and I was threatened by one of them for narking. also had a white girl ask me how I can afford to live in a hall. the price point was terrible when I was in the halls two years ago and I could barely afford it. now, I doubt halls will be inclusive of brown kids.”*

Recommendation:

- Student Accommodation should uphold Te Tiriti o Waitangi, including providing specific accommodation for Māori students.

2.5 Bonds

The University holds bonds for University owned halls in its accounts where they earn interest that is then retained by the University, VUWSA cannot be sure what and how the bonds are managed by non-University owned halls as they are not covered by the Official Information Act 1982. Students had raised concerns with VUWSA about the amounts that were being withheld, after investigating we believe that the use of bond and the amount taken from bonds at the end of the year has grown over the years. Paying bonds back to students, there are cases where bonds have not been paid back in a timely manner by a hall, including taking 11 weeks to return a student’s bond.

One of the standout halls for 2018, for which we were able to get information was Capital Hall where a total of \$30,380.37 was from all students as shared cost for damage and cleaning. information about bonds from non-university run halls was denied, as *“partner halls, including Te Puni Village, hold information related to student bond refunds. The partner halls are separate from the University and are not subject to the Act. Therefore, this information is refused under section 18(g)”*.

A solution to this is for bonds to be covered by the same process as standard tenancy law, the current process unfairly disadvantages tenants/students and places all decisions making in the hands of the University and its independent operators, VUWSA does not believe the process is fair and balanced nor is there an open appeals process.

Recommendation:

- If Halls choose to collect bonds, they should be lodged with Tenancy Services as all other bonds for renters in New Zealand currently are. This would ensure that bonds are paid out independently and there is an open and fair process for appealing bonds.

2.6 Fees and complaints

Last year this university decided to raise its hall fees by significant margins. The University made this decision prior to the open day for students – yet at the open day parents and students were given publicity information advertising the hall prices for 2019, with an asterisk next to it indicating these prices could change. This was deceptive – even if the brochures were published in advance there is no reason why the University could not have included a one page insert with the new prices.

We asked many questions about the pricing and asked for reasons – we were fobbed off with vague responses. There is little transparency about how these fees are set, or how much profit the University is making with its halls. Some of the halls increased their prices by over \$3000 in 2020 (from the 2019 rate). If people were planning their accommodation based on the 2019 prices they would have been hugely disappointed to see the new prices, and potentially excluded from university accommodation as a result.

Many students have reported that their halls are slow and unresponsive to feedback. For example, students have reported emailing University Hall repeatedly about issues and getting no response. They have also reported being asked to change to a different room with short notice (1 days' notice). Our advocate has had issues getting responses to complaints about halls, and

she sometimes only gets complaints dealt with by taking them to senior staff who work for the University itself. She is aware of the senior people who students can contact – but a majority of students have no idea where to escalate a complaint if it is unresolved by a hall. Students are paying high fees to stay in the Halls, yet the student experience varies widely depending on who is Head of Hall and how they choose to run the Hall. Students are often unaware of who they can contact about issues with Halls, and therefore they go to the media with issues.

There is a need for better pathways for students to raise complaints outside of the hall itself. When students email the faceless accommodation address, they often simply get referred back to the hall rather than having their concerns dealt with by the University. There needs to be a very clear complaints process and students need to be referred to external advocacy and support services (such as the VUWSA Advocacy team, or the University's Student Interest team. This would also allow students an avenue to challenge things such as bond deductions).

Recommendation:

- That Student Accommodation must have a clear complaints process and a way in which students can access external advocacy and support services.

2.7 Facilities

In Wellington a number of the halls are re-purposed office blocks. Students have reported a range of issues with this and have expressed the view that these buildings are not necessarily suitable for residential living. In addition, for many years some of the facilities have been very poorly maintained, such as the houses that make up University Hall which were uninsulated and in poor repair.

The situation is exacerbated by lack of proper cleaning/ inventory checking processes at Halls. For example, a student at Education House saw a doctor who told her she'd been exposed to black mold. Despite cleaning her room multiple times, she remained sick. Eventually she took the (hall provided) mattress-cover off the (hall provided) mattress to discover the mattress was

moldy. Many other students have also reported issues with dirty rooms on move in. Many students have reported poor or slow responses to maintenance requests.

