Code of Practice
Self-Review Report 2025

Contents

Our commitment

Safety n Action is focussed on learners' success by combining the approach of listening, gaining feedback, and asking about what assistance students need, with our desire to continue to improve ourselves by providing supportive environment and promote overall wellbeing.

Supporting our learners is reflected in our company pillars and all staff are responsible for supporting learners.

Whanaungatanga binds all individuals within our organisation and affirms the value of collectively working together. It represents an abiding relationship.

Pukengatanga represents the knowledge and skills required to ensure the values, beliefs, needs and aspirations of the people we support and the people we employ.

Rangatiratanga represents the mana of the individual, that all of us have worth, need dignity and are unique.

Manaakitanga is seen through how we serve others. The organisation reflects this with aroha, hospitality, generosity, and mutual respect.

Kaitiakitanga represents preservation, guardianship, and enhancement of our work for the benefit of all.

1 Whanaungatanga	2 Pūkengatanga	3 Rangatiratanga	4 Manaakitanga	5 Kaitiakitanga

Our learner's feedback has proven to be effective in the following ways as we look to improve how we engage with learners, understand more about their experience with us and aim to provide them with exactly what they are after. Across all our courses we have achieved excellent results. We aim to continue these high standards with regular self-assessment, a drive for continuous improvement and constant monitoring and evaluation.

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.

Code Requirements	Safety n Action's Current Process	Compliance
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 – Outcomes sought, and processes required by this code; and	We have strategic plans and goals in place that aim to ensure the support of and safety and wellbeing of learners within our organisation. Weekly SLT meeting reviews learner feedback.	Implemented

Contribute to an education system that honours Te Tiriti o Waitangi and supports Māori–Crown relations.	We have reviewed our Māori strategy and have developed a list of Māori Responsiveness Actions. This includes ongoing Staff Professional Development on the Treaty and tikanga Māori sessions.	Implemented
Clause 7 (2). Providers must -regularly review their learner wellbeing and safety strategic goals and strategic plans as described in subclause (1); and	Continue to use evaluations in our monthly packs and annual reviews to show evidence the strategic goals are being implemented or maintained.	Implemented
make amendments to their learner wellbeing and safety strategic goals and strategic plans within a reasonable timeframe following the review.	Annual review and adjustments to the goals if necessary.	Implemented
Clause 7 (3). Providers must- work proactively with learners and stakeholders (and document this work) when – developing their learner wellbeing and safety strategic goals and strategic plans described in subclause (1); and	We have good data collection from evaluations both from learner's when on course and the 6-week post course evaluations with clients. Constant feedback from the customer service and sales teams also helps us develop plans around the learners needs.	Implemented
reviewing their learner wellbeing and safety strategic goals and strategic plans described in subclause (2).		Implemented
Process 2: Self review of learner wellbeing and safety practices **Clause 8 (1).** Providers must use strategic goals and strategic plans 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.	Annually review strategies and practices for Māori, Pasifika, Disabilities, and eLearning Yearly review	Implemented
Clause 8 (2). Providers must review their learner wellbeing and safety practices using – input from diverse learners and other stakeholders; and	Student Evaluations and Summaries Post course weekly client evaluation Trainer feedback Customer service and sales feedback Incoming Disability Action Plan	Implemented

relevant quantitative and qualitative data (including from learner complaints) that is, as far as practicable, and consistent with the provider's obligations under current privacy legislation, disaggregated by diverse learner groups.	Student Evaluations and Summaries 6-week Client evaluation Trainer Conversations Complaints Register	Implemented
Clause 8 (3). Providers must, in a timely manner, following a review described in subclauses (1) and (2) take appropriate action to address any deficiencies in learner wellbeing and safety practices.	SLT weekly Action Plans	Implemented
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) – strategic goals and strategic plans for supporting the wellbeing and safety of learners described in clause 7(1); and	Accessible on SnA Website Student resources QMS	Implemented
revisions to strategic goals and strategic plans for supporting the wellbeing and safety of learners described in clause 7(2); and	Review student materials and websites annually or when necessary.	Implemented
self-review reports on the quality of their learner wellbeing and safety practices described in clause 8.	Complete self-review reports annually.	Implemented
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 appropriate social, medical, and mental health services.	Response and processes around where students can connect to appropriate services. Referrals to Manager. Support services in lunchrooms Trainer Inductions Complaints Process QMS Policies	Implemented

