

Complaint Handling Process

Section 1 – Purpose of this policy

The purpose of this policy is to provide a framework in which Aveo Group will process complaints received from its residents residing in its retirement communities.

Section 2 – Objectives of this policy

The objectives of this policy are to:

1. Encourage residents to provide feedback in respect of the services they receive;
2. Ensure complaints are processed by Aveo Group in a way which is prompt, accessible, transparent and effective and is also consistent with best practice standards;
3. Seek to resolve complaints where possible in a way to ensure resident satisfaction with Aveo Group, including confidence in Aveo Group's complaint handling procedures as outlined in this policy;
4. Provide support to Community Managers in acknowledging, investigating and responding to complaints; and
5. Ensure Aveo complies with the Retirement Living Code of Conduct, Aveo's values and all laws in respect of the processing of complaints.

Section 3 - Scope of this policy

This policy relates to complaints raised by residents in Aveo Group's retirement communities, other than the following complaints:

1. Disputes between residents. In this regard, we refer residents to the Internal Dispute Resolution Process;
2. Complaints where the subject matter of the complaint does not relate to a specific resident. Common examples include complaints from an Aveo Group supplier or complaints from a neighbour on property adjoining an Aveo Group community which does not involve a specific resident or group of residents;
3. Complaints in respect of Aveo Group's provision of care or other matters which are within the ambit of the Aged Care Act 1997 (Cth). Common examples include complaints in respect of residential aged care in a residential aged care facility or complaints in respect of care delivered under a home care package;
4. Complaints in respect of Aveo Group's Privacy Policy and other matters relevant to the Privacy Act 1988 (Cth);
5. Complaints raised by a legal practitioner acting on behalf of a resident;
6. Formal disputes which are subject to proceedings before a Tribunal or Court; or
7. Complaints raised by Aveo Group employees.

Nothing in this policy is designed to circumvent or derogate from any legal rights a resident or Aveo Group may have. Please refer to Section 7 – Other Information for details regarding where a resident may obtain further information or escalate their complaints to third parties.

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Section 4 - A summary of the complaint process and the role of relevant Aveo Group management

Complaint process

The steps below outline Aveo Group's complaint process.

Step 1 Making the complaint	<p>Residents can make a verbal or written complaint to the Community Manager.</p> <p>For verbal complaints, the Community Manager or other relevant Aveo Group representative will write a summary of the complaint and any other detail provided by resident. The resident may request a copy of this summary and correct any matters relevant to their complaint if they wish to do so.</p> <p>Where possible, Aveo Group will also ask the resident how they would like Aveo Group to address the complaint, either through a meeting with the Community Manager or other relevant Aveo Group manager, in writing or both.</p>
Step 2 Confirming appointment of resident representatives	<p>When a complaint is made on behalf of a resident, Aveo will acknowledge and investigate the complaint in accordance with this policy.</p> <p>Where a third party requires a response to the complaint back to the third party and to do so requires Aveo Group to disclose personal information, Aveo Group will take reasonable steps to verify that third party's authority to act on the resident's behalf as set out in this policy.</p>
Step 3 Acknowledging receipt of the complaint	<p>For all kinds of complaints, Aveo Group will acknowledge receipt of the complaint in writing back to the resident within 3 working days of receiving it.</p>
Step 4 Investigating the complaint	<p>As soon as reasonably possible, Aveo Group will commence an internal investigation of the subject matter of the complaint.</p> <p>Aveo Group's investigations may include reviewing internal records, interviewing staff and residents and seeking specialist advice. In all circumstances, Aveo Group's objectives in undertaking its investigations will be to seek to resolve the complaint in a timely and efficient manner and to provide natural justice to the parties.</p> <p>The urgency of any investigation will also be generally commensurate with the nature of the complaint lodged by the resident (see for example Section 6 – Critical complaints).</p>
Step 5 Addressing the complaint	<p>Once Aveo Group's investigations are concluded, based on any information received from the resident how they wish for the complaint to be resolved, Aveo Group will either provide a full written response detailing Aveo Group's investigations and its response to the complaint, call a meeting with the resident or do a combination of these things.</p> <p>For all complaints, Aveo Group will acknowledge receipt of the complaint in writing, undertake its internal investigation in respect of the subject matter of the complaint and seek to resolve the complaint with the resident within 15 working days from the date the complaint is made or any other timeframe prescribed by legislation.</p>
Step 6 Closing the complaint	<p>Once Aveo Group has responded to all items made in the complaint, either at a meeting or in writing, Aveo Group will consider a complaint to be closed unless further notice from a resident is received.</p>

