

Complaint Handling Process



Section 1 – Purpose of this process

The purpose of this process is to provide a framework in which Aveo will process complaints received from residents (and their appointed representatives, other than a legal practitioner) residing in its retirement communities.

Section 2 – Objectives of this policy

The objectives of this policy are to:

1. encourage feedback in respect of the services residents receive;
2. ensure complaints are processed by Aveo in a way which is prompt, accessible, and effective;
3. seek to resolve complaints where possible in a way to ensure resident satisfaction with Aveo, including confidence in Aveo'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 (or their appointed representatives, other than a legal practitioner) in Aveo'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 supplier or complaints from a neighbour on property adjoining an Aveo community which does not involve a specific resident or group of residents;
3. complaints in respect of Aveo'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 care delivered under a home care package;
4. complaints in respect of Aveo'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; or
6. formal disputes which are subject to proceedings before a Tribunal or Court.

Nothing in this policy is designed to circumvent or derogate from any legal rights a resident or Aveo 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.

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

Complaint process

The steps below outline Aveo's complaint process.

Step 1: Making the complaint	Residents can make a verbal or written complaint to the Community Manager or to the Resident Services Hotline on 1800 316 901 or at residentservices@aveo.com.au .
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 to disclose personal information, Aveo will take reasonable steps to verify that third party's authority to act on the resident's behalf as set out in this policy and in accordance with Aveo's Privacy Policy.</p>
Step 3: Acknowledging receipt of the complaint	For all kinds of complaints, Aveo will acknowledge receipt of the complaint in writing back to the resident within five working days of receiving it.
Step 4: Investigating the complaint	<p>As soon as reasonably practicable, Aveo will commence an internal investigation of the subject matter of the complaint.</p> <p>Aveo's investigations may include reviewing internal records, interviewing staff and residents and seeking specialist advice.</p> <p>The urgency of any investigation will also be generally commensurate with the nature of the complaint lodged by the resident.</p>
Step 5: Addressing the complaint	<p>Once Aveo's investigations are concluded, taking into account any information received from the resident on how they wish for the complaint to be resolved, Aveo will determine what response is appropriate and how and by whom it will be provided. The response may be, for example, a written response to the complaint, or to call a meeting with the resident, or to do a combination of these things.</p> <p>For all complaints, Aveo will acknowledge receipt, undertake its internal investigation, and seek to resolve the complaint within 15 working days from the date the complaint is made or in accordance with any other timeframe prescribed by legislation.</p>
Step 6: Closing the complaint	Once Aveo has responded to the complaint, Aveo will consider a complaint to be closed unless further written notice is received from a resident that includes a basis for further consideration of the matter.

Relevant Aveo staff

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

Community Manager	Unless otherwise specified in this policy or in writing by Aveo, the Community Manager is the primary contact between the resident and Aveo in respect of the receiving, investigating and responding to complaints.
Regional Manager and Group Manager – Quality and Resident Services	Where appropriate, the Regional Manager, State Manager or Group Manager – Quality and Resident Services (as determined by Aveo) may undertake any steps on behalf of the Community Manager, including meeting with a resident to discuss their complaint. In that case, references in this document to the Community Manager include references to these persons.
Anonymous and sensitive complaints	The Company Secretary is responsible for receiving anonymous and sensitive complaints. Such complaints can be sent to the Company Secretary (companysecretarial@aveo.com.au) or to the Resident Services Hotline (residentservices@aveo.com.au).

Section 5 – Making a complaint

Complaints may be verbal or in writing

Aveo will accept complaints both verbally and in writing. Where possible to do so, Aveo prefers all complaints to be made to the Community Manager. Aveo may request that verbal complaints be submitted in writing before being addressed. Alternatively, Aveo may record a summary of the complaint and the Aveo team member's discussion with the complainant for the purposes of processing the complaint. A resident may request a copy of this summary. Unless otherwise advised by the resident, Aveo's summary will be used as a summary of the complaint, including in respect of a subsequent investigation and response by Aveo.