Clause 10 (2). Providers must provide staff with ongoing training and resources tailored to their roles in the organisation, in relation to – Te Tiriti o Waitangi; and	Online PD Modules available for staff to upskill Cultural Awareness Workshops. Moderation awareness training	Implemented
the provider's obligations under this code; and	Staff upskilling NZQA Code Videos	Implemented
understanding the welfare issues of diverse learner groups and appropriate cultural competencies; and	Staff induction and ongoing PD Departmental meetings Surveys categorises different learner's background.	Implemented
identifying and timely reporting of incidents of racism, discrimination, and bullying; and	QMS Policies Staff Training Staff Inductions	Implemented
physical and sexual violence prevention and response, including how to support a culture of disclosure and reporting; and	QMS Policies Protected Disclosure Policy Staff Training Staff Inductions	Implemented
privacy and safe handling of personal information; and	Privacy Policy Handling of student information	Implemented
referral pathways (including to local service providers) and escalation procedures; and	Training manager and RTM contact	Implemented
identifying and timely reporting of incidents and concerning behaviours; and	Trainer Feedback Incidents and near miss Reports Complaint's process	Implemented
wellbeing and safety awareness and promotion topics including –safe health and mental health literacy and support; and	Trainers upskilled in psychological first aid training Support services identified and promoted in student lunchrooms EAP service provided	Implemented
Suicide and self-harm awareness; and	Open door policy for staff and regular check ins, resources for students Psychological first aid training provided	Implemented+
promoting drug and alcohol awareness; and	Provide access to resources for staff and students Psychological first aid training provided.	Implemented

promoting healthy lifestyles for learners.	Focus is on Health and Safety within all courses, that lifestyle is expected to flow into their personal life	Implemented
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 – making these plans readily available to learners when they begin their study; and	Learners are taught at venues that have policies and procedures in place. Learners are given an induction on safety procedures for each venue. During practical activities learners are briefed and supervised	Implemented
ensuring that there are suitably prepared staff members available to be contacted by a learner, or learners, in the event of an emergency; and	Trainers are experts in emergency situations. Sites have first aid responders.	Implemented
co-ordinating decision-making across the provider when responding to emergencies; and	Health and safety policies Fire drills QMS Policies Refer them to Civil Defence sites for their regions.	Implemented
disseminating timely, accurate, consistent, and accessible information to learners and staff during emergencies; and	Health and safety policies Q Refer them to Civil Defence sites for their regions. MS Policies	Implemented
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	Health and Safety Policies Qualified and Experienced Trainers Trainer Induction Process	Implemented
keeping a regularly updated critical incident and emergencies procedures manual which guides staff involved in emergency situations which contains the immediate and ongoing actions required including – engaging with relevant government agencies (e.g. the New Zealand Police, Ministry of Health, New Zealand Qualifications Authority, Tertiary Education Commission); and	QMS documents held in every branch Health and Safety policies Assembly point signage Fire drills	Implemented

| the follow-up de-briefing processes to support all learners and relevant staff; and | Provide counselling or support service contact
EAP Service available | Implemented |
| recording critical incidents and emergencies and reporting these back annually (at an aggregate level and, as far as practicable, disaggregated by diverse learner groups) to provider management, learners, other stakeholders, and the code administrator. | Recording under current Health and Safety procedures and policies.
Relayed to the SLT
Relayed to Group | Implemented |

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.

