

# Feedback Procedure

PRO-Qandi-004



Brightwater Procedure			
<b>Staff Scope</b>	All Brightwater staff, contractors, volunteers, students, visitors and other stakeholders.		
<b>Service Area Scope</b>	All service areas		
<b>Clinical Governance Framework Application</b>	<input checked="" type="checkbox"/> Leadership and Culture	<input checked="" type="checkbox"/> Consumer Partnership	<input type="checkbox"/> Workforce
	<input checked="" type="checkbox"/> Risk Management	<input type="checkbox"/> Clinical Practice	

## 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 procedure.

Feedback assessed to be an incident will also be reported as per the [Client Incident Management Procedure](#).

## 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 external agencies is provided in Section 9, Appendix 1 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 staff must assist clients and their representatives to access an advocate if appropriate or requested.

Employees should refer to Section 9, Appendix 2 for a list of formal advocacy agencies.

### 3.3 How to Submit Feedback

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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:

- Utilising the CarePage platform
- Having a conversation with any Brightwater staff member, either face to face or by telephone
- Completing the feedback form on the Brightwater website - [Feedback \(brightwatergroup.com\)](https://www.brightwatergroup.com/Feedback)
- Sending an email to [customerexperience@brightwatergroup.com](mailto:customerexperience@brightwatergroup.com)
- Completing the *Compliments, Complaints and Suggestions* brochure
- Sending a letter to Brightwater Central - 2A Walter Rd W, Inglewood WA 6052 OR Reply Paid 762, Osborne Park, WA 6916
- Phoning the Brightwater Contact Centre – 1300 223 968
- Phoning the Aged Care Quality and Safety Commission – 1800 951 822
- Phoning the National Disability Insurance Scheme Quality and Safeguards Commission – 1800 035 544
- Phoning the Health and Disability Services Complaints Office (**HaDSCO**) – 1800 813 583  
*(for State-Funded clients only from 1December 2020)*

### 3.4 Anonymity and Confidentiality

All feedback must be handled in a sensitive, confidential, 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.
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 communicate that you will refer the complaint to your manager or another service and provide the duration, if known.
  - *Compliment:* communicate you will pass the compliment on to the appropriate area.

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- *Suggestion*: communicate you will refer the suggestion to your manager or another service for consideration and provide the duration, 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 CarePage with **within two (2) working days** of receiving the feedback.

The relevant manager **must**, upon receiving notification of feedback:

1. Review the feedback.
  - Review the documentation and discuss with the relevant department/service and others involved as appropriate.
  - If the feedback has legal, media or political implications, the relevant Manager and/or General Manager must be notified immediately.
2. Implement actions.
  - Complete further action, if required.
3. Complete documentation.
  - If not done already, upload and enter the details of the feedback to CarePage **within two (2) working days**.
4. Contact the person that submitted the feedback.
  - **Within four (4) working days** of the feedback being received, respond in writing or contact by telephone to the client or stakeholder:
    - *Complaint*: explain what action will be taken and the proposed duration.
    - *Compliment*: (optional, at discretion of manager) thank the person for providing the compliment.
    - *Suggestion*: explain what and why the action will or will not be taken and the proposed duration.
  - Update the details in CarePage as required and either attach any written response or record what was discussed in the telephone conversation.
5. Follow up.
  - If there is a matter to resolve, follow up until resolved or has reached a logical conclusion.
  - 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 has reached a logical conclusion, close the feedback in CarePage.

### 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 if any action is required.

- If the feedback has legal, media or political implications, the relevant Manager and/or General Manager must be notified immediately.
2. Implement actions.
    - Decide on and complete actions to be taken.
  3. Complete documentation.
    - Enter the feedback details and actions taken directly in to CarePage with **within two (2) working days** of receiving the feedback.
  4. Contact the person that submitted the feedback.
    - **Within four (4) working days** of the feedback being received, respond in writing or by telephone to the client or stakeholder:
      - *Complaint*: explain what action will be taken and the proposed duration.
      - *Compliment*: (optional, at discretion of manager) thank the person for providing the compliment.
      - *Suggestion*: explain what and why action will or will not be taken and the proposed duration.
    - Update the details in CarePage as required, either attach any written response or record what was discussed in the telephone conversation.
  5. Follow up.
    - If there is a matter to resolve, follow up until resolved and all parties are satisfied.
    - 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 has reached a logical conclusion, close the feedback in CarePage.

**Note:** Written feedback received via the [customerexperience@brightwatergroup.com](mailto:customerexperience@brightwatergroup.com) will be entered into CarePage by the Customer Experience Team and allocated to the relevant site manager or general manager depending on the complexity of the complaint.

### 3.5.3 Receiving External Feedback

All feedback received via the Aged Care Quality and Safety Commission (**ACQSC**), National Disability Insurance Quality and Safeguards Commission (**NDIS**) or any other external body, must be forwarded to the Manager Quality and Information for coordination of response. This will include discussion with the relevant General Manager to determine how it will be handled and/or if an investigation processes will be required. Documentation will be entered into CarePage by the Quality and Information team.

## 3.6 Escalation

If a client or stakeholder is not satisfied with the outcome or how their feedback has been handled, their concerns can be escalate to the relevant Senior Manager, relevant Commission and/or external agencies. Employees should refer to Section 9, appendices for contact information to support clients and or families if required.

## 3.7 Record Keeping

All feedback records are required to be recorded in CarePage, with restricted access to the relevant staff at a service.

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Records will be retained by Brightwater and will record all relevant details to the feedback including details of the person providing the feedback, unless submitted anonymously.

## 4. ROLES AND RESPONSIBILITIES

Role	Responsibility
<b>All Staff</b>	To ensure they remain informed of all Brightwater policies and procedures which impact upon their duties, and to work within them.
<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>	Engage with Brightwater to provide feedback when they have questions, or concerns.
<b>General Manager</b>	To manage escalated feedback.
<b>Manager Quality and Information</b>	Coordinate responses to external agency complaints, ensuring relevant investigation activities are completed and documentation completed and recorded in CarePage.
<b>Customer Experience Team</b>	To manage the overall governance of the feedback process. Record feedback and assign to relevant managers when received via feedback email.
<b>Senior Manager</b>	To manage escalated feedback.
<b>Stakeholder</b>	To provide positive or negative feedback as relevant to their interaction with Brightwater supports and services.

## 5. RELATED DOCUMENTS

- [Feedback Policy](#)
- [Client Incident Management Reporting Procedure](#)
- [Compliments, Complaints and Suggestions Brochure](#)
- [Grievance Resolution Procedure](#)
- [Incident/Event Management Policy](#)

## 6. LEGISLATION, STANDARDS AND REFERENCES

- [Commonwealth of Australia 2021, Better Practice Guide to Complaints Handling in AgedCare](#)
- [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 2018, NDIS Quality and Safeguards Commission, Effective Complaint Handling Guidelines for NDIS Providers](#)
- [Aged Care Quality Standards 2021](#)
- [Charter of Aged Care Rights 2019](#)
- [User Rights Principle 2014](#)
- [National Standards for Disability Services](#)

**7. APPROVAL DETAILS**

Sponsor:	Chief Customer Officer				
Approver:	Manager Quality and Information				
Published:	25/11/2022	Effective from:	25/11/2022	Review Date:	25/11/2025
Version:	3.0				
ACQS:	Standard 8 – Organisational Governance				
NDIS:	Indicator 2 – Provider Governance and Operational Management				
Additional Standards:					
<b>Printed or personally saved electronic copies of this document are considered uncontrolled</b>					

**8. APPENDICES****Appendix 1 – 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

**Appendix 2 – 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