

2024 Annual Report

Retirement Living Code of Conduct



The Code Review Panel



Independent Chair

Dr Elizabeth Lanyon is a lawyer with more than 40 years' experience; she was previously a senior Victorian Government executive with policy responsibility for retirement village regulation.

Operator Representative



Until October 2024

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.



October 2024 to present

Tamara Rasmussen has worked at Lendlease and now Keyton for the past 20 years. With over 25 years of experience in the property and retirement industry, her wealth of knowledge encompasses everything from community engagement and sales to operations and development management. At Keyton, Tamara is responsible for the day-to-day operations of Keyton's 76 retirement villages and resorts with over 17,000 residents and more than 600 staff.

Resident Representative



Judy Mayfield is the President of the Association of Residents of Queensland Retirement Villages, a position she has held for nine 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.

Operator Representative (alternate)



From October 2024

Kim Teudt is the Head of Business Development for Endeavour Foundation, Life Member of the Retirement Living Council, Chair of the Qld Property Council Retirement Living Committee, Member of the Code Review Panel, Non-Executive Director of Lions Haven Aged Care Limited. Kim is a strategic, passionate and empathetic leader who has held Executive leadership, Director, Non-Executive Director and volunteer roles in the retirement living and aged care sector over the last 30 years.



From October 2024

Harish Bastian has more than 25 years' experience working in the Retirement Living and hospitality management sectors. He's worked across a broad range of retirement living models from rentals, land lease and DMF. Since 2016 Harish has been part of the South Australian Retirement Living Committee and will take on the role of Chair in 2025.

Resident Representative (alternate)



Craig Bennett is the President of NSW Retirement Villages Residents Association. Before retiring Craig worked in investment banking (Commodities and Structured Finance). He has held various Board positions including Company Secretary of Bendigo Community Bank, CEO of Socotherm Australia, member of Community Board of Advice for Hawkesbury Hospital and Deputy Chair of Audit Committee for Hawkesbury City Council. Craig is also a volunteer Chaplain in an aged care facility.

The Code Administrator



Deborah (Debbie) MacDonald stepped into the role of Code Administrator in April 2024 and is based at the Property Council's Queensland office. Debbie has extensive administration and compliance experience with KPMG Law, Logan City Council, QUT and The University of Queensland.

Report from the Independent Chair of the Code Review Panel

We are pleased to issue our report on the operation of the Retirement Living Code of Conduct for the year 2024.

Code Review Panel members reflect both operator and resident experience. Panel members also have deep lived experience and significant hands-on operational backgrounds so are practical and knowledge. This balance stood us in good stead when answering the question: why have the Panel not found any Code of Conduct breaches to date? We are confident that we are applying robust and measured consideration to each allegation. There are a few reasons why breaches are not coming to us: difficult legal questions naturally find their way direct to tribunals or regulators; signatories are leading the way with extensive resident consultation and communication and internal complaint handling systems are working well with escalation to senior staff in cases of complexity (as required by the Code. We received some interesting breach complaints this year. One concerned a range of emergency management issues. Another was our first allegation of elder abuse based on complaint handling processes.

In 2024, the Code Scheme received four complaints, two from New south Wales and two from Queensland. In one instance, the Administrator did not proceed with an investigation after making initial enquiries because the matter was being dealt with by a State regulator and raised legal interpretation guestions. The substantive issue underlying another complaint had been already determined by a State Tribunal who directed the operator to enforce village rules with another resident. The complainant has requested the Administrator to consider internal complaint handling by the operator and we await documentation. A third complaint alleged elder abuse, which was treated by the Scheme as an allegation of breach of Code values. The Administrator determined that there was no evidence to support a determination of breach but did issue written guidance to the Signatory. This recommended that an individual complainant should always be advised briefly how the operator proposes to deal systemically with village wide issues, such as a staff training and discipline. The resident should be enabled to have a support person with them especially if the complaint escalates to meeting with senior executives. The last complaint involved a large number of intersecting issues relating to the individual resident and more broadly to a range of issues in the village. The Administrator conducted a thorough review of all documentation relating to the issues and the responses of the operator and the complainant and determined that no Code breaches had occurred. In the course of this investigation the Administrator worked closely with both parties to successfully remove any barriers to positive and constructive communication to solve or progress the issues.

Apart from alleged Code breaches, the Administrator also receives a number of phone calls and written complaints about resident to resident disputes and disputes between the resident and the operator. The Administrator actively liaises with the parties to ensure communication lines are restored and workable solutions are reached.

Panel membership changed this year. Anthony Heald stepped down and we thank him warmly for his contribution. Tamara Rasmussen and Harish Bastian were appointed as operator representatives. The other operator representative is Kim Teudt. The resident representatives, Judy Mayfield and Craig Bennett, continue their valuable contribution to the scheme. All members of the Panel attended the Retirement Living Forum and several of the Panel shared the podium speaking with Age Discrimination Commissioner Robert Fitzgerald AM on the resident experience.

Deborah MacDonald has provided expertise and energy as Code Administrator, engaging with signatories and code compliance officers, systematising records, arranging new printed and online material and liaising with stakeholders at the Forum. She also arranged the very successful webinar on emergency management. The Panel thanks Deb warmly for her work this year.

The Administrator conducted the bi-annual review of the Code of Conduct using a survey. It is pleasing that the RLCA and the RLC approved significant changes and, in particular, agreed to add a requirement for signatories to prepare, implement and publish a strategy to respond to elder abuse. This recommendation for reform was made before the "call to action" at the Forum by Mr Fitzgerald.

