



Department of
Building and Housing
Te Tari Kaupapa Whare

What do you think should be included in a Retirement Village Disclosure Statement?

A Discussion Paper

September 2009



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WHAT IS A 'RETIREMENT VILLAGE DISCLOSURE STATEMENT?'

A Retirement Village Disclosure Statement provides intending residents with the information they need to make an informed choice about which retirement village, if any, to move into.

It is required, under the Retirement Villages Act 2003 and the Retirement Villages (General) Regulations 2006, to address a wide range of issues including:

- whether or not the retirement village is mortgaged and, if so, by how much and who to
- the estimated financial return to residents, or their estate, at the end of their tenure
- weekly fees paid by residents.

The relevant sections of the legislation are available on request from the Department by calling 0800 83 62 62. The Retirement Villages Act 2003 and Retirement Villages (General) Regulations 2006 are available online at www.legislation.govt.nz

THE RETIREMENT VILLAGES ACT 2003

The Retirement Villages Act¹ protects the interests of residents, and intending residents, of retirement villages. It establishes the powers, functions and duties of the Registrar of Retirement Villages and the Retirement Commissioner. The Act also provides a legal framework for retirement village operators.

BACKGROUND TO THIS DISCUSSION PAPER

The Government is committed to reducing red tape and compliance costs. The Minister for Building and Construction, Hon Maurice Williamson, has instructed the Department of Building and Housing (the Department) to review the disclosure statement to determine if it can:

- be reduced in length, which would cut operators' costs
- retain the information, with less detail, that intending residents will need in order to choose a retirement village best suited to their needs.

During consideration of the Retirement Villages Bill, the Justice and Electoral Select Committee envisaged retirement village disclosure statements would be user-friendly documents of no more than four pages. They would provide intending residents with key information. In addition, they would be available at open days for general marketing purposes.

We want to know if the disclosure statement should be amended to make it more useful for intending residents and cost-effective for operators.

We are inviting written comments from anyone with an interest in retirement villages. We are specifically interested in the views of operators, residents, lawyers and statutory supervisors.

¹ The Department of Building and Housing has been administering the Retirement Villages Act since 2005. Previously it was the responsibility of the Ministry of Social Development.

HOW TO COMMENT

You are invited to answer the following questions in writing by 11 December 2009. This questionnaire can be downloaded at www.dbh.govt.nz/retirement-villages. All comments received will be carefully considered before the Department advises the Minister.

There are two parts to the discussion document.

In **Part One**, there are sets of questions for each key stakeholder group.

- A Operators
- B Residents and intending residents
- C Lawyers
- D Statutory supervisors

If you are from an interest group that does not fit the above, we would still like to hear from you. Please answer the set of questions that best suits your position.

In **Part Two**, we have produced a rating scale for the disclosure statement. Its purpose is to help the Department determine whether the law needs to be changed to improve the disclosure statement.

Finally, we would like you to look at a table listing all the information required for a current disclosure statement and tick whether you think the information is needed or not.

OFFICIAL INFORMATION ACT

Please note that all written responses will be public information. Responses may be the subject of requests under the Official Information Act 1982 (OIA). The OIA specifies that information is to be made available to requesters unless there are sufficient grounds for withholding it. While we will take into account any specific request you make for us to keep information confidential, we cannot guarantee that information you provide to us will not be made public. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

REGULATORY IMPACT STATEMENT

In this discussion paper we are required to include questions and/or a discussion of the elements of a regulatory impact analysis (ie, the impact a law change in this area might have on other laws). These elements are: define the problem, the options for change, and the impacts of these options. We confirm that this paper includes the substantive regulatory impact analysis elements as required.²

² Treasury 'Guidelines on the Regulatory Impact Analysis (November 2008)'

Submission cover sheet

Simply fill out the cover sheet and appropriate stakeholder questions in Part One, plus the rating scale and information needed/not needed table in Part Two. Then tear out and send to the Department. Please only fill out the questions that are relevant to you. You can also send additional feedback if you choose.

CONTACT DETAILS
Name of person preparing submission:
Position:
Organisation:
Postal address:
Email:
Telephone:

This form is to provide the Department with your contact details, so that we can continue to keep you informed about developments with the Retirement Villages Disclosure Statement. Please include this with your submission.

