

CODE OF PRACTICE GAP ANALYSIS & SELF REVIEW

Sept 2023

Contents

Details of Gap Analysis & Self Review	2
Key	2
Organisational structures to support a whole-of-provider approach to wellbeing and safety	
Outcome 1: A learner wellbeing and safety system	3
Outcome 2: Learner voice	11
Wellbeing and safety practices for all tertiary providers	19
Outcome 3: Safe, inclusive, supportive, and accessible physical and environments	•
Outcome 4: Learners are safe and well	24

Sept 2023 1/24



Details of Gap Analysis & Self Review

Initial Meeting Date	30 August 2023, continued 8 September 2023.
Venue	Online Zoom meeting
Participants	Derek Martin (General Manager); Bobbie Aramoana (Acting Registrar/Student Services Manager); Megan Hobden (HR Manager/Napier Campus Manager)
Apologies	-
Further	WDL Management Team meetings - August 2023
Consultation post initial meeting	Student representative meetings: 30 October 2023

Key

KEY	
COMPLIANT	 We have the required practices in place We have sufficient evidence on which to make judgements about the effectiveness of our practices
GAP (in evidence)	 We have the required practices in place but we have limited evidence on which to make judgements about the effectiveness of those practices
GAP (in practice)	We do not have the required practices in place

Sept 2023 2/24



Organisational structures to support a whole-of-provider approach to learner wellbeing and safety

Outcome 1: A learner wellbeing and safety system

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

Phase in the gap analysis process:	PREPARE	MAKE SENSE		
Key required processes	Information we can gather to use as evidence of our compliance with this clause WDL Strategic Plan. The WDL Strategic	COMPLIANT	GAP (in evidence)	GAP (in practice)
Process 1: Strategic goals and strategic plans Clause 7 (1). Providers must have strategic goals and strategic plans for supporting the wellbeing and safety of their learners across their organisation, including student accommodation, describing how they will – (a) give effect to the outcomes sought and processes required by this code; and	Plan 2018 - 2022 refers to Student wellbeing and safety (and support) prominently and throughout - on Pg 1; Pg 4 "very strong pastoral support"; Pg 5 "Through this model, stakeholders (foremost learners) will not only be engaged in their journey with us, but they will help us to continually reflect upon, refine and improve all that we do. And this is the essence of co-constructed learning, with true self-reflection, all supported by stakeholders with a vested interest in the company."; Pg 7; Pg 14 "Strong pastoral care - recognition of the barriers that our learners have (e.g. transportation,	Compliant. See COP Section for Strategic plan which was signed off by WDL Governance in 2022.		-

Sept 2023 3/30



				T
	drugs/alcohol, confidence/self-esteem)"			
(b) contribute to an education system that honours Te Tiriti o Waitangi and supports Māori—Crown relations.	WDL Strategic Plan Pg 9; Pg 13; Pg 15 and WDL Draft Maori Strategy. Status of and input from company Kuia and previous Kaumatua.	Compliant	Maori Strategy is new and not yet fully implemented at WDL	-
Clause 7 (2). Providers must – (a) regularly review their learner wellbeing and safety strategic goals and strategic plans as described in subclause (1); and	Review occurs before 31 st August annually	Compliant.	-	-
(b) make amendments to their learner wellbeing and safety strategic goals and strategic plans within a reasonable timeframe following the review.	Amendments will be made by 31st September annually.	Compliant	Amendments made in October this year due to GM availability.	-
Clause 7 (3). Providers must work proactively with learners and stakeholders (and document this work) when — (a) developing their learner wellbeing and safety strategic goals and strategic plans described in subclause (1); and	DM consulted with Learners and Stakeholders during the drafting and finalising of the umbrella document	Compliant Student forums, Academic Board and Industry Expert meetings.	-	-
(b) reviewing their learner wellbeing and safety strategic goals and strategic plans described in subclause (2).	Learners and stakeholders will be included in the annual review.	Compliant Student forums, Academic Board and Industry	-	-