Code Requirements	Safety n Actions Current Process	Compliance
Process 2: Learner complaints Clause 13. Providers must work with learners to effectively respond to, and process complaints (including appropriate engagement with support people); and	Leaner feedback documented and shared with SLT weekly, Resolution of the compliant is recorded.	Implemented
inform learners on how the complaint will be handled and how it is progressing; and	Complaint Policy	Implemented
consider the issues from a cultural perspective; and	As Above	Implemented

Include the provision of culturally responsive approaches that consider traditional processes for raising and resolving issues (for example, restorative justice); and	Complaints Policy	Implemented
Comply with the principles of natural justice; and	Part of Complaints Policy	Implemented
Ensure that the complaints process is easily accessible to learners (and those supporting them), including having practices for – 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	Student Documents Website	Implemented
addressing barriers to accessing this information (for example, due to language, lack of internet access, fear of reprisal, desire for anonymity), such as providing alternative ways of raising a complaint; and	Trainers are available to assist or referred to the National Training Director. Process in the QMS policy	Implemented
providing an opportunity for a support person or people (who can be chosen by the learner) to guide and support the learner through the complaints process; and		Implemented
providing the opportunity for groups of learners to make joint complaints; and		
record complaints; and		Implemented
report annually to provider management, learners, other stakeholders, and the code administrator (including on provider websites where available) on – the number and nature of complaints made and their outcomes (at an aggregate level and, as far as practicable, disaggregated by diverse learner groups); and	Nature of complaints and outcomes are registered and kept.	Implemented
learner experience with the complaints process and the outcome of their complaint; and	Resolution of the compliant is recorded and who it was resolved by	Implemented
promote and publicise complaint and dispute resolution processes available to learners including, but not limited to, the provider's internal complaints process, the education quality assurance agency complaints process, the code	QMS Policies Website	

administrator's complaints process, and the Dispute Resolution Schemes; and		
advise learners, on the next steps available to them if the provider does not accept the complaint (or the learner or provider perceives that the provider does not have the 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 – 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		<mark>Implemented</mark>
how to make a complaint to the code administrator if a learner believes that the provider is failing to meet the outcomes or requirements of this code.		<mark>Implemented</mark>
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.	N/A	

Outcome 3:

Safe, inclusive, supportive, and accessible physical and digital learning environments

Providers must foster learning environments that are safe and designed to support positive learning experiences of diverse learner groups.

Process 1: Safe and inclusive communities Clause 16 (1). Providers must have practices for – reducing harm to learners resulting from discrimination, racism (including systemic racism), bullying, harassment and abuse; and	Student Code of Conduct Policy Staff Code of Conduct Policy Classroom etiquette – safe place to learn, treat with respect. Harassment, Bullying and Discrimination Policy	Implemented
working with learners and staff to recognise and respond effectively to discrimination racism (including systemic racism), bullying, harassment and abuse; and	QMS Policies available at branches for review Staff inductions	Implemented
promoting an inclusive culture across the learning environment; and	Te Tiriti o Waitangi principles and tikanga Maori Trainer classroom management evidenced by equitable completion rates	Implemented
upholding the cultural needs and aspirations of all groups throughout the learning environment; and	See above	
providing all learners with information – that supports understanding, acceptance, and connection with all learners, and collective responsibility for an inclusive learning environment; and	Students can connect with the PTE through Customer Service, Sales or our website. All 3 processes provide understanding and acceptance and provide for an inclusive experience	Implemented

about the cultural, spiritual, and community supports available to them; and	Community supports are displayed in shared student areas	Implemented
providing learners with accessible learning environments where they can connect with others, build relationships, support each other, and welcome their friends, families, and whānau.	Facebook pages and other social media sources All premises have shared student spaces provided for interactions	Implemented
Process 2: Supporting learner participation and engagement Clause 17 (1). Providers must provide learners with opportunities to – actively participate and share their views safely in their learning environment; and	Trainer/Learner discussions Classroom Q and A's Student Evaluations	Implemented
connect, build relationships and develop social, spiritual and cultural networks; and	Facebook pages and other social media sources.	Implemented
use te reo and tikanga Māori to support Māori learners' connection to identity and culture.	Staff training in tikanga Māori Te Reo Assessments available upon request	Implemented
Clause 17 (2). Providers must have practices for supporting learners through their studies, including – enabling learners to prepare and adjust for tertiary study, and	Terms and Conditions are displayed on the website Customer Service and Sales teams provide all information and pastoral care to help prepare for any courses Friendly and Welcoming Trainers and staff	Implemented
maintaining appropriate oversight of learner achievement and engagement; and	Qualified Trainers Moderation Team Moderation Process Moderation Committee	Implemented
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	Customer Service and Sales teams provide opportunities to engage about any issues Trainer/student discussions Online chat service Contact Us Form 24 hour call service	Implemented

