

## 1. Purpose

This procedure outlines how Brightwater encourages and manages feedback, including complaints, compliments and suggestions from clients, their families, carers or other representatives and any other Brightwater stakeholder.

## 2. Scope

This procedure applies to all Brightwater clients, their family, carers or other representatives, employees, contractors, volunteers, students, temporary staff, visitors and other stakeholders.

This procedure excludes any work-related grievance which is subject to Brightwater's Grievance Resolution policy and procedure.

Feedback assessed to be an incident will be subject to Brightwater's Client Safeguards Protocol (Incident management and reporting) and Clinical Incident Management Reporting policies and procedures.

## 3. Procedure

### 3.1 Promoting and Encouraging Feedback

Brightwater employees must use all relevant opportunities to welcome, encourage, support and facilitate feedback, including regularly checking in on clients.

The Welcome Team and employees orientating clients to a site or service will provide new clients with a Compliments, Complaints and Suggestions brochure outlining the feedback process.

A list of agencies is provided in Appendix Two for those clients and stakeholders who wish to use an alternative avenue to provide feedback.

### 3.2 Advocates

Clients and their representatives have the right to an advocate. An advocate may be an informal advocate (a family member or friend) or a formal advocate from a recognised advocacy agency.

Brightwater must assist clients and their representatives to access an advocate if appropriate or requested.

Employees should refer to Appendix One for a list of formal advocacy agencies.

### 3.3 How to Submit Feedback

A client or stakeholder that would like to provide feedback directly to Brightwater may do so in writing or verbally. Feedback may be provided by:

- By having a conversation with any Brightwater employee or volunteer, either face to face or by telephone
- Brightwater website – [www.brightwatergroup.com](http://www.brightwatergroup.com)
- Email to – [welcome@brightwatergroup.com](mailto:welcome@brightwatergroup.com) OR [covid19@brightwatergroup.com](mailto:covid19@brightwatergroup.com)
- Zipline
- By completing the *Compliments, Complaints and Suggestions* brochure
- Sending a letter to Brightwater House – Brightwater House, Level 3, 355 Scarborough Beach Road Osborne Park WA 6017
- Phoning the Brightwater Contact Centre – Phone: 1300 223 968

- Through Brightwater's social media channels (Facebook, Twitter, LinkedIn)
- Phoning the Health and Disability Services Complaints Office (HaDSCO) – 1800 813 583 (for all disability clients until 30 November 2020 then State-Funded clients only from 1 December 2020)
- Phoning the Aged Care Quality and Safety Commission – 1800 951 822
- Phoning the National Disability Insurance Scheme Quality and Safeguards Commission – 1800 035 544

### 3.4 Anonymity and Confidentiality

All feedback must be handled in a sensitive, confidential and timely manner and discussed only with those persons relevant to the case or who can provide specialist advice.

Clients and stakeholders may provide feedback to Brightwater anonymously where practicable however Brightwater will be unable to communicate updates to anonymous sources.

### 3.5 Managing Feedback

All feedback will be respected, acknowledged and documented, including formal and informal.

All employees must identify the communication needs of the client or stakeholder and any challenges they may have in providing feedback and facilitate access to supports if required.

#### 3.5.1 Receiving Verbal Feedback

Any Brightwater employee receiving verbal feedback must:

1. Remain positive and receptive.
  - Reassure the client or stakeholder and assist them to work through their reason for contact. Encourage the use of an advocate if appropriate.
2. Listen carefully.
  - Make notes during the conversation (where possible) or record the details directly onto the *Brightwater Feedback Form* (available on Brightnet).
3. Confirm the details.
  - Repeat back the information and gain agreement from the client or stakeholder.
4. Explain what action will be taken.
  - Complaint: where possible resolve the issue; alternatively let them know that you will refer the complaint to your manager or another service and how long this will take (if known).
  - Compliment: let them know that you will pass the compliment on to the appropriate area.
  - Suggestion: let them know that you will refer the suggestion to your manager or another service for consideration and how long this will take (if known).
5. Implement the action.
  - If appropriate, follow through with any agreed action.
6. Complete documentation.
  - Enter the feedback details and actions taken directly in to E10 **OR**
  - Complete the *Brightwater Feedback Form* and upload to E10. If you do not have access to E10, provide the form to your direct line manager.
  - Documentation must be completed **within two (2) working days** of receiving the feedback.

The relevant manager must, upon receiving notification of feedback:

7. Review the feedback.
  - Review the documentation and discuss with the relevant department/service and others involved as appropriate.
  - Where it is thought that the feedback has legal, media or political implications, the relevant manager and/or General Manager must be notified immediately.
8. Implement action.
  - Complete further action if required.
9. Complete documentation.
  - If not done already, upload and enter the details from the *Brightwater Feedback Form* in to E10 **within two (2) working days**.
  - Categorise the feedback in E10. For a complaint, ensure it is appropriately risk rated.
10. Contact the person that submitted the feedback.
  - Within **four (4) working days** of the feedback being received, respond in writing **OR** make personal contact by telephone to the client or stakeholder:
    - i. Complaint: explain what action will be taken and how long this will take.
    - ii. Compliment: (optional, at discretion of manager) thanking the person for providing the compliment.
    - iii. Suggestion: explain what and why action will or will not be taken (and why)and how long this will take.
  - Update the details in E10 as required and either attach any written response or record what was discussed in the telephone conversation.
11. Follow up.
  - If there is a matter to resolve, follow this up until it is resolved and all parties are satisfied (refer 3.6 Severity of the Complaint or Concern).
  - Where a matter remains unresolved for 30 days, the manager must advise the relevant general manager and update them on the progress towards resolution.
12. Close the feedback.
  - When the feedback has been resolved or reached the logical conclusion, close the feedback in E10.