Submissions can be sent by:

Post or courier to:
Retirement Villages Act Team
Regulatory Policy
Department of Building and Housing
Street address:
Level 6, 86 Customhouse Quay
Wellington 6011

Or postal address:

PO Box 10-729
Wellington 6143

Fax to:

(04) 494 0290
(please put 'Retirement Villages'
in the subject line)

The **closing date for submissions is 11 December 2009.**

For more information please contact the Department on 0800 83 62 62 or refer to www.dbh.govt.nz



Part one: A Questions for operators

A QUESTIONS FOR OPERATORS

- 1 Are you a:
 - Commercial operator
 - Religious, welfare or charitable operator (this includes trusts and other not-for-profit operations)
- 2 Do you operate:
 - One village (on a single site)
 - A multi-site single village
 - Between two and no more than five villages (either complete or in development)
 - Between six and no more than 10 villages (either complete or in development)
 - Between 11 and no more than 15 villages (either complete or in development)
 - More than 16 villages (either complete or in development)
- 3 Should intending residents be able to understand the disclosure statement before consulting a lawyer?
 - Yes
 - No
- 4 Should the Government provide a standard disclosure statement template that all operators must use?
 - Yes
 - No

Please explain your answer.
- 5 What would be the benefits of using a standard disclosure statement template for:
 - You

A QUESTIONS FOR OPERATORS (CONTINUED)

- Your residents/intending residents

- Your statutory supervisor

6 What would be the disadvantages of using a standard disclosure statement template for:

- You

- Your residents/intending residents

- Your statutory supervisor

A QUESTIONS FOR OPERATORS (CONTINUED)

7 Should the disclosure statement contain information about services and facilities that the village **does not** offer?

- Yes
- No
- Don't know

Please explain your answer.

8 Considering your current disclosure statement:

- How much did it cost you to develop? \$.....
- Are there ongoing costs?
 - No
 - Yes, these are:
 - administration costs \$.....
 - legal fees \$.....
 - lay-up costs \$.....
 - printing costs \$.....
 - registrar fees \$.....
 - other \$.....

Please explain your answer.

A QUESTIONS FOR OPERATORS (CONTINUED)

- 9 How do you pay for the disclosure statement?
- Through the residents' weekly fees
 - From your reserves
 - From lowering your dividends to shareholders
 - Borrowing money from a financial institution
 - Other

Please explain your answer.

- 10 Do you have a statutory supervisor?

- Yes
- No

- 11 Thinking about the future, if the disclosure statement framework is changed, do you think the Deed of Supervision (the contract between the statutory supervisor and the retirement village operator) would need to change as well?

- Yes
- No
- Don't know/not sure

Please explain your answer.

- 12 Any other comments about the disclosure statement.

Please go to Part two, page 17.

Part one: B Questions for residents and intending residents

B QUESTIONS FOR RESIDENTS AND INTENDING RESIDENTS

- 1 Do you live in a village/are you considering a village that is:
- Commercial?
 - Religious, welfare or charitable (this includes trusts and other not-for-profit operations)?
- 2 What size is your village/what size of village are you interested in?
- Two or more units but no more than 34
 - 35 or more units but no more than 84
 - 85 or more units
- 3 At what stage were you given a disclosure statement?
- At an open day
 - At your initial enquiry
 - When you asked for a copy
 - As part of your contract
 - Other
- 4 Did you/can you understand the disclosure statement without legal advice?
- Yes
 - No
- 5 Did you find/are you finding the disclosure statement helpful in choosing your village?
- Yes
 - No
 - Unsure
- Please explain your answer.

B QUESTIONS FOR RESIDENTS AND INTENDING RESIDENTS (CONTINUED)

6 How easy is the information in the disclosure statement to understand?

- Very easy to understand
- Easy to understand
- Hard to understand
- Very hard to understand
- Neither easy nor hard to understand
- Don't know

7 If you are a resident, do you use the disclosure statement now that you live in your village?

- Yes
- No
- Not a resident

8 If the disclosure statement was/is helpful, please describe how it helped/helps you.

9 If the disclosure statement was/is unhelpful, please explain why.

10 Were/are there parts of the disclosure statement that were/are not relevant to you?

- Yes
- No

B QUESTIONS FOR RESIDENTS AND INTENDING RESIDENTS (CONTINUED)

11 What parts were/are not relevant? Please list and explain your answer.

12 Is there any information that was not included in the disclosure statement that should be?

Yes

No

13 Please list the information that you think should have been included:

14 Should the disclosure statement contain information about services and facilities that the village **does not** offer? (For example, being told that there is no minibus, or hairdresser in the village etc.)

