Vision College Limited

The Education (Pastoral Care of Tertiary and International Learners) Code of Practice Strategy and Action Plan - 2023

_____

Contents

1. Overview

The Education (Pastoral Care of Tertiary and International Learners) Code of Practice, known as the Code, came into effect on 1 January 2022, replacing the previous International Code and Interim Domestic Code.

Under the Education and Training Act 2020, the purpose of the Code is to require providers to:

1. Take all reasonable steps to maintain the wellbeing of domestic tertiary students and to protect international students

2. Ensure as far as possible that domestic tertiary students and all international students have a positive experience that supports their educational achievement. With this purpose in mind, the Code must be implemented in a way that is appropriate to learners' needs.

The Code is about contextualising pastoral care practices in a way that is "appropriate" to the needs of learners. As Code Administrator, NZQA expects providers to take responsibility for determining what is appropriate practice for their learners, including practice undertaken by any contracted third party.

Providers are required to work proactively with learners and other stakeholders to understand what 'appropriate' means to them

Working out what is 'appropriate'

To work out what is appropriate means:

1. We work proactively with students and other stakeholders to understand what 'appropriate' means to them

2. We use evidence, that is

    a. Input from diverse learners and other stakeholders

    b. Relevant data on what we know, such as feedback surveys, focus groups, attendance rates, achievement data and other items

3. We need to consider this evidence in light of our four strategic elements:

    a. Create and deliver outstanding learning experiences for students

    b. Championing the best in one another – our staff team

    c. Build strong stakeholder/industry relationship

    d. Academic integrity and business excellence

4. We make robust, defensible, and documented decisions about what is appropriate and why.

Vision College Limited is committed to effectively embedding the Code, for the wellbeing, safety, and inclusion for all learners in our community, including Māori, Pasifika, and those with disabilities and neuro-diversities.

To ensure that we are truly enacting our values in supporting learners, we seek to create a warm, inclusive, and welcoming environment so students can flourish, succeed, and achieve their goals.

Vision College's Code of Practice strategy is the organisations' programme for the wellbeing, safety, and inclusivity of all learners in a culturally relevant manner. Accompanying this strategy is the Disability Action Plan (DAP) strategy. A copy can be viewed on Vision College's website.

The organisation's Code of Practice strategy provides the opportunity to identify and remove

barriers so learners may achieve their educational goals and aspirations in a safe manner that promotes their health and wellbeing.

Vision College Limited is approved by NZQA as a Code signatory.

2. Who is the Code for?

The Code is for students who are studying on campus, online, offshore, and/or in workplace-based settings.

The Code sets out the roles and responsibilities of Tertiary Education Organisations (TEOs) in promoting and supporting learner wellbeing, safety, and educational achievement.

Under the Code, providers support and respect learners and their learning, ensuring they are accepted for who they are, supported in their learning and wellbeing, connected with social and cultural networks, and able to express their voice.

The Code has four key elements known as the cornerstones of the Code, and twelve outcomes.

3. Cornerstones of the Code

There are four key cornerstones of the Code, these are listed below. Our commitment to the Code is expressed through what we inwardly value and outwardly express, or in an acronym SHOW:

1. **S**tudent Voice

   a. While any relationship needs commitment and engagement from both parties to be successful, the Code requires providers to build and maintain strong relationships with diverse learners and other stakeholders through meaningful partnership

2. **H**onouring Te Tiriti o Waitangi

   a. Principles of partnership, protection, and participation are inherent to the Code

3. **O**rganisational wide approach - committed to effectively embed the Code

   a. Under a whole-of-provider approach, the Code requires providers to have a strategic, transparent, and responsive safety and wellbeing system. This means that under a whole-of-provider approach, we take a strategic, outcomes-focused approach to learner wellbeing and safety

   b. We work with diverse learners and stakeholders to understand and respond effectively to their needs

   c. We have the capability and capacity to put learner wellbeing and safety practices in place

   d. We are transparent about our wellbeing and safety system and its performance, so that learners and other stakeholders have clear and accessible information about wellbeing and safety practices

   e. Lastly, under a whole-of-provider approach, we will undertake quality self-review that uses and embeds learner voice and relevant data, to regularly review, develop, and improve practices so that they remain fit for purpose

4. **W**ellbeing and safety of students and staff.

We **SHOW** care in a meaningful way to learners, for student academic success, wellbeing and safety in a culturally warm and relevant learning environment.

4. The 12 Tertiary Outcomes of the Code

Below are the 12 Tertiary Outcomes of the Code. As Vision College does not offer student accommodation, outcomes 5 - 7 are not applicable. The outcomes are:

1. **Organisation structures for whole of organisation approach**

    1. Outcome 1: Learner wellbeing and safety system

    2. Outcome 2: Learner voice

2. **Wellbeing and safety practices for all learners**

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

    4. Outcome 4: Learners are safe and well

3. **Student Accommodation**

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

    6. Outcome 6: Accommodation administrative practices and contracts

    7. Outcome 7: Student accommodation facilities and services

4. **International Tertiary Learners**

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

    9. Outcome 9: Prospective international tertiary learners are well informed

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

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

    12. Outcome 12: Safety and appropriate supervision of international tertiary learners.

5. The Code Outcomes in detail

Outcome 1: A learner wellbeing and safety system

Process 1: Strategic goals and strategic plans

Process 2: Self-review of learner wellbeing and safety practices

Process 3: Publication requirements

Process 4: Responsive wellbeing and safety systems

- We have strategic goals and plans to support the wellbeing and safety of our students across the organisation

- We work proactively with our learner and stakeholders, and use relevant data to develop and review these, with action put into place where improvement or enhancement can be made

- These plans and goals are available to our students, our team, and the public.

- We will gather relevant information to identify trends so that we can connect our students to support in a timely manner

- We will provide training for our team and ensure they have the resources to support learner safety and wellbeing

- We will have a plan for responding effectively to assist our students in emergency situations in our learning community

- We will keep accurate records and reflect and report back on these, at least annually.

Outcome 2: Learner voice – what we call Student Voice

Process 1: Student (learner) Voice

Process 2: Students (learner) complaints

Process 3: Compliance with the Dispute Resolution Scheme

- For details on Student Voice, please view the Student Voice Guide

- For details on Student (learner) complaints please view the Student Handbook

In summary:

- We will work with students to understand and respond to diverse learner voices and wellbeing and safety needs in a way that upholds learner mana and autonomy

- We will have practices to build effective relationships with students and provide them with skills and resources to participate in decision making processes, and provide information to help students understand our decision-making processes

- We will work with students to sensitively handle any complaints and seek to reach a resolution in a timely and respectful manner

- We will have a complaint process that is easily accessible to students and the people that support them, including what to do if we can't resolve an issue

- We will provide information about the Dispute Resolution Scheme and comply with its rules for domestic students.