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Relevant Aveo Group staff

Below is a summary of the role of Aveo Group staff in Aveo Group's complaint handling policies and procedures.

Community Manager	Unless otherwise specified in this policy, the Community Manager is the primary contact between the resident and Aveo Group in respect of the receiving, investigating and responding to complaints
Group Community Manager	For sensitive and other appropriate matters (for example critical complaints), the Group Community Manager may undertake any steps on behalf of the Community Manager, including meeting with a resident to discuss their complaint.
Anonymous and sensitive complaints	The General Counsel and Company Secretary is responsible for receiving anonymous and sensitive complaints through a centralised address on behalf of Aveo Group should a complainant wish to lodge a complaint in this way.

Section 5 - Making a complaint

Categorisation of complaints

All complaints will be categorised into one of four categories according to Aveo Group's established risk management framework to ensure appropriate review, management and escalation within the management structure of Aveo Group. These four categories are:

1. Minor complaints – complaints that can be promptly corrected by the Community Manager or other staff under the supervision of the Community Manager;
2. Moderate complaints – complaints with a higher level of complexity than minor complaints and complaints that require some form of action by the Community Manager to resolve within Aveo Group but which have a low level of risk attached to them;
3. Major complaints – complaints involving significant risk that require a coordinated response by Aveo Group's management structure to seek to resolve them. These complaints require escalation beyond Community Manager to Group Community Manager to manage; and
4. Critical complaints - complaints that involve significant risk requiring escalation in the Aveo Group management structure beyond the community manager, including complaints relating to alleged or suspected criminal conduct (including elder abuse), dishonesty, regulatory or other legal breaches or complaints categorised as having significant risk in Aveo Group's risk management framework. Major complaints which are unresolved after 30 days change character to critical complaints.

Each complaint received will be categorised into one of these categories at the time the complaint is received and recorded by Aveo Group. See Section 6 – Recordkeeping.

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Complaints may be verbal or in writing

Aveo will accept complaints both verbally and in writing. Where possible to do so, Aveo Group prefers all complaints to be made to the Community Manager. Unless exceptions apply as specified in the policy, the Community Manager is Aveo Group's primary representative in respect of acknowledging, investigating and responding to complaints on behalf of Aveo Group with the support of other relevant Aveo Group staff.

For a verbal complaint, the Community Manager will record a summary of the complaint and their discussion with the complainant for the purposes of processing the complaint. A resident may request a copy of this summary if they wish to do so. Unless otherwise advised by the resident, the Community Manager's summary will be used as a summary of the complaint, including in respect of a subsequent investigation and response by Aveo Group.

Aveo Group requests that written complaints are addressed and delivered to the Community Manager, either in person or by leaving the complaint at the Community Manager's office in the relevant retirement community. Written complaints can either, at the election of the resident, take the form of a letter or email from a resident, drafted as the resident sees appropriate, or by completing and lodging a complaint form supplied by Aveo Group.

