



2026 Comcare Licensee Audit

Australian National University

FINAL REPORT

Claims Management System Review

Audit Date: January 2026

claims

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Scope of Review

Organisation	Australian National University ('ANU')
Site/Workplace	Audit conducted remotely
Scope of review	<p>The review examined the ANU's claims management system, processes and outcomes to validate that ANU is meeting its licence conditions and is complying with the <i>Safety, Rehabilitation and Compensation Act 1988</i> (SRC Act) and the <i>Safety, Rehabilitation and Compensation Regulations 2019</i> (SRC Regulations)</p> <p>16 claim files were examined by the auditors. These files were randomly selected from a list of all claim files where some activity had occurred in the previous 12 months.</p> <p>The review encompassed a review of all relevant policies and procedures as they relate to claims management and any other relevant supporting documentation.</p> <p>Overall findings are based on the identification of issues that are considered to be systemic rather than isolated incidents.</p>
Criteria	<p>This review assessed the claims management system against 31 criteria grouped within 5 elements:</p> <ol style="list-style-type: none">1. Commitment and corporate governance (3 criteria)2. Planning (5 criteria)3. Implementation (17 criteria)4. Measurement and evaluation (5 criteria)5. Review and improvement (1 criterion)
Ratings	<p>The findings in the review report have been classified and marked as follows:</p> <p>Conformance: indicates that the criterion has been met.</p> <p>Non-conformance: indicates that the criterion has not been met.</p> <p>Not able to verify: indicates that the organisation has documented procedures in place however there are no cases to test that the organisation has followed those procedures. It is expected that this classification will only be used in limited circumstances and where applied, the reasons for the finding will be explained by the auditor.</p> <p>Not Applicable: indicates that the criterion does not apply to the organisation.</p> <p>Where a criterion has been met but the auditor has identified a 'once off' situation or a 'minor' deviation from the documented management system or reference criterion, an Observation may be made. These findings, while representing a non-fulfilment of a requirement, are recognised as being of lower risk to the organisation.</p>

Date(s) of review	12 to 13 January 2026 (file review)
Auditors	Sophie Anastasov, Ritu Barhmi and Tedra Boag, BRM Risk Management Pty Ltd (“BRM”)
Client contacts	Ingrid Krauss, Manager, Injury Prevention and Wellbeing, Safety & Wellbeing, ANU Lisa McLoughlin, Senior Consultant, Claims Management, Safety & Wellbeing, ANU
Record of review	This report contains a summary of the review outcomes. Detailed information is not recorded in the report. A record of the documentation and records sighted, persons interviewed, observations and auditor comments are retained on the auditor’s file.
Acknowledgment	BRM Risk Management Pty Ltd wishes to acknowledge the cooperation and assistance provided by the management and staff of ANU and thanks them for their contribution to the review process.

Executive Summary

Australian National University has held a self-insurance licence under the Safety, Rehabilitation and Compensation Act 1988 (SRC Act) since 1 July 2018. Their licence is due to expire on 30 June 2026.

ANU engages Comcare as a third-party service provider for claims management and this arrangement has been in place since the commencement of the licence. ANU's Deed of Agreement with Comcare establishes the formal contractual arrangements for the delivery of claims management services, including service expectations, performance standards, and compliance obligations aligned to the SRC Act and licence conditions.

ANU maintains a comprehensive Claims Management System that demonstrates effective governance, regulatory compliance, and a commitment to continuous improvement. This commitment is evidenced by well-developed policies, procedures, and governance arrangements that provide clear strategic direction, align with University values and objectives, and support ongoing improvement in claims management practices.

The audit confirmed compliance with the Safety, Rehabilitation and Compensation (SRC) Act and identified strong administrative controls. Delegations are clearly defined, objectives, targets, and performance measures are supported by structured planning and reinforced through regular operational, senior executive, and University Council reports and meetings.

Claims were acknowledged promptly, and employees were provided with information regarding the assessment process. Determinations were issued accurately and within required timeframes, applying the principles of equity and good conscience.