Sept 2023 4/30



		Expert		
		meetings.		
Process 2: Self review of				
learner wellbeing and				
safety practices				
7 -				
Clause 8 (1).	Dec 24st Contractors	Carralliant		
Providers must use strategic	By 31 st September	Compliant	-	-
goals and strategic plans	annually			
described in clause 7(1) to				
regularly review the quality of				
their learner wellbeing and				
safety practices to achieve the				
outcomes and practices of this				
code, at a frequency or by a				
date determined by the code				
administrator.				
Clause 8 (2). Providers must review their	6. 1	.		
learner wellbeing and safety	Student	Compliant.		
practices using –	Representatives, Kuia			
practices using –	as well as stakeholders		-	-
(a) input from diverse	from our community			
` ' '	and employer groups			
learners and other	consulted.			
stakeholders; and				
(b) relevant quantitative and				
qualitative data	GM collates and			
(including from learner	includes this data in	Compliant.	-	-
complaints) that is, as far	review.			
as practicable, and				
consistent with the				
provider's obligations				
under current privacy				
legislation, disaggregated				
by diverse learner				
groups.				
Clause 8 (3).				
Providers must, in a timely				
manner, following a review	By 31 October annually	Compliant	_	-
described in subclauses (1) and	,			
(2) take appropriate action to				
address any deficiencies in				
learner wellbeing and safety				
practices.				

Sept 2023 5/30



Process 3: Publication requirements Clause 9. Providers must make the following information readily available, in accessible formats, to learners, staff and the general public, including on their websites (where available) —	Plan on website and student noticeboards	Compliant. See our website	-	-
(a) strategic goals and strategic plans for supporting the wellbeing and safety of learners described in clause 7(1); and	• POL028 Learner Support & Guidance			
(b) revisions to strategic goals and strategic plans for supporting the wellbeing and safety of learners described in clause 7(2); and	 POL028 Learner Support & Guidance Review information on website and student noticeboards 	Compliant	-	-
(c) self-review reports on the quality of their learner wellbeing and safety practices described in clause 8.	Report information on website and student noticeboards	Compliant. Annual self- review.	-	-
Process 4: Responsive wellbeing and safety systems Clause 10 (1). Providers must gather and communicate relevant information across their organisation (including student accommodation) and from relevant stakeholders to accurately identify emerging concerns about learners' wellbeing and safety or behaviour and take all reasonable steps to connect learners quickly to culturally	 R&SSvcs team meetings R & GM meeting HoD/Tutor meetings Student Forum meetings 	Compliant	-	-

Sept 2023 6/30



			1	_
appropriate social, medical, and mental health services.	Academic Board meetings			
	Stakeholder meetings			
Clause 10 (2). Providers must provide staff with ongoing training and resources tailored to their roles in the organisation, in relation to – (a) Te Tiriti o Waitangi; and	Training at 2023 Company Conference and online mandatory sessions for all staff.	Compliant	-	-
(b) the provider's obligations under this code; and	 All staff emails (done June 2022) All staff meetings Annual conference. 	Compliant	-	-
(c) understanding the welfare issues of diverse learner groups and appropriate cultural competencies; and	Our PDCoP topics	Compliant	-	-
(d) identifying and timely reporting of incidents of racism, discrimination, and bullying; and	 See POL005 Bullying section in Learner Handbook Bullying section in Tutor Handbook Induction process All staff meeting Training sessions 	Compliant	-	-
(e) physical and sexual violence prevention and response, including how to support a culture of disclosure and reporting; and	 See Learner Handbook Bullying section and Complaints See Policies 	Compliant	-	-

Sept 2023 7/30



(f) privacy and safe handling of personal information; and	 POL028 Learner Support & Guidance Privacy and Confidentiality Policy 013 Induction process Privacy offer all staff emails 	Compliant	-	-
(g) referral pathways (including to local service providers) and escalation procedures; and	 POL028 Learner Support & Guidance 	Compliant	-	-
(h) identifying and timely reporting of incidents and concerning behaviours; and	Incident reporting record and documents	Compliant	-	-
(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.	 Record of staff PD – training sessions attended Curriculum for all our programmes provides guidance and training in these areas POL028 Learner Support & Guidance Materials in Learner Handbook and campuses 	Compliant	More staff training sessions need to be arranged.	-

