



# Retirement Living Code of Conduct

## 2020 Annual Report



## The Code Review Panel



**Independent Chair of the Code Review Panel:** Dr Elizabeth Lanyon is a lawyer with more than 35 years' experience, she was previously a senior Victorian Government executive with policy responsibility for retirement village regulation.



**Operator Representative:** Peter Nilsson is the Executive Director of the Chas Jacobson Group of Companies and Chief Operating Officer of the Village Glen Group which is located at Capel Sound on the Mornington Peninsula. The Village Glen is Australia's largest privately-owned retirement village located on a 54-hectare site comprising 616 independent living dwellings.



**Resident's Representative:** Rev Alistair Christie is a retired minister of the Uniting Church in Australia, who has lived in retirement villages for 17 years. Chair of his village resident committee, he is President of the ACT and Australian Resident Associations. He was a member of the Advisory Group reviewing ACT Retirement Village Legislation from 2015-2019.

## The Code Review Panel (Alternate Representatives)



**Operator Representative (Alternate):** Jennifer Clancy is a Director and Executive General Manager at Tigcorp. Jennifer has over 30 years senior management experience with 20 years in retirement living. Jennifer is currently a member of the Retirement Living Council and the Chair of the Property Council's Victorian Retirement Living Committee.



**Operator Representative (Alternate):** Anthony Heald has more than 20 years experience working in the retirement living, infrastructure and finance sectors. Anthony works at RetireAustralia as General Manager for People, Culture and Technology.



**Resident's Representative (Alternate):** Judy Mayfield is the current President of the Association of Residents of Queensland Retirement Villages, a position she has held for five years. Judy has held various positions in the community sector, prior to her retirement she was, for 12 years, the CEO of a supported accommodation service for people with an intellectual disability.

## The Code Administrator



**Code Administrator:** Megan Hobson has worked as an Adviser to a Federal Minister and a number of Members of Parliament, both in Canberra and in Queensland. She also has experience in events management in the not-for-profit sector. Megan brings a wealth of administrative, and professional knowledge to this role.

# Report from the Independent Chair of the Code Review Panel

We are pleased to issue our inaugural report on the operation of the Retirement Living Code of Conduct which came into effect on 1 January 2020.

The Code Review Panel comprises myself as the Independent Chair of the Code Review Panel, Peter Nilsson (Operator Representative), Alistair Christie (Resident's Representative), Jennifer Clancy (Operator Representative Alternate) Anthony Heald (Operator Representative Alternate) and Judy Mayfield (Resident's Representative Alternate).

Statistics recording breach complaints, disputes and enquiries are tabled elsewhere in this document.

The Code Administrator, Megan Hobson, has received seven Code breach complaints. One of these involved legal questions which were the subject of an application to the Queensland Consumer and Administrative Tribunal and which therefore was not dealt with under the Code until those actions were determined. However, the Code Administrator was able to investigate simultaneously a breach complaint regarding the same village's complaint handling processes. This year, the Administrator has determined that no breaches have occurred in the complaints referred to the scheme. The Panel expects a greater number of complaints in 2021 as the Code's existence is more widely promoted among residents.

The Panel notes two points to be considered moving forward when interpreting breaches under the Code. First, only conduct occurring after an operator committed to the Code can be taken into account in determining a breach. Secondly, under the Code, the Operator can only appeal the application of a sanction by the Administrator to the Code Panel, residents have no appeal process.

The Panel is expecting robust self-assessment from all Signatories as required by the Code as we move into 2021.

The Code Administrator also facilitated the resolution of disputes between residents and operators within villages as required under the Code.

The Panel is grateful for the rigorous and thorough investigations conducted by the Code Administrator. It considers that one of the strengths of the Code is the requirement for each operator to appoint a Code compliance officer and also to establish a complaints escalation process. This has enabled strong governance at executive levels by Code Signatories.

The Code Review Panel together with the Alternate representatives have met bi-monthly. It has considered all the questions and comments received prior to the Code coming into effect and published guidance on how it will apply Code provisions. It cannot add to or subtract from Code obligations: this must wait until it conducts its first Code review which will commence in 2021. However, it can spell out its interpretation, always making it clear that this will change from time to time as the Code Review Panel determines cases and receives more information. In some cases where the Code Review Panel could not agree or the question was not amenable to detail beyond the Code clause itself, being dependent on particular facts, no guidance has been given.

The Code Administrator and myself with others have taken every opportunity to explain the importance of the Code and its operation to State and Federal ministers, members of parliament and to government officials. Information sessions have also been run for Signatories and residents. The Panel considers that it is vital that the Code be promoted as widely as possible for two reasons. One is that every resident in a retirement village in Australia deserves the protection of the Code. Secondly confidence in the governance of villages can be detrimentally affected by the behaviour of non-Code village operators that lack the accountability that Code Signatories subscribe to.

This year was of course affected by COVID-19 restrictions, and we encourage and support the Board and Code Administrator to build on awareness and promoting the adoption of the Code across the nation in 2021.