Case file notes demonstrated regular and meaningful communication with employees, providing evidence that employees were kept informed of the progress and status of their claims throughout the process.

A total of 16 files were reviewed during the audit, with findings identified in 6 files. No non-conformances were identified. However, an opportunity for improvement was noted in relation to ensuring employees are advised when stop-clock provisions are applied and when they are lifted, to support transparency and ensure employees are fully aware of timelines for liability determination.

The audit period reviewed was from 1 January 2025 to 31 December 2025.

This audit has been conducted against the full criteria of Comcare's CMS audit workbook, version 5.0, October 2025.

Non-conformances

No non-conformances were identified during the review.

Observations

Two observations were identified during the review. They are:

Criterion	Observations
3.3	ANU did not effectively communicate relevant information regarding the claims management process, as employees were not advised of when the stop-clock commenced or when it was lifted.
3.17	The following documents require review: <ul style="list-style-type: none">• ANU Claims Management Manual, v4.0, 8 May 2024 – references AAT rather than ART• ANU Workers' Compensation Claim Pack, v7.0, 12/12/25, next review 12/12/25 – review date appears to be a typographical error

In summary, for the 31 criteria within the claims management audit tool, the outcomes are:

	Number of criteria	% of assessed criteria
Conformance (with 2 Observations)	26	100%
Non-conformance	0	Nil
Not able to verify	4	
Not applicable	1	

An action plan, which includes completion/review dates and responsibilities, must be developed to address each of the above review/audit findings, and any individual file findings where an error in entitlement was identified.

The auditors invite ANU to discuss any aspect of this review.



Signed:

Sophie Anastasov
Head of BRM

Date: 2 February 2026

Table of criteria

Audit element/criterion description	Criterion	Rating
1. Commitment and corporate governance		
Documented commitment	1.1	Conformance
Internal and external accountability	1.2	Conformance
Identify, assess and control risk	1.3	Conformance
2. Planning		
Delegation schedule	2.1	Conformance
Documented procedures	2.2	Conformance
Planning for legislative compliance	2.3	Conformance
Setting objectives and targets	2.4	Conformance
Plans to achieve objectives and targets	2.5	Conformance
3. Implementation		
Adequate resources	3.1	Conformance
Communication—relevant stakeholders	3.2	Conformance
Employees are aware of rights	3.3	Conformance with Observation
Training and competency	3.4	Conformance
Determinations in accordance with the Act	3.5	Conformance
Powers under the Act	3.6	Not able to verify
Initial liability	3.7	Conformance
Determining incapacity	3.8	Conformance
Determining benefits	3.9	Conformance
Determining permanent impairment	3.10	Not able to verify
Transitional provisions	3.11	Not Applicable
Reconsiderations	3.12	Conformance
Reasonable opportunity	3.13	Not able to verify
Claim reviews	3.14	Conformance
Surveillance	3.15	Not able to verify
Privacy and confidentiality	3.16	Conformance
Reporting, records, documentation	3.17	Conformance

Audit element/criterion description	Criterion	Rating
4. Measurement and evaluation		
Monitoring planned objectives	4.1	Conformance
Internal audits	4.2	Conformance
Outcomes of audits are actioned, reviewed	4.3	Conformance
Communicating audit results	4.4	Conformance
Providing reports to Comcare and Commission as requested	4.5	Conformance
5. Review and improvement		
Continuous improvement	5.1	Conformance

ELEMENT 1: Commitment and corporate governance

Documented commitment

Criterion 1.1

The determining authority sets the direction for its claims management system through a documented commitment by senior executive.