Yes

No

Don't know

Please explain your answer.

B QUESTIONS FOR RESIDENTS AND INTENDING RESIDENTS (CONTINUED)

15 Should there be a standard disclosure statement template that all operators must use?

Yes

No

16 What would be the benefit of using a standard disclosure statement template for you?

17 What would be the disadvantage of using a standard disclosure statement template for you?

18 Any other comments about the disclosure statement.

Please go to Part two, page 17.

Part one: C Questions for lawyers

C QUESTIONS FOR LAWYERS

- 1 Do you advise (tick all that apply):
 - Operators
 - Intending residents
 - Statutory supervisors
 - Other lawyers about the Retirement Villages Act
- 2 Should intending residents be able to understand the disclosure statement before consulting a lawyer?
 - Yes
 - No
- 3 If you advise operators, how much time does it take to develop and finalise a disclosure statement?
- 4 If you advise intending residents, how much time does it take you to explain the disclosure statement?
- 5 If you advise statutory supervisors, how much time does it take you to explain the disclosure statement?
- 6 If you advise other lawyers, how much time does it take you to explain the disclosure statement?

C QUESTIONS FOR LAWYERS (CONTINUED)

7 Thinking about the future, if you advise operators and statutory supervisors, and the disclosure statement framework is changed, would the Deed of Supervision need to be changed as well?

- Yes
- No
- Don't know/not sure
- It depends on how the disclosure statement framework is changed

Please explain your answer.

8 Should there be a set disclosure statement template that all operators must use?

- Yes
- No

9 What would be the benefits/disadvantages of using a set disclosure statement template for:

- You as a lawyer advising an operator
- You as a lawyer advising intending residents

10 Any other comments about the disclosure statement.

Please go to Part two, page 17.

Part one: D Questions for statutory supervisors

D QUESTIONS FOR STATUTORY SUPERVISORS

1 How many villages do you/your company supervise?

- One, but no more than 10
- More than 10, but less than 30
- 30 or more, but less than 50
- 50 or more

2 Should intending residents be able to understand the disclosure statement before consulting a lawyer?

- Yes
- No

3 Is the current disclosure statement 'fit for purpose'?

- Yes
- No

Please explain your answer for:

- Operators

- Intending residents/residents

4 Does the current disclosure statement provide all the important financial information (in comparison to a financial prospectus) for intending residents?

- Yes
- No

D QUESTIONS FOR STATUTORY SUPERVISORS (CONTINUED)

5 If there is financial information missing, please list it below:

6 Should there be a standard disclosure statement template that all operators must use?

- Yes
- No

7 What would be the benefits/disadvantages of using a standard disclosure statement template for:

- Operators

- Intending residents

8 Thinking about the future, if the disclosure statement framework is changed, would the Deed of Supervision need to be changed too?

- Yes
- No
- Don't know/not sure
- Cannot answer the question until an alternative disclosure statement framework is proposed

9 Any other comments about the disclosure statement.

Please go to Part two, page 17.

Part Two

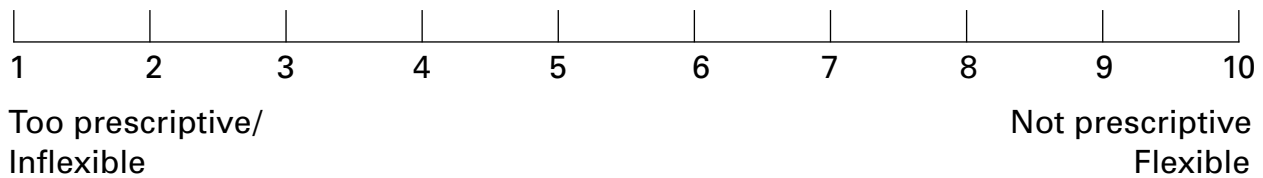
RATINGS SCALE

Current disclosure statement

We want to know if you consider the current disclosure statement framework too prescriptive/inflexible, about right or not prescriptive/flexible.

Please consider the scale below and mark where the current disclosure statement framework sits.

