

**Townsville Lot Owners Group**

PO Box 740

TOWNSVILLE QLD 4810

tsv.log.20@gmail.com

Mobile: [REDACTED]

24th February 2022

**Queensland Human Rights Commission**  
L 15 53 ALBERT STREET, BRISBANE CITY  
Queensland 4000

## **Queensland Human Rights Commission Review of the Anti-Discrimination Act 1991**

Dear QHRC,

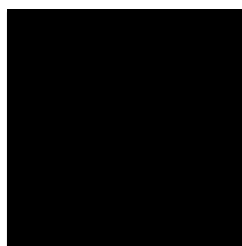
please find our online QHRC review submission, would it be possible to obtain confirmation this submission has being received by the QHRC.

Thank you.

Andrew Turnour

Discrimination definition: -

### **Discrimination**



Discrimination is the act of making unjustified distinctions between people based on the groups, classes, or other categories to which they belong or are perceived to belong. People may be discriminated on the basis of race, gender, age, religion, or sexual orientation, as well as other categories. Discrimination especially occurs when individuals or groups are unfairly treated in a way which is worse than other people are treated, on the basis of their actual or perceived membership in certain groups or social categories. It involves restricting members of one group from opportunities or privileges that are available to members of another group.

 Wikipedia

## Queensland Human Rights Commission (QHRC) Submission seven template questions

### 1.0: your experiences of discrimination and harassment

Home insurance location discrimination is rampant in North Queensland

**Home “House” Insurance:** My personal experience, like many in Townsville, is that many homeowners are for paying home insurance that is sold with a false (discriminatory) insurance natural disasters risk. We are “3<sup>rd</sup> line forced” to buy flood insurance when our house is on the side of a hill, that even the Townsville 2019 “1 in 500” year flood monsoon did not even threaten. This home flood insurance is a “theft” product that cannot ever be used by the purchaser. The flood sales process is opaque and discriminatory as is based on false information. No evidence of street address flood specifics is ever disclosed by the home insurance provider.

**Home “Strata Apartment” (strata) Insurance:** We, on behalf of many of the strata insured in Townsville believe there is significant home insurance procurement discrimination “culture” in play in North Queensland (NQ).

The two main complaint elements are:

- the unverified insurer claims that NQ has more natural disasters damage than the rest of Australia.
- And that strata buildings are more natural peril damage prone than non-strata “free standing house” homes.

Both these unverified home insurance risk foundation claims allow the insurance industry to wrongly justify price gouging NQ strata residents for the last decade with impunity.

These false claims are based on manipulated opinions, opaque reports, and verbiage. No actual verified third party evidence is ever disclosed. We believe this NQ home insurance sales discrimination is sustained as is caused by State and Federal Insurance regulatory failure for lack of crisis monitoring, visibility and equitable evidence management. Not one regulator has correctly reported to our NQ Members of Parliament that there is a strata insurance crisis in existence in NQ. Denial is the current regulatory position for home insurance in NQ

The strata insured are trapped consumers who must have “compulsory” strata insurance per the Qld BCCM<sup>1</sup> Regulations. These “trapped” consumers are therefore at the mercy of rogue insurers knowing the strata insured must have insurance no matter what the cost. If not compliant insured they are breachable by BCCM legislation and subject to the consequences. This “prisoner insurance” is a veritable gold mine for insurers and is endorsed by the BCCM who regulates the consumers and does not regulate the insurance providers. This discriminatory

---

<sup>1</sup> BCCM is the Queensland Body Corporate Community Management (-Act 1997) Commission which stipulate the 15 compulsory insurance regulations that Community Titles Scheme (CTS) otherwise known as Strata or Strata Apartments must abide by or face breach of regulations consequences.

insurance legislation has been reported to the BCCM who in reply state it is not their problem. The BCCM denies QHRC responsibility for “its” regulated and compulsory strata insured residents’ accommodation mental welfare in NQ. This we believe is in defiance of the BCCM Act-1997 explanatory notes to parliament for assumed fair play by the prescribed secondary objects of the Act for all strata Queenslanders.

