

1 Purpose

At Levande we recognise the importance to our residents of listening to what they have to say about our products, services, or people. We also recognise that feedback provides opportunities to build knowledge, improve our products and services and enhance relationships with residents.

The purpose of this Policy is to outline Levande's approach to managing resident feedback, including positive feedback, complaints and internal disputes or resident suggestions for improvement.

It outlines the guiding principles that Levande will follow when dealing with resident complaints or disputes, including avenues for escalation, and provides information about providing additional support or feedback, including making a complaint.

2 Scope

This Policy applies to Deakin TopCo Pty Ltd, its related companies and trusts, (collectively, **Levande**) and all Levande directors, officers and employees (including permanent, casual or fixed term and maximum term employees and temporary workers including contractors and consultants) (**People** or **Persons**).

3 Guiding Principles

- **Accessibility, Visibility & Transparency**

This Policy will be available on our website and at our Villages. If we discover that a resident requires support or assistance during the process, we will take steps to see that appropriate assistance or support is provided so that the resident can meaningfully participate in the process.

- **Responsive**

We will acknowledge receipt of feedback promptly and respond in full in a reasonable timeframe having regard to the nature of the feedback and the urgency of issues raised. We are committed to resolving complaints as quickly as possible. We will seek to resolve a complaint at the first point of contact, but if we cannot, we will communicate the expected timeframes to you and inform you if we think there may be some delay. Please see further details on response times set out in Section 5 (How to make a Complaint or give Feedback) of this Policy.

- **Objective, Fair and Equitable**

We will review, and where appropriate investigate, each complaint in an objective and unbiased manner. We will take all reasonable steps to make sure that you are not adversely affected because a complaint was made by you or on your behalf. If a complainant's behaviour during the process is unreasonable, we will still endeavour to take all reasonable steps to address the valid issues raised in the complaint in a fair and ethical manner.

- **Conduct and Communication**

We will be helpful, courteous, and professional in all our dealings and will maintain confidentiality and act

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impartially in responding to all matters. We will explain the reasons for our decision and any remedy or resolution we consider fair and reasonable in the circumstances. We will provide contact details for the person managing your matter so that you know who to contact during the process.

Residents are also expected to engage respectfully and courteously with each other at all times. Levande has zero tolerance for harassment, bullying, intimidation, discrimination, threatening behaviour, or conduct that compromises the safety, wellbeing or peaceful enjoyment of others.

• **Accountability, Learning and Prevention**

In all circumstances, we will attempt to put things right for a complainant, at as early a stage as possible. We will monitor feedback to gain insight into areas for improvement and issues requiring deeper analysis to prevent recurrence. Where we have made a mistake, we will acknowledge that and take steps to see that similar mistakes are not made in the future.

Our People undertake training on the importance of complaints and this Policy. We undertake periodic reviews and audits of our complaints management system to assess our adherence to this Policy, and to evaluate the overall effectiveness and suitability of our complaints management system.

• **Support**

Levande is committed to ensuring that all residents can meaningfully participate in the feedback, complaints and dispute resolution process. Residents are always welcome to bring a support person, family member, advocate, interpreter, or representative of their choice to any meeting or discussion relating to feedback, complaints or disputes. Levande will not restrict a resident's choice of support person unless required by law or to protect the safety of the resident or others.

4 The difference between Complaints and Disputes

This table explains the difference between complaints and disputes and which process to follow depending on the type of issue.

Complaint	Dispute
<p>You can make a complaint to Levande about a village issue which is not a dispute but is:</p> <ul style="list-style-type: none">• causing you dissatisfaction; and/or• is negatively impacting your wellbeing. <p>Applicable procedure: Refer to Section 5 (How to make a Complaint or give Feedback) of this Policy.</p>	<p>A dispute can arise from:</p> <ul style="list-style-type: none">• A complaint from a resident to Levande which has not been resolved to the resident's satisfaction; or• A complaint from a resident to Levande which has not been resolved and continues to impact village peace or staff wellbeing;• A disagreement or issue between two or more residents. <p>Applicable procedure: Refer to Section 6 (Dispute Resolution Procedure) of this Policy.</p>

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5 How to make a Complaint or give Feedback

If you have a complaint about Levande or would like to provide us with any feedback, you can follow the steps below.

If you have a dispute with another resident or a dispute which arises from an unresolved complaint, please refer to Section 6 (Dispute Resolution Policy) of this Policy which sets out the dispute resolution process.

Step 1 Contact the Village Manager, Area Manager or Code Administrator

A complaint or feedback may be submitted by telephone, mail, email or in person and may be lodged by a customer, resident and/or persons acting on behalf of customers or residents.

Complaints and feedback should be addressed to the **Village Manager** in the first instance.