Finding: Conformance

Evidence:

- ANU Policy: Rehabilitation and compensation, 17/10/24, next review 17/10/27
- ANU Policy: Work health and safety, 25/3/24, next review 24/3/29
- ANU Policy: Disability, 15/12/25, next review 15/12/30
- ANU Policy: Fitness for work, 17/10/24, next review 16/10/29
- ANU Procedure: Rehabilitation and compensation, 17/10/24, next review 16/10/29
- ANU Procedure: Work health and safety committees and representatives, 6/1/26, next review 6/1/31

Comment:

The ANU Rehabilitation and Compensation Policy sets out how the University supports employees who experience work-related injury or illness, with a strong emphasis on early intervention, safe rehabilitation, and timely return to work. Operating under the *Safety, Rehabilitation and Compensation Act 1988*, the policy establishes shared responsibilities between ANU, managers, and employees to actively participate in rehabilitation where medically appropriate, ensure suitable duties are identified, and manage compensation claims in accordance with Comcare requirements. The policy aims to minimise the impact of injury on employees, maintain productive workforce participation, and ensure ANU meets its legal, health, and safety obligations through a structured, confidential, and compliant rehabilitation and compensation framework.

The policy is approved by the ANU Vice Chancellor.

Corporate governance

Criterion 1.2

The determining authority's claims management system provides for internal and external accountability.

Finding: Conformance

Evidence:

- Position description:
 - Associate Director, Work Environment

- Claims Manager
- Manager, Injury and Claims
- WHS Claims Management Senior Consultant
- ANU Executive Organisation structure, July 2025
- Safety and Wellbeing Org Chart
- ANU Workplace Adjustments Funding Pack, v1.0, 11/11/25, next review 11/11/26
- SLA's:
 - Contract Extension with Comcare to 30 June 2026, signed 11/6/24
 - Deed of Agreement with Comcare Schedule 7, start date 26 November 2025, signed 4/12/2025
 - Deed of Agreement with Comcare version 2, signed 1/7/20
 - ANU Claims and Rehabilitation Management System Audit, External Audit Service Level Agreement, v2.0, 12/12/25, next review 12/12/26
 - Letter of engagement with BRM for audit services, 25 June 2025
 - Legal Provider - Capability Statement examples (Sparke Helmore, McInnes Wilson, Moray & Agnew)
- Licensee Compliance Performance Improvement Report, 2024/25
- Licensee quarterly performance report - ANU Quarter 1 2025-26
- Claims Management System audit report, January 2025, completed by BRM

Comment:

Internal Accountability is demonstrated through the following:

- Job descriptions
- Organisational structures
- ANU Workplace Adjustments Funding Pack

External Accountability is demonstrated through the following:

- SLA's with external parties:
 - Contracted claims manager - Deed of Agreement with Comcare
 - External auditors - Letter of engagement with BRM for audit services
 - Legal firms - Capability Statement examples (Sparke Helmore, McInnes Wilson, Moray & Agnew)
- Licensee Compliance and Performance Improvement (LCPI) Annual Report
- KPI reports for Licensees
- Claims Management System audit report

Criterion 1.3

The determining authority identifies, assesses and controls risks to the claims management system.

Finding: Conformance

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024 - 6. Decision making framework and quality assurance
- Determination quality assurance template
- ANU certificate of currency, 30/7/25
- ANU Policy: Risk management, 29/4/21, next review 29/4/26
- CMS ANU Risk Management Plan, v5.0, 6 January 2026

Comment:

The ANU Risk Management Policy establishes a structured, university-wide approach to identifying, assessing, and managing risks that may affect ANU's ability to achieve its objectives. It embeds risk management into governance, decision-making, and operational activities, making it a shared responsibility for Council, senior leaders, managers, and staff. Support for the framework is provided by the University Risk Office, which maintains the enterprise risk management framework and oversees risk oversight and internal controls to meet legislative obligations and promote a strong culture of risk awareness, accountability, and continuous improvement across the University.

The CMS ANU Risk Management Plan provides a structured framework for identifying, assessing, and managing risks that could affect the effective operation of ANU's Claims Management System (CMS) in accordance with the *Safety, Rehabilitation and Compensation Act 1988* and Comcare licence requirements. Aligned with the ANU Risk Management Policy, the plan documents key CMS-specific risks—such as staffing capacity, reliance on third-party providers, legislative and funding changes, information systems, and service delivery performance—and sets out existing controls, risk ratings, ownership, and review timeframes within a formal risk register.