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

Process 1: Safe and inclusive communities

Process 2: Supporting learner participation and engagement

Process 3: Physical and digital spaces and facilities

- We will work with staff and students to recognise and respond effectively to discrimination, racism, bullying, harassment, and abuse, and have practices in place for reducing harm resulting from any of the issues listed

- We will promote an inclusive culture across the learning environment and uphold the cultural needs and aspirations of students

- We will provide students with information that supports understanding, acceptance, connection, and collective responsibility for an inclusive learning environment

- We will provide students with the information about cultural, spiritual, and community support available to them

- We will provide an accessible learning environment for students where they can connect with others, build relationships, support each other, and welcome their friends, families, and whanau

- We will provide students with opportunities to actively participate and share their views safely in their learning environment to connect, build relationship, and develop social, spiritual, and cultural networks, and use te reo and tikanga Māori to support Māori learners' connection to identity and culture

- We have practices for supporting students through their studies, including enabling learners to prepare and adjust for tertiary study, and maintaining appropriate oversight of student achievement and engagement

- We will provide the opportunities for students to discuss, in confidence, any issues that are affecting their ability to study and provide learners with a response to their issues

- We will provide students with advice on pathways for further study and career development, where appropriate

- We will encourage students to actively participate and share their views safely in their learning environment; connect, build relationships, and develop social, spiritual, and cultural networks; and use te reo Māori and tikanga Māori to support Māori learners' connection to identity and culture

- We will have practices in place for providing healthy and safe learning environments; identifying and where possible, removing access barriers to our facilities and services; involving students in the design of physical and digital environments when making improvements; engaging with Māori and involving Māori in the design of physical and digital environments where appropriate.

Outcome 4: Learners are safe and well

Process 1: Information for learners about assistance to meet their basic needs

Process 2: Promoting physical and health awareness

Process 3: Proactive monitoring and responsive wellbeing and safety practices

- We will have practices for enabling all students and prospective learners to identify and manage their basic needs – the essential material requirements to support wellbeing and safety including housing, food, and clothing

- This includes providing accurate, timely, and tailored information on how they can access services through the provider or through community and public services that will help them maintain reasonable standards of material wellbeing and safety.

- When we make food available on campus, we will ensure that the food is available includes a range of healthy food options that is obtainable at a reasonable cost or in some cases free

- We will have practices for providing opportunities and experiences for students that improve their physical and mental health and wellbeing and safety

- We will promote awareness of practices that support good physical and mental health, that are credible and relevant to students

- We will support students' connection to their language, identity, and culture

- We will provide accurate and timely information and advice to students about how they can access medical and mental health services through our organisation or through community and public services, including culturally responsive services

- We will provide accurate and timely information and advice to students about how they can report health and safety concerns they have for their peers

- We will provide accurate and timely information and advice to students about how to respond to an emergency and engage with relevant government agencies

- We will provide accurate and timely information and advice to students about how they can make positive choices that enhance their wellbeing

- We will have practices in place for:

  - Requesting that domestic students 18 years and over provide a name and up-to-date contact details of a nominated person

  - Describing the circumstances in which the nominated person referred to above should be contacted in relation to their wellbeing and safety

  - Contacting the person nominated by domestic students 18 years and over, in the circumstances described above, or where the provider has reasonable grounds for believing that a disclosure is necessary to prevent or lessen a serious threat to the student's life or health

- We will have emergency evacuation procedures in place to assist students, including those with disabilities to evacuate the building

- We will have Health and Safety related policies and procedures in place to ensure the safety and wellbeing of students

- We will have an adequate number of first aid qualified staff trained to assist in an emergency

- We will collect medical and disability information in a timely manner during the enrolment process, to ensure an effective response in an emergency situation

- We will provide the necessary Health and Safety information to students during the orientation process and through other means such as Student Handbooks etc.

- We will conduct a risk assessment through our RAMS (Risk Assessment and Management System), to ensure safe trips and excursions.

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

- We will engage with all international tertiary learners to understand and respond to their wellbeing and safety needs as outlined in outcomes 3 and 4 of this code.

Outcome 9: Prospective international tertiary learners are well informed

We will ensure that prospective international tertiary learners receive clear, accessible, accurate, and sufficient information, to be able to make informed choices about the study and services we provide before they begin their study

Process 1: Marketing and promotion

We will ensure marketing and promotion practices, that include –

- Proactively seeking to understand the information needs of prospective international tertiary learners

- Developing and providing information to prospective international tertiary learners, and reviewing the information to ensure it is kept up to date

- Ensuring that prospective international tertiary learners receive, as a minimum, up-to-date accessible, and timely information about the following –

    - Our quality assurance evaluations

    - The educational instruction, staffing, facilities, and equipment, available to international tertiary learners

    - The Dispute Resolution Scheme

    - Potential learning outcomes for international tertiary learners, including pathways for further study, employment, and residency where applicable

    - Estimated study and living costs for international tertiary learners, including any additional fees or levies that are on top of the basic tuition fee

    - Accommodation and transport, or ways to obtain such information.

Process 2: Managing and monitoring education agents

We will ensure we have practices in place for effectively managing and monitoring the performance and conduct of education agents in relation to learner safety and wellbeing under this code, including –

- Carrying out and recording reference checks on potential education agents to ensure as far as possible, that they are not involved in any conduct that is false, misleading, deceptive, or in breach of the law

- Entering into written contracts with education agents

- During the term of any contract, monitoring the activities and performance of the education agents in relation to –

    - Their obligations as specified in the contract

    - Whether they provide prospective and enrolled international tertiary learners with reliable information and advice about studying, working, and living in New Zealand

    - Whether they act with integrity and professionalism in their dealings with prospective and enrolled international tertiary learners

    - Whether they have engaged in any activity or conduct that in the opinion of the signatory, is or may be in breach of the law, or that jeopardises the signatory's compliance with this code

    - Managing the education agents by terminating contracts with an agent if there is evidence which on the balance of probabilities, shows that the education agent has been involved in any serious, deliberate, or ongoing conduct that is false, misleading, deceptive, or in breach of the law; or has jeopardised the signatory's compliance with this code

        or

- Managing the education agents by taking appropriate action to address misconduct by act or an omission by an education agent in relation to the other matters described in subclause (c); and ensuring that education agents have access to, and maintain, up-to-date information relevant to their duties as specified in the contracts with the signatory.

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

We will have practices in place 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

Process 1: Offer of educational instruction

We will ensure that the educational instruction offered to international tertiary learners is in accordance with the Act, and is appropriate for international tertiary learners' expectations, English language proficiency, academic ability, and the educational outcomes being sought.

Process 2: Information to be provided before entering contract

We will have practices in place that ensure prospective international tertiary learners receive, as a minimum, accurate, timely, and tailored information about the following before entering into a contract with the learner –

- The most recent results of Vision College's evaluations by education quality assurance agencies

- Quality improvement or compliance notices and conditions imposed under the Act, that the Code administrator directs, must be disclosed to prospective international tertiary learners,

- The education provided and its outcome, for example, whether a qualification is granted

- Refund conditions that comply with the process as outlined in the Code

- Staffing, facilities, and equipment

- Available services and supports

- Insurance and visa requirements for receiving educational instruction from the signatory

- This Code and the relevant Dispute Resolution Scheme Rules

- Full costs related to an offer of educational instruction.

