



**POLICY ON STUDENT HOUSING AT PUBLIC UNIVERSITIES AND
THE MINIMUM NORMS AND STANDARDS APPLICABLE**

RESPONSE BY HIGHER EDUCATION SOUTH AFRICA (HESA)

June 2013

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1. INTRODUCTION

Government Gazette No 36361 of 11 April 2013 contains a proposed policy on student housing at public universities together with applicable norms and standards accompanied by a call for comment by interested parties. The set of comments given in this document represents HESA's formal response.

Despite a variety of comments on specific aspects of the proposed policy and the associated norms and standards, HESA wishes to express its strong support for a policy and norms and standards for student housing. HESA believes that this long overdue policy intervention by the Minister of Higher Education and Training and his Department, will play a significant role in improving the quality of support for teaching and learning at universities and should, in the longer run, have a positive effect on student throughput rates.

HESA's comments are structured as follows:

- General policy background in relation to student housing;
- Specific proposals as set out in the proposed policy; and
- Financing of capital costs and running costs of student housing
- General comment on student housing for students with disabilities

2. POLICY BACKGROUND TO STUDENT HOUSING

2.1 The policy background to higher education student housing largely involves the following:

- The former SAPSE-110 funding formula;
- The present funding framework for higher education; and
- Infrastructural funding for universities.

2.2 **Former SAPSE-110 subsidy formula.** By common consent the former SAPSE-110 subsidy formula which had served South African higher education since the early 1980s, while containing a number of strengths also suffered from some deficiencies necessitating its overhaul which resulted in the implementation of the existing funding framework for higher education in 2004. One of its strengths lay in its provision of government subsidy for student housing. This occurred through the mechanism of funding for the 'auxiliary enterprises programme' and in essence involved universities carrying the running costs of student accommodation themselves but provision being made for government subsidies regarding capital expenditure on the establishment of new student accommodation facilities. In addition the SAPSE-110 subsidy formula included a provision for subsidising an increase in the number of students making use of student accommodation from one year to the next.

The advantages of having such an explicit provision for student accommodation within the Government's funding policy lay not so much in the precise detail of these funding arrangements but rather in the clear signal to institutions of the importance of student housing to Government as part and parcel of the menu of teaching and learning, research and community engagement services rendered to students and its expectation that institutions, although free to apply their own internal allocation mechanisms, would at the very least, ensure that adequate funding flowed to student housing. In effect this provision provided a platform for student housing sections in universities to strongly argue their case for an extension of services and concomitant funding of such services in the face of other competing priorities in institutions.

2.3 New higher education funding framework: In 2004 the SAPSE-110 funding formula was replaced by the new funding framework which in itself has been the subject of a recent investigation by a Ministerial Review Committee which has already submitted its report to the Minister although ensuing policy proposals are still being awaited. The new funding framework represented a radical departure from the former SAPSE-110 subsidy formula in that it did not attempt to model itself on costs incurred by institutions on recognised higher education core and support activities, but rather on the value placed by Government on the provision of higher education as reflected in its annual budgetary provision for higher education. This annual provision was to be distributed to institutions based on a set of input, output and institutional factors as part of block grant funds. Specific initiatives which were subject to Governmental prioritisation rather than institutional prioritisation as is the case with block grant funding, were funded from so-called earmarked funds.

While having some commendable features one of the major drawbacks of the new funding approach was that it did not contain any explicit signals regarding matters of importance to Government except if specifically included in the building blocks making up block grants, or if mentioned in the Annual Ministerial Funding Statement, or if included as a special category under earmarked funding. This meant that the provisions of new funding framework, possibly with the exception of research and student throughputs, no longer played such a decisive role in internal institutional prioritisation as was the case before. The unfortunate and unintended outcome, especially in those institutions which did not have rational formula based systems of internal allocation, was that funding for student housing often became subject to varying and inconsistent internal institutional prioritisation with extremely negative consequences for its maintenance and extension. This outcome was enforced by a lack of provision under earmarked funding in the initial years of implementation of the new funding framework for student housing.

2.4 Infrastructural funding. The difficulties surrounding adequate student accommodation, both in terms of extent and quality, were compounded by a number of factors during the post-1994 years such as sustained and increased demand for student accommodation, especially in the rural universities, but also by challenges facing Government and institutions in the area of infrastructural funding. Unfortunately the system of using building space and building cost norms in determining building backlogs for the various programmes of universities as used in the former SAPSE 110- formula became dysfunctional in the late 1990s resulting in no or very little funding being made available for new building infrastructure for a period of nearly 10 years. Commendably the DHET developed a new set of building space and cost norms some years ago. In terms of these norms and using the student FTEs in 2009 as basis, the HESA Infrastructure Study (HESA 2011) concluded that

a building backlog amounting to R9.1 billion (Rand of 2010) existed in the HE sector in 2009. The portion of building backlogs in student residences was 32.5% of this amount. Simultaneously Government initiated a series of infrastructural funding initiatives from 2006 onwards based on priorities determined by the Minister. Although the basis for arriving at such priority areas remains unclear this funding provided very significant relief for many universities in respect of their building programmes and specifically for mainly rural universities, in the provision of student accommodation and its upgrading.