The Code Review Panel welcomes the leadership of the Foundation Members in supporting the Code and through continuous improvement, bettering the protection and wellbeing of all residents and their families.

**- Dr Elizabeth Lanyon**  
**Independent Chair of the Code Review Panel**





# Code Review Panel Guidance

*The Code Review Panel's function is to review sanctions for breach of the Code determined by the Code Administrator.*

*This Guidance sets out the approach the Panel intends to take to interpreting the Code provisions and which it will apply when undertaking a review.*

*The Panel may change its Guidance from time to time so it is important to check the website [www.awisemove.com.au](http://www.awisemove.com.au) for the latest version.*

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**A3.2 We will internally audit our own compliance with the Code annually, act to rectify any failings as necessary and provide written confirmation to the Code Administrator of compliance. The Annual Compliance Certificate form is contained in the Code Resources.**

The Code Review Panel requires Code Signatories to complete an annual self-assessment checklist (at time of renewal) which will serve as a certification of compliance and evidences the audit. It is for the Code Signatory to establish their own process to ensure the audit is accurate. An Annual Compliance Checklist is provided to Signatories as part of the resources pack for this purpose.

**A5.5 Our procedures will assure residents that we will acknowledge a formal complaint, treat it confidentially and provide an initial response in writing as soon as possible. Where residents making a complaint tell us they are not satisfied with our response, we will not require them to write again to pursue the complaint through any escalation procedure. We will escalate the complaint as set out in paragraph A5.8 below. We will maintain a complaints register where we record: the names of the resident making the complaint; key dates when we received, acknowledged and responded to the complaint; the substance of the complaint; and the person responsible for managing the complaint.**

The Panel considers that complaints referred to in A5.5 are not confined to written complaints. The distinction drawn by the Code provision is between a complaint directed to the Code Signatories formal complaint system and one which is not. The Panel expects the Operators' procedures to set out clearly when complaints, both verbal and in writing, will be treated as formal and thus triggering the complaints process outlined in A5.5.

**A5.8 We will follow a cascading complaints-handling policy, which allows complaints to be escalated in a way that seeks to resolve them in a cost effective and efficient manner that is fair and reasonable to all parties. The escalation pathways will be detailed in writing in our policies, but this does not preclude the resident from pursuing their rights elsewhere. Also, this Code does not preclude an operator from offering or maintaining additional complaints handling and dispute resolution processes. However, the escalation pathway should include the following stakeholders:**

- a) The Community Manager (if agreed by the resident);**
- b) A senior manager or executive of the signatory who is not the manager of the Retirement Community;**
- c) The Code Administrator (or the Code Review Panel) for its referral to an external independent dispute resolution service, procedures and processes which are outlined in this document and the Code Resources;**
- d) The relevant authority with legislative authority to consider the Complaint.**

The consent of the resident to escalation to the Community Manager is required because the resident may be concerned that a complaint will adversely affect their treatment in the Retirement Community or that the complaint may involve or be directly in relation to the conduct of the Community Manager.

**B1.2 We will ensure the available sales and marketing information is comprehensive and accurately represents the actual or intended nature of the Retirement Community in terms of the type of tenure, available properties, the facilities on offer, care services available, financial costs and obligations, and information about our current residents.**

The Panel considers information about current residents should be generic and give a prospective resident a sense of the make-up of the Community such as average age, number of residents and gender distribution.

**B1.8 We will provide incoming residents, where possible, practical and reasonable, with information about any charges payable to third parties (e.g. utility companies, local authorities) and their indicative cost**

The Panel considers the main purpose of the provision is transparency. It expects signatories to make clear to residents when residents have to pay charges separately to third parties as well the service charge. The Panel will give due weight to the words "possible, practical and reasonable" when evaluating compliance, understanding that in some cases, charges vary with usage, or that although the existence of the charge is disclosed, it is not possible for the signatory to know the answer.

# Code Review Panel Guidance

**B2.6 We will provide new resident contracts in writing and in plain English. Contracts will:**

- a) Seek to implement, if appropriate and permitted by the relevant laws, contract recommendations of the peak bodies, such as the RLC's National Guide to Creating Simple and Effective Retirement Living Contracts;**
- b) Clearly set out our rights and responsibilities, and those of the residents;**
- c) Accommodate special requests from prospective residents to provide the contracts in other formats such as larger print versions**

The Code sets a principal expectation that contracts are clear and concise. This may involve rewriting of pre Code contract templates. The Code does not prescribe a standard form. If peak bodies recommend certain contract forms or terms it is a matter for the signatory to consider whether it is appropriate for that recommendation to be adopted in their contract. Where State and Territory laws mandate particular contract terms or formats, laws always take priority.

