

# Gap Analyses Summary Report to CUSPaC

## Introduction

This paper provides a roll-up summary of what the eight universities provided in their Gap Analyses and suggests actions and options under five headings. The five headings are:

1. **General comments** – information on the gap analyses generally.
2. **Stakeholder involvement** – evidence (a) that students were engaged and agree with Gap Analyses and (b) confirmation that Gap Analyses were reviewed and signed out at an appropriate level in each university.
3. **Key gaps identified by each university** – individual gaps or groups of gaps reported by each university that we recommend CUSPaC track through to closure through quarterly reporting.
4. **Key themes and common issues** – things that CUSPaC should discuss and determine where there might be opportunities for the sector (via CUSPaC or some other channel) to collectively shape strategies and/or good practice.
5. **Other observations** – that might inform thinking about future Code review and reporting requirements.

Directors of Student Services have reviewed material in this paper relevant to their individual university and filled in gaps (if any) and/or to corrected or reframed comments where they do not accurately or fairly reflect what was provided in the Gap Analysis.

## General Comments

1. All eight universities completed the Gap Analyses and submitted them to UNZ by the deadline.
2. All universities varied how they used the standard template to better communicate gaps and priorities for their own internal audiences. This meant some variation in what was provided to UNZ, but typically stronger and more insightful analyses than would have been the case otherwise.
3. There were some gaps in the information provided. Some universities did not report on some sections of the Code. Not all universities reported on how gap analyses were signed out or indicated the extent to which learners agreed with the gaps identified.

## Stakeholder involvement

All universities reported undertaking a pan-university consultation process to complete their gap analyses and confirmed having engaged with student representatives, groups, and/or Student Associations to ensure appropriate representation of student voices in their gap analysis findings.

This is summarised below.

University	Student Associations	Governance
University of Auckland	UoA Student Consultative Group	Audit & Risk Committee (ART), and Council
Auckland University of Technology	AUT Student Association	SLT, Group Director
University of Waikato	WSU	Director of Student Services
Massey University	MUSA and MAWSA	Executive Director Student Experience, Internal Audit team
Victoria University of Wellington	VUWSA, PGSA and Student Assembly (student rep group)	PCC Governance Group with student leaders from VUWSA and PGSA. SLT, Audit & Risk Committee and Council (for noting)
University of Canterbury	UCSA	Council, ART, SLT
Lincoln University	LUSA	VC, Audit and Risk
University of Otago	OUSA, UG, PG and International Student reps,	Pan university consultation with Academic/Student Services, Director of Strategy, Analytics and Reporting

## Key gaps identified by each university

The following summarises key gaps identified by each university. In some cases a number of interlinked gaps were identified and they have been clustered for summarising.

**Recommendation: That universities use their quarterly CUSPaC reporting to provide short updates on progress towards closing the gaps listed in this paper.**

### University of Auckland – Key gaps (clustered and summarised)

- Update UoA Accommodation Strategy
- Reorganise plans, strategies, and self-reviews on the UoA website to make them more readily available
- Ensure tailored comprehensive training is available to all staff
- Explore options for sharing information on critical incidents and emergencies to diverse learner groups without breaching privacy requirements
- Explore options for: complaints data disaggregation and sharing, collating data on learner experiences of complaints process, options for disseminating this data
- Review discipline statute and processes
- Progress overall review of student complaints processes
- Explore options for encouraging students to consistently update contact/next of kin details in Student Services Online System

### Auckland University of Technology – Key gaps (clustered and summarised)

- With AUTSA, develop the Student Welfare Roadmap, to address Outcome 1 - Clauses 7, 8, 9 and 10, including:
  - Develop the Wellbeing and Safety Plan, Mental Health Plan and Bullying, Harassment Plan and quality of life additions such as events/recreation/community
  - Process to develop, consult, monitor and review the roadmap.
  - Develop and implement AUT's Student Charter