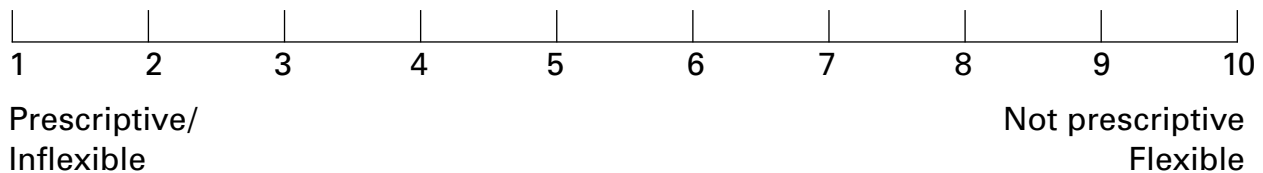
1 is prescriptive/inflexible, 4 to 6 is somewhat flexible and 10 is not prescriptive/flexible.



Future disclosure statement

Using the same scale, please mark where you think a future disclosure statement framework should sit.

1 is prescriptive/inflexible, 4 to 6 is somewhat flexible and 10 is not prescriptive/flexible.



Retirement Villages Disclosure Statement

We would like you to look at the table below, which lists all the information required for a current disclosure statement and tick whether you think the information is needed or not needed.

REQUIRED	NEEDED	NOT NEEDED
Disclosure date		
Retirement village name		
Retirement village street address		
Retirement village registered office		
Retirement village address for service		
Operator name		
Operator street address		
Operator registered office		
Operator contact details		
Contact details of agent		
Retirement village registration date		
PART 1 – OWNERSHIP, MANAGEMENT AND SUPERVISION		
1(a) Ownership structure and occupancy rights		
Legal nature of the operator		
Further operator details		
What underlying freehold or other tenure interests (if any) in the village are retained by the operator?		
The nature and extent of any registered or unregistered encumbrances, mortgages or security interests retained by the operator		
The nature of resident’s tenure in the village		
Where the village is part of a unit titled development, details of the body corporate committee and management structures in place		
Where resident’s rights are ‘another legal structure’, details of the legal ownership structure		

REQUIRED	NEEDED	NOT NEEDED
1(b) Resident's interests in residential unit		
Details of rights of a resident in relation to residential unit		
Details of any rules applying specifically to the village that affect the resident in living in or using the residential unit		
Details of other limits (if any) on the resident living in or using the unit, including limits on the resident making changes to the décor or fittings		
Does the operator control the sale or marketing of the unit?		
Procedures and costs to the resident for selling or marketing the unit		
Does the operator have a right to sell or buy the unit?		
Procedures and costs to the resident for buying the unit		
Right(s) if any, for the resident if there is a delay in the sale of a unit		
Details of the circumstances the resident is entitled to a refund of a capital sum paid		
Details of how the refund of a capital sum to the resident is calculated		
1(c) Management arrangements for retirement village		
Name of manager of the village		
Street address of manager		
Contact details of the manager		
Details of key management personnel and staff of manager		
Details of the times that the manager will be available at the village		
Outside of the above times, the manager can also be contacted at the following times		
Details of the experience and core duties of the manager		
Details of the legal relationship between the manager and the operator		
Are there any ownership links between the manager and the operator?		
Is there a management agreement between the manager and the operator?		
Terms of the agreement		
Amounts payable to manager under the agreement		
Is there a committee of residents in the village?		
What is the role of the committee?		

REQUIRED	NEEDED	NOT NEEDED
1(d) and (e) Statutory supervisor		
Is there a statutory supervisor for the village?		
Name of statutory supervisor		
Contact details of the statutory supervisor		
Is there an exemption in force from the requirement to appoint a statutory supervisor for the village?		
PART 2 – STATE OF VILLAGE, SERVICES, CHARGES, AND ACCOUNTS		
2(a) State of retirement village		
Is the village fully or partially completed, or still to be built?		
If the village is partially completed or still to be built, what is the due date of completion?		
Details of particulars of construction and the buildings		
Details of particulars of building maintenance		
Details of other improvements available and their condition		
Details of any security features		
Details of the number of units occupied and unoccupied in the village		
Details of unfinished residential units		
Details of any new residential units planned		
What is the effect on existing residents of planned new units in the village?		
Details of units disposed of in the last 12 months that were occupied before their disposal		
What is the average time taken to dispose of an occupied unit (based on the above)?		
Details of units disposed of in the last 12 months that were unoccupied before their disposal		
What is the average time taken to dispose of an unoccupied unit (based on the above)?		