**B2.7 Where we are required to report to residents on the financial affairs of the Retirement Community, we will provide information on the community's operating budget with the contract, including:**

- a) The current year's resident charges and other sources of income for the Retirement Community;**
- b) The current year's expenses;**
- c) Details of the most recent surplus or deficit;**
- d) The previous year's audited budget statement;**
- e) The capital works fund (or sinking fund), and planned expenditure**

The Panel will treat provision of this financial information on request as meeting the obligation. The information does not need to be included in contract documentation provided prospective residents are advised what information they can obtain and how they can access it.

**B2.8 Along with the contract, we will provide information on the community rules, including information about:**

- a) The keeping of pets;**
- b) Visitors and guests;**
- c) Parking, including for caravans and boats if applicable;**
- d) Use of common property and community facilities;**
- e) The disposal of rubbish.**

Information about any of the topics a) to e) need not be provided if there is no relevant community rule.

**B2.9 We will provide information to potential residents on the process of leaving the community, including an overview of the re-selling process.**

The Panel considers that written information is required to provide clarity and for future reference. This applies to whatever the residents re-selling process is available, by the signatory or an independent agent.

**B3.1 For properties under construction, we will give residents a realistic expected completion or moving-in date. We will provide as much notice as possible of any delays and offer residents an opportunity to organise alternative arrangements. Wherever possible we will provide on-site accommodation to minimise undue hardship or distress.**

The Panel considers each circumstance relating to provision of on-site accommodation will need to be considered on its own facts and that no guidance can be provided. The Panel will give due weight to the words "wherever possible".

**B3.2 Before the resident moves in, we will ensure that the property is well-presented, clean and that a condition report has been prepared.**

The Panel considers that the condition report must establish the actual condition of the premises before the resident moves in, for each space in the property. The Panel does not expect the condition report necessarily to take the form of or meet the requirements which different States and Territories mandate for residential tenancy condition reports. A condition report could take the form of a video or pictures provided they contain sufficient detail.

**C2.2 We will agree to a clear process for consulting and responding to resident or consumer associations, where they are representing residents. We will facilitate any requests for consultation from residents on such matters, wherever possible.**

The Panel will interpret this provision as limited to requests relating specifically to the residents of the Village and not to general consultation on retirement village matters.

**C4.3 Through budget processes, we will distinguish between capital replacement and capital maintenance costs and provide clarity on who pays for these costs.**

This requirement applies to Code Signatories, whether or not their State or Territory law mandates this. The Code obligation focuses on transparency and clarity so the Operators treatment of these costs needs to be documented. The Panel will not separately evaluate the decisions the Code Signatory has made about whether an item fits in the capital replacement or capital maintenance category.

# Code Review Panel Guidance

**C5.2 In the design of new buildings, we will seek to adopt universal and adaptable design principles. For older, existing buildings, we will carefully consider requests from residents to make adaptations to assist mobility and access.**

The allocation of costs is a matter for negotiation between the Operator and the resident. The Panel will focus on the manner in which they handle a request for adaptation in line with the code's underpinning principles.

**D3.1 Where we are undertaking the re-sale and marketing, we will keep outgoing residents, their legal representatives, guardians or their estates regularly updated with information about the number and timing of prospective purchasers and genuine offers made.**

The Panel considers that this requirement still applies where the contract guarantees the refund of payment within a defined time and also provides for the resident to be paid part of or all of an increase in capital value.

## Generally

The Code stipulates in multiple locations "we will hold policies and procedures on XYZ"

Code policies and procedures must be documented and available to residents for discussion. Provided the policies and procedures cover the elements referred to in the particular Code provision, Code members may determine the level of detail and format.

## Communications

In addition to providing extensive resources to Code Signatories to assist them in maintaining their Code Compliance, the Code Administrator distributes a monthly Code E-Newsletter and regular updates as appropriate.

A bulk print run of the Code of Conduct Booklets was organised, which allowed operators to purchase printed copies of the Code at a reasonable price. A more comprehensive communications and marketing plan is being developed for 2021.