ELEMENT 2: Planning

Administrative arrangements

Criterion 2.1

The determining authority identifies the administrative and financial limitations for each level of claims manager.

Finding: Conformance

Evidence:

- Delegation of Powers and Functions of a Licensed Authority signed 19 May 2023
- Delegation Schedule, signed 4 September 2025
- Delegation Extract Report, 17/12/25
- Service level agreements with claim manager (Comcare)
- File audit

Comment:

There are two delegation schedules applicable during the audit period.

The delegation instrument was signed by Professor Brian Schmidt, Vice Chancellor of the Australian National University on 19 May 2023.

Schedule A specifies the powers and functions that have been delegated to the following positions:

Comcare:

- Claims Manager
- Senior Claims Manager
- Senior Claims Delegate
- Reconsideration Officers

“Nominated Reconsideration Officers as per specified in the Deed of Agreement for Claims Managed Services and subsequent revisions – Schedule 9 Personnel.”

ANU:

- Senior Consultant Claims Management
- Manager Injury, Prevention and Wellbeing
- Deputy Chief People Officer (Safety and Wellbeing)
- Chief People Officer

Schedule B outlines the financial limitations that apply. No payment or agreement to pay above the financial authorities in Table 2 may be made without prior endorsement of the Chief People Officer.

A subsequent delegation instrument was signed by Genevieve Bell, Vice Chancellor and President of the Australian National University on 4 September 2025.

File audit:

Of the 14 files applicable to this criterion, file audit confirmed compliance with this criterion. Determinations and reconsiderations are signed by persons with appropriate delegation.

Criterion 2.2

The determining authority has documented procedures for paying compensation to injured employees, dependants of deceased employees, providers of medical treatment and other recipients.

Finding: Conformance

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024

Comment:

The ANU Claims Management Manual v4.0 documents that compensation payments are made only following claim lodgement and determination under the SRC Act, and that payments are limited to legislated entitlements. Responsibility for determining entitlement and authorising payments is assigned to appropriately delegated claims management personnel, ensuring payments are authorised, supported, and compliant with legislative requirements.

Payments may be made to injured employees, dependants of deceased employees, and approved providers of medical, hospital, pharmaceutical, allied health, rehabilitation, and related services, where liability has been accepted. The manual outlines controls to ensure payments are supported by medical certification, invoices, treatment approvals, and legislative requirements.

Claims management planning

Criterion 2.3

The determining authority recognises legislative obligations and plans for legislative and regulatory compliance, having regard to any policy advice that Comcare or the Commission may issue.

Finding: Conformance

Evidence:

- Claims Management System Governance Framework v7.0 (26 November 2025)
- ANU Policy: Disability, 15/12/25, next review 15/12/30
- ANU Policy: Fitness for work, 17/10/24, next review 16/10/29
- ANU Policy: Rehabilitation and compensation, 17/10/24, next review 17/10/27

- ANU Policy: Work health and safety, 253/24, next review 24/3/29
- ANU Procedure: Rehabilitation and compensation, 17/10/24, next review 16/10/29
- ANU Claims Management Manual, v4.0, 8 May 2024
- Claim Management Strategy
- Safety & Wellbeing Plan 2024-2026
- Position description:
 - Associate Director, Work Environment
 - Claims Manager
 - Manager, Injury and Claims
 - WHS Claims Management Senior Consultant
- ANU Procedure: Work health and safety committees and representatives, 6/1/26, next review 6/1/31
- Service level agreements with claim manager (Comcare)
- ANU Claims Management Core Capabilities and Training

Comment:

The *Claims Management System Governance Framework v7.0 (26 November 2025)* confirms that the CMS is structured to support ongoing compliance with the *Safety, Rehabilitation and Compensation Act 1988* and Comcare's *Licence Compliance and Performance Model*. Legislative compliance is supported through established governance, review, and continuous improvement arrangements, including system governance and review obligations, scheduled document review and update cycles, audit and assurance activities with associated corrective action processes, and integration with ANU's broader governance and risk management framework.