providing learners with advice on pathways for further study and career development, where appropriate	Website Sales and Customer Service Teams Trainer feedback NZ Associations relationships	Implemented
Process 3: Physical and digital spaces and facilities **Clause 18.** Providers must have practices for– providing healthy and safe learning environments; and	Custom built facilities Practical tasks conducted under real life expectations. Equipment fit for purpose for tasks undertaken. Robust Health and Safety briefings Qualified trainers As an online provider we advise students on a healthy workspace to support their learning. Student Resources Study Tips, Computer Ergonomics, Taking Breaks	
identifying and, where possible, removing access barriers to provider facilities and services; and	Trainers have experience in adjusting practical tasks to incorporate disabilities when learning. Disabled parking available Ramps and lifts also available	Implemented
involving learners in the design of physical and digital environments when making improvements; and	N/A due to specific health and safety requirements	
engaging with Māori and involving Māori in the design of physical and digital environments where appropriate.	N/A due to specific health and safety requirements	

Gap Analysis on outcome 4:
Learners are safe and well.

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

Process 1: Information for learners about assistance to meet their basic needs. **Clause 20 (1).** 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 – access services through the provider or through community and public services that will help them maintain reasonable standards of material wellbeing and safety; and		<mark>Ongoing</mark>
access suitable accommodation and understand their rights and obligations as a tenant in New Zealand; and		N/A
maintain a healthy lifestyle.	Embedded in all courses as health and safety	<mark>Implemented</mark>
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.	NA	NA
Process 2: Promoting physical and mental health awareness **Clause 21.** Providers must have practices for – providing opportunities and experiences for learners that improve their physical and mental health and wellbeing and safety; and	Embedded in Safety n Action content. Examples like lifting properly and use of PPE gear. Practical tasks provide confidence and self-worth. Trainers pass on knowledge from psychological first aid	<mark>Implemented</mark>
promoting awareness of practices that support good physical and mental health that are credible and relevant to learners; and	As above	

supporting learners' connection to their language, identity, and culture; and	Te Tiriti o Waitangi principles Te Reo Māori assessments Inclusive classroom practice	Implemented
providing accurate, timely information and advice to learners about – how they can access medical and mental health services through the provider or through community and public services, including culturally responsive services; and	Through community and public services which are displayed. First aid on site provision	Implemented
how they can report health and safety concerns they have for their peers; and	Trainer/student discussions Included in Assessment information Customer Service Student Evaluations	Implemented
how to respond to an emergency and engage with relevant government agencies; and	QMS Policies Trainer classroom inductions	Implemented

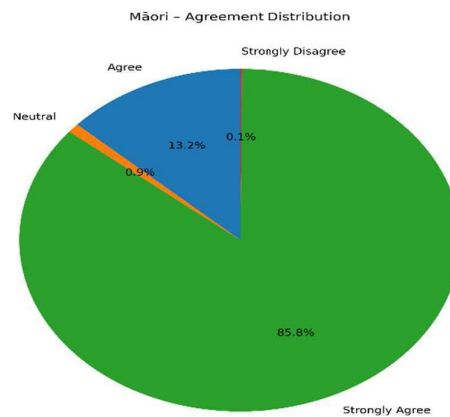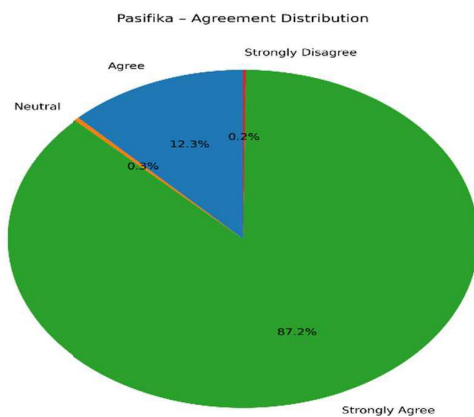|		
how they can make positive choices that enhance their wellbeing.	Embedded in Safety n Action content. Mental Health – 5 Ways to Wellbeing display	Implemented
Process 3: Proactive monitoring and responsive wellbeing and safety practices. **Clause 22 (1).** Providers must have practices for – requesting that domestic learners 18 years and over provide a name and up-to-date contact details of a nominated person; and		Implemented
describing the circumstances in which the nominated person referred to in paragraph (a) should be contacted in relation to their wellbeing and safety; and		Ongoing