### 3.5.2 Receiving Written Feedback

Feedback received in writing must be forwarded directly to the manager of the relevant service.

The relevant manager must, upon receiving the feedback:

1. Review the feedback.
  - Review the feedback and discuss with the relevant senior manager, general manager or others involved as appropriate.
  - Determine any action that is required.
  - Where it is thought that the feedback has legal, media or political implications, the relevant manager and/or General Manager must be notified immediately.
2. Implement action.
  - Decide on and complete action to be taken.
3. Complete documentation.
  - Upload the documentation and enter the details in to E10 **within two (2) working days**.

- Categorise the feedback in E10. For a complaint, ensure it is appropriately risk rated.
- 4. Contact the person that submitted the feedback.
  - Within **four (4) working days** of the feedback being received, respond in writing **OR** make personal contact by telephone to the client or stakeholder:
    - i. Complaint: explain what action will be taken and how long this will take.
    - ii. Compliment: (optional, at discretion of manager) thanking the person for providing the compliment.
    - iii. Suggestion: explain what and why action will or will not be taken (and why) and how long this will take.
  - Update the details in E10 as required and either attach a written response or record what was discussed in the telephone conversation.
- 5. Follow up.
  - If there is a matter to resolve, follow this up until it is resolved and all parties are satisfied (refer 3.6 Severity of the Complaint or Concern).
  - Where a matter remains unresolved for 30 days, the manager must advise the relevant general manager and update them on the progress towards resolution.
- 6. Close the feedback.
  - When the feedback has been resolved or reached the logical conclusion, close the feedback in E10.

### 3.5.3 Receiving External Feedback – Commission and Restrictive Practice

All feedback received via the Aged Care Quality and Safety Commission or National Disability Insurance Quality and Safeguards Commission, including that which relates to the use of Restrictive Practice, should be forwarded to the relevant General Manager to determine how the feedback is to be handled and to coordinate the response.

### 3.6 Severity of a Complaint or Concern

Sometimes the nature of a complaint is so serious that it must be reported to a manager immediately. For example, it may relate to alleged abuse, neglect, drug use or other illegal or inappropriate activity which has the potential to hurt clients or employees if immediate action is not taken.

The employee to whom these complaints or concerns are raised must immediately telephone the relevant manager to advise them of the situation.

If the manager cannot be contacted then the General Manager must be telephoned immediately.

### 3.7 Escalation

If a client or stakeholder is not satisfied with the outcome or how the feedback has been handled, we should encourage them to escalate their concern to the relevant Program, Operations and/or General Manager or to the relevant Commission and/or relevant external agencies. Employees should refer to Appendix Two for a contact list.

### 3.8 Record Keeping

All feedback records are required to be recorded in E10.

Records will be retained by Brightwater and will record the following:

- Details of the person providing feedback and the feedback details
- Date lodged
- Action taken

- Date of resolution and reason for the decision
- Correspondence
- Any response and further action

All records will be confidential with restricted access.

### 3.9 Training Procedures

All employees will be trained in the Brightwater Feedback policy and procedure during orientation and as part of mandatory refresher training.

### 3.10 Continuous Improvement

Operation Managers and Service Managers must ensure that all feedback is documented, reported and any service improvement outcomes as a result of feedback are implemented and incorporated into relevant procedures and continuous improvement plans, if required.

The feedback management system will be owned and reviewed by the Customer Experience Team and evaluated on an annual basis. This will include:

- Review of feedback policies and procedures
- Feedback about the accessibility and effectiveness of the feedback management system
- Implementation of a continuous improvement plan based on the review and feedback received.

## 4 Definitions (procedural related)

Word	Definition
<b>Advocate</b>	<p>Is an impartial person who can help the client understand and stand up for their rights. This includes making sure the client has a say in decisions that affect them, providing options to have their needs met and helping the client communicate and have resolved feedback, complaints and concerns.</p> <p>An informal advocate may be a family member, friend or other representative.</p> <p>A formal advocate may be a representative from a recognised advocacy agency.</p>
<b>Client</b>	<p>A person who receives supports and/or services from Brightwater. A client is inclusive of Residential Aged Care, Brightwater at Home, Regional Assessment Service and disability clients which includes NDIS Participants and clients in the Continuity of Supports Programme.</p> <p>Client is a broad term encompassing carers and representatives.</p>
<b>Complaint</b>	<p>An expression of dissatisfaction made to or about Brightwater, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.</p>
<b>Compliment</b>	<p>An expression of praise, encouragement or gratitude about a product or service provided by Brightwater. It may be about an employee, a team or a service.</p>