Content of complaints

For both verbal and written complaints, Aveo asks that the complainant:

1. provides as much detail as possible in respect of the circumstances surrounding the complaint; and
2. confirms what steps the resident considers Aveo can take to seek to resolve the complaint satisfactorily for the resident.

This will allow Aveo to respond to the complaint as quickly and efficiently as possible.

Anonymous and sensitive complaints

Aveo will accept anonymous complaints. In circumstances where Aveo receives an anonymous complaint, Aveo will take reasonable steps to investigate the complaint but will not acknowledge or respond to the complaint to any party outside Aveo. Aveo also recognises that complaints may be of a sensitive nature or involve Aveo 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 either the Resident Services Hotline at residentservices@aveo.com.au or the Aveo Company Secretary at companysecretarial@aveo.com.au.

A right to complain without consequences

1. Aveo recognises a resident's right to lodge a complaint without fear of reprisal. In these circumstances:
2. Aveo acknowledges that every resident has a right to complain to Aveo in respect of any matter which is relevant between the resident and Aveo;

3. Aveo acknowledges that a resident may lodge multiple complaints, either in respect of the same or different subject matter;
4. Aveo 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; and
5. Aveo 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's privacy policy.

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

Complaints made on behalf of residents

Given the character of its business, Aveo 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 management will take reasonable steps to satisfy themselves that the third party is entitled to receive the resident's personal information. This is to ensure Aveo 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 management will be unable to respond 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.

Complaints made by Resident Associations

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

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

Complainant behaviour

Aveo staff are not expected to tolerate behaviour that is abusive, harassing, aggressive, offensive, threatening or vexatious. 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 staff member may end a call or meeting and otherwise escalate the matter to their direct supervisor for support. Following escalation, Aveo's Executive Leadership Team may determine not to respond to a complaint that is raised in this way, or which is vexatious.

Section 6 - Addressing complaints

Internal investigations

When a complaint is received, if it is appropriate to do so, Aveo may undertake an investigation of the matters relevant to the complaint. The scope, character and urgency of any investigation will be commensurate with the subject matter of the complaint.

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 conducting 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, another senior manager or the Group Manager – Quality and Resident Services.

How Aveo will respond to complaints

Aveo 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 will respond to the complaint in writing to the resident or where appropriate, substitute another Aveo representative, such as the Regional Manager, State Manager.

In some cases, Aveo may reasonably believe that it is more appropriate for Aveo's response to come from someone other than the Community Manager, such as the Regional Manager, State Manager or Group Manager – Quality and Resident Services. These cases may include where the Community Manager is the subject of the complaint, or where the matter is of a critical nature requiring escalation.

Aveo recognises that a resident is able to raise multiple complaints about the same matter. On some occasions, Aveo may consider it has already done all it can to investigate, respond to and resolve the complaint, or consider that the complainant is vexatious. In such circumstances, Aveo may decide to provide only a brief response confirming that the complaint has already been investigated and will not be investigated further, or suggest to the resident that they may wish to raise their complaint with a regulator or tribunal, or not respond to the complaint at all.

Meetings

If a resident wishes to hold a meeting with the Community Manager or other Aveo representative, either to lodge the complaint or discuss Aveo'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 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 or Aveo representative for the purposes of discussing and seeking to resolve the complaint.

Where a resident wishes to be accompanied at a meeting with a qualified legal representative (for example, a solicitor), Aveo asks that they inform Aveo beforehand so that Aveo can consider whether it is appropriate and/or necessary for its representative to also be accompanied by a legal representative.

Aveo team members may also invite a support person to accompany them to any meeting if they are uncomfortable attending alone, in which case another Aveo representative will attend the meeting as well.

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. All dealings with Aveo staff will be respectful, courteous, and reasonable. The parties may end a meeting if they feel 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.

Recordkeeping

Aveo will keep a record of all complaints that have been raised in the retirement community.

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

Section 7 – Other information

Training

Aveo 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 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.

How this policy can be accessed

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

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

Resident surveys

Aveo will pro-actively seek residents' views and feedback in connection with Aveo'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'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's services.

Variation of this policy

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

Right to obtain advice and escalate complaints

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

If a resident is dissatisfied with Aveo'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 operates who administer retirement village legislation.

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