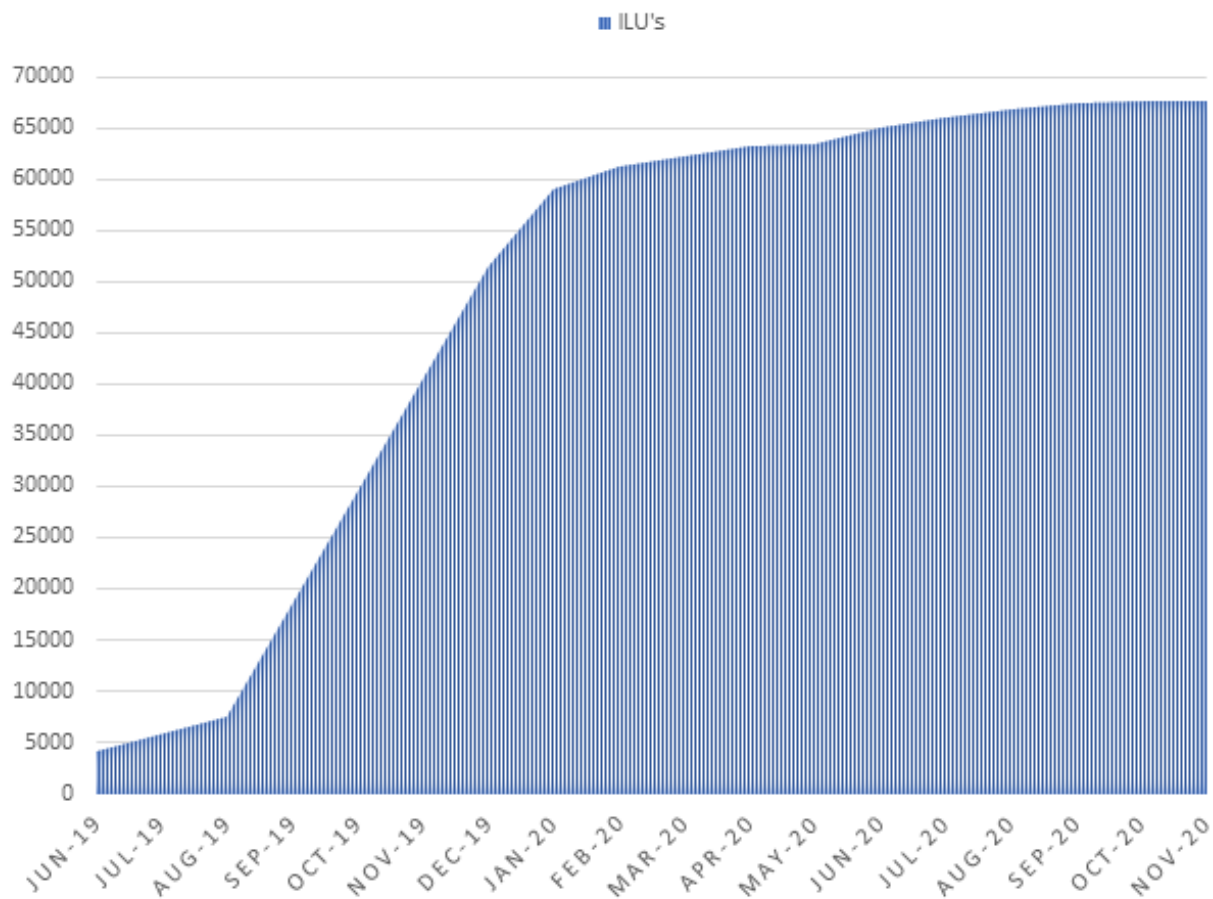
*"In Australia today, more than 46% of retirement village residents are living in a Code Compliant community"*  
- Dr Elizabeth Lanyon

Feedback from residents has also been incorporated into collateral and marketing:

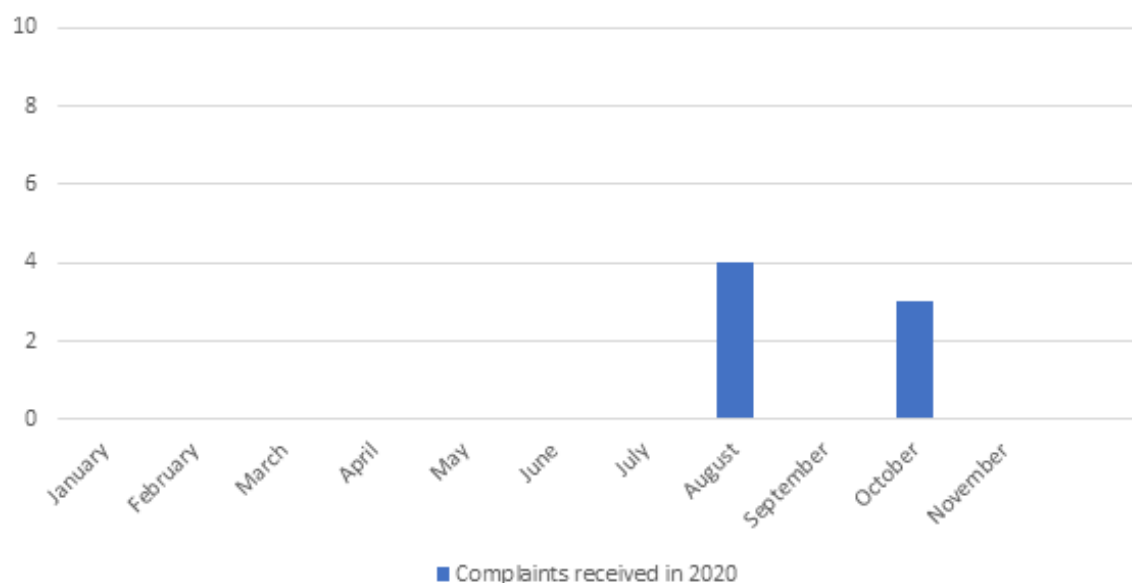
*"I feel confident living in Applewood Retirement Village knowing that they have committed to the Retirement Living Code of Conduct. It gives me great peace of mind that they care about my well-being whilst living here; and when it is time for me to leave."*  
- Robyn, resident of Applewood Retirement Villages

