

RETIREMENT VILLAGES ASSOCIATION

SUBMISSION ON THE COMMERCE COMMISSION'S REVIEW OF THE 111 CONTACT CODE

1. Introduction

The Retirement Villages Association (RVA) represents the interests of the owners, developers and managers of registered retirement villages across New Zealand Aotearoa. Our 420 member villages provide homes for around 50,500 older kiwis. We appreciate the opportunity to comment on the Commission's review of the 111 Emergency Code.

Our residents, generally speaking, are capable of living independently, or perhaps with some limited home-based support provided by the local health agency. This distinguishes them from residents in aged residential care (i.e. rest home, hospital or dementia - ARC). Around 65% of retirement villages have some level of care on the campus.

Almost all retirement village (i.e. independent) residents have access to a call bell system that is either built into their unit or via a pendant that they wear or carry. The call bell system is monitored either by the village (especially if they have a care facility) or via an external provider such as St John's Ambulance. Part of the sector's best practice requirements is that the nature and purpose of the emergency call system is explained to residents and their families so that if there is an emergency, everyone knows what to expect.

2. Aged Residential Care facilities

ARC facilities are compliant under the Te Whatu Ora ARRC agreement for having a health emergency plan. Having to also comply with the 111 Contact Code would be a duplication of compliance requirements, while adding additional pressure on reporting for ARC facilities.

It is important to note that if the alarm system is monitored by the aged care facility, qualified staff are on hand all day and night to tend to the emergency. If an ambulance is required, it can be called immediately, even during power outages.

As a result, the RVA does not support the Code's extension to include residential aged care facilities on the basis that operators already have extensive legal and compliance obligations to keep residents safe.

3. Phone services to village residents

The average age of residents in independent living is around 81 years. The next generation of residents are more likely to have cell phones rather than land lines, but land lines are still very popular. Residents will contract with their preferred telecom supplier and will bundle up other services such as streaming and internet.

It is our understanding that these providers will be subject to the Code.

Where villages provide an emergency call system, it's important for the Code to recognise that this system provides residents with a suitable means of communicating in power outages. However, the Code does not reference emergency call systems that residents can use in an emergency and we recommend that they are so recognised in the Code as a satisfactory means of communication.

The sector includes villages that are unit title developments where the residents are responsible for their own telecommunications and their provider will be covered by the Code. So too for villages that do not have care available on site. We would like to work with the Commission to find a cost-effective way for these residents to have access to an emergency call service if the village itself does not provide one.

Many villages have access to back-up power generators, smoke detectors and heat-activated sprinklers and movement alarms. Staff are required to have 1st aid training. The Retirement Villages Code of Practice requires regular fire drills so that there is an array of support for residents in an emergency.

It is our view that retirement villages that provide emergency call systems that are monitored 24/7 be **exempt** from the 111 Contact Code. If this is not acceptable, we strongly recommend that the Code is amended to allow for other effective means of emergency management that decreases both the risk of the compliance burden and inconsistent application by operators.

We are aware that some RVA members have made their own submissions on this review and we support those.

John Collyns
Executive Director