

## RETIREMENT VILLAGES COMPLAINTS AND FEEDBACK POLICY

|                           |                     |                              |                     |
|---------------------------|---------------------|------------------------------|---------------------|
| <b>Policy category</b>    | Resident Management | <b>Group Application</b>     | Retirement Villages |
| <b>Drafted by</b>         | PM - Ops            | <b>Version</b>               | V2.0                |
| <b>Delegated updates</b>  | COO                 | <b>Last approved</b>         | September 2023      |
| <b>Responsible person</b> | CEO                 | <b>Scheduled review date</b> | September 2026      |

### Purpose

The purpose of this policy is to ensure Brisbane Housing Company Limited and each of its related entities (each **BHC**):

- Has a consistent, systematic approach to managing and monitoring complaints and feedback in relation to its retirement living services; and
- Handles complaints and disputes as required under the provisions of the Queensland *Retirement Villages Act 1999 (RV Act)*, the Retirement Living Code of Conduct and the residence contract (the **Resident's Lease**).

### Application

This policy is applicable to:

- All relevant BHC staff;
- All BHC directors;
- All prospective and existing Residents and their representatives (i.e. family members or advocates) within BHC's Retirement Villages Portfolio;
- All suppliers, independent contractors, associates and partners (**relevant stakeholders**); and
- Visitors and members of the general public.

### Principles

BHC encourages a positive approach to complaints handling and sees it as an opportunity for learning and continuous improvement.

Equally, BHC welcomes positive feedback that compliments staff on the way they deliver a service as it can be used to promote excellence within the organisation.

BHC will maintain a Complaints and Feedback Management System that is resident-focused and provides for continual review and monitoring.

All complaints will be addressed in a prompt, equitable and objective manner based on the principles of cooperation, respect, accessibility, open disclosure (where appropriate) and impartiality.

BHC will act and make decisions in a way that is compatible with human rights.

### Roles and Responsibilities

| Role   | Responsibility  |
|--|---|
| <b>Directors and Chief Executive Officer (CEO)</b> | The directors and CEO have an obligation to: <ul style="list-style-type: none"> <li>• Ensure BHC's complaints and feedback management processes are fair, consistent and transparent; and</li> <li>• Monitor the implementation, outcomes and review of this policy.</li> </ul> |

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| Role                                  | Responsibility   |
|---------------------------------------|--|
| <b>Chief Operations Officer (COO)</b> | <p>The COO has an obligation to:</p> <ul style="list-style-type: none"> <li>• Provide support and guidance to the Village Manager in relation to managing complaints and feedback;</li> <li>• Receive and manage complaints that have been escalated or appealed in accordance with this policy (including any complaints in relation to the Village Manager);</li> <li>• Oversee the collection and analysis of complaints and feedback data and identify opportunities for service improvements;</li> <li>• Provide regular reports to the Tenancy Management Committee on issues arising from complaints; and</li> <li>• Administer this policy and provide direction and clarification on its interpretation and application.</li> <li>• Monitor the implementation, outcomes and review of this policy.</li> </ul>  |
| <b>Village Manager</b>                | <p>The Village Manager has an obligation to:</p> <ul style="list-style-type: none"> <li>• Administer this policy and provide direction and clarification on its interpretation and application;</li> <li>• Assist Residents with their queries, requests or concerns regarding their rights and responsibilities within the Village (wherever possible);</li> <li>• Receive and manage complaints and feedback in accordance with this policy;</li> <li>• Monitor the collection and analysis of complaints and feedback data and in consultation with the COO identify opportunities for service improvements;</li> <li>• Where appropriate, bring complaints and feedback to the attention of and seek advice from the COO in a timely way;</li> <li>• Maintain confidential records related to complaints and feedback; and</li> <li>• Ensure complaints and feedback are appropriately recorded in the Resident Database and/or Continuous Improvement and Feedback Register.</li> </ul> |
| <b>Directors and Staff</b>            | <p>All directors and staff have a duty to:</p> <ul style="list-style-type: none"> <li>• Promote a culture that values feedback and is committed to effective resolution and continuous improvement;</li> <li>• Make decisions and take actions that are fair, transparent and compatible with human rights; and</li> <li>• Ensure all relevant regulatory, safety and contractual requirements are met.</li> </ul>   |

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### Definitions

In this policy, the following words have the following meanings:

A **complaint** is an expression of dissatisfaction made to or about BHC about a specific aspect of its services, an interaction, a decision or handling of a complaint where a response is sought, reasonably expected or legally required.

A **compliment** is an expression of praise, encouragement or gratitude about an interaction, service or decision.

**Feedback** may consist of positive or negative opinion, comment/suggestion or expression of interest/concern made directly or indirectly by an individual where a response is not explicitly or implicitly expected or legally required.

A **Resident** of a retirement village is a person who has a right to reside in the Village and a right to receive one or more services in relation to the Village under the Resident's Lease.