*"As the resident who has lived in Riverside the longest, it is important to me that those considering moving here have the reassurance provided in the Code of Conduct. We already have a good relationship with the operator. However, it is important for someone new to the village that the Code of Conduct will provide an extra layer of protection, should it ever be needed. It's also important for the families of those moving here to know there is a Code of Conduct that maintains the Village Standards."*  
- Diana, resident of Riverside Gardens, North Richmond

### CODE OF CONDUCT SUBSCRIPTIONS BY INDEPENDENT LIVING UNITS



### Complaints received in 2020





## Signatory villages as at 15/12/20

Provisional Registrations**	Aveo Fountain Court	Bartonvale Lodge Retirement Village
Arbor Sherwood**	Aveo Fulham	Bathurst Gardens
Barwarre Gardens Retirement Village**	Aveo Glynde Lodge	Bay Village Retirement Estate
Epping Manor**	Aveo Gulf Point	Baycrest
Ivan Court**	Aveo Hampton Heath	Beauty Point Retirement Resort
Northcott Gardens**	Aveo Hunters Green	Beleura Village Mornington
St Ives Albany**	Aveo Island Point	Bellcarra Retirement Resort
St Ives Carine**	Aveo Kings Park	Bellevue Gardens Retirement Village
St Ives Centro**	Aveo Kingston Green	Bellflower Retirement Resort
St Ives Mandurah**	Aveo Leabrook Lodge	Belrose Country Club Retirement Village
St Ives Melville**	Aveo Leisure Court	Bethanie Beachside
St Ives Murdoch**	Aveo Lindfield Gardens	Bethanie Elanora
St Ives Northshore**	Aveo Lindsay Gardens	Bethanie Esprit
St Laurence Park Lara**	Aveo Manly Gardens	Bethanie Fields
Wurley Court**	Aveo Manor Gardens	Bethanie Geneff
Abervale	Aveo Maple Grove	Bethanie Gwelup
Affinity Village	Aveo Melrose Park	Bethanie Illawong
Allora Gardens	Aveo Mingarra	Bethanie Joondanna
Alumuna	Aveo Minkara Resort	Bethanie on the Park
Amaroo Aged Care	Aveo Mosman Grove	Bethanie Warwick
Amaroo Retirement Village	Aveo Mountain View	Bethanie Waters
Angle Vale Gardens Retirement Estate	Aveo Newcastle	Bethany Close
Annesley Bowral	Aveo Newmarket	Bexley Gardens
Applewood	Aveo Newstead	Bicentennial
Arcadia Apartments	Aveo Oak Tree Hill	Birtinya Retirement Village
Arcadia Waters Bicton	Aveo Palmview	Blue Care Bethania Retirement Living
Arcadia Waters Geraldton	Aveo Peninsula Gardens	Blue Care Brassall Retirement Living
Arcadia Waters Maddington	Aveo Peregrine Springs Country Club	Blue Care Carramar Retirement Living
Arcadia Waters Mandurah	Aveo Pinetree	Blue Care Elandra Retirement Living
Arcadia Waters Port Denison	Aveo Riverview	Blue Care Ibis Court Retirement Living
Arcadia Waters Swanbourne	Aveo Robertson Park	Blue Care Iona Retirement Living
Ardency Aroona	Aveo Robina	Blue Care Nandeebie Retirement Living
Argyle Gardens	Aveo Roseville	Blue Care Tangara Retirement Living
Arilla South Morang Village	Aveo Southport Gardens	Blue Care Wesleyville Retirement Living
Ashlar Glen	Aveo Springfield	Blue Care Yurana Retirement Living
Ashton Gardens	Aveo Springthorpe	Blue Hills Rise
Assisi Court Retirement Village	Aveo Sunbury	Boambee Gardens Retirement Village
Athelstan	Aveo Sunnybank Green	Bolton Clarke Rowes Bay
Aveo Ackland Park	Aveo Taringa	Bolton Clarke Talbarra, Waterford - Retirement Living
Aveo Albany Creek	Aveo The Braes	Bolton Clarke Tantula Rise
Aveo Amity Gardens	Aveo The Domain Country Club	Bondi Beach Astra Retirement Village
Aveo Aspley Court	Aveo The Haven	Bongaree, Bribie Island
Aveo Banora Point	Aveo The Parks	Bougainvillea Retirement Village
Aveo Bayview Gardens	Aveo Tranquility Gardens	Bramble Bay Retirement Village
Aveo Bella Vista	Aveo Veronica Gardens	Bramblewood Retirement Village
Aveo Bentleigh	Aveo Westport	Breezes
Aveo Botanic Gardens	Azure Blue Carina	Brentwood Village
Aveo Bridgeman Downs	Azure Blue Redcliffe	Brig-O-Doon Retirement Village
Aveo Camden Downs	Baldwin Living Lane Cove Gardens	Brindabella Court Downer
Aveo Carindale	Baldwin Living Maroubra Gardens	Bribie Island Retirement Village
Aveo Carisfield	Baldwin Living Northside	Broadwater Gardens
Aveo Cherry Tree Grove	Baldwin Living Seabeach Gardens	Brooklyn Gardens
Aveo Cleveland Gardens	Baldwin Living Sequana	Buderim Gardens
Aveo Crestview	Baldwin Living Spring Gardens	Bunbury Village
Aveo Derwent Waters	Baldwin Living Vaucluse Gardens	Bundoora Village
Aveo Domainé	Balmoral Village	Burnside Village
Aveo Durack	Barnsbury Deepdene	Burwood Terrace
Aveo Edrington Park	Bartonvale Gardens Retirement Village	