REQUIRED	NEEDED	NOT NEEDED
2(b) Services and facilities at the retirement village		
Details of the services available		
Details of the facilities available		
Details of services currently unavailable and facilities that are planned to be made available		
Expected availability date		
Effect on residents		
2(c) Charges		
Service and facility charges		
Details of the charge, or basis for charging for each of the services and facilities available		
Are the service and facility charges reviewable? If so, on what basis?		
What are the roles of the operator and resident in working out the service and facility charges detailed above?		
What is the relationship between the above service and facility charges and the actual costs?		
Amounts to secure an interest in a residential unit		
Must an amount be paid to secure an interest in a residential unit in the retirement village? If so, when is it payable?		
Is the amount to secure an interest reviewable? If so, on what basis?		
What are the roles of the operator and resident in working out the entry amount detailed above?		
What is the relationship between the above charges and the actual costs?		
Charges for a resident permanently leaving		
Detail any charges for a resident permanently leaving a residential unit in the village for any reason		
How are the charges for a resident permanently leaving worked out?		
Are any of the charges (for a resident permanently leaving) reviewable? If so, on what basis?		

REQUIRED	NEEDED	NOT NEEDED
What are the roles of the operator and resident in working out the entry amount detailed above?		
What is the relationship between the above charges and the actual costs?		
Periodic charges payable by the resident		
Description of periodic charge		
Amount		
What does the amount cover?		
Percentage retained by the operator (if any)		
Percentage paid by the operator to a related party		
Details of any anticipated new or changed charges		
Must a resident continue to pay the charges after vacating the unit? If so, for what period?		
Details of amounts payable for maintenance, rates, and insurance		
How are the periodic charges worked out?		
Are any of the periodic charges reviewable? If so, on what basis?		
What are the roles of the operator and resident in working out the periodic charges detailed above?		
What is the relationship between the above periodic charges and the actual costs?		
Maintenance and sinking fund contributions		
Is it possible that the maintenance or sinking fund (for repairs, maintenance, refurbishment, and capital replacement works associated with the village) may need to be added to with further contributions from residents if expenditure from the fund exceeds reserves?		
Is expenditure from the maintenance or sinking fund (for repairs, maintenance, refurbishment, and capital replacement works associated with the village) capped funds in the reserve? If so, will expenditure be delayed if planned expenditure exceeds reserves?		

REQUIRED	NEEDED	NOT NEEDED
Body corporate levies		
Do residents intending to acquire a unit title interest in a residential unit have to pay any levies to the body corporate (as defined in the Unit Titles Act 1972)?		
How are the levies worked out?		
What are the roles of the operator and resident in working out the levies detailed above?		
What is the relationship between the above periodic charges and the actual costs?		
2(d) Maintenance and refurbishment		
Details of maintenance the operator of the village is responsible for		
Details of maintenance the resident of a residential unit is responsible for		
Is there a sinking fund for repairs, maintenance, refurbishment, and capital replacement works associated with the village (including its facilities)? If so, what is the balance as at the date of this Disclosure Statement?		
Details of any expenditure planned from a sinking fund		
List the purposes for which expenditure from the sinking fund may be incurred		
Can sinking fund monies be used to refurbish a unit vacated because the relevant occupation right agreement is terminated?		
Details of any consultation process undertaken with residents of the village before decisions are made on major expenditures from the sinking fund		
Is a resident who disposes of his or her residential unit entitled to a payment, refund or credit from the sinking fund? If so, how is that amount calculated?		

