

Feedback, Complaints and Internal Disputes Resolution Procedures

1. Purpose of Policy

- 1.1. The purpose of this policy is to describe how LDK will manage feedback, complaints and internal disputes from residents, families, representatives and our people.

2. Scope

- 2.1. These procedures apply to all residents, families, authorised representatives and our people.
- 2.2. These procedures do not apply to complaints that meet the criteria for a reportable assault.
- 2.3. A resident's family members, friends or authorised representatives can only be involved:
 - 2.3.1. If LDK has obtained the express consent of the resident; or
 - 2.3.2. in accordance with LDK's Choice and Decision-Making Policy.

3. Policy

- 3.1. LDK welcomes and encourages feedback, complaints and compliments from residents, their representatives, and other stakeholders, and will ensure that an open and transparent complaints management system is operational across all LDK villages.
 - 3.1.1. LDK will:
 - **Culture:** establish and maintain a positive complaint culture as a way of committing to continuous improvement of systems and processes.
 - **Principles:** model the management of complaints based on the principles of advocacy, accessibility, fairness, transparency, responsiveness, efficiency and integration;
 - **Training:** ensure our team is skilled and informed of the processes involved in the handling of feedback and complaints;
 - **Continuous improvement:** analyse information about complaints as part of a continuous improvement process.
- 3.2. Where a complaint relates to a resident assault or suspected resident assault, the matter should be managed in accordance with LDK's Mandatory Reporting Policy. See more on this in the below Part 7.

4. Lodging Feedback and Complaints

- 4.1. Feedback and complaints will be encouraged and accepted in any form including:
 - 4.1.1. Verbally to a member of the LDK Team;
 - 4.1.2. By phone from a resident or their representative;
 - 4.1.3. In writing;
 - 4.1.4. Electronically through LDK's RICI portal; or
 - 4.1.5. Via a regulatory or advocacy body, acting on a resident's behalf.

Note that all complaints and feedback will be entered into the RICI electronic management system regardless of the initial form it is received in.

5. Complaints Resolution Process

Who can make a complaint?

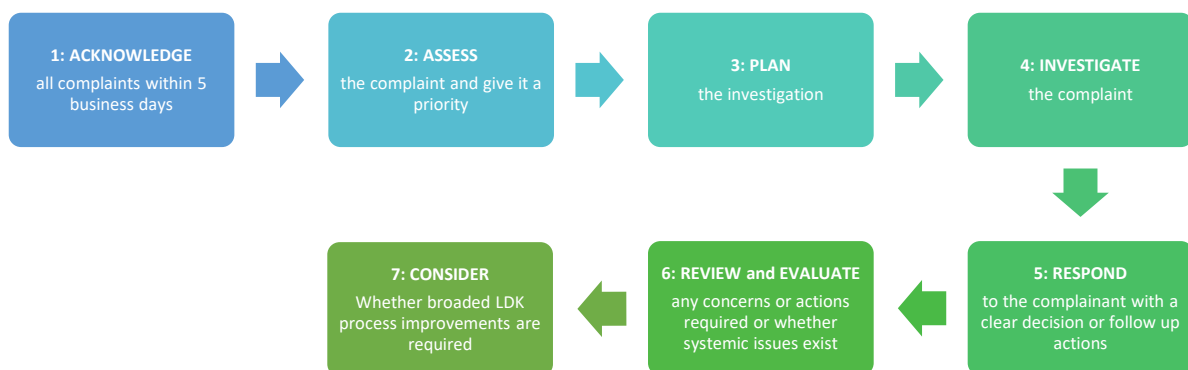
- 5.1. Any resident, family, loved one, or other authorised representative of a resident can make a complaint.

What types of complaints are covered by the process?

- 5.2. This process covers complaints from a resident that are directed to the operator of the LDK retirement village. This may include complaints about Village facilities, village rules, repairs and maintenance, annual meetings, fees and charges, hazards or safety risks, budgets, or the marketing process.

7 Step Complaint Resolution Process

- 5.3. LDK will follow the following process for managing complaints:



Step 1: Acknowledge

- 5.4. The Village General Manager is responsible for ensuring that a formal acknowledge of the complaint is provided within 5 Business Days of a complaint being received to reassure the resident or complainant that their complaint is being actioned.
- 5.5. Acknowledgement will include:
 - 5.5.1. Information about LDK's complaint management process;

- 5.5.2. Information about communication the complainant can expect throughout the complaint investigation process; and
- 5.5.3. Contact details of who is responsible for the process.