## Signatory villages as at 15/12/20

Busselton Village	Fernhill	Greglea Village
Caesia Gardens	Fiddlers Green Village	Griffith Retirement Estate
Caloundra Rise Retirement Estate	Fig Tree Village	Grovedale Gardens
Camden View Village	Finncare Villas	Halls Head Village
Cameron Close Village	Foley Village	Harbourside Village Mindarie
Campbell Place	Forest Hills Village	Harwin Retirement Village
Cardinal Freeman The Residences	Forest Lakes Village	Heathglen
Cardinia Waters Village	Forresters Beach Retirement Village	Hedley Sutton
Carey Park Gardens	Fraser Shores Retirement Village	Henry Brooks Estate at IRT Kanahooka
Carlyle Gardens Mackay	Freedom Aged Care Balwyn	Henry Kendall Gardens
Carlyle Gardens Retirement Village	Freedom Aged Care Banora Point	Hertford Gardens
Carlyle Gardens Townsville	Freedom Aged Care Bendigo	Heydon Grove Independent Living Units
Carrington	Freedom Aged Care Berwick	Hibiscus Buderim Meadows
Carrington	Freedom Aged Care Burwood	Hibiscus Chancellor Park
Casey Grange Village	Freedom Aged Care Clayfield	Hibiscus Nambour
Castle Ridge Resort	Freedom Aged Care Cleveland	Hibiscus Noosa Outlook
Cazna Gardens	Freedom Aged Care Coffs Harbour	Hidden Valley Resort
Chatsbury Gardens	Freedom Aged Care Doncaster	Highlands Retirement Village
Chelsea	Freedom Aged Care Dromana	Highvale
Chesterville Retirement Village	Freedom Aged Care Geelong	Hillsvie Village
Claremont Gardens	Freedom Aged Care Glen Waverley	Homestay Village
Classic Residences	Freedom Aged Care Hawthorn	Horsham Gardens
Cleveland Manor Retirement Village	Freedom Aged Care Launceston	Howard Court at IRT Pioneer Place
Closebourne Village	Freedom Aged Care Morayfield	Inverpine
Coastal Waters	Freedom Aged Care Redland Bay	IRT Birch Villa Lifestyle Community
Coburns Gardens	Freedom Aged Care Rochedale	IRT Braeside Lifestyle Community
Constitution Hill	Freedom Aged Care Sandringham	IRT Culburra Beach Lifestyle Community
Corinthian Court Retirement Village	Freedom Aged Care Tamworth	IRT Dalmeny Lifestyle Community
Corinthian Court Village	Freedom Aged Care Tanah Merah	IRT Diment Towers Lifestyle Community
Corpus Christi Village	Freedom Aged Care Toowoomba Bridge St	IRT Edwina Lifestyle Community
Crows Nest Retirement Village	Freedom Aged Care Toowoomba Taylor St	IRT Greenwell Gardens Lifestyle
Darlington	Freedom Aged Care Tweed Heads	Community
Dee Why Gardens	Freedom Concierge Balwyn	IRT Harbourside Lifestyle Community
Devonport Gardens	Freedom Concierge Bayside	IRT Kangara Waters Lifestyle
Dianella Village	Galleon Gardens	Community
Donovan Village	Garden Village	IRT Links Seaside Lifestyle Community
Donvale Village	Geelong Grove	IRT Macarthur Lifestyle Community
Drayton Villas Retirement Village	Gillin Park Retirement Village	IRT Moruya Lifestyle Community
Drummond Place	Glenaeon	IRT Parklands
Dubbo Gardens	Glangara Retirement Village	IRT Peakhurst Lifestyle Community
Eaglemount Resort	Glangarry Retirement Village	IRT Sarah Claydon Lifestyle Community
Eastwood Retirement	Glangowrie Retirement Village	IRT Sea View Lifestyle Community
Edens Landing Retirement Village	Glenorchy Gardens	IRT St Georges Basin Lifestyle
Elderslee	Golden Age Retirement Village	Community
Elements of Toronto	Golden Ponds Resort	IRT Tarrawanna Gardens Lifestyle
Elliot Gardens	Good Shepherd Lodge	Community
Elphinwood Gardens	Goodwin Close	IRT The Clyde Lifestyle Community
Emmaus Lodge	Goodwin Village Ainslie	IRT The Palms
Encore Living Trafalgar	Goodwin Village Farrer	IRT The Ridge
Esperance Masonic Village	Goodwin Village Monash	IRT Thomas Holt
Evelyn Ridge	Gowanbrae Village	IRT Towradgi Park Lifestyle Community
Fair Haven Retirement Village	Gracehaven Retirement Village	IRT Towradgi Park Lodge
Fairview	Grant Street Retirement Village	IRT William Beach Gardens Lifestyle
Fairways	Greenleaves Retirement Village	Community
Farrington Grove Retirement Estate	Greenways Retirement Village	IRT Woodlands
Fassifern Retirement Village	Greglea Village	IRT Woolwich Lifestyle Community
Faulkner Park		IRT Woonona
Fernbank		Isabella Gardens