The above discussion highlights the necessity of ensuring a greater integration between specific Governmental priorities in formal higher education policy instruments and funding policies in particular, in order to avoid the development of crisis and catch-up situations such as that regarding student housing.

Comment: While welcoming the new proposed policy on student housing, HESA wishes to argue for a stronger integration between this policy and other Government policies on higher education, specifically its funding policies. Such integration should serve as a strong coercing mechanism for both Government and institutions to ensure that this all important matter is accorded its proper priority nationally as well as institutionally, while at the same time bringing about an adequate level of sustained funding support for student housing.

Implementing the proposed policy, as will be shown in the ensuing comments, is certain to raise the overall cost of providing student housing significantly. It is therefore crucial that the proposed policy is strengthened by linking it to increased financial provision for student housing in respect of the provision of new student housing infrastructure, upgrading existing student housing infrastructure, and maintaining existing student housing infrastructure. Failing to provide such a linkage will in HESA's view, seriously jeopardise the necessary and adequate implementation of this policy.

This matter is addressed later in more detail in the form of specific policy proposals aimed at linking the implementation of this policy with increased financial provision for student housing.

3. SPECIFIC POLICY PROPOSALS

The specific proposals in the policy are discussed next together with HESA's comments and proposals where applicable. HESA's comments are made in terms of the various sub sections of the proposed policy. The page numbers used are those appearing at the top of the Government Gazette's pages.

1. Introduction (p4 of GG)

No specific comments

2. General definitions (p5-6 of GG)

Comment: The general definitions include terminology related to 'designated' and by implication to 'non-designated' funds, and for 'encumbered' and by implication for 'non-encumbered funds'. The existing Regulations for Reporting by Public Higher Education Institutions (2007) do not define either of these terms and in addition use the terms 'restricted funds' and 'unrestricted funds'. Furthermore the proposed new 'Reporting Regulations' as set out in Government Gazette 35923 of 29 November 2012 define the

following terms: Designated funds, Restricted funds, and Unrestricted funds. Some clarification and consistency in the use of terminology is required.

Proposal: HESA proposes that the terms used in the proposed new 'Reporting Regulations' for designated, restricted and unrestricted funds be incorporated in the proposed Regulations for Student Housing. Although not essential a definition of encumbered funds would be helpful.

3. Application (p6 of GG)

Comment: While HESA supports the scope of application of the student housing policy it wishes to emphasise the difficulties which universities experience in regulating privately owned accommodation - even that which is accredited by universities - and the extremely high cost which such supervision entails. This is particularly the case with large urban universities where the number of such accredited privately owned forms of accommodation can easily run into hundreds. Apart from the cost of the initial setting up of systems of accreditation of privately owned student accommodation, universities simply do not have the human capacity or financial means to maintain an 'inspectorate' to ensure that initially accredited privately owned forms of accommodation continue to adhere to the provisions of the accreditation agreements. In addition the need for housing is so acute at some universities that many providers of privately owned accommodation see little advantage for them in entering into an accreditation agreement with a university as the demand for places is so high that they are able to fill their accommodation despite not meeting minimum requirements and despite not having the university's 'stamp of approval'. This is usually where the real exploitation of students both in terms of quality of accommodation and costs thereof occurs.

Although the Report of the Ministerial Committee on Student Housing suggests that allocations to students from NSFAS could be used as a financial lever in compelling providers of private student housing to compel with minimum standards, it is not entirely clear how such a form of financial leverage is to be applied in practice. Presumably such leverage would have to be exercised on a 'student-by-student' basis which would increase the cost of administering a system of accreditation of private housing considerably.

One way of resolving the dilemmas for universities in setting up and thereafter maintaining such systems of accreditation of privately owned student accommodation is for the DHET to make available some funding as part of earmarked funding for a specified period for this purpose.

In assisting universities which have not yet set up such systems of accreditation of privately owned student accommodation, HESA undertakes to arrange a workshop in this regard where universities which already have done so can share their experiences in this regard in order to arrive at some form of best practice.

Proposal: In resolving the dilemmas for universities in setting up and thereafter maintaining systems of accreditation of privately owned student accommodation, HESA proposes that as part of the annual ministerial funding statement, DHET makes available some funding as part of earmarked funding for a period of say 3 years to assist universities in carrying the costs of setting up such initial systems of accreditation and in establishing ways of maintaining the accreditation standards.