This can be done through the following suggested methods:

- meeting with the Village Manager, in-person during business hours;
- by telephoning the Village Manager; or
- in writing, either by way of letter or via email.

Contact details for your Village Manager: You can refer to our website at <https://bit.ly/village-contact-list> for full list of Village Managers and their contact details.

For confidential, sensitive and other similar complaints, they can be submitted to your **Area Manager** or the **Levande Customer Experience Manager** via the following channels:

- by telephoning 1800 72 71 70;
- online via our website at www.levande.com.au/contact-us/;
- in writing, either by way of letter or via email, to:
Levande Customer Experience Manager
Levande
Level 18, 9 Castlereagh Street
Sydney NSW 2000
RL_Operations@Levande.com.au

Retirement Living \ Council's Retirement Living Code of Conduct

Levande is a signatory to the Retirement Living Council's Retirement Living Code of Conduct. As such, complaints in relation to Levande can be made via the Code Administrator:

- via email: complaints@rlcode.com.au
- in writing: Code of Conduct Administrator
Level 7, 136 Exhibition St
MELBOURNE VIC 3000
- via telephone: 03 9664 4234

Step 2 Acknowledgement

We aim to provide initial acknowledgment of receipt of any type of complaint within 24 hours and no longer than 5 working days after receiving it. We will contact you if any further information is required.

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Step 3 Investigation

If you have submitted a complaint which requires investigation (rather than positive feedback), your complaint will be investigated within a reasonable period. The timeframe will depend on the complexity of the complaint.

Step 4 Response

Consistent with the committed timeframes of resolution under the Property Council of Australia's Retirement Living Code of Conduct, we will endeavour to:

- respond to the substance of the complaint; and
- resolve a complaint or internal dispute,

within 15 working days of receiving it. There may be occasions whereby an investigation or further exploration needs to take place requiring a longer response period to matters. On these occasions we will keep you informed of our progress.

Step 5 Resolution

If you are satisfied with our response to your complaint, the complaint resolution process is complete.

If you are not satisfied with the outcome or with our response, please refer to Section 6 (Dispute Resolution Procedure) of this Policy for the dispute resolution process.

6 Dispute Resolution Procedure

The below procedure sets out the steps to follow in resolving a dispute between a resident and Levande or between residents. It is important to note:

- a resident has the right to be accompanied by a support person chosen by the resident at any meeting held to resolve a dispute; and
- the below procedure can be applied by residents directly or by persons acting on behalf of residents.

Step 1 Contact the Village Manager, Area Manager or discuss with another resident

Usually, the quickest way to resolve a problem, either with Levande or another resident, is a discussion with the Village Manager, Area Manager, or the other resident. Please see contact details for the Village Manager and Area Manager at Step 1 of Section 5 (How to make a Complaint or give Feedback) of this Policy.

Talking through things allows everyone to share their concerns and work towards a mutual agreement.

For ACT residents only: For disputes between the resident and Levande, the residents may give written notice of the dispute to the disputes committee. Please refer to the Disputes Committee Policy for further information on this process available at <https://bit.ly/Levande-dispute-resolution>

Step 2 Contact external body

If the dispute cannot be resolved by mutual agreement or directly by the Village Manager or Area

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Manager (after making contact in accordance with Step 1 above), you can contact an external body which can provide a process to help resolve the dispute.

If you didn't contact the Code Administrator of the Property Council of Australia's Code of Conduct at the time of making your complaint, you can contact them:

Via email: complaints@rlcode.com.au
In writing: Code of Conduct Administrator
Level 7, 136 Exhibition St
MELBOURNE VIC 3000

You can also seek advice on the processes available from the bodies listed below:

NSW - *NSW Fair Trading* - Ph: 13 77 88 www.fairtrading.nsw.gov.au
ACT - *Access Canberra (Fair Trading)* - Ph 13 22 81 www.accesscanberra.act.gov.au
QLD - *Queensland Government* - Ph 07 3008 3450 www.qld.gov.au
VIC - *Consumer Affairs Victoria* - Ph 1300 55 81 81 www.consumer.vic.gov.au
SA - *Office of the Ageing* - Ph 08 8204 2420 www.sahealth.sa.gov.au

These bodies offer mediation services which are an informal negotiation with a neutral, qualified mediator to help find options that may address all parties' concerns. When an agreement is reached, the mediator can help draft a written agreement.

Step 3 Contact Tribunal

If the matter is still unresolved after contacting one of the relevant bodies listed at Step 2 above, you may be able to lodge an application with the relevant Tribunal as listed below.

The Tribunals are an independent decision-making body which hears and decides on applications for orders from both residents and village operators. The Tribunal can make enforceable orders to resolve a dispute whereas the external bodies mentioned in Step 2 above cannot.