## Signatory villages as at 15/12/20

James Milson Village  
 Jefferis Gardens  
 Karagi Court  
 Karana  
 Karingal  
 Keilor Village  
 Keith Simpson Village  
 Keperra Sanctuary  
 Kiah Lodge  
 Kilkivan Retirement Village  
 Knox Village  
 Koorootang Court  
 Lady Small Haven Retirement Village  
 Lakes Residential Retirement Village  
 Lakeside Retirement Village  
 Lakeside Village  
 Latrobe Village  
 Launceston Gardens  
 Lawley Park Village  
 Leabrook Place  
 Leisure Lea Gardens  
 Leschenault Village  
 Lexington Gardens  
 Lifestyle Manor  
 Lightsview Retirement Village  
 Lincoln Gardens Retirement Village  
 Lincoln Grove Retirement Village  
 Little Bay Apartments  
 Living Choice Alloura Waters  
 Living Choice Broadwater Court  
 Living Choice Deepwater Court  
 Living Choice Fullarton  
 Living Choice Galston  
 Living Choice Glenhaven  
 Living Choice Kawana Island  
 Living Choice Sunshine Cove  
 Living Choice Twin Waters  
 Living Choice Woodcroft  
 Long Island Village  
 Lourdes Retirement Village  
 Lutanda Manor  
 Macarthur Gardens Retirement Village  
 Macquarie Grove Retirement Village  
 Macquarie View  
 Magill Retirement Village  
 Main Street Village Pakenham  
 Margaret Hubery Village  
 Marsden Gardens  
 Martha Cove Village  
 Martha's Point  
 Maybrook Village  
 McDonald Court Retirement Village  
 Meadowvale  
 Menora Masonic Village  
 Menzies Malvern  
 Mernda Retirement Village  
 Midlands Terrace  
 Milford Grange

Moonah Park Retirement Village  
 Moreton Shores  
 Morven Manor  
 Mt Eymard  
 Murray Gardens Retirement Village  
 Murray Lands Retirement Village  
 Murray River Village  
 Nellie Melba Retirement Village  
 Nelsons Grove  
 Newling Gardens Retirement Village  
 Next Stage Living  
 Noosa Waters Retirement Estate  
 North Lakes Retirement Resort  
 Noyea Riverside Retirement Village  
 Nubeena Retirement Village  
 Oak Grange Village  
 Oak Tree Armidale  
 Oak Tree Bathurst  
 Oak Tree Boolaroo  
 Oak Tree Boronia Heights  
 Oak Tree Burpengary  
 Oak Tree Cairns  
 Oak Tree Capricorn Coast  
 Oak Tree Cardiff  
 Oak Tree Darling Heights  
 Oak Tree Dubbo  
 Oak Tree Goodna  
 Oak Tree Goondiwindi  
 Oak Tree Goonellabah  
 Oak Tree Gunnedah  
 Oak Tree Kanwal  
 Oak Tree Kingston  
 Oak Tree Moss Vale  
 Oak Tree Mudgee  
 Oak Tree Norman Gardens  
 Oak Tree Orange  
 Oak Tree Park Avenue  
 Oak Tree Pelican Waters  
 Oak Tree Riverway Townsville  
 Oak Tree Rutherford  
 Oak Tree Skye  
 Oak Tree Tamworth  
 Oak Tree Taylor St Armidale  
 Oak Tree Toowoomba  
 Oak Tree Victoria Point  
 Oak Tree Warwick  
 Oak Tree Yeppoon  
 Ocean Gardens Retirement Village  
 Ocean Grove Gardens  
 Orella  
 Ormiston Rise Retirement Village  
 Oxley Gardens  
 Parkland Villas Booragoon  
 Parkland Villas Ellenbrook  
 Parkland Villas Mandurah  
 Parkland Villas Woodlands  
 Parklands Village  
 Parkside at IRT Pioneer Place