The RLCA has taken steps to increase take-up of the Code by lowering the prices for subscription and renewal. In addition, a refreshed marketing approach is designed for early 2025. We are keen to ensure further coverage of the Code by enlarging the number signatories.

In a timely step, after 5 years in operation an external review of the Code of Conduct has been commissioned from Cameron, Ralph Khoury. Extensive consultation will occur in the first half of 2025.

Thank you and congratulations to the Code Review Panel, Code Administrator, Signatories, Code Compliance officers and residents for their ongoing commitment to the Retirement Living Code of Conduct.

Dr Elizabeth Lanyon Independent Chair of the Code Review Panel



State-by-state

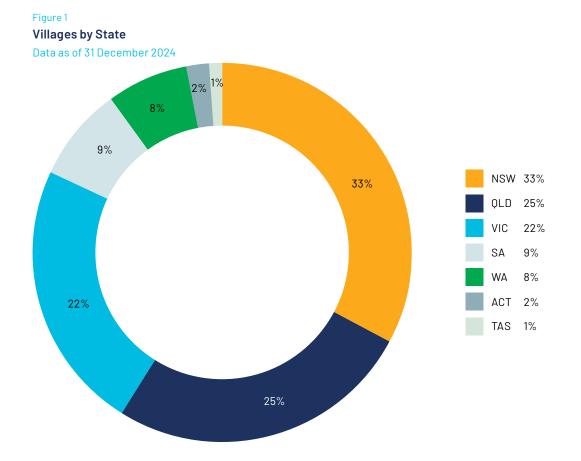
Benefits of the Code

Retirement community operators who sign up to the Code of Conduct will be listed on <u>www.awisemove.com.au</u> as a signatory, enabling current and prospective residents to easily identify them when making their decision to move to a community.

Signatories can also use the Retirement Living Code of Conduct seal in their marketing materials and within their communities, to acknowledge their commitment to the Code's standards.

The Code provides a complaint management framework, including an independent dispute resolution service, to assist the speedy and cost-effective resolution of complaints where possible.

Code signatories will have developed consistent and transparent complaints and dispute management systems that have the support of the Code and its framework.



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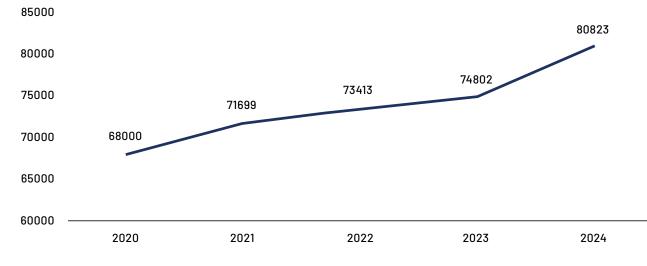
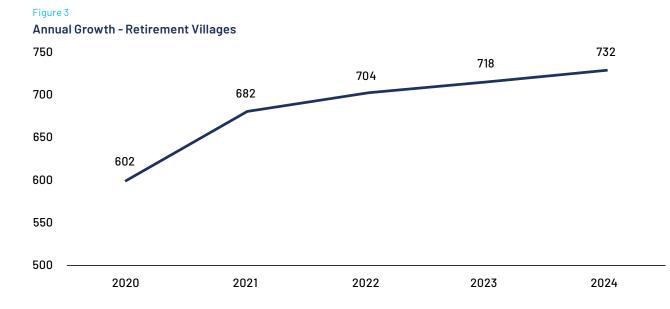


Figure 2 Annual Growth - Independent Living Units (ILUs)



8

Signatory villages as at 31/12/24

Alchera Living (Inc) - Webber Gardens Village

- Alchera Living (Inc) Weeronga Village
- Amana Living Meadow Springs Village

Amana Living - Treendale Village

Amana Living - Lady McCusker Village

Amara Residences Pty Ltd - Amara by Pathways

Amara Residences Pty Ltd - Arama by Pathways

Anglicare NSW South, NSW West & ACT - Brindabella Court Downer

Anglicare NSW South, NSW West & ACT - St David's Close

Anglicare NSW South, NSW West & ACT - Wollondilly Gardens

Arcadia Group - La Dimora Retirement Resort

Arcadia Group - Rylands of Hawthorn

Arcadia Group - Rylands of Kew

Arcadia Group - Arcadia Waters Bicton

Arcadia Group - Arcadia Waters Geraldton

Arcadia Group - Arcadia Waters Maddington

Arcadia Group - Arcadia Waters Mandurah

Arcadia Group - The Beaumont Swanbourne

Arcadia Group - Affinity Retirement Village

Arcadia Group - Arcadia Waters Lakelands

Australian Unity - Constitution Hill Retirement Community

Australian Unity - Elderslee

Australian Unity - Greglea Village

Australian Unity - Karagi Court

Australian Unity - Kiah Lodge

Australian Unity - Mt Eymard

Australian Unity - Sienna Grange

Australian Unity - St Brigid's Green

Australian Unity - St Patrick's Green

Australian Unity - The Governor's Retirement Resort Australian Unity - The Heritage of Hunters Hill