Sept 2023 8/30



Clause 10 (3). Providers must have plans for assisting learners, and responding effectively, in emergency situations in the learning or residential community (whether localised or more widespread), including — (a) making these plans readily available to learners when they begin their study; and	 Learner Handbook Policy 073 SOP031 SOP034 SOP035; SOP038 	Compliant	-	-
(b) ensuring that there are suitably prepared staff members available to be contacted by a learner, or learners, in the event of an emergency; and	Yes. Tutors and Campus Administrators	Compliant	-	-
(c) co-ordinating decision- making across the provider when responding to emergencies; and	 Policy 073 and related SOPs Student Services Manager Relevant Policy 	Compliant	-	-
(d) disseminating timely, accurate, consistent, and accessible information to learners and staff during emergencies; and	Yes Pol 073 and related SOPs.	Compliant	-	-
(e) ensuring all relevant staff are aware of the indicators of imminent danger to a learner or others and what action they can reasonably provide to help make them safe; and	Relevant policies Record of staff PD sessions attended	Partial	Not all relevant staff have attended this training. Student Services staff have. More training is needed for tutors and management staff.	-
(f) keeping a regularly updated critical incident and emergencies	• SOP031			

Sept 2023 9/30



	T		T	
procedures manual	• SOP032	Compliant	-	-
which guides staff	• SOP034			
involved in emergency				
situations which				
contains the immediate				
and ongoing actions				
required including –				
i. engaging with				
relevant				
government				
agencies (e.g.				
the New				
Zealand Police,				
Ministry of				
Health, New				
Zealand				
Qualifications				
Authority,				
Tertiary				
Education				
Commission);				
and				
ii. the follow-up				
de-briefing				
processes to				
support all				
learners and				
relevant staff;				
and				
(g) recording critical				
incidents and				
emergencies and	See H&S & Incidents	Compliant	No critical	_
reporting these back	report		incidents and	
annually (at an aggregate	•		emergencies	
level and, as far as			have occurred	
practicable,			in 2022/23.	
disaggregated by diverse				
learner groups) to				
• . ,				
provider management, learners, other				
stakeholders, and the				
code administrator.				

Sept 2023 10/30



Outcome 2: Learner voice

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

Phase in the gap analysis process:	PREPARE	MAKE SENS	E	
Key required processes	Information we can gather to use as evidence of our compliance with this clause	COMPLIANT	GAP (in evidence)	GAP (in practice)
Process 1: Learner voice Clause 12. Providers must have practices for — (a) proactively building and maintaining effective relationships with diverse learner groups within their organisation; and	 POL028 Learner Support & Guidance Student Representatives on the Academic Board (Academic Board minutes) Student Forums (minutes) Disability Coordinator role Cultural celebrations and events 	Compliant	-	-
(b) working with diverse learners and their communities to develop, review, and improve learner wellbeing and safety strategic goals, strategic plans and practices; and	 Programme Advisory committee meetings Student Forums Academic Board 	Compliant	-	-

Sept 2023 11/30



(c) providing formal and informal processes for actively hearing, engaging with, and developing the diverse range of learner voices and those of their communities; and	 POL028 Learner Support & Guidance Pasifika Representative on Academic Board (Academic Board minutes) Chinese Representative on Academic Board (Academic Board (Academic Board (Academic Board (Academic Board minutes) Annual Programme Advisory Committee meetings (minutes) Student Forum minutes 	Compliant	-	-
(d) providing timely and accessible resources to learners to support them and their learner communities to develop the necessary skills to enable them to participate fully in decision-making processes; and	 Student forums Academic Board Advisory Committee meetings 	Compliant	-	-
(e) providing timely and accessible information to learners to increase transparency of providers' decisionmaking processes.	Minutes of Student Forum and Academic Board and action points taken; WDL website	Compliant	-	-
Process 2: Learner complaints Clause 13. Providers must –				

Sept 2023 12/30



(a) work with learners to effectively respond to, and process complaints (including appropriate engagement with support people); and	 SOP026 Managing Learner Complaints & Disputes Learner Handbook). Written Student Complaints 	Compliant	-	-
(b) inform learners on how the complaint will be handled and how it is progressing; and	 SOP026 Managing Learner Complaints & Disputes WDL Complaints procedure (Policies and Procedures 	Compliant	-	-
(c) handle complaints in a timely and efficient way, including having practices that — i. are appropriate to the level of complexity or sensitivity of the complaint; and ii. consider the issues from a cultural perspective; and iii. include the	(d) SOP026 Managing Learner Complaints & Disputes	Compliant	-	-
provision of culturally responsive approaches that consider				