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		
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	Ability to disclose at the enrolment process with customer service, sales or online. Info provided to trainer to assist. Trainer/Student discussions	Implemented
providing opportunities for learners to raise concerns about themselves or others in confidence; and	Trainer/Student discussions Through the enrolment process	Implemented
identifying learners at risk and having clear and appropriate pathways for assisting them to access services when they need it; and	Trainer/Student discussions Customer Service/Sales interactions with students or the bookers, then providing the required service or info to the trainer.	Implemented
identifying learners who are at risk of harming others, and having clear and appropriate pathways for assisting them to access services when they need it; and	Trainer/Student discussions Liaise with Trainers Referral to services or Police,	Implemented
protecting learners and staff who experience harm from other learners and/or staff, including sexual assault; and	Staff and Student Code of Conduct	Implemented
making arrangements with disabled learners or those affected by health and wellbeing difficulties to accommodate learning needs, including for study off-campus; and	Customer service/Sales to ensure those with disabilities are accommodated for at delivery site Part of our booking, forwarded to Trainer to ensure student gets the support they require.	Implemented
responding to disruptive and threatening behaviour in a way that is sensitive to a learner's situation; and	Student code of conduct Student discipline and appeals policy Harassment, Bullying and Discrimination policy	Implemented

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.	Liaise with Trainers in first instance provide extensions and support learning pathway. Customer service/Sales to attempt to rebook or provide further opportunities. Offer online.	Implemented
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.	Enrolment data collection. School database	Implemented
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.	Enrolment process to clearly state that any student under the age of 18 where there are concerns will have their NOK contacted (could be a tick box that they understand and agree)	Implemented
Clause 22 (4). Providers must maintain a record of reported risks, including any concerns raised in relation to the effective administration of this code.	SLT Actions	Implemented

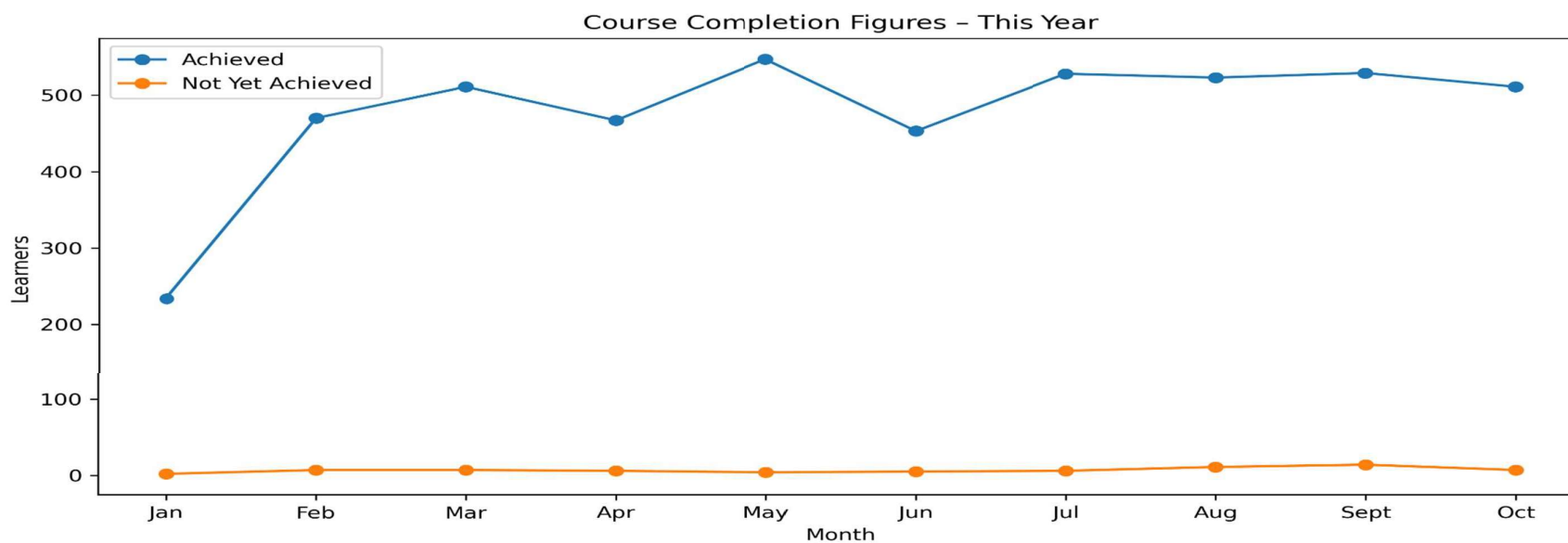# Input from diverse learners' population.