Australian Unity - Willandra Village and Bungalows

Australian Unity - St Luke's Green

Australian Unity - Campbell Place Retirement Community

Australian Unity - Drummond Place Carlton

Australian Unity - Geelong Grove

Australian Unity - Morven Manor

Australian Unity - Peninsula Grange

Australian Unity - The Grace Albert Park Lake

Australian Unity - The Oaks Retirement Community

Australian Unity - The Alba Easy Living Apartments

Australian Unity - Victoria Grange Residential Community

Australian Unity - Walmsley Friendship Village

Aveo - Banora Point Retirement Village

Aveo - Bayview Gardens Retirement Living

Aveo - Bella Vista Haven Retirement Living

Aveo - Camden Downs Retirement Village

Aveo - Fernbank

Aveo - Island Point Retirement Living

Aveo - Lindfield Gardens Retirement Village

Aveo - Maple Grove Retirement Village

Aveo - Minkara Resort

Aveo - Mountain View Retirement Village

Aveo - Ocean View Retirement Living

Aveo - Peninsula Gardens Retirement Living

Aveo - Pittwater Palms

Aveo - Shortland Waters Retirement Living

Aveo - The Manors of Mosman

Aveo - Albany Creek Retirement Village

Aveo - Amity Gardens Retirement Living

Aveo - Aspley Court Retirement Village

Aveo - The Newstead Residences

Aveo - Aveo Springfield

Aveo - Bridgeman Downs Retirement Village

Aveo - Cleveland Gardens Retirement Living

Aveo - Cleveland Heights Retirement Living

Aveo - Forest Grove Retirement Living

Aveo - Lindsay Gardens Retirement Living

Aveo - Manly Gardens Retirement Living

Aveo - Newmarket Parklands Retirement Village

Aveo - Parkside Carindale Retirement Living

Aveo - Peregian Springs Country Club

Aveo - Redlands by the Bay Resort

Aveo - Robertson Park Retirement Village

Aveo - Robina Gardens Retirement Living

Aveo - Rochedale Gardens Retirement Living

Aveo - Southport Gardens Retirement Living

Aveo - Sunnybank Retirement Village

Aveo - Sunset Palms Retirement Living

Aveo - Taringa Parkside Retirement Living

Aveo - The Clayfield

Aveo - The Domain Country Club

Aveo - The Parks Retirement Living

Aveo - The Sanctuary Retirement Living

Aveo - Tranquility Gardens Retirement Living

Aveo - Derwent Waters Retirement Village

Aveo - Mowbray Links Retirement Village

Aveo - Beachside Gardens Retirment Village

Aveo - Botanic Gardens Retirement Living

Aveo - Cherry Tree Grove Retirement Living Aveo - Concierge Balwyn Retirement Living

- Aveo Concierge Bayside Retirement Living
- Aveo Coral Mews Retirement Village
- Aveo Cornish Grange Retirement Village
- Aveo Domaine Retirement Living
- Aveo Edrington Park Retirement Living
- Aveo Fountain Court Retirement Living
- Aveo Hunters Green Retirement Living
- Aveo Kingston Green Retirement Living
- Aveo Lisson Grove Retirement Village
- Aveo Mingarra Retirement Living
- Aveo Oak Tree Hill Retirement Living
- Aveo Redmond Park Retirment Living
- Aveo Roseville Retirement Living
- Aveo Sackville Grange
- Aveo Springthorpe Retirement Living
- Aveo Streeton Park Retirement Living
- Aveo The George Retirement Living
- Aveo Toorak Place
- Aveo Veronica Gardens Retirement Living
- Azure Retirement Living Azure Retirement Living
- Baldwin Living Baldwin Living Lane Cove Gardens
- Baldwin Living Baldwin Living Maroubra Gardens
- Baldwin Living Baldwin Living Seabeach Gardens
- Baldwin Living Baldwin Living Northside
- Baldwin Living Baldwin Living Sequana
- Baldwin Living Baldwin Living Vaucluse Gardens
- Baldwin Living Baldwin Living Kensington Hill
- Baldwin Living Baldwin Living Spring Gardens
- Baptcare Ltd Baptcare Karingal Community

Baptcare Ltd - Baptcare Hedley Sutton Community

- Baptcare Ltd Baptcare Karana Community
- Baptcare Ltd Baptcare Strathalan Community
- Baptcare Ltd Baptcare The Orchards Community Baptist Village Baxter - Rosebud Village
- Baptist Village Baxter Village Baxter
- **Beauty Point Retirement Resort**
- Benetas Dalkeith Heights Retirement Village
- Benetas St John's Rise Retirement Village
- Benetas Bridgewater Lake Retirement Estate
- Bethanie Group Bethanie Beachside Retirement Village
- Bethanie Group Bethanie Elanora
- Bethanie Group Bethanie Esprit
- Bethanie Group Bethanie Fields Bethanie Group - Bethanie Geneff
- . Bethanie Group - Bethanie Gwelup
- Bethanie Group Bethanie Illawong
- Bethanie Group Bethanie Joondanna
- Bethanie Group Bethanie on the Park
- Bethanie Group Bethanie Warwick
- Bethanie Group Bethanie Waters
- Blue Care Argyle Gardens
- Blue Care Azure Blue Carina
- Blue Care Azure Blue Redcliffe
- Blue Care Blue Care Acacia Gardens Retirement Living
- Blue Care Blue Care Alkira Retirement Living
- Blue Care Blue Care Ardmore Retirement Living
- Blue Care Blue Care Ben Bryce Retirement Living
- Blue Care Blue Care Bethania Retirement Living
- Blue Care Blue Care Bli Bli Retirement Living
- Blue Care Blue Care Brassall Retirement Living