In assisting universities which have not yet set up such systems of accreditation of privately owned student accommodation, HESA undertakes to arrange a workshop in this regard where universities which already have developed such accreditation systems can share their experiences in this regard in order to arrive at some form of best practice.

4. Physical infrastructure (p 6 of GG)

4.1 Sites of residences (p 6 of GG)

Comment: HESA is in broad agreement with these provisions and notes that they are termed as 'recommended minimum standards'. HESA also wishes to point out that situations could arise where for multi-campus institutions it would be more feasible to erect student accommodation within close proximity to already existing student accommodation on the 'main campus' rather than on one of its satellite campuses which could be further than 20km away from the main campus. Doing so enables students to participate more readily in all aspects of student life such as sport and cultural activities, than would often be the case on an outlying campus..

Proposal: When considering applications from multi-campus universities for residence accommodation, DHET should bear in mind that in some cases it may be preferable to erect student accommodation on the 'main campus' rather than on the satellite campus in order to provide a full spectrum of student development opportunities to students such as opportunities for participation in university arranged cultural, social, and sporting activities.

4.2 Design of residences (p7 of GG)

Comment 5: While HESA in principle supports the minimum design standards as set out it wishes to point out that these standards are likely to raise building costs appreciably and, depending on infrastructural funding support from DHET, this could have a negative impact on the ability of universities to provide additional student accommodation – particularly for those universities which under Government's infrastructural funding programme have to bear a sizeable portion of the building costs from their own funds.

In terms of Government's existing rules governing the allocation of infrastructural funding applicable for 2012/13 and 2013/14 ' every institution will be expected to contribute from its own resources to a set of projects approved by the Minister. The minimum institutional contribution towards an approved project is set at between 10%-50% depending on each institution's financial position'. HESA believes that this particular rule should be amended to provide for a maximum own contribution of, say 20%, in the case of allocations for new student accommodation and the upgrading of existing student accommodation. It could of course be that the recommendations made by the Ministerial Task Team on the Funding Model, already cover this matter. If so, it strengthens HESA's earlier argument for a much stronger integration of applicable higher education policies.

In addition some discrepancies occur between some of the design standards set out in this section of the proposed policy and those reflected in the norms and standards given at Annexure A. These matters and some other issues are covered more fully later when commenting on the norms and standards set out in Annexure A.

The provision of hand wash basins (one for every 4 students), shower cubicles (1 for every 7 students) and wc's (one for every 5 students) is difficult to assess as no indications are given as to a quantitative analysis or basis from which these norms are deduced. It is however clear that these provisions, though laudable, will increase the building and maintenance costs of student residences considerably. A similar remark holds with regard to the furnishings and fittings listed for residences where provision is made for self-catering of meals.

HESA is in full support of the provision of wireless and/or fibre optic cable internet access for all student rooms and social spaces as it could make a significant contribution towards improving teaching and learning levels for students. As has been mentioned before, this will however most certainly add quite significantly to the cost of providing student housing.

In the absence of additional funding resources being made available to universities for expenditure on student accommodation, these higher costs are likely to result in some very acute decision making dilemmas for universities such as: Either providing more residence spaces at lower costs and hence at lower standards, or providing fewer residence spaces at these higher standards and hence at higher costs, thus requiring a greater participation by the providers of private student accommodation in the overall provision of student housing.

Proposal: In resolving the dilemma of significantly higher costs in the provision of new student accommodation and upgrading existing student accommodation HESA proposes that in the case of the provision of infrastructural funding for university owned student accommodation by DHET, no university be expected to contribute a figure of say, more than 20%, of the total cost from its own funds regardless of which own contribution rules may hold for other forms of infrastructural funding support.

In addition proposals on assistance with the cost of maintenance of residence facilities are made later.

See in this regard also Recommendation 7 of Section 2.3.3 of the HESA Infrastructure Study (HESA 2011).

5. Health and safety (p8 of GG)

Comment: HESA supports the health and safety provisions set out but wishes to point out that the fitting of shower doors to shower cubicles in existing student accommodation may present some unexpected practical and financial obstacles and should preferably be spread over a reasonable period of time.

Proposal: HESA proposes that universities be given a period of at least 5 years in which to fit shower doors (or curtains) for existing shower facilities in existing student accommodation.

6. Furnishings and fittings (p8 of GG)

HESA has no specific comments to make in respect of the provision of furnishings and fittings save as to point out again that the provisions are likely to raise the cost of providing university owned residences considerably and that this should strengthen the case for setting a limit of 20% 'own contribution' for any university in respect of university owned student accommodation funded through DHET's infrastructural funding programme.