Sept 2023 13/30



			Г	1
traditional				
processes for				
raising and				
resolving				
issues (for				
example,				
restorative				
justice); and				
iv. comply with				
the principles				
of natural				
justice; and				
(e) ensure that the				
complaints process is				
easily accessible to	• SOP026			
learners (and those	Managing	Compliant	-	_
supporting them),	Learner	·		
including having	Complaints &			
practices for –	Disputes			
i. providing				
learners with				
clear				
information				
on how to				
use the				
internal				
complaints				
processes				
(including the				
relevant				
people to				
contact), and				
the scope and possible				
outcomes of				
the				
processes;				
and				
ii. addressing				
barriers to	• SOP026	Compliant	N/A	N/A
accessing this		F		
information				
(for example,				
due to				
language, lack				
of internet				
51 III.65. II.66		i	<u> </u>	i

Sept 2023 14/30



			_	
access, fear of				
reprisal,				
desire for				
anonymity),				
such as				
providing				
alternative				
ways of				
raising a				
complaint;				
and				
iii. providing an				
opportunity	• SOP026			
for a support	 Complaints 	Compliant	N/A	N/A
person or	procedure in			
people (who	Learner			
can be	Handbook			
chosen by the				
learner) to				
guide and				
support the				
learner				
through the				
complaints				
process; and				
iv. providing the				
opportunity	50004	C 1:		
for groups of	• SOP026	Compliant	-	-
learners to				
make joint				
complaints;				
and				
(f) record complaints;				
and	• SOP026	Compliant	N/A	N/A
(g) report annually to				
provider	Complaints Summary			
management,	Record published,	Compliant	-	_
learners, other	including on website			
stakeholders, and the				
code administrator				
(including on provider				
websites where				
available) on –				
i. the number				
and nature of				
complaints				

Sept 2023 15/30



_				1
made and				
their				
outcomes (at				
an aggregate				
level and, as				
far as				
practicable,				
disaggregated				
by diverse				
learner				
groups); and				
ii. learner				
experience				
with the				
complaints				
process and				
the outcome				
of their				
complaint;				
and				
(h) promote and				
publicise complaint				
and dispute	See Complaints	Compliant	-	-
resolution processes	Procedure in Learner			
available to learners	Handbook; notices on			
including, but not	classroom walls			
limited to, the				
provider's internal				
complaints process,				
the education quality				
assurance agency				
complaints process,				
the code				
administrator's				
complaints process,				
and the Dispute				
Resolution Schemes;				
and				
(i) advise learners, on				
the next steps				
available to them if	Complaints Procedure	Compliant	-	-
the provider does not	in Learner Handbook			
accept the complaint				
(or the learner or				
provider perceives				
that the provider				
does not have the				

Sept 2023 16/30



cultural competency		
to deal with it), or		
the learner is not		
satisfied that the		
provider has made		
adequate progress		
towards resolving the		
complaint, or the		
learner is not satisfied		
with the provider's		
internal complaints		
process or outcome,		
including –		
i. how to seek		
resolution of		
a contractual		
or financial		
dispute by		
way of a		
complaint or		
referral to an		
appropriate		
body or		
agency		
depending on		
the subject		
matter of the		
dispute, for		
example, the		
code		
administrator,		
the Dispute		
Resolution		
Scheme, the		
Disputes		
Tribunal, the		
Human Rights		
Commission		
or the		
Ombudsman;		
and		
ii. how to make		
a complaint		
to the code		
administrator		
if a learner		

Sept 2023 17/30



believes that the provider is failing to meet the outcomes or requirements of this code.				
Process 3: Compliance with the Dispute Resolution Scheme Clause 14. Providers must ensure they are familiar with the relevant Dispute Resolution Scheme rules for domestic and international learners and ensure compliance with those rules in a dispute to which it is party.	• SOP026	Compliant	-	-

Sept 2023 18/30



Wellbeing and safety practices for all tertiary providers

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.