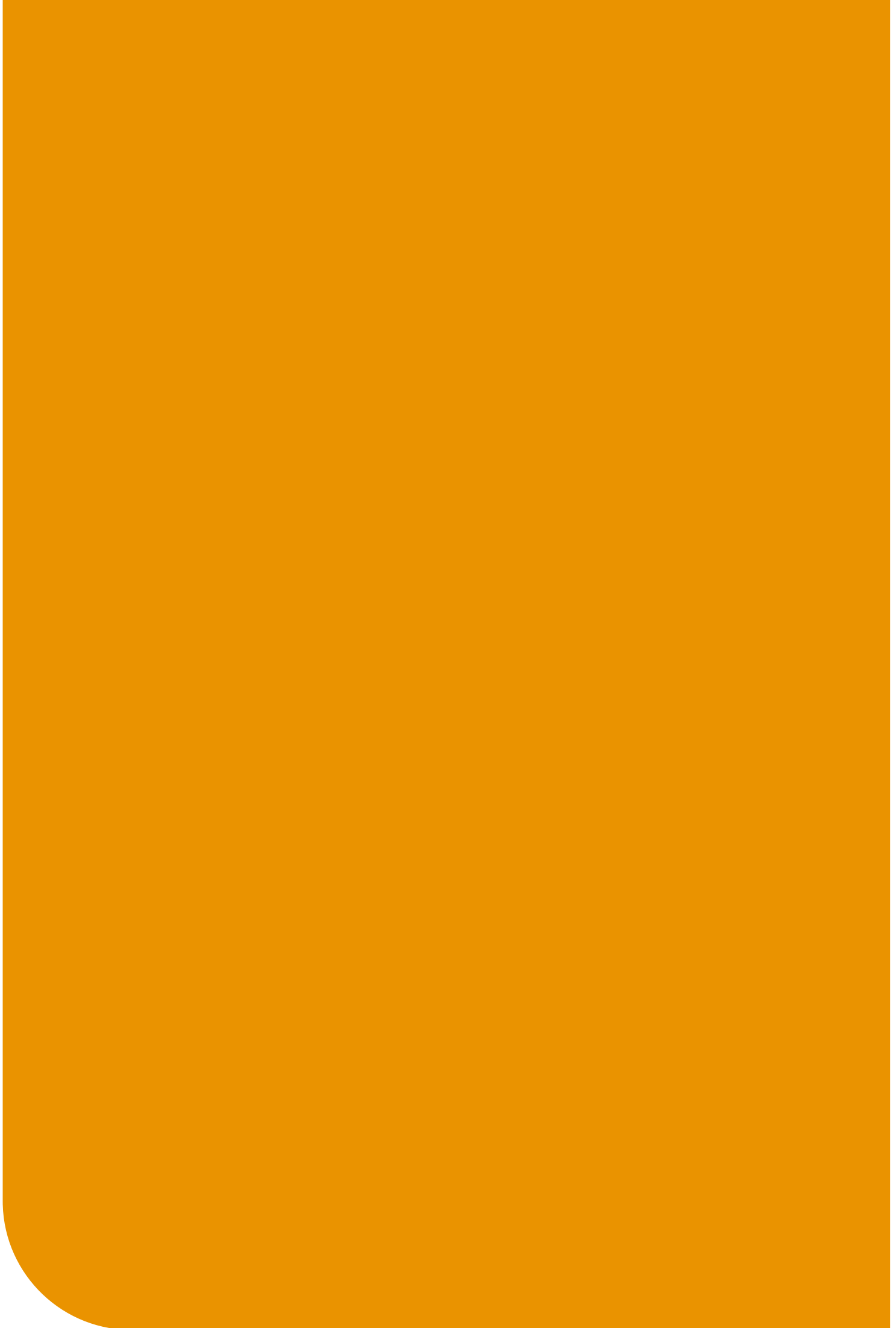
REQUIRED	NEEDED	NOT NEEDED
2(e) Financial accounts for retirement village		
Details of the obligations on the operator under the Financial Reporting Act 1993 (FRA)		
The process for preparing, auditing, and disclosing financial statements		
Details of the circumstances in which a resident is entitled to the village's financial statements (including at what cost)		
Details of other accounts or financial statements (apart from those required by the FRA) prepared in relation to the operation of the village, and charges to residents of the village		
Are accounts prepared for the manager of the village (separately from those required by the FRA from the operator)? If so, are they available to residents on request?		
If any financial statements are attached to this disclosure statement, do they only relate to the operator or do they relate to both the operator and the village?		
If any financial statements are attached to this disclosure statement, have they been audited?		
PART 3 – OCCUPATION RIGHT AGREEMENTS, TERMINATIONS, DEDUCTIONS, AND ESTIMATED FINANCIAL RETURNS		
3(a) Cooling-off period and cancellation of occupation right agreement		
Does the occupation right agreement contain more favourable cooling-off and cancellation provisions than contained in section 28(1) of the <i>Retirement Villages Act 2003</i> ?		
Cooling-off period for cancellation without reason		
Period for finishing the residential unit (to a point of practical completion) after which the resident may cancel		
3(b) Varying occupation right agreement		
Details of the ability of a party to vary a occupation right agreement		
3(c) Termination of occupation right agreement		
What is the effect on any person(s) living with a resident (at the time of termination), if the occupation right agreement is terminated?		
Details of charges that continue to be payable by a former resident after termination		