Strata insurance discrimination is applied to strata homes that exist above the Rockhampton Line (tropic of Capricorn). A fictitious commercial boundary line that justifies insurers to inflate home insurance prices to more than 6 times the same amount that a similar home would pay for home insurance anywhere else in Australia below the Rockhampton line. NQ homes are excluded from access to national home insurance affordability because our federal and state regulators tolerate this discriminative home post code segregation position.

Some insurance companies will not quote insurance above this line, which is weird as it dilutes the purpose of national insurance that is to spread the risk.! This selective “cherry picking” pricing of home insurance access by post code is discriminatory, as defies the intended purpose of home insurance in Queensland. This selective cherry picking is designed and tolerated blatant profit harvesting!

The 2011 Qld SEQ flood inquiry enabled insurers to distribute future flood risks premiums across every home insurance policy in Queensland. Cyclone risk distribution state-wide is denied, which is very unfair and thus discriminatory and hypocritical by government to have the North Queenslanders home insured risk mitigations treated differently.

We have researched Cyclone, Flood, Bushfire, Earthquake, Hail, Storm natural disasters and they all exist, yet the NQ natural disaster pair of floods and cyclone risks are dwarfed by the occurrence of multiple natural disasters per annum per decade below the Rockhampton line. Yet home insurance down there is 1/5<sup>th</sup> to 1/10<sup>th</sup> the cost of home insurance in NQ. This Insurance discrimination needs to be called out with verified natural disaster consequence evidence. All Insurance inquires since 2011 concerning NQ have only used insurance industry provided data, at no time has equitable consumer tax invoiced home insurance data being used to balance, refute or confirm the insurers data claims that NQ is a bad place to insure homes.

Intimidatory and deceptive sales tactics, aggressive highly skilled insurance salespersons easily overwhelm befuddled aged body corporate committee members who rely on engaged insurance brokers and body corporate managers for their insurance advice. Yet Brokers and Body Corporate Managers both suffer from “conflict of interest’s” issues in putting their customer needs first. When insurance advice is not in writing, when “junk” insurance products are added to the mandatory strata insurance product sales process that have undisclosed potential to inflate premiums and commissions. Profit temptations then exist on who’s interests are to be being served first. There is no regulatory controls for conflict-of-interest abuse behaviors. Trust is the only ‘fragile’ control strata consumers have with their insurance providers, that they assume they are being truly informed and their needs are being insured honestly.

## 2.0: how this experience has impacted you

Strata home insurance is becoming more unaffordable for the insured residents who live above the Rockhampton line. Two types of home insurance exist

- **Optional Home House insurance.**
  - take it or leave it consumers affordability choice available.
- **Compulsory Home Strata Insurance.**
  - Qld BCCM regulated and CTS<sup>2</sup> enforced
  - Called “prisoner insurance” as no one cannot decline it, no matter what the price.
  - Enforced by legislations that regulated the strata resident but not the strata insurer.
  - Devalues the strata property if BCCM award reduced value insurance concessions
  - Devalues NQ ability to quickly insurance recover from a natural disaster event.
  - If underinsured, then becomes a government compensation liability at time of event.

Our national regulators cannot differentiate between compulsory strata insurance and optional home house insurance. APRA<sup>3</sup> demonstrate this as APRA have homogenised all optional and compulsory home insurance reports into one “aggregated” distorted data set, thus denying “granular” visibility by home classification and premiums and claims accountability at post code and LGA level. APRA has now neutered itself as an insurance prudential regulator as has no insurance visibility of the billion dollar strata insurance premium and claims market in Australia.