In addition, ANU's Deed of Agreement with Comcare establishes the formal contractual arrangements for the delivery of claims management services, including service expectations, performance standards, and compliance obligations aligned to the SRC Act and licence conditions. The deed supports legislative compliance by defining accountability between ANU and Comcare, requiring adherence to agreed service levels, facilitating performance monitoring, and enabling audit, reporting, and continuous improvement activities in accordance with Comcare's regulatory oversight role.

ANU Policies reference requirements of the legislation and the Claims Manual documents supporting compliance with the SRC Act and Comcare licence requirements.

Criterion 2.4

The determining authority sets objectives and targets and identifies key performance measures for its claims management system.

Finding: Conformance

Evidence:

- ANU Strategic Plan 2021 - 2025
- Safety & Wellbeing Plan 2024-2026
- Claim Management Strategy
- Licensee quarterly performance report - ANU Quarter 1 2025-26
- LCPI report, 2024/25
- ANU Claims Management Manual, v4.0, 8 May 2024 - 15. Reporting
- ANU Self-insurance Progress Report for Council, 1 January to 31 December 2024
- ANU WHS Performance Report 1 January - 30 June 2025
- WHS Performance at ANU 2024 Calendar Year, prepared January 2025
- Service level agreements with claim manager (Comcare)
- ANU Policy: Disability, 15/12/25, next review 15/12/30
- ANU Policy: Fitness for work, 17/10/24, next review 16/10/29
- ANU Policy: Rehabilitation and compensation, 17/10/24, next review 17/10/27
- ANU Policy: Work health and safety, 25/3/24, next review 24/3/29
- ANU Procedure: Rehabilitation and compensation, 17/10/24, next review 16/10/29

Comment:

The Claims Management Strategy translates ANU's strategic objectives into clear operational priorities, focusing on timely and accurate claim determinations, early intervention, effective rehabilitation and return-to-work outcomes, cost containment, and the proactive management of high-risk and long-tail claims.

The Safety & Wellbeing Plan 2024–2026 establishes organisation-wide goals that directly support claims management outcomes by embedding safety into everyday decision-making, strengthening systems and capability, and improving physical and psychological health outcomes for staff. These goals underpin CMS targets relating to injury prevention, early support, return-to-work participation, and workforce capability.

ANU monitors CMS performance through defined performance measures and reporting mechanisms, including:

- Timeliness of claim determinations (initial liability and ongoing entitlements)
- Return-to-work and recovery outcomes
- Claims duration and cost trends, including management of high-cost and long-tail claims

- Compliance with legislative and licence requirements
- Quality assurance and audit outcomes

Performance against these measures is reported through Licensee quarterly performance reports, Licensee Compliance and Performance Improvement (LCPI) reports,

Criterion 2.5

The determining authority establishes plans to:

- achieve its objectives and targets
- promote continuous improvement
- provide for effective claims management arrangements.

Finding: Conformance

Evidence:

- ANU Policy: Disability, 15/12/25, next review 15/12/30
- ANU Policy: Fitness for work, 17/10/24, next review 16/10/29
- ANU Policy: Rehabilitation and compensation, 17/10/24, next review 17/10/27
- ANU Policy: Work health and safety, 25/3/24, next review 24/3/29
- ANU Procedure: Rehabilitation and compensation, 17/10/24, next review 16/10/29
- ANU Strategic Plan 2021 - 2025
- Claim Management Strategy
- Safety & Wellbeing Plan 2024-2026
- LCPI report, 2024/25
- ANU Claims Management Manual, v4.0, 8 May 2024
- Service level agreements with claim manager (Comcare)

Comment:

Refer to comments against criterion 2.4.

ELEMENT 3: Implementation

Resources

Criterion 3.1

The determining authority allocates adequate resources to support its claims management system.

Finding: Conformance

Evidence:

- Licensee quarterly performance report - ANU Quarter 1 2025-26

Comment:

ANU allocates adequate resources to support its claims management system. ANU has engaged Comcare as a third party service provider for claims management.