The **Resident's Lease** is a written contract about residence in a Village entered into between a Resident and the Operator.

**Unreasonable Complainant Conduct** is any conduct by a current or former complainant which because of its nature or frequency, raises substantial health, safety, resource or equity issues for the parties to the complaint. For the purposes of this policy, unreasonable conduct includes (but is not limited to) the following:

- Threatening harm or violence towards workers or third parties;
- Engaging in aggressive or verbally abusive conduct towards staff, including making derogatory, racist or demeaning remarks or sending threatening correspondence;
- Persistently calling, writing to and/or emailing BHC and/or making complaints about matters that have already been dealt with by BHC; and
- Making unwarranted demands to have matters dealt with in a particular way.

### Policy

BHC recognises that errors, misunderstandings, dissatisfaction and unexpected problems occur in all systems and services. Complaints may occur when a complainant feels BHC's decisions, behaviours or actions interfere with their rights or are unreasonable and inconsistent with the policies of BHC.

As part of normal operations, it is expected that the Village Manager will work to resolve these on a case-by-case basis in accordance with the RV Standard Operating Procedure (**SOP**) Grievances/Issues/Concerns.

This policy is made available on the Arbor Sherwood website at [www.arborsherwood.com.au](http://www.arborsherwood.com.au) and the BHC website at [www.bhcl.com.au/contact-us/feedback/](http://www.bhcl.com.au/contact-us/feedback/).

### 1. Complaints Covered by this Policy

Types of complaints covered by this policy include:

- Service issues such as accessibility and quality of services;

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- Competence or conduct of BHC staff and relevant stakeholders (including allegations of suspected fraud, misconduct or illegal activity). Note: if an individual fears reporting the matter may result in repercussions, they may use the confidential or whistleblowing\* reporting channels (refer to the BHC Whistleblower Policy). \* *This channel is only open to eligible disclosers*;
- BHC actions or decisions that directly impact a Resident's experience or are not properly explained;
- Privacy and confidentiality matters;
- Inaction or unexplained delays in responding to requests or providing services; and
- Disagreement with or inconsistent application of BHC policy or procedure.

### 2. Complaints not Covered by this Policy

This policy does not cover the following:

- Complaints about suspected illegal or criminal activity – these should be reported to the Queensland Police Service (**QPS**). Allegations involving BHC staff or relevant stakeholders are an exception and should be reported to both QPS and BHC;
- Complaints about dog barking or dangerous dogs outside of the Retirement Village. These should be reported to the respective local council (please note: internal complaints about dog behaviour are covered in the Retirement Villages Pets Policy);
- Complaints about violent or threatening behaviour – these should be reported to QPS (phone 000 if an emergency);
- Disputes between Residents;
- Complaints between a Resident and an external contractor not engaged by BHC;
- Anti-social behaviour investigations, except where there is a perceived deficiency in BHC's management of the anti-social behaviour;
- Internal staff or management issues which are addressed through the BHC Work Related Grievances and Concerns Policy; and
- Matters that have already been escalated to another forum such as a Court or the Queensland Civil and Administrative Tribunal (**QCAT**).

### 3. Right of complainants

BHC affirms the right of complainants to make complaints. All complaints will be seriously considered, valued and addressed through a process that is thorough, unbiased, systematic, fair and accessible to all.

BHC may consider providing assistance to enable complainants to make a complaint. This may include arranging an appropriate service provider or interpreter if needed. Where a complainant is unable to submit a complaint in writing, BHC supports lodgement to be made by a representative.

### 4. Anonymous Complaints

Anonymous complaints will be accepted and investigated where there is enough information provided. Please note: insufficient information may limit BHC's ability to investigate or advise the complainant of an outcome.

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### 5. Privacy and Confidentiality

BHC will maintain strict confidentiality about any discussions, matter, content and process relating to a complaint. BHC complies with the Australian Privacy Principles as outlined in BHC's Privacy and Confidentiality Policy.

Information relating to complaints is securely stored and only accessible by those staff members whose duties require them to deal with the information (refer to BHC Privacy and Information Management Procedure).

### 6. Complaints process

#### How to make a complaint

BHC encourages complainants to first attempt to resolve any issues directly with the relevant BHC staff member, which in most cases will be the Village Manager.

Further specific information relating to Residents can be found in the Complaints Section of the Resident Handbook.