NQ strata insurance prices go up each year and the risks remain the same... what gives? The risks are never explained, detailed nor disclosed with verified evidence. This “data denial” discrimination enables the insurers and regulators to treat NQ as geographically different strata insured consumers to the rest of Australia.

Strata home accommodation was once a lower cost option for many elderly, invalid, retired, impaired, single homeowners. These vulnerable residents are now suffering affordability eviction threat from their strata homes since the ICA mounted its strata insurance fee hike campaign of 2012. (Appendix-A) This ICA campaign is designed to make strata insurance more expensive than house home insurance in NQ. (We discovered insurance premium tax invoices for a 45-unit apartment building in Townsville. In 2006 it was premium tax invoiced \$8,200 and in 2021 was tax invoiced \$266,000 in 2021. In that same period some \$65,000 in claims were made and total of premiums invoiced were \$1.2 million). Strata living is becoming unaffordable for many vulnerable persons and this trend is silently tolerated by the BCCM.

Accommodation discrimination occurs if the compulsory insured Strata insurance cannot get full insurance cover fully compliant to the BCCM legislation. Anything less than this devalues the strata home value and can delay their home natural disaster event recovery if damaged. The BCCM is becoming strata irresponsible now by allowing PD-28 insurance devaluation applications to be submitted to the BCCM for approval. The process is devaluing the CTS building assets and

---

<sup>2</sup> CTS = Community Titles Scheme – Queensland legislation for strata apartment home communities

<sup>3</sup> The **Australian** Prudential Regulation Authority (**APRA**) is an independent statutory authority that supervises institutions across banking, **insurance** and superannuation

fails to detect let alone report the root endemic cause of why full strata insurance cannot be accessed.

Nearly 100% of NQ strata insured premiums are BCCM non-compliant, thus putting the NQ entire region at risk of being exposed to a very poor recovery ability after a natural disaster event. Because of this we believe the government could be liable from strata community claims for compensation because the Government allowed the BCCM to tolerate and endorsed non-compliant insurance procurement that can underinsure the entire NQ CTS community who bought impaired non-compliant strata insurance products that the BCCM allowed to invade its regulated insured CTS Strata communities.

On a tangent note, most NQ strata home values have been financially damaged by the BCCM Act and Regulation deficiencies. Most NQ strata homeowners have missed out on the national property boom because of excessive unaffordable insurance costs that the national regulators and the BCCM have allowed to occur in NQ. This has had a consequence of a weaker and poorer NQ home economy and has knock on effects of low investment thus causing accommodation shortage and lack of new apartments stock.

### 3.0: [whether you told anyone about what happened and if so, who you told](#)

In May-2021 we made submissions to our BCCM commissioner outlining 21 legislative failures in the strata insurance legislation that penalizes the insured residents and not the insurance suppliers.

There are 6,610 strata apartment communities in NQ above the Rockhampton line that house around 90,000 Queenslanders of all shapes and sizes and vulnerabilities

The suppliers of concern are the insurance industry who have created market conditions in NQ that extract a financial yield five to ten times more per home insurance package sold above the Rockhampton line than below it.

There were over 431 submissions to the 2011 Federal Inquiry into the affordability of residential strata title insurance. The final report [page-27] writes of the impact of price increase sensitivities of fixed income vulnerable persons living in strata accommodation.

During 2021, we have also sent numerous newsletters and observation reports about the NQ insurance crisis to Queensland Attorney General, APRA, ASIC, ACCC, ARPC, AFCA the Federal Treasury and our local NQ members of Parliament both Federal and State. Also we have made numerous media releases to our NQ newspapers and radio for our strata audience to become more aware of the NQ strata insurance crisis that threatens the NQ communities and economy.

4.0 whether you made a formal report or complaint, and if so, who to Queensland Body Corporate Community Manager Commissioner. 18th May 2021. Emailed – 4+27+1+18 pages of concerns and proposals.

5.0: what makes it difficult for people to make a complaint about discrimination and harassment

Strata insured residents find it difficult to talk about strata insurance for a host of reasons.

