



**Comments on the Draft Policy on Student Housing at  
Public Universities and the Minimum Norms and  
Standards Applicable**

**July 2013**

## **1. Introduction**

- 1.1 The Minister of Higher Education and Training has released for public comment a *Draft Policy on Student Housing at Public Universities and the Minimum Norms and Standards Applicable* in the Government Gazette, Notice No. 280, Government Gazette No 36361 of 11 April 2013.
- 1.2 The Council on Higher Education (CHE) welcomes the opportunity to comment on the Draft Policy in terms of section 3(1) of the Higher Education Act, 1997 (Act No. 101 of 1997), as amended. The Council would like to note that due to an administrative error the Draft Policy incorrectly indicates that the CHE was consulted prior to the publication of the Draft Policy.
- 1.3 The Council has considered the Draft Policy on Student Housing at Universities and the Minimum Norms and Standards Applicable. The Council's response is outlined below.

## **2. National Policy and the Role of Student Housing**

- 2.1 The Council welcomes the development of the Draft Policy on the housing of students in public universities. The Council agrees with the Report on the Ministerial Committee for the Review of the Provision of Student Housing at South African Universities (DHET: September 2011) that the development of national policy to address sub-standard student housing in universities where it occurs is long overdue. As the Report of the Ministerial Committee found, about a "quarter of all infrastructure, fixtures, fittings and dining hall facilities are assessed by the universities concerned to be in an unsatisfactory or poor condition" and furthermore, that "the conditions under which students are being housed in some university-leased buildings can only be described as squalid" (Ibid: xiv-xv).
- 2.2 The Council strongly endorses the view that "the accommodation of students is much more than merely the provisioning of beds... [but] is also about the establishment of living and learning and social communities" (Government Gazette: 4). As the Report of the Ministerial Committee states, universities must "make residences an integral part of the academic project and encourage and promote them to become sites of academic endeavour" (Op.cit: 142). In the Council's view, the role of student housing as an extension of the intellectual project of the university cannot be over-emphasised and should inform the manner in which a university approaches the management and structure of residences.
- 2.2 The Council notes that although the Report of the Ministerial Committee indicates that there is "preliminary evidence to suggest that being housed in a

safe, well-managed residence does advantage students, particularly those from poorer backgrounds”, it cautions that the “relationship between student housing and academic success“ is complex and is impacted on by a range of social, cultural and educational factors, which require further research.

2.2.1 In the Council’s view, in addition to the complexity of the relationship between student housing and academic success, a range of contextual factors also have to be considered in the development of student housing policy for public universities. This includes the recognition that:

- Higher education can be delivered in many modes, not all of which are predicated on the existence of on-site or near-site residential accommodation.
- Students may exercise choice with respect to their mode of learning and their accommodation, and that some may choose to be “day students” who organise their accommodation privately, either with their families or friends.
- The social and geographical location of a university is a determinant of the extent and type of student housing that may be required.

### **3. Guidelines vs Minimum Norms and Standards**

3.1 The need for a national student housing policy for public universities is long overdue. However, in the Council’s view, what is less clear is whether the national student housing policy should be translated into applicable Minimum Norms and Standards as specified in the Government Gazette.

3.2 The Council is of view that the applicable Minimum Norms and Standards as specified are inappropriate as they are too specific and detailed and may be unnecessarily prescriptive. As all new or refurbished public buildings must adhere to the National Building Regulations and national, regional and municipal Health and Safety legislation in any case, the need for additional specifications of the order of those presented is not clear. Furthermore, they appear to be based on one conception of what form a student residence might take, and a traditional conception at that, which presuppose a particular governance model and staffing levels for a residence that may not suit all environments such as house or apartment-based student villages, converted houses, student flats and so on. They also do not consider or accommodate changing technologies and design or the spatial context within which student housing is provided.

3.2.1 The short-comings with regard to the development of detailed specifications can be illustrated with reference (but not limited) to the following examples; (i)

the specification that each room should have a wall mounted heater, curtains and curtain rails ignores the alternatives such as central or solar heating and blinds instead of curtains. Similarly, the specification that the residences should be landscaped with a “flat lawned area min size for a volleyball court” (Spec Room No. 23), may not be possible or even appropriate for a university residence located in an urban metropolis.

- 3.3 The Council has similar concerns with regard to the governance of student housing. The Council accepts that there is a need to ensure that appropriate structures to govern student housing at universities are in place. However, their form, structure and composition should be determined by institutions based on institutional context and needs. In this respect, the underlying reason for the stipulation that a residence committee should be a committee of Council rather than a general university committee accountable to institutional management is not clear and has the potential to undermine institutional management structures and create inefficiencies and backlogs.
- 3.4 The provision that universities must accredit private student housing, while its intent is understood, presupposes that universities have enforceable jurisdiction over the private market. This may, if not approached in a flexible manner, lead to the unintended consequence that private housing provision, in an attempt to avoid bureaucracy, becomes less amenable to university oversight and may result in a greater shortage of student housing. This is not to suggest that the accreditation of private providers is not important but that it may not be possible to do so in line with the Minimum Norms and Standards as stipulated. For example, it is not clear how the draft policy and minimum norms and standards are applicable to single rooms let out in “houses occupied by the home owner”. The extent of application may imply that parents’ homes are also subject to this policy, which is both inappropriate and unenforceable. Similarly, for example, individually-let garden flats are unlikely to comply with all the specifications laid down in the regulations.
- 3.5 Finally, the Council is concerned with the appropriateness of the targets that the Draft Policy establishes for the percentage of residence places that should be made available to first year students both in principle and in practical terms.
  - 3.5.1 In terms of principle, the proposal is contrary to the principle of student choice, that is, that students may choose to be “day students” either because of costs or because of preference. The Council is aware of the concern that day students may be disadvantaged as they do not have access to on-campus infrastructure that would enable them to form learning communities in the same way as residence students. However, there are alternatives that institutions could consider (and indeed some are doing) such as student hubs

for day students, which provide a space on-campus for day students to meet, have meals and to participate in study groups and other activities.

- 3.5.2 In practical terms, it is not clear whether the target is realisable in the context in which student numbers are growing while funding is limited. In the absence of detailed modelling assessing the financial implications of the proposal, it should be treated with caution. In addition, the modelling notwithstanding, the setting of targets must be accompanied by the allocation of funds to enable universities to meet the targets.
- 3.6 The Council believes that instead of the applicable Minimum Norms and Standards the policy framework for student housing must include a set of national guidelines, which indicate what constitutes decent student housing along the lines of the minimum design standards in 4.2 of the Draft Policy but interpreted in a flexible manner taking into account institutional context and other relevant factors. It is in the translation of the minimum design standards into a specification manual in the Annexure that results in the level of detail and prescription, which in the Council's view is inappropriate.

#### **4. Conclusion**

- 4.1 The Council welcomes the development of the Draft Policy in general and supports the underlying purposes for which it was developed. The provision of appropriate student housing is an important supportive element of student success.
- 4.2 The Council is concerned, however, that the weight of the policy rests too heavily on building specifications and a traditional conception of student housing. In this regard, the Council does not support the inclusion of the applicable Minimum Norms and Standards in their current form.
- 4.3 The Council is of view that instead of the Minimum Norms and Standards, the the Draft Policy must provide a framework for ensuring that students are provided with decent housing based on a set of national guidelines, which should be flexibly applied by higher education institutions taking into account the institutional context and other relevant factors.
- 4.4 The Council believes that further research and modelling is required to determine the optimal number of places in student residences nationally taking into account the principle of student choice and institutional contextual factors, in particular, delivery modes, social and geographical location, affordability and sustainability.