Some of the facilities provided by halls come with an additional cost to students. For example, students expect their fee to pay for their stay at Te Puni, yet they have to pay additional money each week to do their laundry. Halls should cover all of these costs, rather than having students discover additional fees when they arrive.

2.8 COVID-19 specific

As the country entered alert level 4 students' in accommodation were emailed to go home or they would be sent to Weir House. The following email was sent to students in halls and university flats just as New Zealand was entering Alert level 3.

“You will be aware the Prime Minister announced at 1.30 pm this afternoon that the country has moved to a temporary alert level 3 to combat COVID-19 (coronavirus), and that New Zealand will be moving to a level 4 alert in 48 hours. Schools and universities must close by midnight Wednesday 25 March. Transport will become limited and students now have 48 hours to return home. Residents who are able to go home must make plans to do so as soon as possible, within the next 48 hours. The halls will be closing for students at 1.30 pm Wednesday. All accommodation contracts will be suspended from today, and you will not be charged during this time. If you cannot return home, please speak to your head of hall immediately. We will be providing you with alternative accommodation at Weir House with full catering. Please prepare what you need to take for the next 4 weeks as we will be consolidating all remaining residents in the one hall on Thursday 26 March, to ensure we can look after you all, and provide a high level of care for your health and wellbeing. Self-isolation processes stay the same. You must stay in your self-isolation accommodation for the duration of your mandated period. You can go home if you wish after your self-isolation period. If you cannot return home, we will accommodate you at

Weir House. Please speak to your contact at University Accommodation to make arrangements. These are extraordinary circumstances, and we understand this is a very anxious time for you all. We will be working to welcome you back after 28 April and we will be in touch with updates for you during this time.”

The email was originally sent to residents in halls as well as self-contained flats, after VUWSA was contacted by concerned international students in flats, VUWSA raised their concerns with the University internally and fortunately the students were allowed to remain in their flats. For example, a group of postgraduate students sharing a house were told they needed to move to Weir, which would have raised their level of risk and exposed them to many other students. Another student living alone in a University Hall house was told he would need to move to Weir even though he was immuno-compromised and that he would have been exposed to a lot of other students by moving to Weir.

The key message here is that *“Residents who are able to go home must make plans to do so as soon as possible, within the next 48 hours”*. This means that students were essentially told they need to go home, and that the University had suspended the contract that students had signed without consultation. There was and is no clause in the contracts that students signed that allowed the University to ‘suspend contracts’, while certainly it was a pragmatic response to uncertain times, it highlights why there needs to be more regulation in place to ensure that the University does not abuse its privileged position.

The University also failed to consider the self-catered halls, and the students who it was unsuitable for them to move (such as the immuno-compromised student) and it was only when VUWSA raised these issues that they re-considered their decision and told some students they could stay where they were.

2.8.1 Students being asked to pay a place holder fee for their room

Students were emailed on Friday evening April 29 from the University's Director of Student and Campus Living that they would need to start paying for their rooms as the country was entering alert level 3 even though the students would not be able to use or return to their rooms.

The \$150 fee would cover "holding the room and taking care of items left there", "We are gearing up for your return to our halls of residence. We continue to hold your room and take care of the items you left there. After the fee waiver period ends on 28 April, we will be charging you a weekly fee of \$150 for those who intend to return to the hall as soon as they are able."

This place holder fee of \$150 per week to hold their room, was and is neither fair nor reasonable given the circumstances. It was charged after the University initially told students that there would be no charge for rooms that students were unable to occupy under the COVID-19 lockdown.

There were suggestions by the University that the fee relates to the University "taking care of items" that students have left in the halls, further the University had also variously suggested that the placeholder fee is for "staff costs" "insurance" and "leases". The University then moved to a position that the fee will be made but that it would delay payment of the fee for ten days from when it was originally going to charge the place holder fee.

The University has misled students about the charges they would face both at the start of the relationship between the halls and the students and since then by claiming that initially that no charge would be made, then attempting to impose one unfairly and without authority, essentially rewriting the contracts that existed with students without any consultation.

VUWSA did not at the time nor do we still accept that the University has rights under the contract between students and the halls of residents to impose the fee and change terms as it saw fit and its amounts to an attempt to impose an unfair terms on the students in the Halls.