- Vulnerable people often lack the skill sets to negotiate with insurance pressure selling.
- Sensitive about their age and decision-making skills,
- Embarrassed, exploited, got conned, did not fully understand the product purchased.
- Body Corporate Committee are all volunteers, easy targets for aggressive salesmen and disgruntled lot owners.
- Committee retribution to defend their muddled befuddled decision to procure poor insurance that was pressure sales sold to them.
- Most committee procured insurance is poorly understood by volunteer committee members.
- Much without evidence to support the risk mitigation claim(s), Volunteers often subjected to soft sales techniques such as “everyone else has it” rhetoric or “it costs nothing, so leave the junk insurance product in there” All sold with dumbing accusations towards anyone who may ask questions.
- Deflect responsibility,
- Decision Frustrations – kept uninformed, denied enough time for other quotations, Delayed response times is best sales toy to frustrate committees into buying products Last minute panic buying is the best sales strategy as if late or uninsured then exposed to the BCCM breach threat if insurance not procured before the deadline. N not fully informed as waiting on last minute replies, mostly verbal and not in writing. Unenforceable commitments
- Intimidation by volume of sales paper that committee must read through.
- Community fear of purported insurance risks
- Body Corporate Manager – wrong attitude to consumers not acting in their best interests, do not test nor search the entire home insurance market as they advocate, they do, most only shop with “insurance mates” – do not declare insurer / broker actual relationships and his such disclosure in fine print FSG insurance quotation documents mountain
- Insurance Brokers putting products sales and commissions before customers best interest and defending product sales and risks with talk and not with writing
- Insurance retributions to troublemakers, make renewal difficult, delay tactics and threats to not renew insurance can exist, we the only one you can get. Do not shop around as it overloads the insurer as we are told in reply anger.

## 6.0: how the complaints process could be improved

1. Queensland Government
  - a. have their BCCM declare if a Strata insurance crisis does exist in NQ.
  - b. confirm there is a Strata insurance crisis by asking NQ MP's to report.
  - c. Collect data to define the problem
    - i. establish a complaints desk in Townsville, Cairns, Mackay to audit strata insurance policies for BCCM compliance.
    - ii. establish a hot line and internet line for insurance complaints without cost to make the complaints, ask for tax invoices with 5-year claims data evidence
    - iii. Requisition, advertise and obtain 1000 strata insurance tax invoices with 5-year claims records from NQ and from SEQ CTS communities for insurance comparative benchmarking
  - d. Queensland Government
    - i. Will have its own body of verified strata consumers supplied tax invoice insurance data that neither APRA, ASIC, ATO, ACCC can provide.
    - ii. Are now listening to all the complaints and are now able to make the desired corrections to remove all strata home insurance discriminations that separate NQ from the rest of strata insured Queensland.

## 7.0: Your suggestions and ideas for change

The current BCCM legislation is poorly designed as only addresses arguments. The Queensland Government needs to redesign and modernize the BCCM-Act 1997 and regulation modules. More than a million Queenslanders are controlled and subjected by these restrictive “disputes only” **reactive** legislation. This legislation records around 130 disputes a month that conclude the BCCM legislation has created a large pool of toxic communities and insurance abused residents. The Queensland government must discipline and empower the BCCM to embark on activating the 9 secondary objects of the Act that satisfy numerous QHRC objectives that have been previously denied to the strata community by the current BCCM.

The strata residents of Queensland want a BCCM that **proactively advocates** for them and not for the rogue services suppliers, truth distorters and insurance predators that freely operate with the current BCCM blessings.

We need a BCM that advocates for Strata Queenslanders at all levels of state and federal government, to challenge wrong or damaging policies and practices that have potential to damage Qld strata communities. For the last decade the BCCM has been for ever silent and gone missing from all state and federal insurance inquiries and policy repair attempts for the NQ strata insurance crisis.