<b>Employee</b>	Any person whom Brightwater has engaged to provide a service on a permanent, casual or contractual basis including volunteers and students.
<b>Feedback</b>	Any issue, enquiry or general discussion which is brought to the attention of Brightwater in order to improve the operations of the organisation.
<b>Incident</b>	An event or circumstance that occurred during service delivery, which resulted in harm or has the potential to harm a client.
<b>Manager</b>	The person whom the employee reports to.
<b>Open disclosure</b>	The open discussion that Brightwater has with clients and stakeholders when things go wrong or have the potential to go wrong.
<b>Procedural fairness</b>	Means acting fairly during the decision making process. The course of natural justice.
<b>Senior Manager</b>	The next most senior person whom an employee reports to.
<b>Stakeholder</b>	Key individual, group or organisation with a vested interest in the implementation and approach of services within Brightwater who may be directly or indirectly affected.
<b>Suggestion</b>	Any issue, enquiry or general discussion which is brought to the attention of Brightwater in order to improve the operations of the organisation.

## 5 Roles and Responsibilities

It is a requirement that employees ensure they remain informed of all Brightwater policies and procedures which impact upon their duties, and to work within them.

All clients, stakeholders and Brightwater employees are encouraged to provide feedback on this procedure to ensure that it continues to reflect the way in which the feedback process is undertaken. Feedback may be provided verbally or in writing as per this procedure.

<b>Role</b>	<b>Responsibility</b>
<b>Advocate</b>	To act solely on behalf of a client or their representative. To act on their instructions, provide support and speak on their behalf to promote their ideas and interests.
<b>Client</b>	To be engaged and involved in their care, speak out and provide feedback when they have questions, suggestions or concerns.
<b>Complaints and Feedback Officer</b>	Is responsible for coordinating the handling of complaints and feedback and ensuring the process is properly managed.
<b>Customer Experience Team</b>	To manage the overall governance of the feedback process.
<b>Employee</b>	Are expected to have knowledge of and comply with all Brightwater policies and procedures.
<b>General Manager</b>	To manage feedback escalated to them.
<b>Learning and Development</b>	Provides training and education regarding the feedback procedure and processes.
<b>Manager</b>	To implement actions, follow process and close out feedback.
<b>Quality Team</b>	Ensure process integrity including effectiveness and informing continuous improvement.
<b>Senior Manager</b>	To manage feedback escalated to them.
<b>Stakeholder</b>	To provide feedback as relevant to their interaction with Brightwater supports and services.

## 6 Related Documents

- Compliments, Complaints and Suggestions brochure
- Client Protection Policy and Procedure
- Grievance Resolution Policy and Procedure
- Incident Management Policy and Procedure
- Client Safeguards Protocol (Incident management and reporting)
- Restrictive Practices Policy and Procedure

## 7 Legislation, Standards and References

- National Disability Insurance Scheme Act 2013
- Commonwealth of Australia 2016, Better Practice Guide to Complaints Handling in Aged Care
- National Disability Insurance Scheme (Procedural Fairness) Guidelines 2018
- National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018
- NDIS Quality and Safeguards Commission, NDIS Practice Standards and Quality Indicators, January 2020
- Australian Government 2019, Aged Care Quality and Safety Commission, Open Disclosure Framework and Guidance 2019
- Commonwealth of Australia 2015, NDIS Quality and Safeguards Commission, Effective Complaint Handling Guidelines for NDIS Providers
- National Disability Insurance Scheme Code of Conduct
- AS/NZS 10002-2014, Guidelines for complaint management in organisations
- Guidance and Resources for Providers to support the Aged Care Quality and Safety Standards 2019
- Charter of Aged Care Rights 2019
- User Rights Principle 2014

## 8 Appendices

### 8.1 Appendix One – Advocates

National Aged Care Advocacy Program (NACAP)

Email - [NACAP@health.gov.au](mailto:NACAP@health.gov.au)

Older Persons Advocacy Network (OPAN)

Email - [enquiries@opan.com.au](mailto:enquiries@opan.com.au)

Phone – 1800 700 600

Advocare

Email – [rights@advocare.org.au](mailto:rights@advocare.org.au)

Phone – 08 9479 7566

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**8.2 Appendix Two – External Agencies**

National Disability Insurance Scheme (NDIS) Quality and Safeguards Commission  
Phone - 1800 035 544

National Disability Abuse and Neglect Hotline  
Phone - 1800 880 052 (call WA Police in an emergency: 000)

Aged Care Quality and Safety Commission  
Phone – 1800 951 822

Health and Disability Services Complaints Office (HaDSCO)  
Email – [mail@hadsco.wa.gov.au](mailto:mail@hadsco.wa.gov.au)  
Phone – 1800 813 583

Translating and Interpreting Service TIS National  
Email – [tis.freeinterpreting@homeaffairs.gov.au](mailto:tis.freeinterpreting@homeaffairs.gov.au)  
Phone – 1300 575 847

Elder Abuse Helpline  
Phone – 1300 724 679