Step 2: Assess

- 5.6. The Village General Manager will follow best practices for complaints management by:
 - 5.6.1. enquiring with the complainant how they would like to see their complaint resolved (i.e. the outcome they are seeking);
 - 5.6.2. assessing the complaint and assigning it a priority; and
 - 5.6.3. referring the complaint to the Chief Operations Officer based on the seriousness of the complaint.

Step 3: Plan

- 5.7. The Village General Manager is responsible for planning the process of complaint management by:
 - 5.7.1. defining what is to be investigated;
 - 5.7.2. outlining the steps involved to fully investigate the complaint and ascertain whether further information is required, either from the complainant or from another person or organisation;
 - 5.7.3. estimate the time required to resolve the complaint;
 - 5.7.4. identify:
 - the remedy the complainant is seeking;
 - whether the complainant's expectations are realistic or need to be managed;
 - other possible remedies; and
 - any special considerations that apply to the complaint (e.g. increased confidentiality or privacy if there is sensitive or confidential information).
- 5.8. The plan may also be used for continuous improvement of the complaints handling processes by LDK.

Step 4: Investigate

- 5.9. The Village General Manager is responsible for:
 - 5.9.1. Ensuring all complaints are reviewed and investigated with 14 days of acknowledging the complaint;
 - 5.9.2. Investigating the resolution of factual issues; and
 - 5.9.3. Considering appropriate resolutions.
- 5.10. For all building related feedback or complaints, the complainant will need to lodge the complaint with the Resident Committee and action referred to and investigated by the Village Facilities Manager.
- 5.11. For all care and service-related complaints the following process applies:
 - 5.11.1. To ensure impartiality, a person who is the subject of a complaint, cannot investigate the complaint or be involved in the investigation of the complaint. For example, where a Village General Manager is the subject of a complaint, the Village General Manager should immediately escalate the complaint to the Chief

Operations Officer;

- 5.11.2. the Chief Operations Officer may choose to investigate the complaint or delegate investigation of the complaint to a team member;
- 5.11.3. investigation may include contacting the complainant to gather additional information about the complaint, interviewing other persons relevant to the matter or reviewing relevant documents and records.
- 5.11.4. complaints will be dealt with and resolved as quickly as possible; and
- 5.11.5. where complaints cannot be resolved at first contact, the matter should be escalated in accordance with this policy.

Step 5: Respond

- 5.12. LDK is responsible for responding to the complainant in a clear and informative manner.
- 5.13. If a complaint investigation confirms the issues raised in a complaint, the person managing the complaint will:
 - 5.13.1. identify and document the action required to improve service quality and reduce the likelihood of the issue recurring;
 - 5.13.2. facilitate the implementation of corrective action as soon as reasonable practicable; and
 - 5.13.3. write to the complainant and advise them of the outcome of the complaint, including any action taken to prevent a recurrence of the issues (where appropriate).
- 5.14. The complainant will also be advised about the action to take if they are not satisfied with the outcome of the complaint.
- 5.15. If the complaint is about an LDK employee, performance management actions may be undertaken in consultation with the General Manager of People and Culture.

Step 6: Review and Evaluate

- 5.16. LDK will:
 - 5.16.1. offer the complainant an opportunity to provide feedback on how their complaint was handled and resolved;
 - 5.16.2. review and use data to identify opportunities to improve service quality across the organisation, with recommendations to the Care Governance Committee or Risk Committee, where appropriate;
 - 5.16.3. review and evaluate any systemic issues that arise from the complaint to identify and implement improved processes or training; and
 - 5.16.4. retain a documented paper or electronic record of the complaint investigation process, outcomes and actions, including copies of all documentation and communication related to the complaint
- 5.17. If the complainant is not satisfied with the outcome of the complaint, the complainant can:
 - 5.17.1. escalate their concerns in writing to the Chief Operations Officer, who will review the complaint management process and determine if any additional action or investigation is required; and
 - 5.17.2. be provided with information about external review options including:

- engaging an independent dispute resolution service or mediator (such as a Community Justice Centre);
- use the NSW or ACT Fair Trading retirement village complaint service; or
- lodge an application with the NSW or ACT Civil and Administrative Tribunals

Step 7: Consider

5.18. Through LDK's complaint and feedback handling process, LDK will consider whether broader changes are required as part of LDK's commitment to continuous improvement for improved service delivery.