We will ensure that, before a student enrols, each international tertiary learner is informed of the learner's rights and obligations in relation to receiving educational instruction from the signatory, including their rights under this Code.

Process 3: Contract of enrolment

We will ensure that a contract of enrolment is entered into between Vision College Limited and each international tertiary learner that includes the following information and terms –

- Clear information about the beginning and end dates of enrolment

- The grounds for terminating the contract of enrolment

- The circumstances under which the learner's conduct may be in breach of the contract of

enrolment

- The type of disciplinary action short of termination of the contract of enrolment, that may be taken by the signatory against the student (for example suspension or exclusion)
- The process that the organisation will follow when seeking to terminate the contract of enrolment.

We will ensure that the contract of enrolment is fair and reasonable.

Process 4: Disciplinary action

We will ensure where any process is undertaken for terminating the contract of enrolment, or for taking disciplinary action, will be in accordance with the principles of natural justice (which includes those necessary to ensure the prompt, considered, and fair resolution of the matter that is the subject of the action).

Process 5: Insurance

We will have practices that ensure, as far as practicable, each international tertiary learner who is enrolled with the signatory for educational instruction of 2 weeks' duration or longer, has appropriate insurance covering –

- The international tertiary learner's travel –

    - To and from New Zealand

    - Within New Zealand, and if the travel is part of the educational instruction, outside of New Zealand; and

- Medical care in New Zealand including diagnosis, prescription, surgery, and hospitalisation

- Repatriation or expatriation of the international tertiary learner because of serious illness or injury, including cover for travel costs incurred by family members assisting repatriation or expatriation

- Death of the international tertiary learner, including cover for –

    - Travel costs of family members to and from New Zealand

    - Costs of repatriation or expatriation of the body

    - Funeral expenses.

NB: International tertiary learner's insurance applies to travel to and from their country of origin or citizenship before their educational instruction begins and after it ends (which may be outside of the enrolment period). International travel insurance does not include the international tertiary learner's travel to other countries unless that travel is primarily for the purpose of embarking on connecting flights to and from New Zealand.

Process 6: Immigration matters

We will have practices that as far as possible, will ensure that international tertiary learners are entitled to study in New Zealand under the Immigration Act 2009, including –

- Ensuring that each international tertiary learner who enrols with the signatory has the necessary immigration status for study in New Zealand

- Reporting to Immigration New Zealand any known or suspected breaches of visa conditions by international tertiary learners

- Notifying Immigration New Zealand of terminations of enrolment.

Process 7: Student fee protection and managing withdrawal and closure

We will ensure that –

- Fees paid by international tertiary learners are secure and protected in the event of student withdrawal or the ending of educational instruction, or the closure of a signatory

- Our refund policies are fair and reasonable

- We provide international tertiary learners with sufficient information to understand their rights and obligations under those refund policies

A refund policy must include refund conditions for the following situations

- Failure by an international tertiary learner to obtain a study visa

- Voluntary withdrawal by an international tertiary learner

- The signatory ceasing to provide a course of educational instruction as contracted with an international tertiary learner, whether as the result of a decision by the signatory or as required by an education quality assurance agency

- The signatory ceasing to be a signatory

- The signatory ceasing to be a provider.

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

We will ensure that international tertiary learners are given the opportunity to participate in well-designed orientation programmes and continue to receive relevant information and advice to support achievement, wellbeing and safety.

Process 1: Provision of information

We will –

- Ensure that information and advice provided by the signatory to international tertiary learners is accurate, age-appropriate, up to date and presented in a way that meets the ongoing needs of diverse learners

- Ensure that ongoing provision of information and advice is appropriate to the needs of the learner

- Provide the names and contact details of designated staff members responsible for international tertiary learner support

- Provide appropriate information relating to health and safety of international tertiary learners (including in relation to any disabilities or impairments a learner may have)

- Provide information about the termination of enrolment

- Provide information to international tertiary learners about their legal rights and obligations and, where possible, the risks when learners receive or accept advice or services

- Provide information about the international tertiary learner's rights and entitlements, including any entitlement to a fee refund, if the learner voluntarily withdraws from the educational instruction

- Provide each international tertiary learner with full information and advice on –

    - All relevant policies of the signatory

    - The services, support, and facilities that the signatory offers

    - Where applicable, how to adjust to a different cultural environment

    - Where applicable –

        - Minimum wages and labour conditions in New Zealand

        - Maximum hours of work permitted under visa conditions

        - How to access information and support regarding employment

        - How to report misconduct by employers.

Outcome 12: Safety and appropriate supervision of international tertiary learners

We will ensure that international tertiary learners are safe and appropriately supervised in their accommodation

Process 6: Accommodation for international tertiary learners 18 or over

In relation to an international tertiary learner 18 years or over who lives in accommodation provided or arranged by a signatory and not subject to Part 5, the signatory must –

- Ensure that the learner's accommodation is safe, is in an acceptable condition, and meets all regulatory and legislative requirements

- Maintain effective communication with the learner when accommodation issues arise, and must take responsibility for addressing those issues, including reporting them to relevant authorities

- Accommodation issues include issues of health and wellbeing arising from a learner's accommodation or connected with it.

6. Vision and Strategy

Vision College's vision is to demonstrate best practice in Code implementation and practice. This involves moving beyond compliance to embrace an innovative paradigm for wellbeing and safety. This strategy is supported by the Senior Leadership Team (SLT), and includes the Board, CEO, and Senior Managers.

Vision College's Code strategy sits within the organisation's broader strategic framework and is aligned within its first and second Key Strategic Elements: "Create and deliver outstanding learning experiences for students" and "Champion the best in one another – our staff team".

The strategic process below outlines how the Code strategy is implemented.

7. Strategic Process

1. Allocation of responsibilities

The CEO, with support from the SLT is responsible, on behalf of the Board, for the leadership and implementation of the Code. The CEO is responsible to ensure the Code is effectively implemented across the organisation.

The Learner Wellbeing, Safety and DAP Team is responsible for the implementation of this strategy. The team is made up of staff across the organisation and meets regularly with records of minutes kept. The Learner Wellbeing, Safety and DAP Team works closely with the Cultural Team, Student Voice and Academic and Quality Committee (AQC). The Learner Wellbeing, Safety and DAP Team reports to the CEO. The CEO reports to the Vision College Board.