7. Construction, repairs and maintenance (p8 of GG)

Comment: In principle HESA supports the stipulations set out in this part of the policy with an exception relating to the first requirement that gives DHET the right to inspection of DHET funded student accommodation in respect of the facilities being fit-for-purpose, provide value for money and comply with relevant legislation. While this provision in the proposed policy has probably been sparked by a serious lack of proper management and oversight by the senior management of universities in respect of the quantity and quality of their student housing, HESA has some reservations in this regard:

i) Assessing whether a newly erected residence building funded by DHET complies in respect of the three matters mentioned would require high level expertise in the fitness-for-purpose of special usage facilities such as student accommodation, high level quantity surveying expertise in such special type of buildings for assessing value-for-money, and high level legal expertise in terms of health and safety considerations and any other legal considerations. In a sense undertaking such an inspection after the building has been erected, provided the DHET could assemble the requisite expertise to do so, would not only be time consuming but costly, and in addition could amount to a situation where little can be done to remedy the situation except at considerable extra cost. HESA's view is that it would be less onerous for the institutions as well as DHET to require a formal certificate of compliance on the above matters signed by the VC and Principal and by the professional team in charge of the building project based on the approved plans for the building, before any building work is allowed to commence. In addition such a certificate of compliance should be issued once again at the halfway stage and then on completion of the building before any occupation by students is permitted. Only in cases where these compliance certificates at any of the three stages gives rise to serious questions and doubts would DHET assemble a team of experts at DHET's cost for undertaking such an inspection.

ii) The phrase 'which have been funded by the DHET' needs some clarification. Some universities make no or a very low own contribution under the DHET's programme of infrastructural funding while others are required to make own contributions of up to 50%. Although it could be argued that considerations of 'public good' override any arguments in favour of a differentially based 'inspection' approach of student housing, it strikes one as somewhat odd that a university funding up to 50% of student accommodation from its own sources and DHET the other 50%, should be subject to the same inspection rules as would be the case for a university which is required to contribute only 10% from its own sources. The earlier proposal that no university be expected to contribute more than 20% from its own sources would go some way towards resolving this problem, if it is indeed regarded as a problem.

Proposal: HESA proposes that the existing provision for inspections by DHET in respect of the fitness-for-purpose, value for money and compliance with legal requirements of DHET funded student accommodation facilities, be reworded in a more nuanced manner requiring the submission of compliance certificates to DHET as described earlier before the commencement of any building work, at the halfway stage, and upon completion of the student housing facility but before any students occupy the buildings. In cases of non-submission of such certificates of compliance

or where DHET has genuine grounds to suspect that non-compliance may be occurring on the basis of submitted certificates, would DHET then assemble a team of experts at its own cost for the conducting of an 'inspection' of the facilities.

8. Student well-being and support (p9 of GG)

Comment: HESA supports the provisions relating to student well-being and support set out in Section 9. However, HESA wishes to point out that modern trends in the provision of student accommodation relate to making such accommodation learning environments as well and not only living environments. Although still in its infancy this goal is pursued in a number of ways and even goes as far as some universities in the USA providing office space for academic staff and lecturing halls as part of student accommodation facilities. HESA is of the view that it should not be necessary for students in residences to escape unbearable noise levels and other forms of disturbance in residences by seeking recourse to study in libraries etc during the day and in the evenings but should be able to pursue their studies in an environment more strongly geared towards combining living and learning.

Proposal: HESA proposes that this section of the proposed regulations be expanded to include a recommendation that all new university owned student accommodation should incorporate ways of making such accommodation more of a learning environment as well as a living environment. This aspect should also be included in every university's general student housing policy and provisions.

9. Student housing governance and management (p9 of GG)

9.1 Governance of student housing (p9 of GG)

Comment: HESA assumes that this section only applies to university owned student accommodation although the phrase '... from off campus student housing units housing ten or more students' suggests that in DHET's view this should also apply to accredited but privately owned student accommodation. If this is indeed the case it would be necessary to limit such representation to one or two students only as the number of such accommodation units can be quite large. Furthermore, HESA deems it necessary that this committee should not be unduly large and that its size should preferably be limited to not more than say 10 or 11 persons providing for 5 students, 5 appropriate members of the university's staff and the chairperson who will be a senior university official. In this respect HESA is of the view that the present wording of equal numbers of student and staff members needs to be clarified to make it clear that this does not include the chairperson.

Proposal: HESA suggests that the wording of the present Section 10.1 be amended to make it clear whether this section only refers to university owned student accommodation or to privately owned but accredited student accommodation as well. HESA advocates a position involving students in university owned as well as privately owned student housing. In addition the size of this committee should be limited to not more than 11 persons of which 5 would be student members, 5 university staff members and the chair a senior university official. The 5 student members could be made up of either 4 from university owned residences and 1 from privately owned student accommodation or alternatively 3 from university owned residences and 2 from privately owned student accommodation. The above ratios of students from

university owned versus those from privately owned residences should be informed by the overall ratio of students in these two types of student accommodation.