- Reviewing/updating U18 Handbook for International Students (Outcomes 4 & 11)
- AUTSA to provide U18 welcome guide to student life (digitally) from Semester 2 2022 (Outcome 11)

### **Victoria University of Wellington – Key gaps (clustered and summarised)**

- (Outcome 1) Develop a Wellbeing Outcomes Framework. Look at metrics/evidence to show performance against the framework. Explore options for data disaggregation by learner groups.
- (Outcome 1) Review current state for staff training and implement new staff training, as required.
- (Outcome 2) Embed processes for the holistic student advising model through a new operating model for academic student support in Faculties (Outcome 1, Process 4). Supported by the new Student Relationship Management System (CRM) and training, which is scheduled to be launched in April 2022.
- (Outcome 2) Develop and implement streamlined central complaints process. Look at options to publish disaggregated complaints data without breaching privacy obligations.
- (Outcome 3) Explore options to address gaps in evidence to have student involvement in the design of physical and digital spaces.
- (Outcome 5) Accommodation:
  - Enhance use of prospective residents' information gathered through application processes,
  - Improve uptake of online pre-arrival induction modules,
  - develop central rooming policy and guidelines,
  - Strengthen hall staffing structure, and
  - Address appropriate welfare safeguards with standardised welfare agreement.
- (Outcome 8) Develop 2022 action plan to better understand international learners' wellbeing and safety needs for those based offshore.

### **Massey University – Key gaps (clustered and summarised)**

- (Outcome 1) Developing Student Wellbeing Operational Plan to support implementation of the university's strategic priorities.
  - Identify and implement metrics
  - Audit process to validate metrics before they are reported.
  - Use the Data-Enabled Student Support Analytics Project to review performance.
- (Outcome 1) Establish Student Advisory Group as part of overall student wellbeing support network
- (Outcome 1) review university-wide emergency and crisis management plan and communication framework to ensure it is fit for purpose
- (Outcome 2) Review student complaints policy to ensure Code compliance. Update Student Complaints Webpage to convey updated complaints and DRS pathways
- (Outcome 3 – safe, inclusive, supportive, and accessible physical & digital learning environments). Develop training and resources for university staff in direct or non-direct pastoral care roles
  - University to develop, consult and communicate policies on student discrimination, racism, bullying, harassment, abuse
  - Capture additional information from students on needs.
- (Outcome 4) Update information gathered from students to address Outcome 4 information and support requirements. Use the new CRM to assist in coordinating student support.
- (Outcomes 5 & 6) Bring accommodation arrangements in line with Code requirements, specifically:
  - Develop consistent, shared parent/caregiver information and communication plan for under 18 residents
  - Clarify interpretation and actioning of 'routine checks'
  - Clarify university's scope of responsibility for residents receiving care from external agencies via appropriate communication channel
  - Update Accommodation webpage and handbook.

- (Outcome 9, process 2 – managing & monitoring education agents) Amend contractual terms and conditions to include performance monitoring clause. Agree on performance indicators with partner agents
- (Outcome 10, Process 7) Review international student refund and fee protection policy, and include appropriate Code references
- (Outcome 12 – safety & appropriate supervision of international learners) Develop communication plan and information pack for under 18 international learners. Develop formal transfer plan template for under 18 residential caregiver to legal guardian/parent transfers