Blue Care - Blue Care Caloundra Retirement Living

- Blue Care Blue Care Carramar Retirement Living
- Blue Care Blue Care Elanora Gardens Retirement Living
- Blue Care Blue Care Gracemere Gardens Retirement Living
- Blue Care Blue Care Ibis Court Retirement Living
- Blue Care Blue Care Iona Retirement Living
- Blue Care Blue Care Kallmar Retirement Living
- Blue Care Blue Care Kirami Retirement Living
- Blue Care Blue Care Lakeside Retirement Living
- Blue Care Blue Care Masters Lodge Retirement Living
- Blue Care Blue Care Nandeebie Retirement Living
- Blue Care Blue Care New Haven Retirement Living
- Blue Care Blue Care North Pine Retirement Living
- Blue Care Blue Care Tangara Retirement Living
- Blue Care Blue Care Wesleyville Retirement Living
- Blue Care Blue Care Wirunya Retirement Living
- Blue Care Blue Care Wondall Gardens Retirement Living
- Blue Care Blue Care Yurana Retirement Living
- Blue Care Carlyle Gardens Mackay
- Blue Care Carlyle Gardens Townsville
- Blue Care Fraser Shores 2 Retirement Village
- Blue Care Fraser Shores Retirement Village
- Blue Hills Residences Blue Hills Residences
- Blue Hills Residences Blue Hills Rise
- Bolton Clarke Broadwater Gardens Retirement Living Community
- Bolton Clarke Darlington Retirement Living Community

Bolton Clarke - Macquarie View Retirement Living Community

Bolton Clarke - Riverwood Retirment Living Community

Bolton Clarke - Winders Lodge Retirement Living Community

Bolton Clarke - Baycrest Retirement Living Community

Bolton Clarke - Bicentennial Retirement Living Community

Bolton Clarke - Rowes Bay Retirement Living Community

Bolton Clarke - Talbarra Retirement Living Community

Bolton Clarke - Tantula Rise Retirement Living Community

Bolton Clarke - Bongaree Retirement Living Community

Bolton Clarke - Breezes Retirement Living Community

Bolton Clarke - Carrington Retirement Living Community

Bolton Clarke - Cazna Gardens Retirement Living Community

Bolton Clarke - Chelsea Retirement Living Community

Bolton Clarke - Fairview Retirement Living Community

Bolton Clarke - Fairways Retirement Living Community

Bolton Clarke - Fernhill Retirement Living Community

Bolton Clarke - Galleon Gardens Retirement Living Community

Bolton Clarke - Inverpine Retirement Living Community

Bolton Clarke - Milford Grange Retirement Living Community

Bolton Clarke - Moreton Shores Retirement Living Community

Bolton Clarke - Pioneers Retirement Living Community

Bolton Clarke - Westhaven Retirement Living Community

Bolton Clarke - Sapphire on the Esplanade Retirement Living Community

Bolton Clarke - Sunset Ridge Retirement Living Community

Bolton Clarke - Bribie Cove Retirement Living Community Bolton Clarke - Glasshouse Views Retirement Living Community

Bolton Clarke - Hillside Gardens Retirement Living Community

Bolton Clarke - Europa On Alma Retirement Living Community

Bolton Clarke - Callisto Place Retirement Living Community

Bolton Clarke - Armstrong Green Retirement Living Community

Bolton Clarke - Casey Grange Retirement Living Community

Bolton Clarke - Martha Cove Retirement Living Community

Bolton Clarke - Martha Bay Retirement Living Community

Bolton Clarke - Beachlands Village Retirement Living Community

Bolton Clarke - Coral Estate Retirement Living Community

Bolton Clarke - Jacaranda Gardens Retirement Living Community

Bolton Clarke - Jurien Bay Village Retirement Living Community

Bolton Clarke - Mandurah Village Retirement Living Community

Bolton Clarke - Menora Gardens Retirement Living Community

Bolton Clarke - Pearson Village Retirement Living Community

Bolton Clarke - Riverwood Retirement Living Community

Bondi Beach Astra - Bondi Beach Astra Retirement Village

Boroondara Aged Services Society (BASScare) - Hester Canterbury

Boroondara Aged Services Society (BASScare) - Morgan Glen Iris

Brightwater Care Group - Kingsway Court Brightwater Retirement Village

Brisbane Housing Company Ltd - Arbor Sherwood

Bupa - Bupa Sutherland Retirement Village

Burnside Retirement Services Inc -Pineview Retirement Village

Buxton Group Retirement Trust - The Crescent, Brighton

Buxton Group Retirement Trust - The Granton, Brighton

Carrington Centennial Care Ltd - Carrington Retirement Living Community

Centennial Living - Beleura

Centennial Living - Cardinia Waters

Centennial Living - Main Street

Centennial Living - Wyndham Grange

Churches of Christ in Queensland -Amaroo Retirement Village

Churches of Christ in Queensland -Assisi Court Retirement Village

Churches of Christ in Queensland -Bribie Island Retirement Village

Churches of Christ in Queensland -Brig-O-Doon Retirement Village

Churches of Christ in Queensland -Crows Nest Retirement Village

Churches of Christ in Queensland - Fair Haven Retirement Village

Churches of Christ in Queensland -Fassifern Retirement Village

Churches of Christ in Queensland -Golden Age Retirement Village

Churches of Christ in Queensland -Gracehaven Retirement Village

Churches of Christ in Queensland -Kilkivan Retirement Village

Churches of Christ in Queensland - Lady Small Haven Retirement Village

Churches of Christ in Queensland -Moonah Park Retirement Village

Churches of Christ in Queensland -Nubeena Retirement Village

Churches of Christ in Queensland -Regency Park Retirement Village

Churches of Christ in Queensland -Sanctuary Park Retirement Community

Churches of Christ in Queensland - St James Retirement Village

Churches of Christ in Queensland -Sugarland Gardens Retirement Village

Churches of Christ in Queensland -Woorim Retirement Village

Churches of Christ in Queensland -Arcadia Apartments

Churches of Christ in Queensland -Bethany Close Retirement Village

Churches of Christ in Queensland -Chesterville Retirement Village Churches of Christ in Queensland - Churches of Christ in Queensland Emmaus Lodge