9.2 Staffing levels (p10 of GG)

Comment: HESA accepts that the proposed residence staff: resident student ratios refer to university owned student accommodation only and serve as guidelines only as more modern approaches to student accommodation in which provision for greater student self-sufficiency is made, may well impact quite significantly on such ratios. Similarly typical 'graduate student villages' catering for more senior students in which measures aimed at enhanced student self-sufficiency are common, would probably also exceed such ratios without any negative impact.

Proposal: HESA proposes that the wording of this section be changed to indicate that these ratios apply to university owned student accommodation only and would as a rule apply for residences in which undergraduate student numbers predominate and for student housing facilities in which limited provision for high levels of student self-sufficiency have been introduced. In order to prevent unacceptable student: staff ratios from occurring, upper limits of say +10% or +15% of such ratios could be set.

9.3 Professional development of student housing staff (p10 of GG)

HESA supports the emphasis on on-going training and development of student housing staff and has no further comments to make in this regard.

9.4 Policy, procedure and agreement (p10 of GG)

HESA supports the development of comprehensive student accommodation information manuals by all universities.

9.5 Student discipline (p10 of GG)

Comment: HESA fully supports the emphasis on universities being responsible for student discipline in university owned residences but is less certain whether it can enforce its disciplinary oversight in respect of incidents warranting some form of disciplinary action occurring in accredited privately owned student accommodation unless such a provision forms part of the accreditation agreement with a private provider of student accommodation. Doing so would still however leave open the question whether the university's disciplinary powers can be exercised to the full in cases of unruly or un-disciplined behaviour by students in non-accredited privately provided accommodation. If an argument is made that the university indeed has an unqualified right to exercise its disciplinary powers over any student regardless of their form of accommodation it raises the awkward question of whether a university's disciplinary powers override those of parents whose children still reside in their homes while studying.

Proposal: HESA proposes that the wording in this section be subjected to a formal legal opinion and if necessary, be changed in terms of such an opinion.

9.6 Residence admissions and allocation policies (p10 of GG)

Comment: With the exception of the provisions set in par (a) HESA supports the various provisions and requirements set out in this section. HESA finds the wording of this section confusing. Initially the wording refers to only 5.3% of all new first year contact students being accommodated in university residences, but then refers to 20% of all residence places being available for new first year students by 2018, and confusingly then states that the above 20% is to be increased to 100% 10 years later.

HESA wishes to point out a number of difficulties with these targets:

- i) HESA does not believe that the reaching of a target of residence space available for new first year contact students of 20% by 2018 can be divorced from the types of study programme offered by the university or that followed by students in its residences, and neither can the setting of such targets be divorced from the provision of infrastructural funding specifically for residences. For example, in university residences with students mainly following 4 year professional degree programmes the proportional inflow and outflow patterns of residence students will differ from those in which 3 year degree programmes dominate. Similarly, in some cases, particularly in the health sciences, some residences are designated for these students who normally would follow programmes of a minimum duration of 4 years and, which in the case of medicine and dentistry, are in fact substantially longer.
- ii) Furthermore, the present low student throughput rates (see Council on Higher Education's cohort study data in its publication VitalStats for 2010 published in 2012) aggravate the problem of clogging up in residence occupancy.
- iii) Reaching a system wide target of 20% of available residence space being set aside for new first year contact students by 2018 will undoubtedly require substantial additional infrastructural funding for student accommodation which the proposed regulations are silent about.
- iv) In addition the target of 100%, presumably of residence places reserved for new first year students, by 2028 is hard to understand as it would in fact imply a brand new intake of only new first years into residences each year? This surely would run counter the need for a more balanced residence population consisting of both 'junior' and more 'senior' students. This is particularly important from the point of view of the exercising by senior students of residence leadership and student mentorship.
- v) Finally, it is assumed that this section applies to university owned student accommodation only.

Proposal: It is proposed that the wording of par (a) of Section 10.6 be changed to read that all universities are expected to develop rules as part of their residence admission and allocation measures ensuring that no student stays in university owned student accommodation longer than a prescribed number of years in relation to the duration of his/her study programme. For example, students following a 3 year

programme should not be allowed to stay in residence for say longer than 4 years while studying for that programme. Similarly students registered for a 4 year programme should not be allowed to stay in residence for longer than say, 5 years while studying for that programme etc. Such provisions would assist in resolving the problem of clogging up of student places to the detriment of accommodating new first year students.

As far as targets are concerned each university should be expected to set targets for the percentage residence places to be earmarked for new first year students based on an analysis of its student residence population enrolled in 3 year and in 4 year or longer programmes. In order to avoid developing a student accommodation environment dominated by residences having only first or second year students such targets should aim to ensure that residences have an even distribution of 'junior' and 'senior' students. This is particularly important due to the mentoring role which such senior students can play as well as providing for their contribution to the residence or house committee system as part of residence oversight and management.