### **University of Canterbury Key Gaps (clustered and summarised)**

- (Outcome 1) Update and align Mahere Oranga Wellbeing Implementation Plan with Code outcomes and processes, including:
  - Making available self-review documentation through UC website
  - Develop staff training matrix to align roles with current and proposed training options
  - Improve annual critical incident reporting processes, including disaggregation by diverse learner groups
- (Outcome 2) Improve processes updating students on survey/evaluation findings and outcomes, and update student enrolment form. Review and develop:
  - Appeals and Grievances Policy, and Complaints Process
  - Annual complaints report process
  - Evaluation process for annual reporting on views of complainants
  - New complaint escalation options for students/staff on UC website
  - DSR training for staff and domestic students
- (Outcome 3) Expand and make available to learners' information on inclusiveness, and review 6 monthly postgraduate reporting process
- (Outcome 4) Provide consistent cultural approaches in messaging, and support for learners around language, culture and identity, and review:
  - Processes used by students to elevate concerns about other students
  - Emergency contact details recording practices and requirements
  - Staff training to improve awareness of appropriate referral pathways
- (Outcome 5) Improve police vetting requirements and processes across accommodation providers, align accommodation manuals with UC's critical incident procedures, use resident feedback to develop accommodation handbooks/village rules
- (Outcome 6) Provide additional information on wellbeing and safety on UC accommodation website, make available complaint logs, subject to privacy obligations
- (Outcome 10) Update UC website to include refund options
- (Outcome 12) Update indemnity form to clarify scope of UC responsibilities for students in care of designated or residential caregiver

## Lincoln University Key Gaps (clustered and summarised)

- (Outcome one) Further develop and align:
  - Pre-arrival information for domestic and international learners
  - Strategic plan which aligns with all Code outcomes and Treaty and Māori Crown relations
  - Future self-reviews with updated strategic plan, and include WHO-5 questions in annual surveys to report on student wellbeing, making self-review documents available on the LU website
  - Relevant university policies and processes
  - Further develop process to identify emerging safety and behavioural concerns
  - Staff training matrix to identify training requirements
  - Annual reporting on emergencies and critical incidents
- (Outcome two) Improve consultation processes with diverse student groups to gain input into goals, plans and practices, including development of Rainbow Policy, student rep training, and process for managing student survey and evaluation feedback, and update and develop:
  - LU website to make complaint pathways and processes clearer with links to relevant agencies, to align with Code outcomes
  - Complaint policies and processes, including examination of complaint process barriers, cultural approaches, restorative justice objectives, and complaint elevation options
  - Complaint log tracking system (with reporting disaggregated by diverse student groups), to support annual report on complainants' experience of the university's complaints process, to be made available on LU's website
- (Outcome three) Improve responses to bullying, and harassment, promote inclusion, and support transition of new students by:
  - Improving staff training
  - Further developing inclusiveness and appropriate behaviour education programme
  - Consult with students in review of Student Code of Conduct
  - Examine options to improve access to facilities for students with disabilities or injuries
  - Develop improved postgraduate student complaint processes
  - Expand monitoring of student engagement using Learn and Gradebook
- (Outcome four) Review and make available to students' emergency contact details recording practices and protocols, and improve:
  - wellbeing team promotion
  - staff awareness of referral pathways to student services and processes used to identify and manage students at risk,
  - resources supporting undergraduate students returning to study after health and wellbeing events
- (Outcome six) Incorporate updated complaints/DRS information in accommodation documentation
- (Outcome ten) Review and update LU enrolment contract, LU International Tuition Refund Policy Document, develop process for monitoring international student engagement and assessment breaches
- (Outcome eleven) Improve communication with offshore students regarding processes for reconsiderations, recounts and grievances
- (Outcome twelve) Update indemnity form to clarify scope of LU responsibilities for students in care of designated or residential caregiver

### **University of Waikato Key Gaps (clustered and summarised)**

- (Outcome one) Implement taskforce findings following independent review of racism claims at the university, including ensuring pastoral care systems align and honour Te Tiriti o Waitangi support Māori-Crown relations (see also Outcome three).  
(Outcome one) Establish Learner Wellbeing and Safety Action Plan (LWSAP) to address gaps in service provision in response to Code outcomes. The LW&SAP will include two yearly review and amendment where required of plan's goals, and include processes to:
  - expand engagement with learners/stakeholders
  - identify where appropriate data about wellbeing and safety practices can be accessed
  - identify deficiencies in learner and wellbeing safety practices
  - Make LW&SAP available to learners on UoW website, along with self-review reports
  - explore fitness to study initiative (see also outcome four)
  - include actions to revise diversity and inclusion process/policy, develop physical and sexual violence prevention measures, develop wellbeing course offerings with wellbeing coordinator
  - Undertake annual review for report on critical incidents and emergencies
  - Update Accommodation Service surveys to reflect Code requirements
- (Outcome two) LW&SAP to incorporate improvements to student representation, student consultation, student rep training, consultation and communication processes with diverse student groups, and improve complaint reporting by:
  - Making complaint reporting/publication processes, and related staff roles and responsibilities visible to learners
  - Publishing reports annually at aggregate level
  - Complying with DRS obligations
- (Outcome three) Taskforce to develop campus-wide initiative addressing racism, with review of Bullying and Harassment Policy to include Tikanga Māori processes/objectives
- (Outcome four) Explore alternative affordable on-campus eating options, and implement Fitness to Study Policy