Content of complaints

For both verbal and written complaints, Aveo Group asks where possible to do so, the complainant:

1. Provides as much detail as possible in respect of the circumstances surrounding the complaint;
2. Confirms what steps the resident considers that Aveo Group can take to seek to resolve the complaint satisfactorily for the resident; and
3. Specifies their preference how they wish for Aveo Group to respond to the complaint. Residents can generally elect whether they wish to meet with Aveo Group management (unless otherwise specified in this policy, this will be the Community Manager), receive a written reply or both.

This allows Aveo Group to respond to the complaint as quickly and efficiently as possible. Where no preference is specified regarding how the resident would like the complaint addressed, Aveo Group will respond in writing to the resident seeking to address their complaint. All responses by Aveo Group will be written in plain English.

Anonymous and sensitive complaints

Aveo Group will accept anonymous complaints. In circumstances where Aveo Group receives an anonymous complaint, Aveo Group will take reasonable steps to investigate the complaint but will not acknowledge or respond to the complaint to any party outside Aveo Group. Aveo Group also recognises that complaints may be of a sensitive nature or involve Aveo Group staff who would ordinarily process residents' complaints as specified in this policy.

For both anonymous complaints and sensitive complaints, Aveo requests such complaints are directed to the Aveo Group General Counsel and Company Secretary at companysecretarial@aveo.com.au.

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A right to complaint without consequences

Aveo Group recognises a resident's right to lodge a complaint without fear of reprisal. In these circumstances:

1. Aveo Group acknowledges that every resident has a right to complain to Aveo Group in respect of any matter which is relevant between the resident and Aveo Group;
2. Aveo Group acknowledges that a resident may lodge multiple complaints, either in respect of the same or different subject matter;
3. Aveo Group commits to treating each complaint with appropriate respect and importance and will not discourage, hinder or penalise a resident from lodging a complaint with Aveo Group; and
4. Aveo Group commits to treating every complaint as confidential and private. This includes communicating the existence of a complaint and its subject matter on a need to know basis. All personal information will be held in accordance with Aveo Group's privacy policy.

Aveo Group will ensure a copy of this policy and any other material in connection with it, including a copy of complaint forms and Aveo Group's privacy policy is easily accessible to residents.

Complaints made on behalf of residents

Given the character of its business, Aveo Group recognises that third parties may lodge a complaint on behalf of a resident. Common examples of such third parties include a resident's children, spouse, other family member or friend.

In circumstances where a third party complainant requires a response to be provided to them and not the resident, before Aveo can respond to the complaint, Aveo Group management must take reasonable steps to satisfy themselves that the third party is entitled to receive a resident's personal information. This is to ensure Aveo Group complies with its Privacy Policy and its legal obligations in respect of the provision of personal information which may be necessary to investigate and respond to the complaint. Reasonable steps may include:

1. Requesting the third party to provide a certified copy of a valid power of attorney or enduring power of attorney appointing them to act on behalf of the resident;
2. If a power of attorney or enduring power of attorney is subject to a particular circumstance arising in respect of the principal (the resident), reasonable evidence that circumstance has occurred. This may include, for example, where an enduring power of attorney commences when a resident loses capacity, evidence from a medical practitioner that the resident has lost capacity;
3. A certified copy of any administrative or guardianship orders issued by a Tribunal or Court appointing that third party to act on behalf of the resident; or
4. Where a resident has passed away, a certified copy of a grant or probate or letters of administration sealed by a Supreme Court in Australia.

Until such time as reasonable evidence is supplied by that third party, Aveo Group management will accept and investigate a complaint but will be unable to respond to the complaint to the third party if to do so would require the disclosure of personal or sensitive information regarding a resident.

References in this policy to rights and obligations of the resident include a resident's lawfully appointed representative unless expressly stated otherwise.

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Complaints made by Resident Associations

Aveo Group may also receive written complaints from Resident Associations advocating on behalf of a resident or group of residents.

Where Aveo Group receives a complaint from a Resident Association that requires Aveo Group's response to detail information about a specific resident or group of residents to the Residents Association, Aveo Group will first obtain the resident(s) written authority to provide their personal information to the Resident Association for the purposes of responding to the complaint.