It is time for the BCCM to make all BCCM controlled strata communities a safe haven to live by adopting much of the QHRC advocations (Appendix-E).

### Additional

The 2018 Royal Commission into Aged Care identified the need to modernize the underperforming incumbent legislation. One “incapacity to function” recommendation stipulated 5 commissioners must be appointed to replace the sole overloaded incumbent commissioner.

13/10/21 ABC news reported one hospital health complaint gets a doctor and hospital investigated, whereas NQ have multitudes of insurance complaints and no investigation is conducted by the BCCM. This legislative administrative reluctance to act is a form of bureaucratic selective discrimination.

Because the BCCM and therefore the Queensland Government have no visibility mechanisms of the actual status of NQ strata insurance crisis and the toxic CTS community crisis. We believe the BCCM should be charged with collecting Insurance premiums tax invoices and 5 year claims histories and all AGM materials from every regulated body corporate in Queensland. This annual collection then becomes the BCCM strata community condition monitoring repository. This repository then securely protects and presents all CTS documents for BCCM compliance scrutiny, supplier behaviors, advisor advice quality, committee performance monitoring and corrective actions training. All assembled, analyzed, and monitored in order to raise the communal living standards of strata community by delivering improved CTS community behaviors with evidenced based accountability, redundancy and transparency.

We believe the BCCM should provide an annual **Strata Performance** report to Government minister of housing and to all Strata community residents in Queensland to comfort all that someone in Government is actually watching over and protecting our precious and valued Queensland strata communities called “**home**”.



## Appendix-A: Insurance Council of Australia: Sales Extracts

ICA the national insurance industry lobby group – a juggernaut. We believe the home insurance industry has no regulator, because like the 2017 Banking Royal Commission states that the regulated are sometimes too close to the regulators. The ASIC regulator endorsed ICA Code of Practice does not work, as offers insufficient consumer protections for the “procurement of home Insurance”

### ICA Sales Extract-1:

#### **Is strata insurance too expensive?**

On October 19, 2012, an independent review completed by the Australian Government Actuary reported that strata insurance prior to 2011 was significantly underpriced in some regions. It concluded strata insurers in high-risk areas were experiencing high losses compared with the premiums being collected. In some areas insurers in effect were paying \$160 in claims and costs for every \$100 collected. This is not commercially sustainable.

Since 2011, insurers have repriced premiums to address the risks and losses in the strata market. Many strata unit holders now pay, on average, premiums on parity with those paid by the average household in the same location after many years of paying much less.

This 2012 ICA media claim, when researched, found all data used by government was supplied entirely by the insurance industry. At no stage did the AGA use consumer tax invoiced data to validate let alone balance or make equitable contribution to their reports.

The second part of their investigation by the AGA we read they did not even come to North Queensland to investigate and validate their data. The AGA did say they detected “price competition” amongst NQ insurers who at the time were engaged in a “price war” by slashing prices to gain market share, **thus self-inflicted** losses. The ICA coterie can now claw back incurred losses with impunity as there is no Home Insurance Regulator in Australia for price controls the AGA should have reported.

**ICA Sales Extract-2:** So wrong as simply no evidence provided to support this eloquently greased justification statement. Regulatory failures allowed such miss information to be published and distort the purpose of having a national home insurance industry.

The 2011 Qld SEQ flood inquiry enabled home insurers to spread future flood risks premiums across every home insurance policy in Queensland.

The reverse for spreading cyclone risk across all Qld home policies is denied, which is deemed discriminatory and hypocritical by government for North Queenslanders to be sectioned off from access to the same insurance affordability that is available for the rest of Queensland home insured.