Our Learner's Voice

Ensuring wellbeing and learner success remains a key focus area for us, below is a data which proves that of our learners feel supported and guided throughout our course. Below is the breakdown of data based on feedback received on questionnaire *"I feel supported and guided throughout the course"*

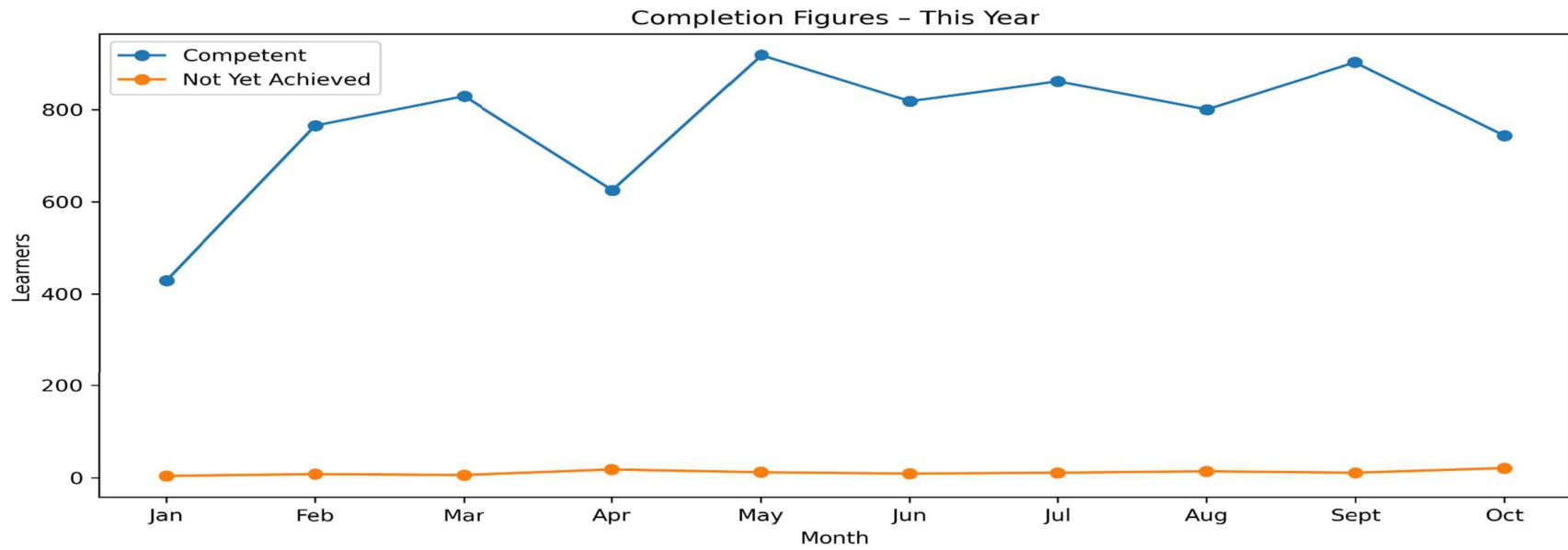Pasifika – Agreement Distribution

Māori – Agreement Distribution

Learner's success: Maori and Pasifika achievements

We are pleased to see that there is an equality of results across the demographics based on our review, our average parity for Maori learners is 1.01% and Pasifika learners is 1.01% based on 2024-2025.

Course Completion Figures – This Year

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Completion Figures – This Year

Learner Complaints

We value learner perspectives and promote different opportunities for learners' voice. This includes learners' feedback immediately after the course and another feedback after 6 weeks of course completion. In considering what constitutes a formal complaint we have been careful to differentiate this from those occasions when a learner is simply providing feedback.

A complaint can relate to any problem or grievance a learner may have which involves their experience at *Safety n Action*. In such instances our aim is to support the learner and to aim at a successful resolution of the matter raised. A problem or grievance is recorded as a formal complaint if it escalates to our Senior Leadership Team.

	Formal Complaints		
Year	Number	Nature	Status
2024	0	NA	NA
2025[1]	0	N/A	N/A

The range of opportunities learners must express voice both formally and informally likely supports a free flow of feedback and mutual communication that minimises escalation of any concerns. We continue to promote learner voice while also reminding learners of our complaints process.

Critical Incidents

The wellbeing of our people is of great importance, and we all play a role ensuring our facilities and environment is safe. Despite the best efforts of any organisation critical incidents can occur and we understand that it is essential that we have in place procedures to manage such occurrences.

We have drawn on the Health and Safety at Work Act 2015 to define a critical incident. A critical incident is a notifiable event and includes:

- If someone dies because of our activities.
- If someone is admitted to hospital for immediate treatment because of a serious injury or illness resulting from our activities.