Phase in the gap analysis process:	PREPARE	MAKE SENSE		
Key required processes	Information we can gather to use as evidence of our compliance with this clause	COMPLIANT	GAP (in evidence)	GAP (in practice)
Process 1: Safe and inclusive communities				
Clause 16 (1). Providers must have practices for –	WDL Discrimination, Bullying & Harassment POL005. In Learner	Compliant	-	-
(a) reducing harm to learners resulting from discrimination, racism (including systemic racism), bullying, harassment and abuse; and	Handbook and on classroom and common area walls.			
(b) working with learners and staff to recognise and respond effectively to discrimination racism (including systemic racism), bullying, harassment and abuse; and	 Staff Induction & PD records Student Forum minutes Curriculum for all programmes 	Compliant	More training could be provided to staff.	-
(c) promoting an inclusive culture across the learning environment; and	Tutor interview questions & selection process All staff meetings	Compliant	-	-

Sept 2023 19/30



			ı	
(d) upholding the cultural needs and aspirations of all groups throughout the learning environment; and	 Record of Cultural Events and Celebrations Maori Strategy Tutor practice. CoPs All staff meetings Record of Cultural Events 	Compliant	-	-
	EventsMaoristrategy			
(e) providing all learners with information — i. that supports understanding, acceptance, and connection with all learners, and collective responsibility for an inclusive learning environment; an ii. about the cultural, spiritual, and community supports available to them; and	 Learner Handbook Information in Student Common Areas 	Compliant	-	-
(f) providing learners with accessible learning environments where they can connect with others, build relationships, support each other, and welcome their friends, families, and whānau.	 Campus Student common rooms MS Teams Online learning environment Whanau Day records 	Compliant	-	-

Sept 2023 20/30



Process 2: Supporting learner participation and engagement Clause 17 (1). Providers must provide learners with opportunities to (a) actively participate and share their views safely in their learning environment; and	 Student Forum minutes Academic Board minutes 	Compliant	-	-
(b) connect, build relationships and develop social, spiritual and cultural networks; and	Whanau Days; Language weeks; Matariki festival etc	Compliant	-	-
(c) use te reo and tikanga Māori to support Māori learners' connection to identity and culture.	 See Draft Maori strategy See Learner Handbook 	Compliant	-	-
Clause 17 (2). Providers must have practices for supporting learners through their studies, including – (a) enabling learners to prepare and adjust for tertiary study, and	 POL028 Learner Support & Guidance Interview process and Induction programme 	Compliant	-	-
(b) maintaining appropriate oversight of learner achievement and engagement; and	 Academic Board minutes; Student Surveys EPI HoD – tutor meeting records Attendance records 	Compliant	-	-

Sept 2023 21/30



(c) providing the opportunity for learners to discuss, in confidence, any issues that are affecting their ability to study and providing learners with a response to their issues; and	 POL028 Learner Support & Guidance 	Compliant	-	-
(d) providing learners with advice on pathways for further study and career development, where appropriate.	 POL028 Learner Support & Guidance Tutor provision 	Compliant	-	-
Process 3: Physical and digital spaces and facilities Clause 18. Providers must have practices for— (a) providing healthy and safe learning environments; and	 POL032 Physical Resources POL073 Academic Board minutes General Manager annual check of campuses Management Meeting notes Student Forum notes 	Compliant	-	-
(b) identifying and, where possible, removing access barriers to provider facilities and services; and	 See Online and Blended Learning Strategy POL032 Physical Resources Disability Coordinator role 	Compliant	-	-
(c) involving learners in the design of physical and digital environments when making improvements; and	 POL073 See Academic Board minutes 	Compliant	-	-

Sept 2023 22/30



	Student Forum minutes			
(d) engaging with Māori and involving Māori in the design of physical and digital environments where appropriate.	 See draft Maori strategy See WDL Kaumatua and Kuia input at all levels 	Compliant	N/A	N/A

Sept 2023 23/30



Outcome 4: Learners are safe and well

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

Phase in the gap analysis process:	PREPARE	MAKE SENSE		
Key required processes Process 1: Information for learners about assistance	Information we can gather to use as evidence of our compliance with this clause	COMPLIANT	GAP (in evidence)	GAP (in practice)
Clause 20 (1). Providers must have practices for enabling all learners and prospective learners to identify and manage their basic needs (the essential material requirements to support wellbeing and safety including housing, food and clothing), including providing accurate, timely and tailored information on how they can — (a) access services through the provider or through community and public services that will help them maintain reasonable standards of material wellbeing and safety; and (b) access suitable accommodation and understand their rights and obligations as a tenant in New Zealand; and (c) maintain a healthy lifestyle.	Student Common room and Student Services referral material to support services and relevant external agencies	Compliant	-	-