### **University of Otago (clustered and summarised)**

- (Outcome one) Assess pan-university wellbeing and safety processes and operations, consider implementing wellbeing strategy/framework to support the university's student wellbeing and safety goals and align policy guidelines with Code requirements, including code compliant processes for critical incident reporting which meet all privacy obligations  
(Outcome one) Develop separate learner wellbeing and safety section under current policy library headings to align policies/plans with the Code  
(Outcome one) Explore options for learner wellbeing and safety landing page with Code focus, and publish self-review findings on UO website  
(Outcome one) University information Systems Group to undertake strategic assessment of student record systems tracking engagement, and make systems improvement recommendations  
(Outcome one) Update Support Services References for staff and increase/improve role specific training, including:
  - Supporting staff to identify and escalating behavioural/safety concerns
  - Options to include role specific staff training requirements in position descriptions
  - Compulsory training options as part of staff induction processes

- Developing Code specific training options for international student support staff following release of NZQA Code guidelines
- (Outcome two) Develop Student grievances webpage to improve user experience and help learners engage with complaints processes  
(Outcome two) Examine options to adapt/improve/coordinate complaint data capture, and capture of complainant experiences engaging with complaint processes
- (Outcome four) Examine options to update emergency contact requirements/circumstances communicated to students in application/enrolment processes
- (Outcome six) Working group to assess complaints recording and publication processes across accommodation portfolio and update for Code compliance

## Key themes and common issues

The following common themes and issues were noted when summarising the gap analysis findings and proposed compliance actions reported by each university:

1. When assessing compliance with the Code's 12 outcomes, except for AUT, all universities reported they were not yet fully Code compliant. Importantly, this finding did not suggest there were deficiencies in current pastoral care practices; it indicated that otherwise robust strategies, policies, and processes (previously assessed as 100% compliant with the IDC) would need to be updated, enhanced or re-organised so that they aligned with new sets of obligations articulated under each new Code of Practice outcome.
2. Assessing each university's current level of compliance is best approached by looking at how many pastoral care process, and subclause requirements were assessed as being fully compliant. Using this metric, all universities reported a high level of compliance with most of the 39 processes requirements supporting the Code's 12 outcomes.
3. As would be expected with different institutional approaches to applying assessment criteria to identify gaps in pastoral care systems, there may have been variations in how gaps in evidence or gaps in practice were defined for the purposes of the gap assessment process. Whether this resulted in higher or lower levels of reported compliance with Code outcomes will be a useful discussion point when defining future assessment criteria. Equally, there was variation in the emphasis placed on assessing gaps in practice to determine *pastoral care compliance*, versus the emphasis placed on assessments of gaps in evidence to determine *pastoral care effectiveness*. Again, broader discussions about what constitutes effectiveness when assessing pastoral care systems, and what types of evidence might be utilised for consistent approaches to pastoral assessment across the university sector will be needed at CUSPaC to reach consensus on assessment criteria in order to develop robust quality assurance assessment processes.