Churches of Christ in Queensland -Grant Street Retirement Village

Civic Group Australia Limited as trustee for Civic Church trading as Yukana Private - Yukana Private

Clayton Church Homes - Balhannah Retirement Village

Clayton Church Homes - Retirement Living Beulah Terraces, Norwood

Clayton Church Homes - Retirement Living Crafers SA | Clayton Church Homes

Clayton Church Homes - Retirement Living Gumeracha SA | Clayton Church Homes

Clayton Church Homes - Retirement Living Lobethal SA | Clayton Church Homes

Clayton Church Homes - Retirement Living Magill SA | Clayton Church Homes

Clayton Church Homes - Percival Street, Norwood

Clayton Church Homes - Norwood Cottages

Clayton Church Homes - Retirement Living Stirling SA | Clayton Church Homes

Clayton Church Homes - Retirement Living Uraidla SA | Clayton Church Homes

Clayton Church Homes - Retirement Living Woodside SA | Clayton Church Homes

Clayton Church Homes - Bridgewater Village

Eastwood Retirement - Eastwood Retirement

Elements of Toronto - Elements of Toronto

Encore Living Trafalgar Pty Ltd -Encore Living Trafalgar

Finley Regional Care Pty Ltd - Alumuna

Forsite Capital - Balmoral Village

Forsite Capital - Greenways Village

Gannon Lifestyle Communities - Griffith Retirement Estate

Gannon Lifestyle Communities -Tamworth Gardens Retirement Estate Gannon Lifestyle Communities - Angle Vale Gardens Retirement Estate

Garden Village - Garden Village

Goodwin Aged Care - Goodwin Village Ainslie

Goodwin Aged Care - Goodwin Village Crace

Goodwin Aged Care - Goodwin Village Farrer

Goodwin Aged Care - Goodwin Village Monash

Goodwin Aged Care - Goodwin Village The Manor

Human Touch Retirement - Mount Gilead Estate

Human Touch Retirement - Camden Grove

Human Touch Retirement - Gibraltar Park Estate

Ingenia Communities - Ingenia Gardens Bathurst

Ingenia Communities - Ingenia Gardens Coffs Harbour

Ingenia Communities - Ingenia Gardens Dubbo

Ingenia Communities - Ingenia Gardens Dubbo

Ingenia Communities - Ingenia Gardens Goulburn

Ingenia Communities - Ingenia Gardens Port Macquarie

Ingenia Communities - Ingenia Gardens Taree

Ingenia Communities - Ingenia Gardens Wagga Wagga

Ingenia Communities - Ingenia Gardens Bundaberg

Ingenia Communities - Ingenia Gardens Marsden

Ingenia Communities - Ingenia Gardens Carrum Downs

Ingenia Communities - Ingenia Gardens Geelong

Ingenia Communities - Ingenia Gardens Geelong

Ingenia Communities - Ingenia Gardens Grovedale

Ingenia Communities - Ingenia Gardens Hertford Ingenia Communities - Ingenia Gardens Melton

Ingenia Communities - Ingenia Gardens Melton

Ingenia Communities - Ingenia Gardens Sovereign

Ingenia Communities - Ingenia Gardens Warrnambool

Inheritance Capital Asset Management - Langton Park Retirement Village

Inheritance Capital Asset Management - The Elms Retirement Estate

IRT Group - IRT Kangara Waters

IRT Group - Henry Brooks Estate at IRT Kanahooka

IRT Group - Howard Court at IRT Pioneer Place

IRT Group - IRT Birch Villa

IRT Group - IRT Braeside

IRT Group - IRT Culburra Beach

IRT Group - IRT Dalmeny

IRT Group - IRT Diment Towers

IRT Group - IRT Edwina Court

IRT Group - IRT Greenwell Garden

IRT Group - IRT Harbourside

IRT Group - IRT Macarthur

IRT Group - IRT Moruya

IRT Group - IRT Peakhurst

IRT Group - IRT Sarah Claydon

IRT Group - IRT Sea View Retirement Village

IRT Group - IRT St Georges Basin

IRT Group - IRT Tarrawanna Gardens

IRT Group - IRT The Clyde

IRT Group - IRT Thomas Holt Acacia Road

IRT Group - IRT Towradgi Park Lodge

IRT Group - IRT Towradgi Park

IRT Group - IRT William Beach Gardens

IRT Group - IRT Woonona

IRT Group - Parkside at IRT Pioneer Place

IRT Group - IRT Thomas Holt Stafford Court (Village)[NSW]