2. Review of current practices

This means reviewing current practices using the Self-Review GAP Analysis tool. The analysis assesses multiple areas, including:

- Learner wellbeing and safety system
- Student Voice
- Complaints systems and processes
- Physical and digital spaces and facilities
- Promotion of physical and health awareness
- Wellbeing and safety monitoring
- International students
    - Marketing and promotions
    - Travel and Insurance
    - Visas
    - International student safety and wellbeing

Once the assessment is completed, action plans are prepared and reviewed. The Learner Wellbeing, Safety and Disability Action Plan Team works through the priority areas to improve the organisation's ability to create an inclusive and supportive environment for learners.

3. Setting goals and targets

Goals and targets are reviewed and include the following:

- Assessment of current position, using the self-review tool
- Identify GAPs and implement goals and targets through an action plan
- Prepare a schedule of deliverables and measure outcomes.

A schedule of deliverables is to be prepared annually to identify milestones and timelines – see section 6.

4. Evaluative Strategies

Reviewing our current and future practices enables the organisation to track improvements and identify opportunities for further improvements. The following items are reviewed:

- Student voice feedback, including feedback from diverse learners
- Attendance rates
- Academic achievement of learners including Māori, Pasifika, and those with disabilities and neuro-diversity
- Safety and wellbeing feedback through surveys
- GAP analysis and milestone achievements
- Policy and process reviews.

This process results in robust, defensible, and documented decisions about what is appropriate and why. This is an ongoing process of review and practice improvement over time. This evaluative, evidence-based approach will develop growing confidence in decision-making and importantly the wellbeing and safety of students.

5. Communication of policies and processes

The Learner Wellbeing, Safety and DAP Team is responsible for the development of Code policies and processes for the organisation. The AQC is responsible to review and approve policies and processes. Students and staff are updated on the relevant policy releases with key policies uploaded on the Vision College website.

6. Professional Development

We are focused on ensuring staff are well trained and supported in implementing and embedding the Code into the fabric of the organisation. Annually, a PD schedule is prepared to support staff and their ongoing professional development to support student success is a safe and culturally relevant manner. Professional development and training records are to be kept.

8. Privacy Policy

A copy of the organisation's Privacy Policy is available on the Vision College website. The Privacy Policy complies with the Privacy Act 2020 which sets out how we will collect, use, disclose and protect personal information. The Policy ensures personal information, collected, and held by Vision College Limited is managed in accordance with the requirements of the Privacy Act 2020, the 13 privacy principles and other relevant laws.

When applying the Code, Vision College protects learners' privacy. Key student privacy considerations include having a clear and lawful purpose when obtaining, using and sharing learners' information.

9. Code of Practice – Schedule of Deliverables - 2023

Milestones and timelines

The Learner Wellbeing, Safety and DAP Team is responsible to prepare a schedule of deliverables for each calendar year. The schedule of deliverables is to include, Milestone title, Milestone description and deliverable date.

At the end of each calendar year, and potentially more frequently, an assessment of outcomes is

to be noted against each Milestone and actions implemented to address any identified gaps.

At the beginning of each calendar year a new schedule of deliverables is to be prepared and reviewed by the Learner wellbeing, Safety and DAP Team.

No.	Milestone title	Milestone description	Deliverable date
Governance			
1.	Governance reporting	The Board is responsible for the implementation of the Code of Practice.	Ongoing
		Through the Academic Quality Committee (AQC) the Code of Practice strategy is reviewed and approved.	1/12/2023
		Reports and updates are reviewed, discussed and shared with the board, including the annual attestation report.	Bi-monthly
Learner Wellbeing, Safety and DAP Team			
2.	Learner Wellbeing, Safety and DAP Team	The Learner Wellbeing, Safety and DAP Team is tasked with the implementation of the Code of Practice.	Ongoing
		The CEO is responsible for the implementation of this initiative	Ongoing
		Meeting facilitation is shared amongst team members	Ongoing
		Meetings are to occur bi-monthly	Ongoing
		Meeting minutes are to be kept	Ongoing
Learner Wellbeing, Safety and DAP Team functions			
3.	NZQA GAP Analysis	NZQA Gap Analysis Self-review covering outcomes 1 - 4 and 8 - 12:	
		Using the GAP Analysis Toolkit, review current systems, processes and practices to identify gaps.	30/6/2023
		From the GAP analysis prepare an action plan with implementation timelines specified. The NZQA Action plan template is used for recording actionable items.	31/7/2023
		Action plan outcomes are reviewed and assessed for effectiveness	15/12/2023
4.	Code strategy and Schedule of Deliverables	Code strategy and schedule of deliverables is prepared and reviewed by the Learner wellbeing, Safety and DAP team:	30/6/2023
		The review is to occur by the end of the second quarter of each calendar year	30/6/2023

		The Code of Practice strategy is then tabled with the AQC for review and approval.	30/6/2023
Student Voice			
5.	Student Voice	Student Voice, including representation from Māori, Pasifika, Non- Māori /Non-Pasifika and learners with disabilities and neuro diversity, is sought to effectively implement this strategy	30/11/2023
		Implement Student Voice initiatives that improve provider practice and processes and champion student success, retention and progression, and their safety and wellbeing.	
		Proactively respond to and resolve student complaints and provide summary reports to the Board including any dispute resolution scheme interactions.	Ongoing
Honouring the treaty – Te Tiriti o Waitangi			
6.	Honouring The Treaty - cultural inclusivity	Engage the perspective of the Cultural Team to support learners and their wellbeing and safety in a culturally safe and relevant manner.	Ongoing
		Support staff through professional development through PD on Te Tiriti, unconscious bias, and other programmes to equip staff to be culturally inclusive and supportive of learners.	15/12/2023
		(For full details on cultural initiatives, see the Cultural Strategy).	
Organisational wide approach			
7.	Organisational wide approach	An organisation wide approach is taken to ensure sound and robust systems, processes and feedback loops are in place for the effective implementation and embedding of the Code	30/10/2023
Wellbeing and safety of students and staff			
8.	Wellbeing and safety of students and staff	Strengthen student and staff wellbeing and safety systems through effective self-assessment and implementation processes.	15/12/2023

CODE OF PRACTICE SUMMARY OF REVIEW AND ACTION PLAN 2023

Action Plan – Learner Wellbeing and Safety Practices – Code of Practice

The Learner Wellbeing, Safety and DAP Team has carried out a Self-Review of the Code Outcomes (1 - 4 and 8 -12) and presents the following summary of that review with action plan points that may be ongoing or set to a specific due date of completion or review. This document relates directly to the outcomes, processes, clauses, and sub points contained within the Tool Kit Gap Analysis documents.

The Learner Wellbeing, Safety and DAP Team is responsible to implement these actions and assess outcomes in a timely manner.