The image shows a blue header for the Insurance Council of Australia with the text 'INSURANCE COUNCIL OF AUSTRALIA' and 'Common'. Below the header is a white box with a blue border containing the text: 'Why is strata insurance more expensive in some areas? In some parts of Australia the risks to property are more significant than elsewhere. Cyclone-prone areas are exposed to greater risks and as a consequence are more expensive to insure than less-hazardous regions. Insurers are required to operate in a financially prudent manner under Australian law and must take into account the geographical risks.'

## Appendix-B: Home Insurance Procurement Assessment

An extract from The ACCC North Australian Insurance Inquiry 2018.

**Rating factors**

The models used to determine claims costs will take various characteristics of the property and policyholder into account. These characteristics or 'rating factors' are factors which have been shown to affect the likelihood of the policyholder making a claim, or the severity of a claim when it occurs.

Rating factors generally include characteristics of the property, the policyholder and the policy coverage. Table 5.1 provides examples of rating factors used by insurers to determine expected claims costs when setting the technical premium. Different factors will be relevant to different types of claims and will also impact model outputs to different extents. We understand though, that for most claims types, the location of the property and the sum insured have the greatest impact on the estimated claims cost.

**Table 5.1: Example rating factors used in claims cost models**

Property characteristics	Policyholder characteristics	Coverage characteristics
Sum insured	<u>Age</u>	Excess
Location	<u>Retiree status</u>	Accident damage
Building type	Claim History	Rent default
Wall and roof construction	Installments	Malicious damage
Number of stories	<u>Tenure</u>	Portable contents
Stilts	Other products	Special valuables
Pool		
Year of construction		
Occupancy		
Security		

The ACCC are telling us here that the home insured public is subject to numerous secretive rating factors. This rating factor assessment is never disclosed to the home insured consumer. Therefore this "rating" is devoid of any data entry error correction and control mechanisms to ensure consumer financial safety and prevent erroneous miss classifications.

Rating non-disclosure to the "assessed consumer" provides a massive sales leverage advantage to the insurer during the sensitive product sales process. The insurer is now aware of all the insured vulnerabilities and can make price determination and profit prediction based on the unverified data portrayal of the insured. This consumer sensitivity insurance selling process takes advantage of the consumer's weakened mental state after being threatened with potential home destroying risks. Risk exaggeration can occur without evidence.

All home insurance policy contracts notify the insured they have an obligational duty to make disclosures, normally four basic disclosures are requested. Yet at no stage in the contract process or execution is there any obligations that the insurers must provide disclosure on how they "rated" the building, the home and the person(s), in interests of mutual fairness.

This putrid non-disclosure ratings insurance sales process that sells insurance protection cover for a valuable mental and material sensitive object called "home" is abusive and discriminatory. It needs to be regulated by forensically testing all the insurer's risks claims are factual with occurrence probability and consequence evidence being disclosed by the insurer.

## Appendix-C: A cry for help

Email extract from the home insured exploited.

Subject FW: Kim Bee: FW: Townsville Lot Owners Group Suncorp media question -2nd

funding) .....there is Stamp Duty, GST blah blah, blah

Example - my 102 strata lot complex has \$237,000 Insurance premium with excess for cyclones into the \$100,000's  
Plus my contents insurance is \$3000  
I pay \$4795.46 per annum for my little home, no car insurance in this either, plus levies, plus rates - total \$13,796 per year.....  
Pensioners cannot afford to live up here because of the insurance.....blowing out their fees when they only receive \$24,000 per annum (food, fuel, medical, repairs etc).

This is what has been happening up here in the North (11years) and we need to fix it whilst we are still 'alive'.  
With tears  
KB

## Appendix-D: Aged Insurance Abuse

Who advocates for these people? The BCCM does not, Federal regulators do not. No one is monitoring nor regulating NQ strata home insurance. To complain, consumers are advised to try the Australian Financial Complaints Authority (AFCA), which we have discovered is not a regulator nor a consumer advocate. It is a safe haven for the insurance industry that protects the interests of the insurance supply industry. The AFCA we believe is a consumer insurance protection charade.