REQUIRED	NEEDED	NOT NEEDED
Details of the application of the maintenance or sinking contributions paid by or allocated to the former resident		
Details of the extent (if any) a former resident is exposed to a capital gain or capital loss arising out of termination		
Details of the process to be followed in finding a new resident for the vacated residential unit		
Details of the process for determining the sum or sums payable by a new resident for the right to occupy a vacated unit, and the entitlement of any resident, former resident, or the estate of a former resident in relation to that sum or sums		
3(d) Deductions from payments by and to residents		
Details of the deductions from any payments made by or due to residents		
3(e) Estimated financial return on disposal of residential unit		
The estimated financial return that a resident, former resident, or the estate of a former resident, could expect to receive on the sale or other disposal of a vacant residential unit is set out		
Details on how the estimated financial return (detailed above) is affected by the duration of the resident's occupation		
Details on how the estimated financial return (detailed above) is affected by termination of the occupation right agreement arising out of a resident's breach of the agreement		
Details on how the estimated financial return (detailed above) is affected by termination of the occupation right agreement arising out of a resident's decision to terminate the agreement voluntarily		
PART 4 – OTHER MATTERS		
4(a) Details relating to certain security interests		
Has a holder of a security interest (to whom section 12(1)(b) of the Retirement Villages Act 2003 applies) refused consent to the registration of the retirement village?		
If 'yes' to the above question, the details of the holder and security interest		

REQUIRED	NEEDED	NOT NEEDED
4(b) Exemption from requirement to comply with code of practice		
Is there an exemption from the requirement to comply with a provision or provisions of the code of practice?		
4(c) Responsibilities for insurance		
Details of the insurance cover for the retirement village the operator is to obtain or has obtained		
The risks relating to the residential unit for which the resident is responsible		
4(d) Moving into a rest home or hospital care institution in a retirement village		
If the retirement village shares premises with a rest home or hospital care institution, is the resident (under the occupation right agreement) allowed to leave the residential unit and receive either rest home care in the rest home or hospital care in the hospital care institution?		
If 'yes' to the above question, details of the terms contained in the occupation right agreement		
4(e) Effect of marriage, etc, on occupation right agreement		
Details of the effect on an occupation right agreement if a resident marries or enters into a civil union (irrespective of whether the resident was in another marriage or civil union when the agreement was made)		
4(f) Financial assistance		
If this part 4(f) applies, then full details of the financial assistance and the terms on which residents may receive the assistance		
4(g) Basis for working out prospective financial information		
If any financial information is attached to this disclosure statement, what are the principal assumptions and methods used in working out the information?		
4(h) No statement about entry into occupation right agreement being safe or free from risk		
Any statement in this disclosure statement is not to be taken or construed so as to represent that entry into an occupation right agreement relating to a retirement village is safe or free from risk		

REQUIRED	NEEDED	NOT NEEDED
4(i) Matters required by Deed of Supervision		
Details of any matters required by the deed of supervision with the statutory supervisor to be disclosed in this disclosure statement		
4(j) Documents to be made available		
The most recent audited financial statements of the village operator that comply with the Financial Reporting Act 1993 (if that Act applied to the operator during the period to which the statements relate)		
If the Financial Reporting Act 1993 requires preparation of financial statements in respect of the village, then the most recent audited financial statements in respect of the village that comply with the Financial Reporting Act 1993		
If there are no audited financial statements, the operator will provide financial statements that meet the requirements in Schedule 6 of the Retirement Villages (General) Regulations 2006		
A copy of the rules that apply specifically to the village and affect a resident living in or using a residential unit in the village		
A copy of the agreement (if any) between the village operator and manager for the management of the village		
A copy of the deed of supervision (if any) between the operator of the village and the statutory supervisor		





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Department's website: www.dbh.govt.nz

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