Review Summary and Action Plan – Learner Wellbeing and Safety Practices

Education (Pastoral Care of Tertiary and International Learners) Code of Practice

Review Summary and Action Plan		
Outcome	**Summary by Outcome**	**Action Plan**
Outcome 1: A learner wellbeing and safety system: Whole-of-provider approach to maintain a strategic and transparent learner wellbeing and safety system that responds to the diverse needs of their learners.		
Process 1: Strategic goals and strategic plans. Clause 7 (1-3)	**Clause 7.1** (a) The "Disability Action Plan Strategy", "Code Strategy", and learner wellbeing and safety related policies are refined and updated on an ongoing basis (available on website). Learner and staff guides/handbooks are regularly updated. (b) As part of our identity, we honour te Tiriti o Waitangi and the expression of this is led by the Cultural Team. The organisation implemented Sir Mason Durie's Te Whare Tapa Whā wellbeing model into our framework in 2022 - the model is embedded into student Learner Journeys; Vision College Limited (VCL) seeks expert input for strategy and policy development; The Cultural Strategy Plan was updated in 2023; Regular related staff professional development is undertaken. **Clause 7.2** (a) and (b) Reviewed on an ongoing basis, amendments implemented over the 12 months following review	Systems, processes, practices, and evidence are sufficient and will be further enhanced as staff continue to develop relationship with Iwi. Ongoing process. Systems, processes, practices, and evidence are sufficient and will be further enhanced as staff continue to develop relationship with Iwi. Ongoing process.

	Clause 7.3 (a) Vision College engages with both learners and stakeholders informing both practice and strategic goal setting and planning for learner well-being and safety. (a) Review processes are in place involving input from Student Voice (SV), Student Support, The Cultural Team, and Learner Well-being and Safety (LWBS)/DAP Team. Stakeholder engagement is ongoing and meaningful.	Systems, processes, practices, and evidence are sufficient. Ongoing process.
Process 2: Self-review of learner wellbeing and safety practices Clause 8 (1-3)	**Clause 8.1** The Code and DAP Strategy systems and policies are in place and reviewed annually by the LWBS Team to ensure learner wellbeing and safety.	Systems, processes, practices, and evidence are sufficient. Ongoing process.
	Clause 8.2 and 3. Input from diverse learners and other stakeholders includes the SV, Learner Journeys, student surveys, and wider industry, community, and Iwi engagement. A complaints register is kept by the CEO and includes a review of process, response to complaint, actions, and learnings resulting from the complaint – any resulting changes/improvements made. Action points from related meetings address learner well-being and safety practice deficiencies, as do matters raised by tutors and/or student support services, and learners through the Learner Journeys.	Systems, processes, practices, and evidence are sufficient. Ongoing process. A high-level complaints summary is included in this review summary.
Process 3: Publication requirements	**Clause 9:** (a -b) Strategies, plans and policies are reviewed on an ongoing basis and are available on the website, as are any revisions. (c) The DAP and Code Strategies, EER category rating, and learner well-being and safety policies are available on the website. Meeting minutes related to learner well-being and safety are available to staff; SV meeting feedback is provided to students and staff and Learner Journeys are accessible by relevant staff. A high-level complaints process review and complaints summary is included in this review summary.	Systems, processes, practices, and evidence are sufficient. Ongoing process.
Process 4: Responsive wellbeing and safety systems Clause 10 (1-3)	**Clause 10.1** Sufficient processes and mechanisms are in place to identify and respond to trends or concerns about learner wellbeing.	Systems, processes, practices, and evidence are sufficient. Ongoing process.

	Clause 10.2 (a- c) Staff undertake regular professional development around diversity, wellbeing models, unconscious bias, the Code, Te Tiriti o Waitangi, and cultural development. Code 101 Workshops and internal professional development are ongoing. Cultural resources are shared through nationwide meetings, professional development sessions, and campus meetings. (d) We have robust complaints and incident reporting system and incidents, and response is timely. Evidence is also gathered through Learner Journeys, SV, Student Support, and student surveys. (e) Staff are trained in disclosure response. Internal support is provided, and external services are engaged where appropriate. (f) Well-developed policies are in place. Staff professional development is undertaken. (g) Staff undergo regular learner well-being and safety training/ professional development and work collaboratively with local service providers where appropriate. (h) Robust policies and procedures are in place (i)Relevant service providers are engaged for both student support and workshop delivery to both students and staff. VCL identifies ongoing training needs and professional development.	Systems, processes, practices, and evidence are sufficient. Ongoing process. VCL has identified a need for further staff training to assist in recognising indicators of self-harm/suicide and student distress. Reviewed March 2024.
	Clause 10.3 (a-c) Solid emergency response plans and policies are in place and accessible to learners and staff. Coordination and decision making response is as per those policy/plans. Staff are informed of emergency and critical policies during onboarding and undergo regular training and professional development. Staff contact information is accessible to learners in the event of an emergency. (d)Proven (pandemic) communication and support systems during emergencies are in place. (e)) Frontline staff are given training and professional development in relevant areas. (f) Supported by the Health and Safety Statement and Emergency Lockdown Policy, the Student Critical Incident Response Policy guides staff through engagement with relevant government agencies during an emergency or critical incident, and necessary debriefing and support processes after the fact. (g) The Student Critical Incident Policy supported by the Health and Safety Statement covers this well.	Systems, processes, practices, and evidence are sufficient, and are continuously enhanced with ongoing training and staff professional development. Review March 2024.

Outcome	Summary by Outcome	Action Plan
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.		
Process 1: Learner voice	**Clause 12:** (a-b) VCL builds and maintains effective relationships with diverse learners within the organisation and works with diverse learners and their communities to develop, review, and improve learner wellbeing and safety strategic goals, strategic plans, and practices. c/ Formal and informal processes are in place to hear, develop, and engage with the diverse range of learner voices (and their communities). d/ Timely and accessible resources are provided to learners to support them and their learner communities to develop the necessary skills to enable them to participate fully in decision-making processes. e/ Timely and accessible information is provided to learners to increase the transparency of providers' decision-making processes.	Systems, processes, practices, and evidence are sufficient. Ongoing process.
Process 2: Learner complaints	**Clause 13:** (a-b) There is a formal complaint process in place, with a reference number assigned to each complaint. The process is thorough and robust. (c) i-iv Complaints are handled in a timely, thorough, and sensitive manner for the wellbeing of the complainant. Systems, processes, and practices are reviewed and updated, as required, to ensure as much as practicable, that there is a significantly lower likelihood of the same complaint/issue reoccurring. (d)i-iv Details of the complaint process are available to students, including details on the relevant people to contact. The process is sensitive to the individuals needs of students, alternative ways of receiving complaints are accepted, and the presence of a support person is encouraged. Joint complaints are accepted. (e - f) i-ii The CEO keeps a confidential register of complaints. Reporting, outcomes, and learner experience are covered well in the process. (g) The Complaints and Dispute Resolution processes are available on the VCL website, campus noticeboards, and is available throughout the Orientation process. The Student Handbook provides details on the Dispute Resolution Process. (h)i-ii This is covered well by the information provided on the website, Student Handbook, and at orientation. ***Complaints self-review reporting (Reporting and publishing requirements)*** Definition of complaint: can relate to any aspect of student experience at Vision College. The Vision College Student Complaints Procedure (May 2023) is available in the Policy Hub section of the Vision College website. ***Review of complaints (2022)*** Three student complaints were received in 2022, and no common themes identified. One complaint related to staff conduct towards	Systems, processes, practices, and evidence are sufficient. Ongoing process. A high-level complaints summary is included in this review summary. Refinement of complaints definition and annual review of process 2024.

