



**Compliments, Complaints and  
Feedback  
Policy and Procedure**

## Purpose and Scope

Network Rehabilitation Group (NRG) are committed to fostering a culture that values and learns from compliments, complaints, and feedback. We aim to empower our participants, their families, and our employees to speak up about the things we're doing well, and not so well, as it will help us continuously improve how we deliver our supports. Having a system that actively manages compliments, complaints and feedback is a key part of NRG's Risk Management Framework, NRG's Engagement Framework and is a requirement of the National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018, NDIS (Code of Conduct) Rules 2018, National Disability Insurance Scheme Act 2013. Our Compliments, Complaints and Feedback Policy and Procedure ensures we deliver supports that align with our Purpose, 'we empower people to lead purposeful, fulfilling lives that align with their goals'.

This policy and procedure applies to all employees, contractors, reference group members, participants and family members who engage with Rehabilitation Support Services (RSS) and Network Case Management Services (NCMS).

## 2.0 Definitions

**Allegation:** a claim that an illegal act has occurred. Allegations are always investigated and sometimes an external authority undertakes the investigation such as the police.

**Complaint:** formal advice that an incident has occurred, something is not working the way it should, something is inappropriate, or someone is at risk. A serious incident process is required for legal and contractual purposes when a complaint is about a serious incident.

**Compliment:** Positive information about reactions to supports, a person's performance of a task, etc.

**Concern:** a notification that a person is worried that something is not working, has gone wrong or is otherwise not as it should be.

**Employees:** A person that has an employment contract with NRG whether it be casual, part-time, full-time or contract.

**Family member:** Refers to people who may or may not be directly related to the participant but who the participant identifies as having a significant familial affect in the participants life.

**Feedback:** information about reactions to supports, a person's performance of a task, etc. which is used as a basis for improvement

**Key supporter:** Refers to friends, partners or others who have experience in providing ongoing care and support to our participants.

**Omission:** Withholding information

**Participant:** Refers to a person who accesses supports from either Network Case Management Services or Rehabilitation Support Services or both.

**Reference group member:** A person that is a member of NRG's Reference Group

**Support Worker:** A person employed to provide supports to our participants so they may achieve their goals

## 3.0 Policy

We welcome compliments, complaints and feedback from our participants, their families, our employees, and stakeholders. We understand that many people find it difficult to provide a compliment, complaint or feedback and ensure that everyone will be always treated with courtesy and respect. We will involve the person making the compliment, complaint or feedback and any person with a disability (if not the informer) affected by any issues raised. We will work with them to find a mutually beneficial resolution and communicate this in a manner that has been requested by the person, either in person, phone, or email. If we cannot fully resolve the concern, we will listen and work with the person to ensure they feel that they have been listened to; that their opinion was valued; and that we did everything we could to address their concerns. We understand the process really is as important as the outcome and is critical to building and strengthening relationships between Network Rehabilitation Group and the Participants we support.

### Principles

- Everyone has the right to provide a compliment, complaint, or feedback.
- People making compliments, complaints, or feedback should be supported to do so.
- Compliments, complaints, and feedback process should be sensitive to any cultural requirements.
- Robust compliments, complaints, and feedback processes are an important part of quality service management and help safeguard the people we support.
- Compliments, complaints, and feedback identify risks to people with disability but also visitors and staff and support NRG to meet its work health and safety obligations.
- Compliments, complaints, and feedback identify opportunities for NRG to continuously improve its services.

Our complaints management procedure is:

- simple and easy to use
- available to all members, clients, and stakeholders via our website.
- ensures complaints are fairly assessed and responded to promptly
- procedurally fair and follows principles of natural justice
- compliant with legislative requirements.

### Our commitment

If you make a complaint to NRG you can expect that we will:

- treat you with respect
- Let you know what to expect while your complaint is being investigated
- carry out the complaint handling process in a fair and open way
- provide reasons for decisions that are made
- protect your privacy

## 4.0 Procedure

### 1. Making a compliment, complaint, or feedback

Any person wishing to make a compliment, complaint or feedback may do so verbally or in writing:

- to the staff member they were dealing with at the time unless you are making it about this person and would prefer to speak with their Manager which you can do by calling the office on 9387 5797 and asking for their Manager
- if you are more comfortable you are welcome to make your compliment, complaint, or feedback directly to the General Manager
- if you wish to make a compliment, complaint, or feedback about the General Manager you can speak directly to the Managing Director
- if you wish to make a compliment, complaint, or feedback about Rehabilitation Support Services or Network Case Management Services you can phone the NDIS Commission on 1800 035 544 utilise their [complaint contact form](#).