IRT Group - IRT Thomas Holt Kilpatrick Court (Village) [NSW] IRT Group - IRT Parklands IRT Group - IRT The Palms IRT Group - IRT The Ridge IRT Group - IRT Woodlands James Milson Village - James Milson Village - North Sydney James Milson Village - James Milson Village - Woolwich Jeta Gardens - Jeta Gardens **Retirement Village** Keyton - Isabella Gardens Keyton - The Aerie Keyton - The Grove - Ngunnawal Keyton - Annesley Bowral Keyton - Ardency Aroona Keyton - Ardency Trebartha Keyton - Ashton Gardens Keyton - Brentwood Village Keyton - Closebourne Village Keyton - Coastal Waters Keyton - Dee Why Gardens Keyton - Glenaeon Keyton - Henry Kendall Gardens Keyton - Kingfisher Grove Keyton - Lakeside Retirement Village Keyton - Little Bay Apartments Keyton - Lutanda Manor Keyton - Nelsons Grove Keyton - Pittwater Village Keyton - Rochford Place Keyton - The Baytree by Ardency Keyton - Allora Gardens Keyton - Bellflower Retirement Resort Keyton - Bernborough Ascot Keyton - Buderim Gardens Retirement Village Keyton - Eaglemount Retirement Resort Keyton - Hibiscus Buderim Meadows Keyton - Hibiscus Chancellor Park

Keyton - Hibiscus Nambour Keyton - Hibiscus Noosa Outlook Keyton - Keperra Sanctuary Keyton - The Gardens on Lindfield Keyton - The Lakes Bundaberg Keyton - The Terraces Keyton - Elliot Gardens Keyton - Townsend Park Keyton - Trinity Green Keyton - Vermont Estate Keyton - Abervale Village Keyton - Ardency Kennedy Place Keyton - Burwood Terrace Keyton - Caesia Gardens Keyton - Classic Residences Brighton Keyton - Evelyn Ridge Keyton - Fiddlers Green Keyton - Forest Hills Retirement Village Keyton - Goodwin Close Keyton - Heathglen Keyton - Highvale Retirement Village Keyton - Koorootang Court Keyton - Lexington Gardens Keyton - Martha's Point Keyton - Meadowvale Retirement Vilĺage Keyton - Menzies Malvern Keyton - Peppertree Hill Retirement Village Keyton - Port Phillip Retirement Village Keyton - Sherwin Rise Keyton - The Brighton on Bay Keyton - The Links at Waterford Keyton - The Village Williamstown Keyton - Viewbank Gardens Keyton - Waterford Park Keyton - Waterford Valley Lakes Keyton - Waverley Country Club Keyton - Windsor Park Keyton - Woodlands Park

Keyton - Homestay Village Keyton - Lakeside Village Bibra Lake Keyton - Parkland Villas Booragoon Keyton - Parkland Villas Ellenbrook Keyton - Parkland Villas Mandurah Keyton - Parkland Villas Woodlands Kevton - The Pines Keyton - Timberside Villas Keyton - Woodstock West LDK Healthcare - Greenway Views LDK Healthcare - Amberfield LDK Healthcare - The Landings Levande - Ridgecrest Levande - Bellevue Gardens Levande - Bexley Gardens Levande - Camden View Levande - Cardinal Freeman Levande - Castle Ridge Levande - Golden Ponds Levande - Lincoln Gardens Levande - Lourdes Levande - Macarthur Gardens Levande - Macquarie Grove Levande - Maybrook Levande - Parklands Levande - Queenslake Levande - The Cove Levande - The Village Swansea Levande - The Willows Levande - Wamberal Gardens Levande - Waratah Highlands Levande - Willowdale Levande - Bellcarra Levande - Farrington Grove Levande - Fig Tree Levande - Greenleaves Levande - Newport Levande - North Lakes

Keyton - Harbourside Village Mindarie

Levande - Pine Lake Levande - Salford Waters Levande - Shine Birtinya Levande - Bay Village Levande - Hillsview Levande - Lightsview Levande - Ridgehaven Rise Levande - Salford Community Levande - Somerton Park Levande - The Grange Levande - The Villas in Brighton Levande - The Villas on Milton Ave (Fullarton) Levande - Unity Levande - Walnut Grove Estate Levande - Arilla Levande - Donvale Levande - Gillin Park Levande - Gowanbrae Levande - Highlands Levande - Knox Levande - Mernda Levande - Midlands Terrace Levande - Oak Grange Levande - Patterson Lakes Levande - Plenty Valley Levande - Salford Park Levande - Selandra Rise Levande - Tarneit Skies Levande - Templestowe Levande - The Lakes Estate Levande - Vermont Levande - Wantirna Living Choice Australia - Leisure Lea Gardéns Living Choice Australia - Alloura Waters Living Choice Australia - Broadwater Court Living Choice Australia - Deepwater Court

Living Choice Australia - Glenhaven

Living Choice Australia - Living Choice Kawana Island Living Choice Australia - Living Choice Twin Waters Living Choice Australia - Flagstaff Hill Living Choice Australia - Fullarton Living Choice Australia - Living Choice Woodcroft M by Montefiore - M by Montefiore Martin Luther Homes Boronia Inc -**Martin Luther Homes** Mbark Pty Ltd - The Arbour Berry Mbark Pty Ltd - Wivenhoe Village Mecwacare - Pascoe Vale Gardens **Retirement Village** Mercy Care Ltd - Mercy Care Retirement Wembley Minda Incorporated - Brighton Dunes **Mountainview Retreat Retirement** Village - Penrith Village Mountainview Retreat Retirement Village - Round Corner Village **Mountainview Retreat Retirement** Village - Wattlegrove Village Murray Lands Retirement Village -Murray Lands Retirement Village Novacare Busselton Village - Nova Village Oak Tree Group - Oak Tree Armidale Oak Tree Group - Oak Tree Bathurst Oak Tree Group - Oak Tree Boolaroo Oak Tree Group - Oak Tree Cardiff Oak Tree Group - Oak Tree Dubbo Oak Tree Group - Oak Tree Goonellabah Oak Tree Group - Oak Tree Gunnedah Oak Tree Group - Oak Tree Kanwal Oak Tree Group - Oak Tree Moss Vale Oak Tree Group - Oak Tree Mudgee Oak Tree Group - Oak Tree Orange Oak Tree Group - Oak Tree Rutherford Oak Tree Group - Oak Tree Tamworth Oak Tree Group - Oak Tree Taylor St Armidale