	students and was resolved via employment processes. One complaint related to online graduation process and was resolved via communication of VCL Covid policy and an offer of face-to-face graduation at a later date. One complaint related to assessment timing/grading and was resolved via a re-assessment opportunity. Students were communicated with throughout the process, and regarding outcomes. **Definition of critical incident:** an unplanned or unforeseen traumatic event affecting a student or students which has an impact on Vision College, its staff, its students and/or the wider community, whether: ➢ directly, through a student being the immediate victim of a traumatic event or ➢ indirectly, through students being affected by, but not directly involved in, the event **The Vision College Student Critical Incident Response Policy** was approved in March 2023 and is due for review February 2025.	
Process 3: Compliance with the Disputes Resolution Scheme	**Clause 14** The Senior Leadership Team are familiar with the Dispute Resolution procedures and able to advise both staff and students of processes and requirements involved to ensure compliance with this procedure. The Disputes Resolution information is available on the VCL website, noticeboards, and posters per each campus.	Systems, processes, practices, and evidence are sufficient. Ongoing process.
Outcome	**Summary by Outcome**	**Action Plan**
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.		
Process 1: Safe and inclusive communities Clause 16 (1)	Clause 16 (a-b) The organisation is focused on student success in a safe and inclusive environment and works with learners and staff to recognise and respond effectively to discrimination, racism etc. VCL works to ensure the learner environment is free from discrimination, racism, bullying, harassment. There are robust processes and practices in place to achieve this, including: SV, student surveys, Learner Journeys, Student Support Services, Staff and Student Handbooks, staff professional development, the work of the Cultural Team, and ongoing discussion and review of processes. (c-d) The organisation focuses on promoting an inclusive culture across the learning environment and upholds the cultural needs and aspirations of learners throughout the learning environment. (e)i-ii Learners are provided with the required information required through various regularly updated sources. (f) The learning environments are collaborative and encourage students to connect with others, build relationship, and support one another – including learner's friends, whānau, and community.	Systems, processes, practices, and evidence are sufficient. Ongoing process.

Process 2: Supporting learner participation and engagement Clause 17 (1)	**Clause 17.1:** Students are encouraged to share their views in a safe and supportive environment, and connect and build relationships – developing social, spiritual, and cultural networks. Significant steps have been made in using te reo and tikanga Māori to connect Māori learners to identity and culture.	Systems, processes, practices, and evidence are sufficient, and staff professional development is ongoing. Ongoing process.
Clause 17 (2)	**Clause 17.2:** The Learner Journey is a critical aspect of supporting learners through their studies, enabling them to prepare and adjust for tertiary study. The new Ensight Student Management System (SMS) enables tutors to effectively maintain oversight of learner achievement and engagement. Learners are provided opportunities to confidentially discuss any issues affecting study, well-being, pathways, career development, and /or further study options. The Learner Journeys provide a framework for this and for the appropriate response. External agencies including other providers are also consulted.	Systems, processes, practices, and evidence are sufficient, and staff professional development is ongoing. Ongoing process.
Process 3: Physical and digital spaces and facilities Clause 18	Clause 18: The organisation seeks to provide a healthy and safe learning environment for all students, utilising multiple learner feedback mechanisms to ensure this. Feedback from the SV, staff, and health and safety audits assist the organisation to identify barriers and improve facilities and provision. The recent upgrade in IT infrastructure and equipment has enhanced the physical and digital learning spaces and facilities significantly. Student input into design of physical and digital design is regularly sought through SV, and the student surveys capture this information to some extent. Input from Māori learners is sought for the design of physical and digital design through the SV meetings and the work of the Cultural Team. Student Voice representatives are invited to attend Cultural Team meetings throughout the year.	Systems, processes, practices, and evidence are sufficient and continuously enhanced as we work continuously toward prompt resolution of any IT issues that may arise. (c) To enhance current compliance, the Student Voice Guide will be updated, with more specific guidelines in how to involve learners in the design of physical and digital environments. (d) To enhance current compliance, the Student Voice Guide will be updated with specific guidelines in how to involve Māori in the design of the physical and digital environments. This will be discussed with the Cultural Team. Due: November 2023

Outcome	Summary by Outcome	Action Plan
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.		
Process 1: Information for learners about assistance to meet their basic needs Clause 20 (1-2)	**Clause 20: 1** Practices for enabling all learners and prospective learners to identify and manage their basic needs are in place from pre enrolment to programme completion. Practices include internal support services and facilities, and external agencies where appropriate. Learners are informed of practices in place through the website, the Student Handbook, at orientation, and by communication with tutors, also through the Learner Journey meetings.	Systems, processes, practices, and evidence are sufficient. Ongoing process.
	Clause 20.2: (a) On each campus, food is available to learners through connections with external support agencies. Fresh fruit is available daily at no cost.	Systems, processes, practices, and evidence are sufficient. Ongoing process.
Process 2: Promoting physical and mental health awareness Clause 21	**Clause 21:** Resources, discussions, and support are provided to enhance students physical and mental health, and wellbeing. The Student Hub, classroom discussions, and other publications are used to promote awareness of good physical and mental health practices. Our staff team are from diverse ethnic and identity backgrounds. This is helpful for students. Further support is provided through the Cultural Team, SV, Learner Journeys, and agencies. Students are provided with information, advice, and support in all aspects of this criteria.	Systems, processes, practices, and evidence are sufficient. Ongoing process.
Process 3: Proactive monitoring and responsive wellbeing and safety practices Clause 22 (1-4)	Clause 22.1: (a-c) Both the enrolment and Learner Journey processes capture contact information for learners and their nominated contact person, and any changes are reported to administration. The SMS provides immediate access to this secure information. (d-f) The Learner Journey process enables learners to communicate any concerns or needs to staff so that the provider can proactively offer them support. (g) i-ii Robust systems are in place to identify learners at risk and ongoing review and support for staff is in place to identify pathways for assisting students (h) During the enrolment and initial interview process, student needs, including those with disabilities are assessed - see Disability Action Plan (DAP) Strategy. (i) Robust processes are in place for responding to disruptive and threatening behaviour – while being sensitive to a learner's situation. (j) Where study has been interrupted by circumstances outside a student's control, there is a supportive and understanding approach to re-entry into a study programme	Systems, processes, practices, and evidence are sufficient, and ongoing. Our processes and systems would be further enhanced with greater clarity developed on how to effectively support disabled learners engaged in off-campus study.