Complainant behaviour

Aveo Group staff are not expected to tolerate complainant behaviour which is abusive, offensive or threatening. This includes:

1. Using abusive or foul language, whether face to face, over the telephone or by email;
2. Sending multiple repetitive emails, making telephone calls or leaving voicemails in respect of the same topic or issue;
3. Physical intimidation or threats; or
4. Any other conduct which can reasonably be viewed as intimidating or threatening.

If this behaviour occurs, the Aveo Group staff member may terminate a call or meeting and otherwise escalate the matter to their direct supervisor for support.

Section 6 - Addressing complaints

Internal investigations

When a complaint is received, Aveo Group will undertake an investigation of the matters relevant to the complaint. The scope, character and urgency of the investigation will be commensurate with the subject matter and categorisation of the complaint. The objectives of Aveo Group's investigations will be to ensure:

1. The facts and issues relevant to the complaint are quickly identified. This may include reviewing Aveo Group's records, interviewing staff and Aveo Group contractors and where necessary, obtaining information from residents, including the complainant;
2. Principles of natural justice are applied to all parties to the complaint. This will include ensuring each party to the complaint is given sufficient time and support to respond to any matters raised with them.

Periodically and otherwise promptly on request, Aveo Group will provide the resident making the complaint with an update of Aveo Group's investigations in respect of the complaint pending any formal response from Aveo Group in required timeframes.

An employee who is the subject of the complaint, or otherwise has a conflict of interest in respect of the subject matter of the complaint, must not be involved in the investigation of it.

In these circumstances the complaint must be investigated by the direct supervisor who is not directly involved in the subject matter of the complaint.

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How Aveo Group will respond to complaints

Aveo Group invites residents to select how they wish for Aveo Group to respond to their complaint. A response from Aveo Group will either be in the form of a written response, a meeting with the resident or both.

Aveo Group understands that sometimes residents may not wish to meet with the Community Manager and does not require the resident to do so. In these circumstances, Aveo Group will respond to the complaint in writing to the resident or where appropriate, substitute another Aveo Group manager, such as the Group Community Manager.

MEETINGS

If a resident wishes to hold a meeting with the Community Manager, either to lodge the complaint or discuss Aveo Group's response to a complaint, then a resident may invite a support person to accompany them to that meeting. A support person can either be the resident's lawfully appointed representative or another nominated person.

Where a resident chooses to be accompanied to a meeting with Aveo Group with a nominated representative that is not the resident's lawfully appointed attorney, guardian or administrator, then the resident acknowledges that person may receive disclosure of their personal information at the meeting with the Community Manager for the purposes of discussing and seeking to resolve the complaint.

Where a complaint is either relevantly sensitive and lodged with the General Counsel and Company Secretary, the Group Community Manager may instead of the Community Manager may respond to the complaint, including meeting with the resident to seek to resolve the complaint if it is appropriate to do so or has been requested by the resident, acting reasonably.

In all circumstances, meetings to discuss complaints will occur at the community on a day and at a time agreed between the resident and Aveo Group. All dealings with Aveo Group staff will be respectful, courteous and reasonable. The parties may terminate and dissolve a meeting for another time if any party feels uncomfortable.

IN WRITING

All written responses to complaints will be written in plain English and addressed to the resident or where requested or appropriate, care of their lawfully appointed representative. If a resident confirms they wish to meet with Aveo Group management to discuss the complaint, including Aveo Group's response to the complaint, then Aveo Group will also provide a written response either at the meeting or promptly after the meeting confirming the matters which were discussed.

CRITICAL COMPLAINT ESCALATION

Complaints assigned the critical complaints category must be reported to, and escalated by, the Community Manager immediately, including after business hours. If the Community Manager is not in the community at the time the complaint is lodged, it is to be provided to the most senior employee available at the time, such as a Care Manager. That employee will then notify the Community Manager.