Oak Tree Group - Oak Tree Retirement Village Coffs Harbour Oak Tree Group - Oak Tree Retirement Village Jesmond Oak Tree Group - Oak Tree Broadmeadow Oak Tree Group - Oak Tree Boronia Heights Oak Tree Group - Oak Tree Burpengary Oak Tree Group - Oak Tree Cairns Oak Tree Group - Oak Tree Capricorn Coast Oak Tree Group - Oak Tree Darling Heights Oak Tree Group - Oak Tree Goodna Oak Tree Group - Oak Tree Goondiwindi Oak Tree Group - Oak Tree Norman Gardens Oak Tree Group - Oak Tree Park Avenue Oak Tree Group - Oak Tree Pelican Waters Oak Tree Group - Oak Tree Riverway Townsville Oak Tree Group - Oak Tree Toowoomba Oak Tree Group - Oak Tree Victoria Point Oak Tree Group - Oak Tree Warwick Oak Tree Group - Oak Tree Yeppoon Oak Tree Group - Oak Tree Kingston Oak Tree Group - Oak Tree Skye Oasis Peakhurst Retirement Apartments Pty Ltd - Oasis Peakhurst **Retirement Apartments** Ocean Gardens - Ocean Gardens **Retirement Village Omega Communities - Leabrook Place** Omega Communities - The Glenbrook OzCare - Canossa Gardens OzCare - Currimundi Gardens OzCare - De Paul Manor Estate **OzCare - Delamore Retirement** Community OzCare - Reflections on the Bay **OzCare - Rendu Towers Retirement** Village

OzCare - Sarina Place

OzCare - Lakes Retirement Village

Mecawacare - Pascoe Vale Gardens Retirement Village

Peninsula Village Ltd - Cooinda Village

Peninsula Village Ltd - Peninsula Village

Principle Living - Principle Living

Ravida Properties Pty Ltd -Renaissance Living

RCA Villages - Point Cook Village

Regis Aged Care Pty Ltd - Woodward

Regis Aged Care Pty Ltd - Regis Retirement Living Tasmania - Norwood

Regis Aged Care Pty Ltd - Inala Village

Regis Aged Care Pty Ltd - Brambe Bay

Regis Aged Care Pty Ltd - Corinthian Court

Renaissance Retirement Living -Renaissance Retirement Living

RetireAustralia - Belrose Country Club Retirement Village

RetireAustralia - Boambee Gardens Retirement Village

RetireAustralia - Bramblewood Retirement Village

RetireAustralia - Forresters Beach Retirement Village

RetireAustralia - Glengara Retirement Village

RetireAustralia - Murray Gardens Retirement Village

RetireAustralia - Newling Gardens Retirement Village

RetireAustralia - Queens Park Assisted Living

RetireAustralia - Riverina Gums Retirement Village

RetireAustralia - Tarragal Glen Retirement Village

RetireAustralia - Wood Glen Retirement Village

RetireAustralia - Carlyle Gardens Retirement Village

RetireAustralia - Cleveland Manor Retirement Village

RetireAustralia - Drayton Villas Retirement Village

RetireAustralia - Noyea Riverside Retirement Village

RetireAustralia - The Verge

RetireAustralia - Wellington Manor Retirement Village

RetireAustralia - The Green Tarragindi Retirement Village

RetireAustralia - Bartonvale Gardens Retirement Village

RetireAustralia - Bartonvale Lodge Retirement Village

RetireAustralia - Glengowrie Retirement Village

RetireAustralia - Lincoln Grove Retirement Village

RetireAustralia - Magill Retirement Village

RetireAustralia - Scarborough Mews Retirement Village

RetireAustralia - Spring Grove Retirement Village

RetireAustralia - Tea Tree Gardens Retirement Village

RetireAustralia - The Laurels Retirement Village

RetireAustralia - Torrens Grove Retirement Village

RetireAustralia - Wisteria Grove Retirement Village

Riverside Gardens North Richmond -Riverside Gardens North Richmond

Ryman Healthcare - Charles Brownlow Retirement Village

Ryman Healthcare - Deborah Cheetham Retirement Village

Ryman Healthcare - Essendon Terrace

Ryman Healthcare - John Flynn Retirement Village

Ryman Healthcare - Raelene Boyle Retirement Village

Ryman Healthcare - Nellie Melba Retirement Village

Ryman Healthcare - Weary Dunlop Retirement Village

Ryman Healthcare - Bert Newton Retirement Village

Sencia - Green Ridge Hunter Valley

Sencia - The Breeze

Signature Gardens Retirement Resort -Signature Gardens Retirement Resort

Southern Cross Care (WA) Inc - Donovan Village Southern Cross Care (WA) Inc - Faulkner Park Village