	Clause 22.2: Critical contact information is obtained during enrolment and students are required to inform admin of contact changes.	Systems, processes, practices, and evidence are sufficient. Ongoing process.
	Clause 22.3: We have processes in place to contact next of kin if there is concern about the wellbeing or safety of a student.	Systems, processes, practices, and evidence are sufficient. Ongoing process.
	Clause 22.4: Code risk management is overseen by the Audit and Risk Committee (ARC). Risk is recorded in the Vision College Risk Matrix overseen by ARC	Systems, processes, practices, and evidence are sufficient. Ongoing process.

Outcome	Summary by Outcome	Action Plan
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.		
Process 1: Clause 35	Clause 35: **Outcome 1: A learner wellbeing and safety system** **Outcome 2: Learner voice** **Outcome 3: Safe, inclusive, supportive, and accessible physical and digital learning environments** **Outcome 4: Learners are safe and well** The analysis for Outcomes 1-4 (above) applies to domestic and international tertiary learners. In this way, VCL ensures that practices and processes in place under the Code respond effectively to their diverse learner needs. Additionally, international tertiary learners: • are represented on the SV by an international learner representative • have homestay accommodation organised for them (see Outcome 12).	Systems, processes, practices, and evidence are sufficient. Ongoing process.

Outcome	Summary by Outcome	Action Plan
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.

| Process 1: Marketing and Promotion Clause 37 | **Clause 37**

(a) Feedback from learners, agents, student surveys, and SV is obtained for improvement purposes and informs this process. Admission needs are discussed with learners during the interview stage and collected at enrolment. Staff attend Code workshops and professional development sessions – training is documented. (b) Changes to and developments of information provided to prospective learners are addressed through action points raised at relevant meetings. Information accuracy is regularly reviewed and updated.

(c) i. EER information is communicated via the website, the International Prospectus, International Student Information Booklet, and the Contract of Enrolment. ii. Prospective international learners are informed with relevant information on educational instruction, staffing, facilities, and equipment available to international tertiary learners made available through the website and the International Prospectus; iii. the Senior Leadership Team are familiar with both the Complaints Process and Disputes Resolution information available, and able to advise staff and learners in these matters. Staff, students, and prospective students have direct access to information through the Vision College website, and once enrolled, via the Student Handbook, and campus notice boards. The Vision College website and the International Student Information Booklet provide details on the Complaints Process and Dispute Resolution Process; iv. Information on potential learning outcomes for international tertiary learners, including pathways for further study, employment, and residency where applicable, is provided in regularly updated promotional materials. To ensure that potential students have access to, and understand this information, reliance is also placed on NZ based licensed immigration advisors. It is also planned that to align with immigration criteria for approval of study visas, higher level programmes will be introduced, and MOUs for pathway progressions with other providers will be developed further; v. estimated study and living costs for international tertiary learners are covered and documented in regularly updated information on the website, and at orientation; vi. a dedicated Homestay Coordinator has been appointed to oversee Homestay placements and processes. Information on accommodation and transport is available on the website, at orientation, and in the Homestay Student Guide.

All documentation on the website is updated on an ongoing basis. | Systems, processes, practices, and evidence are sufficient, and reviewed in an ongoing basis.

(c) ii. compliance would be enhanced with further clarification provided to prospective learners around what equipment is provided by VCL, and additionally, and a website update to include general information on staffing. Due: February 2024

(c) iv. Compliance would be enhanced as we work toward more frequent and comprehensive updates for living costs, including likely incidentals on the VCL website and other relevant documentation.

Ongoing process. |

Process 2: Managing and monitoring education agents Clause 38	**Clause 38** There are robust and well established processes in place to meet all requirements of this clause. (a-c) Prior to a contract agreement being signed, all agents are reference checked and all documentation is checked before a contract is signed. Any concerns regarding an agent, are investigated by the International Team. Contracts align to the Code and privacy requirements. Existing contracts have been updated to align to Code obligations and privacy requirements. Regular updates and updated website links are provided to agents on key information. All agents are monitored for performance in fulfilment of Code obligations. (d) Agents acting unprofessionally (as described in Clause 38, do not have contracts renewed and/or agreements are terminated. There are established processes around this issue. Reliance is placed on licensed Immigration Advisors and VCL checks the Immigration Advisers Authority website to monitor licences issued to agents: https://www.iaa.govt.nz/	Systems, processes, practices, and evidence are sufficient and will be further enhanced with the addition of an 'Agent Management Policy' – due March 2024. Planned process improvements are to be implemented in February 2024 and will see all agents providing presentation slides (if any) and website information for review by VCL prior to presentation to students/potential students. Ongoing process.
Outcome	**Summary by Outcome**	**Action Plan**
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.		
Process 1: Offers, enrolment, contracts Clause 40.	All Vision College programmes are approved, and quality assured by NZQA. English requirement is as per entry criteria. Learners seeking entry are required to submit evidence of IELTS or equivalent prior to an offer of place being released (with results no more than 2 years old). Certified copies of the English score are required for admission purposes and are checked for authenticity. This information is available on the website, enrolment/application forms, Offer of Place, and the International Student Information Booklet.	Systems, processes, practices, and evidence are sufficient. Ongoing process.
Process 2: Information to be provided before entering contract. Clause 41 (1-3)	Clause 41.1 (a) EER information is communicated via our website and detailed information is provided through the International Student Information Booklet. Important information is stated on the Contract of Enrolment before it is signed by the student. We have recently revised our Contract of Enrolment. (b) Vision College will disclose any quality improvement or compliance notices and conditions imposed on the VCL website, to agents, and in programme documentation available to potential students. (c-i) Information on education provided and its	Systems, processes, practices, and evidence are sufficient and would be enhanced with further clarification provided to prospective

	outcomes; refund conditions; staffing, facilities, and equipment; available services and supports; insurance and visa requirements, and full costs related to an offer of educational instruction is available on the website, and /or accessible through other related documentation and links, for example, the Offer of Place, International Student Handbook, Contract of Enrolment, Refund Policy, the Complaints procedure, Dispute Resolution, and information on the Code, and via communications with the college.	learners around what equipment is provided by VCL, and additionally, a website update to include general information on staffing. Due: February 2024

A high-level complaints summary is included in this review summary.

Ongoing process. |
| | **Clause 41.2**

Information on learner's rights and obligations, including the rights under this Code is provided in the: Contract of Enrolment, International Student Information Booklet, and on the Vision College Website. | Systems, processes, practices, and evidence are sufficient.

Ongoing process. |
| **Process 3: Contract of enrolment Clause 42 (1)** | **Clause 42.1:**

All required information is on the Application to Enrol Form, Contract of Enrol, International Student Information Booklet, and Offer of Place. All students complete an Application to Enrolment Form and Contract of Enrolment. Enrolment dates appear in the Offer of Place. Once enrolled, learners also receive the Student Handbook. Grounds for termination of contract of enrolment; the type of disciplinary action short of termination; and the signatory process followed when seeking to terminate a contract of enrolment or take disciplinary action are accessible to learners in these documents and available on the website. | Systems, processes, practices, and evidence are sufficient.

