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WESTERN AUSTRALIAN RETIREMENT VILLAGES RESIDENTS ASSOCIATION INC

22 August 2014

David Hatfield
Director, Adjudication Branch
Australian Competition and Consumer Commission
CANBERRA ACT 2601

By email

Dear Sir

National Roads and Motorists Association Limited Certification Trade Mark Application No 1568411 Comment

Thank you for the opportunity to comment on this application on behalf of the residents of retirement villages in Western Australia.

Summary

WARVRA does not support this application being approved for these reasons:

- Retirement Village living cannot be rated like the choice of a motel room
- There are many more variables to be considered than simply “customer satisfaction”
- Retirement village living is a lifestyle choice not easily changed

Comment

1. The process outlined in the application is very simplistic and relies on quick answers to a survey based on pre-determined questions with little room for discussion of the variables.
2. The decision to live in a Retirement Village is not one that can easily be changed. It is a very complex decision, based on many factors, and requires residents to immerse themselves in the experience for a significant period of time. Engendering opportunities to express dissatisfaction will only add to the distress of the change of environment that many residents experience. If residents are dissatisfied, there is little they can do as significant economic loss would accompany any decision to leave the Village.
3. An assessment of “customer satisfaction” in an independent living village is very different to a situation in which continual service interaction occurs such as residential care. For retirement village residents, life style satisfaction is much more significant.

4. There is little or no value in this process for the residents. It seems to be a tool for the operators to charge fees for their services, to be paid by village owners and developers who will be coerced into the scheme by marketing pressures.
5. It is worth noting that there is no category below “good levels of customer engagement”.
6. There will be confusion with the accreditation schemes used in retirement villages which are much more tailored to the retirement village situation and take account of many more factors than the type of “are you satisfied” questions proposed for this system.

Yours sincerely

Des Cousins
President