**Recommendation: consider ways that future reporting/self-reviews might usefully facilitate/support information on both Code compliance and Code effectiveness.**

4. All universities reported identifying more practice and evidence gaps requiring ongoing compliance actions under Code outcome one (*a learner wellbeing and safety system*) and Code outcome two (*student voice*) than the total practice and evidence gaps reported by universities when assessing compliance with Code outcomes three to twelve. This indicated the complexity, scale of work, and fiscal investment being undertaken by universities to satisfy 37 process subclauses supporting institution-wide strategy, policy, and process

obligations required to update a ‘whole of organisation approach to learner wellbeing and safety’ that was Code compliant.

**Recommendation: consider if there is anything that could be usefully done collectively to support universities in addressing practice and evidence gaps associated with Code Outcomes 1 & 2.**

5. All universities noted that there was considerable complexity involved in satisfying critical incident and complaint data capture and associated publication and reporting obligations, as required for compliance with Code outcome one, process 4 (*responsive wellbeing and safety systems*) and Code outcome two, process 2 (*learner complaints*)<sup>1</sup>. In addition to the operational challenges of redesigning university-wide systems, and policies to create unified critical incident and complaint reporting and recording processes which also incorporate additional measurements of complainants’ experiences, how universities will publish disaggregated data without breaching privacy obligations or inadvertently correlating an aggregation of learners with deficiencies or problematic behaviours will be difficult to resolve. This should be signposted as an area for collective discussion to determine if a best practice approach to data collation for Code reporting might be developed by an appropriate committee or working group.

**Recommendation: consider if there is anything that could be usefully done collectively to support universities in good practice around disaggregating critical incidents and complaints data and sharing it in ways that do not breach privacy expectations.**

6. All universities also noted the considerable scope of staff training resources and HR process updates required to comply with Code outcome one, process 4, clause 10 (2) (a) to (i), where universities “must provide staff with ongoing training and resources tailored to their roles in the organisation...”<sup>2</sup> While approaches to collaborating on the development of universal staff training resources are already being explored by DSS, there may be additional value in seeking input from the Human Resources Committee to support future compliance efforts, notably where training requirements for academic and professional staff managed outside of Student Service Directorates.

**Recommendation: consider if there is anything that could be usefully done collectively to support universities in meeting staff training requirements.**

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<sup>1</sup> **Outcome one, process 4 - clause 10 (3) (f)** recording critical incidents and emergencies and reporting these back annually (at an aggregate level and, as far as practicable, disaggregated by diverse learner groups) to provider management, learners, other stakeholders, and the code administrator.

**Outcome two, process 2 – clause 13 (e) and (f) (i) and (i)** record complaints (in written and digital forms); and report annually to provider management, learners, other stakeholders, and the code administrator (including on provider websites where available) on – the number and nature of complaints made and their outcomes (at an aggregate level and, as far as practicable, disaggregated by diverse learner groups); and learner satisfaction with the complaints process and the outcome of their complaint;

<sup>2</sup> Specifically in relation to: (a) Te Tiriti o Waitangi; and (b) the provider’s obligations under this code; and (c) understanding the welfare issues of diverse learner groups and appropriate cultural competencies; and (d) identifying and timely reporting of incidents of racism, discrimination, and bullying; and (e) physical and sexual violence prevention and response, including how to support a culture of disclosure and reporting; and (f) privacy and safe handling of personal information; and (g) referral pathways (including to local service providers) and escalation procedures; and (h) identifying and timely reporting of incidents and concerning behaviours; and (i) wellbeing and safety awareness and promotion topics, including –(i) safe health and mental health literacy and support; and (ii) suicide and self-harm awareness; and (iii) promoting drug and alcohol awareness; and (iv) promoting healthy lifestyles for learners.

7. In the initial designing of the gap analysis template, supplementary questions were provided to help inform the gap analysis process and broader best practice discussions about pastoral care compliance and quality assurance. These questions encouraged universities to consider in their assessments:

- a) how effectively is student voice captured and used in each of the (code outcome and process) elements?
- b) how does consideration of the treaty contribute to meeting (code) processes and outcomes?
- c) how does consideration of learner diversity contribute to effectively meeting (code) processes and outcomes?
- d) what culturally responsive practices are employed in meeting each of the (code) processes and outcomes?