- If someone's health and safety is exposed to a serious and immediate risk because of an unplanned or uncontrolled incident e.g., the collapse of a building, the escape of gas, an explosion.

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[1] Formal complaints as of October 2025

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- Over the course of 2025 and so far in 2026 we have had no critical incidents. While our onsite activities pose minimal risk, we are committed to providing a safe and secure environment for our learners. On our sites we look to ensure not only the physical safety of our learners, but we also prioritise their mental health and wellbeing.

2025-2026 Action Plan for Continuous Improvement

Based on our self-review the following action plan has been established.

Objective	Actions and plan of implementation	Completion	Responsibility
Outcome 1: A learner wellbeing and safety system	Code of Practice Strategic Plan to be reviewed and shared with staff and students.	November 2025	SLT
	Increased learner and stakeholder feedback to be used when setting future strategic goals.	November 2025	SLT
	Quantitative and qualitative data needs to be split into diverse learner groups to better review the student evaluations	November 2025	Customer Service
	Information on strategic goals to be shared with learners, staff, and the public on our website	November 2025	Sales and Marketing
	Staff professional development for the Code of Practice- Treaty of Waitangi workshops, biculturalism modules, Psychological 1st aid training, knowledge of the code and relevant QMS policies to be targeted for upskill	Review completed by January 2026 (Training ongoing)	SLT

| Outcome 2:
Learner voice | Additional diverse learners to be engaged particularly for the incoming Disability Action Plan | January 2026 | SLT |
| | Complaints Policy review and disputes resolution checked on. Complaints Policy available in Te Reo Māori if requested. | November 2025 | SLT |

| Outcome 3:
Safe, inclusive, supportive, and accessible physical and digital learning environments. | New "More Support?" poster to include a wider array of services, community, and cultural connections such (the essential material requirements to support wellbeing and safety including housing, food, and clothing), | November 2025 | Sales and Marketing |

| Outcome 4:
Learners are safe and well. | Review of enrolment data to include information around over 18 contact person and the rules around engaging with that contact person | November 2025 | Customer Service |