Southern Cross Care (WA) Inc - Foley Village

Southern Cross Care (WA) Inc -Margaret Hubery Village

Southern Cross Care (WA) Inc - Success Village

Southern Cross Care (WA) Inc - Thomas Perrott Village

Southern Cross Care QLD - Caloundra Rise Retirement Estate

Southern Cross Care QLD - Edens Landing Retirement Village

Southern Cross Care QLD - Noosa Waters Retirement Estate

Southern Cross Care QLD - Parque Vista on Seville

Southern Cross Care QLD - Stretton Gardens

St Ives Villages Pty Ltd - St Ives Centro

St Ives Villages Pty Ltd - St Ives Mandurah

St Ives Villages Pty Ltd - St Ives Murdoch

St Ives Villages Pty Ltd - St Ives Albany

St Ives Villages Pty Ltd - St Ives Carine

St Ives Villages Pty Ltd - St Ives Lesmurdle

St Ives Villages Pty Ltd - St Ives Melville

St Ives Villages Pty Ltd - St Ives Northshore

St Paul de Chartres Retirement Units -St Paul de Chartres Retirement Units

Summerset Group Holdings (Limited) -Cranbourne North

Retirement Living Services - Windsor Country Village

The Village Glen/Community - The Village Glen

***The Village Retirement Group - The Village Coorparoo

***The Village Retirement Group - The Village Redcliffe

***The Village Retirement Group - The Village Taigum

***The Village Retirement Group - The Village on the Downs ***The Village Retirement Group - The Village Yeronga

TIGcorp - Applewood - Applewood

TIGcorp - Rivervue - Rivervue

Toby's Intet Estate Pty Ltd - Toby''s Inlet Estate

Tranquil Retirement Group - Ormiston Rise Retirement Village

Tranquil Retirement Group - Tranquil Waters Retirement Village

Treeview Estates Pty Ltd - Treeview Estates

Uniting - Uniting Amala Gordon

Uniting - Uniting 10 Congham Road, West Pymble Self Care

Uniting - Uniting 12 & 20 Congham Road, West Pymble (Northaven Village)

Uniting - Uniting Bankstown

Uniting - Uniting Bowden Brae

Uniting - Uniting Bramley

Uniting - Uniting Carinya Epping

Uniting - Uniting Carinya Retirement Village

Uniting - Uniting Carlton Court

Uniting - Uniting Caroona Goonellabah Uniting - Uniting Caroona Woodburn

Uniting - Uniting Chapman Close

Uniting - Uniting Clifton

Uniting - Uniting Colin McFadyen

Uniting - Uniting Conrad Beard Uniting - Uniting Cooinda

Uniting - Uniting Copeland Gardens

Uniting - Uniting Denison Court

Uniting - Uniting Farmborough Grove

Uniting - Uniting Forest

Uniting - Uniting Hawkesbury

Uniting - Uniting Hyandra

Uniting - Uniting Kankama

Uniting - Uniting Kentgrove

Uniting - Uniting Killarney

Uniting - Uniting Koinonia

Uniting - Uniting Lakeview

Uniting - Uniting Lakeview Uniting - Uniting Leichhardt

Village

Uniting - Uniting Lough Neagh Retirement Village Uniting - Uniting MacDonald Homes -Dee Why Uniting - Uniting MacDonald Homes Eastwood Uniting - Uniting Manning House Uniting - Uniting Mawarra Uniting - Uniting Mayflower Gerringong Uniting - Uniting Mayflower Retirement Village Bondi - Édiná Uniting - Uniting Mayflower Village Pendle Hill Uniting - Uniting Mayflower Village Rockdale Uniting - Uniting Mayflower Village Wentworthville Uniting - Uniting Mayflower Westmead Uniting - Uniting Mulluana Uniting - Uniting Nareen Gardens Uniting - Uniting Nareen Terrace Uniting - Uniting Nareena Homes Uniting - Uniting Narla Uniting - Uniting Nowra (Symons House) Uniting - Uniting Nulgara Uniting - Uniting Pindari Uniting - Uniting Pinewood Uniting - Uniting Salamander Bay Uniting - Uniting Scenic Court Uniting - Uniting St Andrew's Uniting - Uniting St John's Uniting - Uniting St Margarets Uniting - Uniting The Garrison Retirement Centre Uniting - Uniting Tredinnick Village Uniting - Uniting Turramurra Uniting - Uniting Wesley Heights Uniting - Uniting Westmead Uniting - Uniting Wirreanda **Uniting - Uniting Woodfield Terraces** Uniting - Uniting Yagoona Village Uniting - Lemongrove Retirement

Uniting - Uniting Amaroo

Uniting - Uniting Autumn Lodge

Uniting - Uniting Yamba

Uniting Communities - U City Retirement Residences

Unitng - Uniting Leichhardt - McRae-McMahon Place

Vasey - Vasey Epping Manor

Vasey - Vasey Ivan Court

Vasey - Vasey Northcott Gardens

Vasey - Vasey Wurley Court

Vasey - Kokoda Residences

Villa Maria Catholic Homes - Athelstan

Villa Maria Catholic Homes - Barnsbury Deepdene

Villa Maria Catholic Homes - Corpus Christi Village

Villa Maria Catholic Homes - Providence Bacchus Marsh

Villa Maria Catholic Homes -Shanagolden Pakenham

Villa Maria Catholic Homes - St Joseph's Mews

Villa Maria Catholic Homes - St Thomas' Greensborough

Villa Maria Catholic Homes - Star of the Sea Torquay

Village Lifestyles - Bougainvillea Retirement Village

Waikerie Community Senior Citizens Home - Warrawee Lodge

Walka Grange Lifestyle Village - Walka Grange Lifestyle Village

Wesley Mission Queensland -Aldersgate Red Hill

Wesley Mission Queensland -Rosemount

Wesley Mission Queensland - Wheller on the Park

Westmont Aged Care Group - Westmont Retirement Home

Woodlands Retirement Village Ltd -Woodlands Retirement Village

For more information please contact The Code Administrator

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