Given the scope and extent of subclause obligations set out under each of the 37 Code processes it was not practical for universities to include outcome-or process specific responses to these questions as they might have been envisaged when designing the gap analysis template in mid-2021. However, all universities referred to, or considered these questions, directly or indirectly, in the following ways:

- a) As previously noted, the prioritising of student voice was made apparent in the gap analysis process by all universities when ensuring appropriate student associations, groups and representatives were included in the consultation and approval process prior to submission. Improving the ways in which student leaders participate in decision-making processes, improving communication and assessment efforts to facilitate a higher level of student engagement and satisfaction with university processes, and protecting students' rights when looking at reporting obligations were also identified by universities as critical to the ongoing development of their learner-centric pastoral care systems
- b) All universities emphasised in the overview of their respective institutions various strategic imperatives celebrating and honouring Te Tiriti o Waitangi and supporting Māori-Crown relations in the context of their overall pastoral care system. Universities also emphasised the importance of work currently in progress, or required for continuous improvement, to ensure their wellbeing and safety systems complied with all Te Tiriti o Waitangi code obligations, notably in relation to Code outcomes one to four.
- c) All universities emphasise the importance of ensuring the needs of diverse learners were realised though the policies, processes and operational realities intended to support a Code compliant wellbeing and safety system. This was evidenced by both the comprehensive range of student services and resources currently supporting multiple diverse student communities<sup>3</sup>, as well as the scope of compliance actions identified by universities to address gaps in pastoral care practices intended to support those communities.

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<sup>3</sup> See for example AUT's Model for Student Wellbeing as provided in their gap analysis institutional overview.

- d) Cultural responsiveness is also fundamental to meeting the needs of diverse learners, and as noted above, all universities reported intentions to develop future pastoral care practices in ways that support and enhance cultural responsiveness. Examples cited include reviewing complaints experiences of university complaints processes, improving processes that support the engagement, and representation of culturally diverse student populations, and tailoring communication about complex university processes such as academic grievances in ways that are more accessible to international on-campus and offshore learners.

**Recommendation: is there value in a collective process to ways of consistently reporting impact and effectiveness in area such as student voice, Te Tiriti, supporting diverse learners, and cultural responsiveness.**

## **Other observations**

The scale of work required by universities to complete the gap analysis process is significant. To ensure the value of that work is maximised and universities are well supported when engaging in future self-review cycles, the following process improvements are recommended:

1. Before undertaking future compliance and quality assurance assessments, the criteria and terms used for the purposes of pastoral care system evaluation will need to be agreed upon and documented by CUSPaC, as part of the handbook updating process. It would be useful to follow the format utilised in the AQA handbook, where key terms such as quality assurance, quality enhancement, compliance, evidence, and evaluation are clearly defined to achieve consistency in assessment processes.
2. As noted under key themes and common issues, consensus will need to be reached about what evidence universities could be expected to provide as part of any future review processes, and what processes would need to be developed to ensure sensitive evidence (such as sexual harm, complaints, and critical incident data) is appropriately managed as part of any verification activities.
3. Equally, there should be discussions about the role of assessment templates, to determine if they are required, or whether agreeing on a set of review/quality assurance assessment report requirements might lend itself to greater flexibility and innovation. That discussion should also include an agreed upon universal format for referring to the Code and its clauses.
4. The gap analysis process has reiterated that no university should be expected to undertake a full self-review in 2022, given the scale of on-going work reported by universities to update their pastoral care systems and set in place a range of new data capturing instruments critical to the reporting obligations set out in the Code. This year should instead allow for the embedding of new system improvements and reporting on their performance the following year. This would also allow for reporting on the impact of the new Disputes Resolution Scheme.

**Recommendation: consider if there are any other learnings from the Gap Analyses exercise that could inform work ahead of, or part of, future review and evaluation work by CUSPaC**