The types of orders that the Tribunal can make include certain orders about:

- village contracts
- village rules
- capital maintenance and replacement
- recurrent charges
- annual budgets and accounts
- payment of money and compensation
- termination and vacant possession
- security and safety
- sale or letting of premises

Applications can be lodged in person, by post or online. For more information on the Tribunal or retirement village orders please visit the relevant website below:

NSW - *NSW Civil and Administration Tribunal* <https://ncat.nsw.gov.au/>
ACT - *ACT Civil and Administrative Tribunal* <https://www.acat.act.gov.au/>
QLD - *Queensland Civil and Administrative Tribunal* <https://www.qcat.qld.gov.au/>
VIC - *Victorian Civil and Administrative Tribunal* <https://www.vcat.vic.gov.au/>
SA - *South Australian Civil and Administrative Tribunal* <https://www.sacat.sa.gov.au/>

Please note:

- application fees apply
- time limits for making an application to the Tribunal may apply

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Levande to provide further assistance in certain circumstances

Levande may provide further assistance with dispute resolution in the following circumstances:

- when a dispute between residents has a serious or significant impact on the peace and enjoyment of the village, especially if there are multiple complaints or staff are affected; and/or
- in respect of a long-standing issue that remains unresolved (if Levande considers intervention is required).

In such circumstances, Levande may, at its absolute discretion:

- appoint an independent expert or mediator and act on their recommendations;
- insist on mediation for unresolved disputes affecting the village;
- offer EAP (Employee Assistance Program) and other wellbeing support.

Where a dispute is unable to be resolved due to a resident's continued behaviour and/or lack of cooperation, Levande may consider whether such conduct could constitute a breach of that resident's obligations under their village contract and/or the village rules. In those circumstances, Levande will discuss relevant concerns with the resident as part of the dispute resolution process and where appropriate, follow the procedures applicable to such matters under the resident's village contract and any relevant legislation.

7 Record Keeping

Levande is responsible for keeping a written record of the following:

- the initial complaint made by a resident;
- any response to the complaint provided by Levande;
- any resolution of the dispute (if applicable) agreed by Levande and the resident; and
- any other correspondence received or sent by the operator relating to the complaint or dispute.

All complaints and disputes will be recorded within three working days of being given notice. Levande must retain files for 7 years from the date the dispute or complaint is recorded.

8 Restrictions on the powers of Village Managers and Area Managers when dealing with disputes and complaints

The Village Manager and Area Manager will not take any action:

- without the consent of the person making the complaint / party to a dispute;
- which duplicates, is inconsistent with or overrides any other law; and
- which duplicates is inconsistent with or overrides the provisions of any contract between the person making the complaint and the village operator.

A Village Manager and Area Manager:

- cannot require that a dispute or complaint be notified in writing;
- will not enable a resident dispute or complaint to be dealt with at the same time as the dispute or complaint is being dealt with by the residents committee. If a residents committee is dealing with a dispute or complaint, it will be dealt with there first. If a resolution cannot be reached it should then be referred to any of the people in Step 1 of Section 5 (Dispute Resolution Procedure) of this Policy; and
- will not prevent a resident who is party to a dispute or making a complaint from being represented by another person when dealing with the dispute or complaint.

9 Information to Provide with a Complaint or Dispute

It will assist us to consider a complaint or dispute efficiently if we are provided with as much relevant information as possible at the time of making the complaint, including:

- a clear description of the concern or issues and what it is believed may have caused it;
- details of any relevant events, actions, conversations or statements;
- any supporting evidence, including any documents, photographs etc; and
- any special arrangements we should follow, including any contact details or support needs.

10 Compliance

Compliance with this Policy by all Levande People is mandatory. Any Person who breaches this Policy may face disciplinary action up to and including dismissal.

11 Review

This Policy is to be reviewed at least every two years or whenever any change (eg, change to Levande's external operating environment, strategic direction, organisation structure or a legislative or regulatory change) requires review.

For the process relating to the variation of this Policy please contact the Village Manager.

12 Related Policies, Guidelines and Forms

Property Council of Australia Retirement Living Code of Conduct

Privacy Policy

Resident Wellbeing Decline Procedure

Disputes Committee Policy

13 Questions or Further Information

Please contact the Levande Customer Experience Manager if you have any questions on this Policy.

Document Control

REVISION	DATE	OWNER	APPROVER	CHANGES MADE
1.0	24 MAY 2023	Chief Operations Officer	Board	Initial document
2.0	29 AUGUST 2024	Chief Operations Officer	Board	Updated document
3.0	15 JULY 2025	Customer Experience Manager	Chief Operations Officer	Updated document
4.0	2 FEBRUARY 2026	Customer Experience Manager	Chief Operations Officer	Updated document