In addition to lodging the complaint as a critical complaint into RiskMan, the Community Manager must contact the Group Community Manager and Chief Operating Officer to escalate the complaint. Where appropriate, critical complaints may be investigated and administered by Aveo Group management outside the operations management structure such as Aveo Group's internal legal team.

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RiskMan software and recordkeeping

Aveo Group will also keep a record of all complaints that have been raised in the retirement community including, the name and contact details of the resident concerned, the date of the complaint and the date the complaint was resolved. This includes any actions taken by management to seek to resolve the complaint.

Aveo Group uses RiskMan software to track and report risks within the Aveo Group management structure. All complaints are entered into RiskMan within 72 hours of the complaint being received and at that time assigned a category based on the four categories of risk detailed in this policy (see Section 5 – Categorisation of complaints). Complaints are then administered within the RiskMan software until such time as the complaint is resolved. This will include entering:

1. The details of any investigation into RiskMan;
2. A copy of the response to the complainant to seek to resolve the complaint.

Once the complaint is resolved, the complaint entry in RiskMan is closed and archived. It can then be accessed by management if required.

All information held by Aveo Group will be stored and administered in accordance with Aveo Group's Privacy Policy.

Quality management

Aveo Group will monitor and analyse trends in the volume and character of complaints at regular intervals but not less than annually to identify themes, trends and areas for improvement.

Section 7 – Other information

Training

Aveo Group will ensure its staff involved in its complaint management and dispute framework are trained in the following matters:

1. The complaint process, including who is responsible in Aveo Group for various aspects of this process;
2. Expected timeframes; and
3. The possible outcomes and further avenues available should the complaint not be satisfactorily resolved.

Copies of this policy will be published on Aveo Group's website and included in induction material, staff handbooks and ongoing training programs with employees and contractors of Aveo Group.

Copies of this policy will also be made available to residents in communities through the posting on community notice boards, inclusion in village handbooks and other orientation programs and otherwise being made available on request from the Community Manager.

Resident surveys

Aveo Group will pro-actively seek resident's views and feedback in connection with Aveo Group's services through periodic resident surveys. In those surveys, residents will be asked to express their views on a number of topics in respect of Aveo Group's performance and the resident's satisfaction with the services provided to them at the community. The purpose of this engagement is to ensure continual improvement in respect of Aveo Group's services

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Variation of this policy

This policy may be varied by Aveo Group from time to time in accordance with the legal requirements that apply in each jurisdiction in which Aveo Group operates.

In South Australia, this policy may only be implemented and varied in a retirement village if the implementation or variation (as the case may be) is agreed by the residents by a majority vote.