If this process does not resolve the issue, then a formal complaint can be lodged in writing via any of the following options:

|             |  |
|-------------|--|
| Online Form | Available at <a href="http://www.arborsherwood.com.au">www.arborsherwood.com.au</a> and <a href="http://www.bhcl.com.au">www.bhcl.com.au</a> |
| Post        | Attention: Feedback<br>GPO BOX 544<br>Brisbane QLD 4001  |
| Email       | <a href="mailto:feedback@bhcl.com.au">feedback@bhcl.com.au</a>   |
| Telephone   | (07) 3307 3000 – member of staff to direct complainant through options for submitting in writing   |

#### What happens when a formal complaint is received?

- BHC logs all formal complaints in the Continuous Improvement and Feedback Register.
- BHC will acknowledge the complaint within three (3) business days of receipt.
- Acknowledgement will include an advised date of response. Complaints will be resolved as quickly as possible. BHC's target timeframe for resolution is 15 business days, but in most cases will take less time than this. For complex cases, additional time may be required and the complainant will be informed of the expected timeframe for resolution and any reasons for the delay.
- An investigation will be conducted by an appropriate manager. To maintain impartiality and fairness, BHC will ensure the manager appointed to investigate the complaint is not the subject of the complaint.
- Complainants will be notified in writing of the outcome of their formal complaint by BHC and reasons for decisions relating to them where appropriate.
- Responses will include details of what to do next if the complainant is dissatisfied with the outcome and any rights to review a determination (if applicable).

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### Review of a Complaint

If a complainant is dissatisfied with the decision, a review may be requested. A review of a complaint will be undertaken by someone who was not the original decision maker and is a senior member of staff.

If a complainant is dissatisfied with the review outcome, the matter can be pursued externally (refer below).

### External Complaints

At any time a complainant can initiate an external review or seek independent mediation through one or more of the channels outlined below:

- Retirement Living Code of Conduct through the Retirement Living Council (Code Administrator or the Code Review Panel);
- Queensland Ombudsman; and/or
- QCAT.

If external complaints are pursued, BHC will to the extent possible, work to resolve any issues through these avenues.

### Unreasonable conduct by a complainant

The majority of people who are dissatisfied with a service or an outcome interact with BHC reasonably and responsibly, even when they are experiencing high levels of distress, frustration or anger about their complaint. However, should any complainant behave unreasonably or in an abusive, aggressive or threatening manner, the matter will be escalated to a Senior Manager for further support.

BHC may respond to unreasonable conduct by limiting or adapting the ways it interacts with and/or deliver services to such a complainant by restricting:

- **Who they have contact with** – e.g. limiting a complainant to a sole contact person within BHC;
- **What they can discuss** – e.g. applying boundaries to what can and can't be discussed with BHC staff;
- **When they may have contact** – e.g. limiting a complainant's contact with BHC staff to a particular time, day, or length of time, or curbing the frequency of their contact; and/or
- **How they may make contact** – e.g. limiting or modifying the form of contact that the complainant has with BHC. This can include modifying or limiting telephone and written communications, prohibiting access to BHC offices, or stipulating contact through a support representative only.

Note: all complaints are to be considered on their merits. Unreasonable complainant conduct does not mean that the issues raised will be invalid or lacking substance.

### Compliments Process

BHC welcomes positive feedback and compliments and will follow the below process to ensure the recipient identified receives the appropriate recognition:

- All compliments will be registered in the Continuous Improvement and Feedback Register;
- Compliments will be acknowledged in writing; and
- Compliments will be forwarded to the relevant member of staff and their supervising manager for appropriate recognition.



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### Feedback Process

Not all feedback requires a response. Any feedback that requires investigation and a response will be recorded in the Resident Database and/or Continuous Improvement and Feedback Register. Feedback will be considered and used to inform BHC's continuous improvement process.

### Continuous Improvement

Some complaints and feedback may result in required change to practices and policies. When this occurs, the Village Manager will initiate the proposed change(s) in consultation with the COO and other relevant staff.

### Reporting of Complaints

BHC will regularly review information from complaints and reviews to identify ways in which its services and their delivery can be improved. It will regularly report to its Board through the delegated Tenancy Management Committee on the numbers, types and outcomes of complaints and reviews.

### **Review**

The Retirement Villages Complaints and Feedback Policy and its related documents are reviewed periodically.

### **Related Documents, Policies & Procedures**

- Anti-Discrimination Policy
- Australian Retirement Village Accreditation Scheme Standards (ARVAS)
- Child and Young Person Protection Policy
- Code of Conduct
- Complaints or Dispute Resolution Flowchart
- Continuous Improvement and Feedback Register
- Privacy and Confidentiality Policy
- Privacy and Information Management Procedure
- Procedure Manual for Retirement Living
- Resident Handbook
- Resident(s) Lease
- Retirement Living Code of Conduct
- RV SOP Grievances/Issues/Concerns
- Whistleblowing Policy

### **DOCUMENT CHANGE HISTORY**

| Version Number | Approved by | Date           | Description of Change  |
|----------------|-------------|----------------|--|
| 1.0            | Board       | September 2020 | New policy for Retirement Villages.  |
| 2.0            | CEO         | September 2023 | Significant update. Added roles and responsibilities, expanded definitions and principles and clarified policy coverage. |