Making allowances for some unsuccessful returning first and second year students in particular, if a university has a predominance of students in its residences enrolled in 3 year undergraduate programmes its target for reserving places for a new first year intake should be around 25% or so, and if it has a predominance of students enrolled in its residences enrolled in 4 year study programmes its target for new first year students should be around 20% or so. These targets already make allowances for the fact that senior student often prefer private accommodation to university provided accommodation in their last year of study. Taking all these factors into account could lead to a composite weighted average target of around 20%-25% of all residence places to be reserved for new first year students each year. Subject to additional funding being made available as part of infrastructural funding, this target should be reached by 2028.

10. Financial control and management of student housing (p11 of GG)

Comment: HESA supports the provisions in this section with the exception of that part of par (b) which entails annual site visits to residences by the DHET. HESA feels that this is not only superfluous in view of the submission of quarterly residence accounts to the University Council and the development of a new standardised reporting framework for annual residence financial reports, but feels that this provision strongly undermines institutional accountability and operational autonomy and is tantamount to departmental inspections which possibly could even include facilities which DHET may not necessarily have funded or may have only funded partially.

Proposal: HESA proposes that the wording of par (b) is changed so that the wording of this provision ends after 'scrutiny and evaluation'.

11. Compliance with student housing and housing minimum standards

HESA has no specific comments to make in respect of this section.

12. Phasing in of minimum norms and standards

Apart from the specific comments following next on the norms and standards set out in Annexure A, HESA has no specific comments to make regarding the provisions of this section with the exception of par (b) where the phasing in period for meeting new first year intake targets for residences should be 10-15 years in line with HESA's proposals above under Section 9.6.

Proposal: In line with HESA's earlier proposals par (b) should be amended to provide for a phasing in period of 10-15 years for meeting targets set for new first year student intakes for residences.

ANNEXURE A: Minimum norms and standards room specification manual

HESA's comments regarding the norms and standards set out in Annexure A fall into three broad categories: Discrepancies between the design standards set out in Section 4.2 and the norms and standards set out in Annexure A; overly detailed provision for the furnishings of some room types, and the relationship, if any, between the norms and standards set out in Annexure A and the DHET's approved space and cost norms for buildings and other land improvements at higher education institutions.

i) Discrepancies between the design standards set out in Section 4.2 and the norms and standards set out in Annexure A.

Comment: A discrepancy occurs between the specifications set out in section 4.2 and those appearing in Annexure A in that in Section 4.2 of the proposed policy 8 sq m is specified as the minimum size for a single room in a residence while Annexure A's room data sheet for a single room specifies and assignable square meter space of 9 sq m.

Proposal: As HESA is not informed as to the exact basis on which the assignable square meters for single and double residence rooms have been calculated and as the relationship between these sizes and the existing space and cost norms of the DHET is unclear, it is difficult to say whether the 8 ASM's of Section 4.2 should be used instead of the 9 ASM of Annexure A for single residence rooms. In any event they have to be aligned.

ii) Overly detailed provision of furnishings for some room types

Comment: Some examples occur of possible overly generous provision of furnishings in some room types. For example, the room data sheet for rooms for recreational and meeting usage, specifies 1 tub chair for every 2 students and 1 stacking chair for every four students. A strict interpretation of these provisions would, for a residence accommodating 200 students, require 100 tub chairs and 50 stack chairs. This specification should, rather than prescribing such detail, preferably simply prescribe a suitable mixture of chairs resulting in the provision of seating for say every 4 students.

The provision of one hand wash basin for every 4 students, one shower cubicle for every 7 students and one wc for every 5 students is difficult to assess due to a lack of information on how these provisions were calculated- similarly for the provisions for kitchenettes.

Proposal: HESA proposes that the provisions for furnishings for the various room types be analysed and where possible aggregated in order to be somewhat more general such as for example in the chair and seating types for rooms used for recreational and meeting purposes.

iii) Relationship between norms and standards in Annexure A and the space and cost norms for buildings of the DHET

Comment: The proposed policy on student housing is silent on the relationship, if any, between the norms and standards given in Annexure A and those in the DHET's space and cost norms for buildings. A relationship is nevertheless assumed as Annexure A uses the concept of assignable square meters which is defined in DHET's Building and Space Inventory and Classification Manual.

Despite the use of the concept of ASM, the relationship between these two sets of policy documents is not clear at all. For example, DHET's Building and Space Inventory and Classification Manual classifies various types of rooms in student housing facilities and assigns specific space codes to these rooms. Annexure A in its room sheet data makes no reference whatsoever to this Classification Manual and the codes developed therein for room types.

Proposal: HESA proposes that the various types of rooms used in Annexure A be linked to the codes provided in the DHET's Building and Space Inventory and Classification Manual. It may be necessary to expand the latter as Annexure A lists some room types that are not specifically listed in the above Classification Manual.