Ongoing process. |
| | **Clause 42.2:**

Every attempt is made to ensure our contract of enrolment is fair and reasonable. | Systems, processes, practices, and evidence are sufficient.

Ongoing process. |

Process 4: Disciplinary action. Clause 43	**Clause 43:** Vision College Limited ensures that the process is compliant with the Code requirements.	Systems, processes, practices, and evidence are sufficient. Ongoing process.
Process 5: Insurance Clause 44 (1-3)	**Clause 44.1:** Learners are required to have Insurance from the time they commence their travel to NZ and for the duration of their stay. Vision College will ensure that the insurance purchased meets the Code requirements. Insurances as required by the Code include travel to, from, and within NZ; medical; repatriation/expatriation and/or travel costs, travel due to illness, injury or death (includes travel costs for family) of an international tertiary learner/ or body in the event of death; and will cover funeral costs. Information on insurance is provided through the website; Offer of Place; International Student Information Booklet.	Systems, processes, practices, and evidence are sufficient. An ongoing process.
	Clause 44.2 and 3: Vision College organises and monitors Insurance and alerts students when insurances are required to be updated. VCL will ensure that the insurance purchased meets the Code requirements. Insurance will cover travel for the purpose of embarking on connecting flights to and from New Zealand. Information is available as per clause 44.1	Systems, processes, practices, and evidence are sufficient. Ongoing process.
Process 6: Immigration matters Clause 45	**Clause 45:** Reliance is placed on licensed Immigration Advisors to ensure that international tertiary learners have the necessary immigration status. This information is available on the website and contained within the International Student Information Booklet. Vision College processes will ensure that this clause is followed as per Code requirements - see sub clauses (a) – (c).	Systems, processes, practices, and evidence are sufficient. Ongoing process.
Process 7: Student fee protection and managing withdrawal and closure Clause 46 (1-3).	**Clause 46.1, 2,3:** All fees paid by International Students are banked into VCL's account with the Public Trust. All students sign the Student Acknowledgment Form to release funds to VCL – a copy is held on file and a copy sent back to Public Trust. The Refund Policy is	Systems, processes, practices, and evidence are sufficient.

	available on the website and included in other related documentation - outlining when a refund is given and under what circumstances this might happen. Any agreement with learners and refund process will be subject to the policy, which is also subject to the code requirements.	Ongoing process.
Outcome	**Summary by Outcome**	**Action Plan**

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.		
Process 1: Provision of Information Clause 48	**Clause 48:** (a-b) Comprehensive orientation packs are given to learners with the necessary information. The information is reviewed and updated at least once a year to ensure it is current. All students will have the orientation pack explained by a staff member - in person. The student can ask questions and understanding of information will be checked by that staff member. Information covering all sub points of Clause 48 is reviewed and updated and made available to learners through the website and relevant links provided, orientation pack, International Student Handbook, Student Homestay Guide, Student IT Handbook, Contract of Enrolment, Welcome Letter, and Learner Journeys meetings, Posters on campus, noticeboards, specific policies and registers, and discussions with staff; (c) a 24/7 contact staff person number is available per campus; information is available in the orientation pack, student notice board, and learners are asked to put the information into their phones. (d) Health & Safety information (includes information in relation to disability and impairments a learner may have), is updated on a regular basis and is made available to learners through the various documentation accessible to learners; for subpoints (e-h), information about (e) termination of enrolment; (f) learner rights and obligations, and entitlements, where possible, the risks when learners receive or accept advice or services; (g) fee refunds, and (h) signatory policies, support services, support with cultural adjustments, work/labour conditions within NZ subpoints (a)-(d), is updated on a regular basis and is made available to learners through the website and various documentation accessible to learners. (i) VCL does not enrol international learners under 18 years of age.	Systems, processes, practices, and evidence are sufficient. Ongoing process.
Outcome	**Summary by Outcome**	**Action Plan**

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.		
Process 1: International tertiary learners under 18	The minimum age that Vision College Limited will enrol an international tertiary learner in any programme is 18 years old.	Systems, processes,

years Clause 50. **Process 2: International tertiary learners under 10 years Clause 51 (1-2).** **Process 3: Decisions requiring written agreement of parent or legal guardian Clause 52 (1-3).** **Process 4: Accommodation for international tertiary learners under 18 years Clause 53 (1).** **Process 5: Safety checks and appropriate checks for learners under 18 years Clause 54 (1-4).**	Processes 1-5 of Outcome 12 are therefore not applicable to this review of Code compliance.	practices, and evidence are sufficient.
Process 6: Accommodation for international tertiary learners 18 or over Clause 55 (1-2).	Clause 55.1-2: A dedicated Homestay Coordinator has been appointed. Accommodation procedures are in place and in compliance with CODE requirements - includes learner concerns or complaints. This information is readily available to students through the website and the relevant links provided, at orientation, through the Homestay Student Guide and Agreement, the Routine Home Check Form, and the Homestay Application Form.	Systems, processes, practices, and evidence are sufficient and ongoing. To further enhance our processes, it is planned in introduce Homestay Student and Host questionnaires Due December 2023

10. Appendix – Code scenarios to discuss in small groups

Consider the following scenario in the context of your organisation.

A learner faints in class and falls out of their chair. You don't know the reasons why they have fainted, however, to respond to this immediately, what do you need to do? What would a response to this situation look like in your organisation?

- From the Code, are found in clauses:10(3) providers must have plans for assisting and responding to the situation

- 10(3) (b) providers must have a suitably prepared staff member to be contacted in an emergency

- 10(3) (e) they have an indicator of the immediate danger to learners and what actions to be made

- 10(2) staff (including teaching staff) have relevant training and resources

- 10(2)(g) staff know where to escalate the issue (for example to a hospital) if needed

- 10(2)(h) how to report such incidents in a timely manner.

Now let's consider if something extends beyond the initial fainting in the class. If a learner faints in class and falls out of their chair and during a check over with staff, the learner discloses that they have not had anything to eat today and that they don't have any money for food until the next week's student allowance comes through.

- Consider, how does this change what an appropriate response is for this learner?

- Under the Code, what else needs to be considered?

- What would the next steps be in your organisation? Now that the acute phase of the emergency is handled (either by the institution, hospital, or other options available to you as the provider), what would be your next steps?

- Some relevant clauses include clause 17(2), that the learner has the opportunity to discuss their personal matters in confidence. This could be in relation to class workload pressures, not eating, social anxiety, bullying, or financial concerns.

- The outcome 4 processes are also relevant as the learner needs to have the relevant information to get some help, either from your organisation, government support, or community support, if required.

Consider the following- You discover in a follow-up meeting, that the learner says that they often have a shortfall in their budget and resort to eating from the flat's communal cooking supplies after everyone else has gone to bed or gone out, mixing the oil and sugar just to have anything to eat.

- Consider: What do you do with this knowledge?

- And what is your responsibility as a provider in this situation?

- What support is available and appropriate to meet the long-term needs for this learner?