Students could not have reasonably expected this fee in these circumstances especially after assurances to the contrary from the University. These students are particularly vulnerable. Not

only are they mostly school leavers but they are also facing job losses and, in many cases, they are borrowing from the student loan scheme to help meet the costs of the halls of residents. Students have few other legal avenues available to address their concerns as the Residential Tenancies Act 1986, Section 5B of the Act exempts Student Accommodation. There is also a significant power imbalance between students who are at the start of their academic careers with the University and we are concerned that the coercive power of the University will go unchecked and additional charges may be casually introduced in other situations unless checks and balances are put in place.

It was only after days of continuous social, media and political pressure that the decision was reversed, and a 10-day hiatus was put in place, this was then extended again further and while the situation should never have happened, nothing is in place to stop it.

Allowing the University to set the terms of an agreement, decide what is fair and reasonable is problematic and in our experience the University has primarily acted in its own best interests. It is an outcome that is unfortunately working as designed and that is why we believe it needs to change. Allowing Universities to then also contract out Halls to third party businesses that are not subject to the Official Information Act nor do they have to comply with the minimum standards afforded all other renters in New Zealand was always going to be problematic.

Throughout this period students at Stafford House were told to ignore the university messaging and that it did not apply to them. This is despite the fact that Stafford House is advertised as a Victoria University Hall, and has the Victoria University logo plastered all over it. For example, all students were eventually told they would not need to pay a fee during level 4, yet Stafford continued to charge them – VUWSA raised this issue with the university as a major reputational risk, and we were told that negotiation about this was taking place at a very high level. We understand that eventually these students were given credit in their accounts for this period. Then the university emailed all halls students and told them they could cancel their hall contract without the usual penalties given the circumstances. Students at Stafford contacted us to tell us that Stafford had told them this email did not apply to them – given they had no idea Stafford

was different from other halls until this point this is grossly unfair. We raised this issue with the University, but they told us to communicate with Stafford directly. VUWSA has subsequently discovered that each room at Stafford is owned by a different investor, which is a bizarre business model.

Recommendation:

- That an independent body be set up, with powers to impose fines and enforce changes.
- That any halls not run and managed by universities are required to comply with the Official Information Act 1982. The ability to opt out of the requirements around tenancy law is a privilege afforded to University Halls and with that should come great responsibility.

3. Conclusion: What needs to change?

Student Accommodation in Aotearoa New Zealand is currently poorly defined within government legislation. This opens up the possibility of students being taken advantage of financially, without tertiary providers being required to deliver adequate services.

Currently, Parliament has very little oversight and control of Student Accommodation. This means that they currently have a very limited ability to regulate the sector. Student Accommodation is exempt from the Residential Tenancies Act 1986, the legislation that governs renting, including tenants and landlords. This means that students do not have access to the Tenancy Tribunal as renters do. We believed that the Pastoral Care Code is too broad and general. It creates no real legislative change which obligates Student Accommodation to care for their residents.

Students in Student Accommodation are not provided with clear information about governance structures, policies, complaints processes, or conflict resolution. This makes it difficult for them to seek assistance on issues that arise, particularly ones where the accommodation provider is a complicit party. Contracts for Student Accommodation should be required to provide clear

guidelines for complaints procedures and conflict resolution, including the option of going to the Tenancy Tribunal.

There needs to be specific legislation which mandates a certain standard of care that accommodation providers are held to. The wellbeing of our students depends on it.

3.1 Summary of recommendations

1. That Student Accommodation should operate with the purpose and mission to:
 - a. Lower barriers and ease access to tertiary education;
 - b. Acknowledge and mitigate the difficulties arising from the high school to university transition;
 - c. Create a supportive community and holistic university experience for their residents.
2. That Student Accommodation should uphold Te Tiriti o Waitangi, including providing specific accommodation for Māori students.
3. That there needs to be a specific number of RAs and Student Support Coordinators in ratio to the number of residents there are, and that this number needs to be appropriately low.
4. That Student Accommodation must have a clear complaints process and a way in which students can access external advocacy and support services.
5. That if Student Accommodation providers choose to collect bonds, they should be lodged with Tenancy Services as all other bonds for renters in New Zealand currently are.
6. That an independent body be set up, that has powers to impose fines and enforce changes for the purpose of regulating Student Accommodation providers.
7. That any halls (or Student Accommodation) not run and managed by universities are required to comply with the Official Information Act 1982.