Neither does Annexure A give an indication of how the various ASM's for different room types relate to DHET's Space and Cost Norms for Buildings and other Land Improvements for Higher Education. For example, the latter document provides under Programme 9 for some sub categories relating to student housing. These sub categories play an important part in the above space and cost norms but no connections are established in this regard between the Annexure A and these space and cost norms. It is, for example, quite difficult to relate the space provision per FTE student in Table A.4 of the above space and cost norms with the ASM space provided for the various kinds of rooms listed in Annexure A. Totalling all the ASMs per FTE student for sub programmes 9.1, 9.2 and 9.6 in Table A.4 yields a total of 15.73 ASM per FTE contact education student making use of university owned student housing. This can unfortunately not be related to the provisions made in Annexure A as the latter do not necessarily express ASM per room type in terms of FTE students.

Proposal: Assuming that the provisions of Annexure A are somehow related to the provisions contained in DHET's Space and Cost Norms for Buildings and other Land Improvements for Higher Education, HESA proposes that this connection be spelled out more clearly in Annexure A. If the new student housing policy is however indeed a new 'stand-alone' policy this should equally be made clear and the relevant amendments be effected in the two DHET documents: Building and Space Inventory and Classification Manual Space, and Cost Norms for Buildings and other Land Improvements for Higher Education.

4. FINANCING OF RUNNING COSTS AND CAPITAL EXPENDITURE RELATED TO STUDENT ACCOMMODATION

HESA is concerned that this document is totally silent about financing the running and capital costs of student accommodation as it also is about funding the implementation of these norms and standards over the next years. It has already been pointed out that Government priorities are best implemented when such priorities are also reflected in other policy documents, particularly in funding policies. HESA is convinced that the implementation of the student housing policy and its consistent application and monitoring within institutions could have a significantly positive effect on the learning achievements of residence students and on throughput rates of students. However, for this to come about it is essential that the funding of running and of capital costs related to student housing be addressed forthrightly.

Comment: All universities will attest to the excessive wear and tear of student housing capital infrastructure and the related furnishings compared to wear and tear of capital infrastructure for other usages. This coupled to the inordinately high increases in food prices during the past few years has made the full cost recovery of all running costs related to student housing well- nigh impossible. Universities are, in particular, finding that they can no longer cover the cost of maintaining an increasingly ageing student housing infrastructure from residence fees and have to utilise monies meant for funding its core functions of teaching and learning, research and community engagement for this purpose. This is particularly the case for institutions in which the majority of its students make use of university owned student accommodation. In most cases this would pertain to rurally based universities where other forms of alternative accommodation are in any event not easy to come by for students.

Proposal: Against the above background HESA thus wishes to propose that as part of earmarked funds provided for in the annual ministerial funding statement, provision is made for assistance to institutions with a high proportion of its students being accommodated in residences in maintaining the residence infrastructure. Such earmarked funding should constitute designated funding in the sense that it may only be utilised for the purposes of maintaining university owned residence facilities and not for any other purposes and specifically not for maintenance on other types of infrastructure. Universities receiving such funding should annually submit a certificate of compliance signed by their external auditors to the DHET. See in this regard also Recommendation 9 and 10 of Section 2.3.3 of the HESA Infrastructure Study (HESA 2011).

In order to ease the administrative burden of managing the allocation of such earmarked funds a simple algorithm such as the following, which merely serves as an example, and which would have to be refined based on a more detailed analysis of residence populations in the university sector, could be used:

- i) Only universities with more than x% of its headcount enrolled student population in university owned residences qualify for assistance with maintenance costs of university owned residences only;

- ii) The annual earmarked financial allocation by DHET for this purpose is divided proportionally between all qualifying universities as follows:

Every university's headcount student residence population in university owned student residences is expressed as a proportion of the total student residence population in university owned residences for all qualifying universities.

The total allocated amount is then divided proportionally between all qualifying universities and only paid out after submission of the required audited financial statements covering maintenance costs of student residences.

An initial value of x% would probably be in the region of 5% to 10% and could be increased as the new student housing policy takes effect.

The above algorithm could be refined somewhat by taking the proportion of students in university owned accommodation with regard to the total number of contact education students for each university into account. This would represent an attempt to make sure that smaller universities with high proportions of students in university owned accommodation are not influenced negatively by a 'big pool' approach such as the one presented above. If this proportion is denoted by z% universities could be categorised according to something along the following lines:

- a) Universities for which the value of z% is higher than say 40%;
- b) Universities for which their z% value falls between 40% and say 20%;
- c) Universities for which their z% value falls between 20% and 10% (or possibly 5%); and
- d) Universities for which their z% value falls below 10% (or possibly 5%)

Universities in Category (a) would then receive say 50% of allocated funds for maintaining residences distributed according to their z% values;

Universities in Category (b) would then receive say 30% of allocated funds for maintaining residences distributed according to their z% values; and

Universities in Category (c) would then receive say 20% of allocated funds for maintaining residences distributed according to their z% values; and

Universities in Category (d) would not qualify for such funding

Comment: Concerning the provision of new university owned student accommodation facilities it has already been proposed that no university should be expected to contribute more than 20% of such capital costs from its own sources. In addition it may be necessary to increase the proportion of funds set aside for student housing as part of infrastructural funding. For example, in the Guidelines for Infrastructure and Efficiency Funding: 2010/11 and 2011/12 student housing made up slightly more than 20% of the total allocated funds.