5.19. This will be achieved by:

5.19.1. maintaining accurate and detailed information of complaints and management strategies and processes;

5.19.2. analysing complaints and reporting through LDK Governance Committees, including:

- the number of complaints which are recurring complaints on the same issue;
- spikes in complaints;
- the spread of complaints, by Village;
- time taken to resolve complaints;
- characteristics of the complainants; and
- level of resident, family, representative or staff satisfaction with the complaint process;

5.19.3. analysing incident reports provided to the Care Governance Committee, Risk Committee and LDK Board;

5.19.4. providing reports on our performance against best practice standards; and determining staff training, development and opportunities for re-training

5.19.5.

6. Internal Dispute Resolution Process

What is an Internal Dispute?

6.1. An Internal Dispute can arise either between a resident and the operator of the LDK retirement village, where a complaint has not been resolved to the resident's satisfaction, or between two or more residents.

How can Internal Disputes be resolved?

6.2. Often the quickest and easiest way to resolve a dispute, between a resident and the operator or between two or more residents, is to discuss the problem in person with the Village General Manager or with each other (in the case of multiple residents). It helps to discuss your concerns and explain the issues with the other party. Let the other party express their concerns and position and try to come to a mutual agreement.

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party express their concerns and position and try to come to a mutual agreement.

4-Step Internal Dispute Resolution Process

6.4. If a mutual agreement cannot be reached, LDK will follow the following process for managing Internal Disputes:



Step 1: Acknowledge:

- 6.5. The Village General Manager is responsible for ensuring that a formal acknowledgement of the dispute is provided within 5 Business Days of LDK being notified of the dispute to reassure the resident or complainant that their dispute is being actioned.
- 6.6. Acknowledgement will include:
 - information about LDK’s Internal Dispute management process;
 - information about communication the complainant can expect throughout the investigation process; and
- 6.7. contact details of who is responsible for the process.

Step 2: Manage Dispute:

- 6.8. The Village General Manager will review the details of the dispute and the results from any investigation already conducted and attempt to resolve the dispute within 21 days.

Step 3: Resolve and Action:

- 6.9. After reviewing the details of the Internal Dispute, the Village General Manager will decide the appropriate course of action.
- 6.10. The Village General Manager may continue to advocate for a course of action taken previously.

Step 4: Options for External Resolution:

- 6.11. If the Internal Dispute has not been resolved to the satisfaction of the resident(s) involved, LDK or the resident may seek resolution through use of an external review option including (but not limited to):
 - engaging an independent dispute resolution service or mediator (such as a Community Justice Centre);
 - seeking legal advice from a lawyer or a retirement village specialist advocacy service

such as LawAccess NSW.

- use the NSW or ACT Fair Trading retirement village complaint service; or
- lodge an application with the NSW or ACT Civil and Administrative Tribunal.

7. Resident Assaults

- 7.1. Where a complaint or dispute relates to a resident assault or suspected resident assault, the matter should be managed in accordance with LDK's Mandatory Reporting Policy.

8. Records of Complaints and Internal Disputes

- 8.1. LDK is responsible for keeping a record of information about Complaints and Internal Disputes that have been raised in the retirement village for at least 5 years. Information that LDK will keep includes:
- 8.1.1. Details of each complaint or internal dispute, including the names and contact details of each resident concerned, and the date the complaint or dispute was raised;
 - 8.1.2. Details of actions taken in response to each complaint or internal dispute, including the names and contact details of any staff involved in the handling of each process and the date the action was taken;
 - 8.1.3. Whether the complaint or internal dispute was resolved, withdrawn, referred or escalated – or whether another outcome was achieved; and
 - 8.1.4. The number of complaints or internal disputes handled each calendar year.

9. Version Control

- 9.1. This policy should be reviewed and updated annually.

Version	Date	Content & Reason for changes	Author
1			