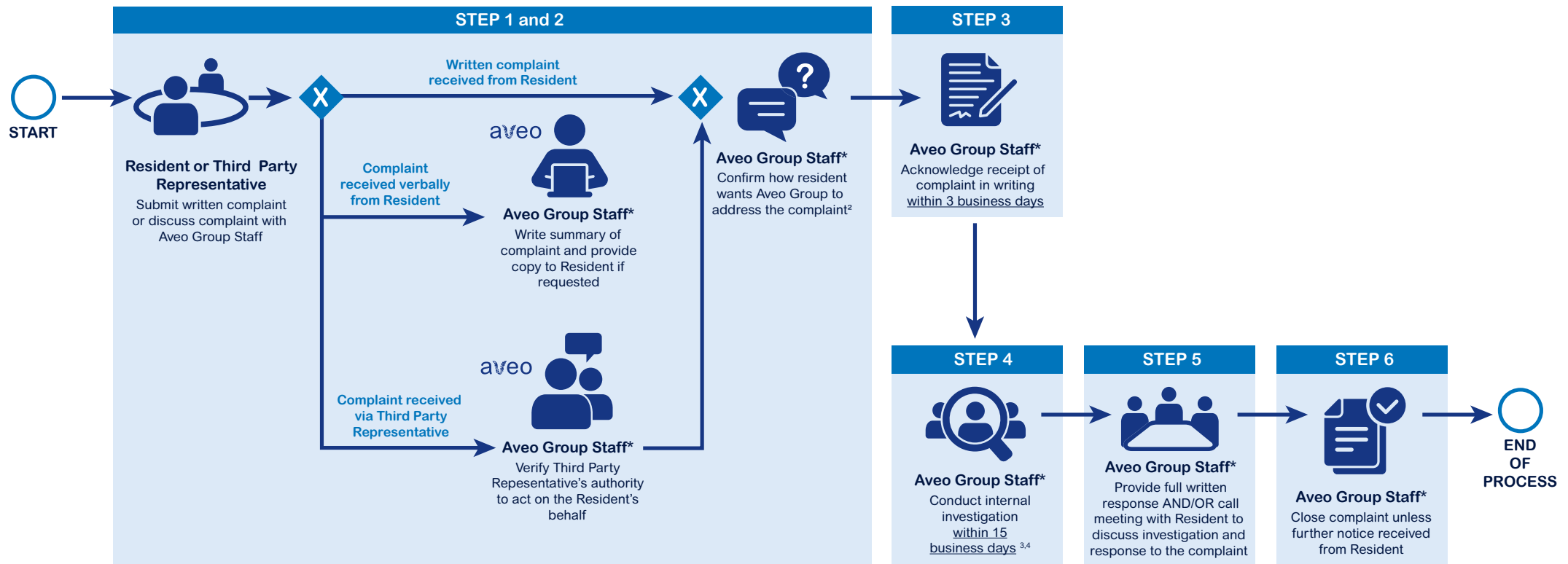
Right to obtain advice and escalate complaints

Aveo Group encourages residents to seek their own independent advice in connection with their rights.

If a resident is dissatisfied with Aveo Group's response to a complaint or the handling of the complaint, a resident may choose to escalate a complaint to, for example, the authority responsible for administering the retirement villages legislation in their State to obtain advice. To assist residents, below is a summary of the Department in each State in which Aveo Group operates who administer retirement village legislation.

New South Wales	Fair Trading NSW at PO Box 22, Bathurst, New South Wales, 2795 or 13 32 20
Queensland	Department of Housing and Public Works at GPO Box 2457, Brisbane, Queensland, 4001 or 07 3008 3450
South Australia	Department of Health and Wellbeing at PO Box 287, Rundle Mall, Adelaide, South Australia or 08 8204 2420 or alternatively Office of Ageing Well at PO Box 287, Rundle Mall, Adelaide, South Australia or 08 8226 0795
Tasmania	Consumer Affairs and Fair Trading at PO Box 56, Rosny Park, Tasmania, 7018 or 1300 654 499
Victoria	Consumer Affairs Victoria at GPO Box 123, Melbourne, Victoria, 3001 or 1300 372 888

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Annotations

*The below Aveo Group staff has the following roles in the complaints handling process:

Community Manager - Unless otherwise specified is the primary contact between the resident and Aveo Group in respect of the receiving, investigating and responding to complaints

Group Community Manager - For sensitive and other appropriate matters (e.g critical complaints), they may undertake any steps on behalf of the Community Manager

Company Secretary - Responsible for receiving anonymous and sensitive complaints through a centralised address on behalf of Aveo Group should a complainant wish to lodge a complaint in this way

- (1) Verification is needed if the representative requires a response to the complaint, requiring Aveo Group to disclose personal information
- (2) Residents can opt to have the complaint addressed in writing and/or a meeting with the Community Manager or other relevant Aveo Group Manager
- (3) Timeframes for resolving a complaint may also be subject to other timeframes prescribed by legislation
- (4) The investigation may include reviewing internal records, interviewing staff and residents, and seeking specialist advice.