Parque Vista on Seville  
 Patterson Lakes Village  
 Peel River Gardens  
 Peninsula Grange  
 Peninsula Village  
 Peppertree Hill  
 Pine Lake Village  
 Pioneers  
 Pittwater Palms  
 Pittwater Village  
 Plenty Valley Village  
 Point Cook Village  
 Port Hedland Masonic Village  
 Port Phillip Village  
 Providence Bacchus Marsh  
 Queens Lake Village  
 Queens Park Assisted Living  
 Regency Park Retirement Village  
 Regis Hollywood Retirement Living  
 Renaissance Living  
 Renaissance Victoria Point Retirement Village  
 Ridgecrest Village  
 Ridgehaven Rise  
 River Parks Village  
 River Pines Village  
 Riverina Gums Retirement Village  
 Riverside Gardens North Richmond  
 Rivervue  
 Rochford Place  
 Rosebud Village  
 Rosemount Retirement Community  
 RSL Care Westhaven Nursing Home  
 Rylands of Hawthorn  
 Rylands of Kew  
 Sackville Grange  
 Salford Park Community Village  
 Salford Retirement Estate  
 Salford Waters Retirement Estate  
 Sanctuary Park Retirement Community  
 Sapphire Luxury Retirement Apartments  
 Scarborough Mews Retirement Village  
 Seascape Gardens  
 Selandra Rise Retirement Village  
 Sencia  
 Settlers Forest Lake  
 Settlers Lakeside  
 Settlers Ridge Estate  
 Settlers Ridgewood Rise  
 Settlers Rockhampton  
 Seville Grove Gardens  
 Shanagolden Pakenham  
 Sienna Grange  
 Signature Gardens Retirement Resort  
 Sinnamon Village  
 Solomons Rise Village  
 Somerton Park Seniors' Living Community

## Signatory villages as at 15/12/20

Southern Village	The Terraces	Yukana Private
Sovereign Gardens	The Verge	
Spring Grove Retirement Village	The Village Glen	
St Albans Park Gardens	The Village Swansea	
St David's Close	The Village Williamstown	
St Ives Albany	The Villas in Brighton	
St Ives Carine	The Villas on Milton Ave	
St Ives Centro	The Willows Retirement Village	
St Ives Mandurah	Thomas Perrott Village	
St Ives Melville	Timberside Villas	
St Ives Murdoch	Toorak Place	
St Ives Northshore	Torrens Grove Retirement Village	
St James Retirement Village	Townsend Gardens	
St Joseph's Mews	Townsend Park	
St Paul de Chartres Retirement Units	Tranquil Waters Retirement Village	
St Thomas' Greensborough	Trebartha Apartments	
Star of the Sea Torquay	Treeview Estates	
Strathalan	Trinity Green	
Stretton Gardens Retirement Estate	Unity Retirement Village	
Success Village	Vermont Estate	
Sugar Valley Lifestyle Estate	Vermont Village	
Sugarland Gardens Retirement Village	Victoria District Village	
Sunset Ridge	Victoria Grange	
Swan View Gardens	Viewbank Gardens	
Tallowood Lodge Retirement Village	Village Baxter	
Taloumbi Gardens	Wagga Gardens	
Tamworth Gardens Retirement Estate	Walka Grange Lifestyle Village	
Tannoch Brae	Walmsley Friendship Village	
Taree Gardens	Walnut Grove Estate	
Tarneit Skies Retirement Village	Wamberal Gardens Retirement Village	
Tarragal Glen Retirement Village	Wantirna Village	
Taylors Hill Village	Waratah Highlands Village	
Tea Tree Gardens Retirement Village	Warrnambool Gardens	
Templestowe Retirement Village	Waterford Park	
The Arbour Berry	Waterford Valley Lakes	
The Baytree by Ardency	Watermark Castle Cove Retirement Village	
The Breeze	Waverley Country Club	
The Brighton on Bay	Weary Dunlop Retirement Village	
The Central by Goodwin	Wellington Manor Retirement Village	
The Clayfield	Wheeler's Gardens	
The Cove Village	Wheller on the Park	
The Crescent, Brighton	Willandra Village and Bungalows	
The Gardens on Lindfield	Willowdale Retirement Village	
The Glenbrook	Winders Lodge	
The Governor's Retirement Community	Wisteria Grove Retirement Village	
The Grace	Wivenhoe Village	
The Grange Retirement Estate	Wodonga Gardens Retirement Estate	
The Granton, Brighton	Wollondilly Gardens	
The Grove	Wood Glen Retirement Village	
The Heritage of Hunters Hill	Woodlands Park	
The Lakes Bundaberg	Woodlands Retirement Village	
The Lakes Estate	Woodstock West	
The Laurels Retirement Village	Woodward Retirement Village	
The Links at Waterford	Woorim Retirement Village	
The Manors of Mosman	Wyndham Grange Village	
The Oaks	Yakamia Gardens	
The Orchards	Yallambee Village	
The Pines		