Sept 2023 24/30



Developing reopie for work					
Clause 20 (2). If food is made available by the provider on campus or in student accommodation, the provider must ensure that the food available includes a range of healthy food options that is obtainable at a reasonable cost.	N/A	N/A	N/A	N/A	
Process 2: Promoting physical and mental health awareness Clause 21. Providers must have practices for (a) providing opportunities and experiences for learners that improve their physical and mental health and wellbeing and safety; and	 POL028 Learner Support & Guidance Referral to Relevant health and support services Our curriculum for all of our programmes includes such activities and experiences 	Compliant	ECE learners could be provided more such activities.	-	
(b) promoting awareness of practices that support good physical and mental health that are credible and relevant to learners; and	 Our curriculum for all programmes Student common room boards Student Forum minutes 	Compliant	-	-	
(c) supporting learners' connection to their language, identity, and culture; and	 Our curriculum for all programmes includes this Record of Cultural days and celebrations Whanau days Maori Strategy 	Compliant	-	-	
(d) providing accurate, timely information and advice to learners about –	<u> </u>				

Sept 2023 25/30



i. how they can access medical and mental health services through the provider or through community and public services, including culturally responsive services; and ii. how they can report health and safety concerns they have for their peers; and iii. how to respond to an emergency and engage with relevant government agencies; and iv. how they can make positive choices that enhance their wellbeing.	 POL028 Learner Support & Guidance Learner Handbook Publications in Student Common areas 	Compliant	-	
Process 3: Proactive monitoring and responsive wellbeing and safety practices. Clause 22 (1). Providers must have practices for —	• Enrolment	Compliant	-	-
(a) requesting that domestic learners 18 years and over provide a name and up-to-date contact details of a nominated person; and	Form • Student records			
(b) describing the circumstances in which the nominated person referred to in paragraph (a) should be contacted in relation to their wellbeing and safety; and	• Tutor Guide	Compliant	-	-

Sept 2023 26/30



(c) contacting the person nominated by domestic learners 18 years and over, in the circumstances described in accordance with paragraph (b), or where the provider has reasonable grounds for believing that the disclosure is necessary to prevent or lessen a serious threat to the student's life or health; and	• Tutor Guide	Compliant	-	-
(d) enabling learners to communicate health and mental health needs with staff in confidence, including accommodation staff, so that the provider can proactively offer them support; and	 POL028 Learner Support & Guidance 	Compliant	-	-
(e) providing opportunities for learners to raise concerns about themselves or others in confidence; and	 POL028 Learner Support & Guidance 	Compliant	-	-
(f) identifying learners at risk and having clear and appropriate pathways for assisting them to access services when they need it; and	 POL028 Learner Support & Guidance 	Compliant	-	-
(g) identifying learners who are at risk of harming others, and i. having clear and appropriate pathways for assisting them to access services when they need it; and	 Student Support policies Tutor Handbook Student forum minutes 	-	More staff training must be arranged here.	-
ii. protecting learners and staff who experience harm from other learners and/or staff, including sexual assault; and	 See Bullying section Learner Handbook POL005 	Compliant	-	-

Sept 2023 27/30



(h) making arrangements with disabled learners or those affected by health and wellbeing difficulties to accommodate learning needs, including for study off-campus; and	 See Learner Handbook P032 Physical Resources 	Compliant	-	-
(i) responding to disruptive and threatening behaviour in a way that is sensitive to a learner's situation; and	 See POL005 See Learner Behaviour in Learner Handbook 	Compliant	-	1
(j) supporting learners whose study is interrupted due to circumstances outside their control, and providing inclusive, accessible re-entry processes for their transition back into tertiary study.	Pandemic policy; Disability Coordinator role; Flexible student centric academic management decision making in such cases	Compliant	-	-
Clause 22 (2). Providers must have up-to-date contact details and next of kin for domestic tertiary learners under 18 and international tertiary learners.	• SOP031	Compliant	-	-
Clause 22 (3). Providers must contact the next of kin for domestic tertiary learners under 18 years and international tertiary learners if there is concern regarding the wellbeing or safety of a learner.	• SOP031	Compliant	-	-
Clause 22 (4). Providers must maintain a record of reported risks, including any concerns raised in relation to the effective administration of this code.	• SOP033	Compliant	-	-

Sept 2023 28/30