Verbal compliments, complaints or feedback need to be escalated to their Manager, who will continue with the following process.

Written compliments, complaints or feedback can be sent through the website, via the Feedback section, or emailed directly, [feedback@networkcms.com](mailto:feedback@networkcms.com)

Any person is welcome to engage with an advocate, friend, or family member if they feel they would benefit from receiving their support to make their compliment, complaint, or feedback.

We recommend contacting,

- Ministerial Advisory Council on Disability: 0435 046 248
- People with Disabilities WA: 1800 193 331
- Health and Disability Services Complaints Office: (08) 6551 7600

### 2. Recording the compliment, complaint, or feedback

- an **acknowledgement** email or phone call (depending on how the compliment, complaint or feedback was received) will be made, acknowledging receipt, and providing the person with information that we will investigate and the maximum time frame for answers and actions will be 10 business days.
- The compliment, complaint or feedback will be attached to the Participants Lumary file and case notes added recording, receipt of the form, investigation, answers, actions, and interactions with those involved.

### 3. Investigating the compliment, complaint, or feedback

- the compliment, complaint, or feedback will be reviewed by the receiving **Manager** within 24 hours of receiving it

- if it's a complaint or feedback that falls within a NDIS Reportable Incident category then the NRG Incident Management Policy and Procedure will be followed
- all other compliments, complaints and feedback will be reviewed by
  - engaging with the people directly involved
  - recording the facts of what occurred from those involved
  - review our process, policies and procedures to ascertain what should have occurred
  - engage and collaborate with the leadership team if required
  - outline the actions that are required including:
    - who will do it
    - when it will be done by
    - how the progress of the complaint and outcomes will be communicated to the person making the complaint and the participant, and
    - how the progress of the complaint actions and implementation will be oversighted.

#### **4. Communicating the findings and outcomes of the investigation**

To ensure those involved understand what happened and why it led to the compliment, complaint, or feedback we will communicate the outcome in the manner that has been requested by the person, either in person, phone, or email. The findings of the investigation will include **answers** that provide a clear explanation that is relevant to the concern raised and the **actions** that have been agreed upon internally. Internal actions are to be discussed with those involved and are subject to change based upon collaboration with those directly affected. If requested or deemed required, an **apology** will be issued by either the direct employee, their Manager or the General Manager

#### **5. Continuous improvement after a compliment, complaint, or feedback**

To ensure we learn from all compliments, complaints, and feedback we will:

- Review each compliment, complaint or feedback at the next Safety and Quality Committee meeting, looking at what occurred and how we can improve processes, policies, procedures and people.
- Implement and recommendations that come from the meeting
- Review a statistical summary of compliments, complaints or feedback every 3 months at the Safety and Quality Committee meeting

## **5.0 Related internal documents**

Compliments, Complaints and Feedback Form

Compliments, Complaints and Feedback Internal Form

Participant Incident Form

NRG Incident Management Policy and Procedure  
 Restrictive Practices Policy and Procedure  
 NRG Risk Management Framework  
 NRG Risk Management Policy and Procedure  
 NRG Safety and Quality Committee Terms of Reference

## 6.0 Supporting legislation and standards

NDIS Quality and Safeguards Commission – Effective Complaint Handling Guidelines for NDIS Providers  
 National Disability Insurance Scheme Act 2013 (the Act)  
 National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018 (the Rules)  
 The Charter of Human Rights and Responsibilities Act 2006  
 Disability Services Act (National Standards for Disability Services) Determination 2014  
 NDIS Code of Conduct, Guidance for NDIS Providers  
 NDIS Code of Conduct, Guidance for Workers  
 NDIS (Procedural Fairness Guidelines) 2018  
 NDIS Terms of Business March 2017  
 NDIS Code of Conduct Rules 2018  
 NDIS (Provider Registration and Practice Standards) Rules 2018  
 NDIS Act 2013  
 The Charter of Human Rights and Responsibilities Act 2006  
 Privacy Act 1988 (Commonwealth)  
 Australian Privacy Principles (APP)  
 Privacy and Personal Information Protection Act 1998  
 Disability Services Act (National Standards for Disability Services) Determination 2014  
 Carers’ Recognition Act 2004 (WA)

### Authorised

*Brett Costello*

Brett Costello, Managing Director

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