Who can our disadvantaged, our elderly, the vulnerable, frail, unskilled, retirees and investors complain to in government about unjust or questionable strata insurance behaviors without the barrage of intimidatory paper-works and processes? Not being able to make insurance complaints devoid of excessive administrative and bureaucratic processes is discriminatory. Home insurance protection is denied in Australia. There is no home insurance regulator in place. This denial of regulatory service can be deemed as discriminatory and is caused by government community care and protection neglect.

Business

**'I nearly passed out': Elderly couple's insurance shock**

Suncorp has hiked the home insurance bill of an elderly Townsville couple by more than 150 per cent.

□ 18



## Appendix-E: Government Departments – QHR implementation uptake.

The Queensland Body Corporate Community Management ACT-1997 and its five regulations modules are devoid of any QHRC aspects for safe non discriminated residential living. The BCCM regulates the strata home environment for more than a million Queensland strata residents. The aged BCCM Act makes no responsibility exists for human rights as the word “discriminate” is used once in the 427 pages of the Act and 220 pages of Accommodation regulations” The BCCM regulates the residents but not the rogue contractors and suppliers. Home insurance contractors are the most popular CTS abuse complaint in NQ. The BCCM does not encourage Human Rights to be considered in this huge highly regulated Queensland community. The internet is littered with thousands of complaints about how toxic, unsafe, and devalued the strata community is becoming. Yet all is tolerated and caused by our silent BCCM.

a particular age.

(5) A by-law must not **discriminate** between types of occupiers.

*Example—*  
A by-law can not prevent a tenant from using a pool on the common property.

---

Current as at 4 December 2020 Page 161

Authorised by the Parliamentary Counsel

---

Body Corporate and Community Management Act 1997  
Chapter 3 Management of community titles schemes  
[s 181]

(6) A by-law (other than an exclusive use by-law) must not impose a monetary liability on the owner or occupier of a lot included in a community titles scheme.

### IMPLEMENTING THE *HUMAN RIGHTS ACT 2019* IN THE QBCC

The QBCC is committed to compliance with, and furthering the objects of, the *Human Rights Act 2019*. In 2020-2021, the QBCC continued to implement steps to identify and address the broader impacts the Human Rights Act 2019 may have on clients of the QBCC as a result of carrying out its regulatory functions.

In 2020, the QBCC appointed an audit officer to review, assess and make recommendations regarding the compatibility of all relevant policies and procedures with the *Human Rights Act 2019*. Substantial progress has been made in the review process, which is expected to be completed in 2021-2022.

The QBCC captures human rights complaints within its current complaints management system. One complaint was assessed as a potential human rights complaint. The outcome of the complaint assessment was that there had been no limit to the complainant's human rights and therefore no further action was taken.

This QBCC extract demonstrates other Queensland Government departments are engaging in QHRC practices. Our BCCM needs to lift its QHRC obligations game here and care for its CTS regulated residents by starting with **eliminating**

- The BCCM “pay as you go” fee applications complaints system that forms a administrative public service barriers and hurdles that make it difficult for unskilled and disadvantaged CTS residents to complain.
- The need to engage costly legal services to be able to make a complaint about CTS living in Queensland.

BCCM must advocate for its regulated strata home community. This is developing a QHRC protective duty where the BCCM is made to be proactively responsible for the home safety and wellbeing of the entire Qld CTS community

## Appendix-F: Conflicts of Interest.

Many Community Titles Schemed (CTS) strata apartments engage Body Corporate Management contractors to provide secretarial and financial management service works for the Body Corporate. This article below demonstrates there is no regulatory control, nor audits nor monitoring by regulators to see if this shameful practice is harming vulnerable residents by financially threatening their strata homes under the guise of service sales commissions without necessarily doing any work for the paid sales commission. The 2019 Banking Royal Commission did report many insurance annual sales commissions outweigh the annual insurance claims.