Proposal: In addition to limiting the own contribution of universities to a maximum of 20% for new university owned student residences, HESA proposes that for the next 5 years the proportion devoted to student housing as a part of the total funds approved for infrastructural funding should be increased to about 40% in order to work away existing backlogs more speedily, after this period this proportion could be decreased slightly to about 30% or so for the next 5 years after which proportions in the region of 20% could once again be considered. In the application of such infrastructural funds for student housing, universities experiencing the greatest backlogs in the provision of student housing should be given preference.

5. PROVISION OF ACCOMMODATION FOR STUDENTS WITH DISABILITIES

Comment: In general the proposed policy on student housing, particularly with regard to university owned student housing, does not give adequate attention to the issue of facilitating housing for students with disabilities. Only two cases could be found where the Room Data Sheets use the word 'disabled' (Annexure A, p42 and p48).

Provision for students with disabilities in each and every residence of a university clearly would be too costly to achieve. The most practical approach would be if universities in a region could somehow reach agreement on the provision of accommodation facilities for disabled students which does away with the need for a single university to provide for every form of disability, provided that the various forms of disability would be covered by the universities in the region. Unfortunately such an approach is subject to all the universities in the region offering comparable study programmes and representing equally attractive alternatives to individual students. This is not likely to be the case in most regions.

Against this background it is deemed desirable that every university providing student accommodation in university owned residences should have at least a few residences catering specifically for the needs of students with disabilities. In addition, universities should ensure that an adequate proportion of accredited privately owned student accommodation is suitable to accommodate students with disabilities.

Provision for students with disabilities in university owned residences can be achieved either by remodelling existing residences or as part of the building of new residences. At a minimum each university providing student accommodation should have at least one and preferably two residences catering for male students suitable for accommodating students with disabilities- similarly for residences catering for female students and for mixed gender residences.

Recommendation: It is recommended that the proposed policy on student housing makes the provision of student housing suitable for students with disabilities mandatory in the following way:

- i) **All universities operating a system of accredited privately owned student accommodation must ensure that an adequate proportion of such accredited student housing is suitable for students with disabilities. Universities must be able to inform students with disabilities of the exact details of such accredited privately owned accommodation.**

- ii) **Every university providing student accommodation in university owned residences must as a very minimum, have one residence for males but, depending on its number of student residences, preferably two or even three, which cater for the needs of students with disabilities and similarly for residences catering for females. Universities operating mixed gender residences must ensure that at least one such residence is suitable for students with disabilities. Universities will be given a period of 5-7 years in which to comply with this requirement.**

Comment: As mentioned before the financial implications of remodelling existing residences and/or building new ones suitable for students with disabilities are likely to be very high and will certainly exceed the provisions made in some of the norms and standards listed in Annexure A. For example, depending on the kind of disability, a wheel chair bound student may well require a single room in excess of 9 sq m as stipulated in Sheet 1. Although challenging it would be expedient if an adapted set of room data for students with disabilities, particularly disabilities which require more space than is normal to ensure freedom of movement, could be included in a new Annexure B. Building plans for new residences would then have to comply with both sets of norms and standards in respect of room data.

Recommendation: Regarding the financing of university owned residences suitable for students with disabilities it is recommended that all universities providing student accommodation who do not yet meet the requirements for the provision of accommodation for students with disabilities as set out above, submit as part of requests for infrastructural funding, plans which are accompanied by proper cost estimates in accordance with a new set of augmented norms and standards for rooms in residences within the next 5-7 years for:

- i) **Remodelling some of their existing residences in order to ensure their suitability for housing students with disabilities; and**
- ii) **If required, building new residences suitable for students with disabilities.**

Requests of such a nature must receive preference in the awarding of infrastructural development funds for student accommodation for the next 5 to 7 years.

6. CONCLUSION

In conclusion HESA wishes to re-iterate its strong support for the introduction of a comprehensive student housing policy with associated norms and standards for building facilities and furnishings. HESA commits itself to playing as constructive role as possible in this respect in the interests of promoting student well-being and development in every respect, and particularly in relation to student accommodation.

HESA once again wishes to emphasise that the undoubted positive effects arising from the successful implementation of this policy will not materialise unless the proposals made on increased funding support for new student housing infrastructure, the upgrading of existing student housing infrastructure, and the maintenance of university owned student housing are accepted and included in the student housing policy.