Staffing levels in both claims management and injury management teams are generally aligned to the volume and complexity of active claims. Staffing arrangements are reviewed in response to significant changes in:

- Workers' compensation claim volumes
- Safety incident notifications requiring RCM screening
- Employee numbers requiring early intervention support
- Demand for injury prevention services, including training

Communication and awareness

Criterion 3.2

The determining authority defines and communicates responsibilities to relevant stakeholders.

Finding: Conformance

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024
- ANU Workers' Compensation Claim Pack, v7.0, 12/12/25, next review 12/12/25
- Workers Compensation Claim Pack - Making a workers compensation claim - Staff Services - ANU
- Position description:
 - Associate Director, Work Environment
 - Claims Manager
 - Manager, Injury and Claims
 - WHS Claims Management Senior Consultant

- Service level agreements with claim manager (Comcare)
- ANU Claims Management Core Capabilities and Training
- File audit

Comment:

The ANU Workers' Compensation Claim Pack (v7.0) is a consolidated set of information and forms that supports employees to make a workers' compensation claim under the Safety, Rehabilitation and Compensation Act 1988.

It outlines when and how a claim can be made, the roles of the employee and employer, and the documentation required to support a claim.

The pack includes the workers' compensation claim form, authority to collect and disclose personal information, frequently asked questions, a medical certificate of capacity, a claim for time off work form, and a medical services claim form. It is designed to ensure claims are lodged consistently, accurately, and in line with legislative and Comcare self-insurance requirements.

The Service Level Agreement with Comcare requires that roles and responsibilities for claims management are clearly defined, documented and communicated to all relevant stakeholders.

The ANU intranet contains comprehensive information on workers' compensation and rehabilitation under the SRC Act and is accessible to all employees. All relevant policies and procedures are clearly documented.

File audit:

The file audit confirmed that a notice of rights and obligations was issued with all employee determinations. Case notes and emails documented discussions between the claims manager and the employee regarding the employee's rights and responsibilities.

Of the 14 files applicable, the file audit confirmed compliance with this criterion.

Criterion 3.3

The determining authority communicates relevant information regarding the claims management process including:

- (i) ensuring that employees are aware of their legislative rights and obligations in relation to workers' compensation
- (ii) ensuring that employees are informed of the status of their claims
- (iii) ensuring consultation occurs between all parties in regard to the claims management process.

Finding: Conformance with Observation

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024:
 - 8.13.15 Communication and complaints
 - 8.13.20 Natural justice

- ANU Workers' Compensation Claim Pack, v7.0, 12/12/25, next review 12/12/25
- Workers Compensation Claim Pack - Making a workers compensation claim - Staff Services - ANU
- File audit

Comment:

Section 8.13 of ANU Claims Management Manual sets out ANU's obligations to ensure effective communication throughout the claims management process and to provide employees with access to complaints mechanisms. It requires that employees are informed of their rights, obligations, and key aspects of claim progression, and that communication occurs in a timely, transparent, and documented manner. The section also provides for employees to raise concerns or complaints regarding claims management decisions or processes, with matters addressed in accordance with established procedures.

File audit:

The file audit confirmed that all determinations issued to employees included a notice outlining their rights and obligations. Case notes contained email evidence of discussions between the claims manager and the employee regarding the claims process.

Claims were acknowledged upon receipt, with employees provided a claim reference number and nominated contact person. The acknowledgement correspondence outlined the claim assessment process.

Of the 12 files assessed against this criterion, 4 findings were identified where stop-clock provisions were applied. In these cases, there was no evidence that employees were advised of the date the stop-clock commenced or was lifted.

Observation:

ANU did not effectively communicate relevant information regarding the claims management process, as employees were not advised of when the stop-clock commenced or when it was lifted.

Training

Criterion 3.4

The determining authority identifies training requirements, develops and implements training plans and ensures personnel are competent.

Finding: Conformance

Evidence:

- Position description:
 - Associate Director, Work Environment
 - Claims Manager
 - Manager, Injury and Claims
 - WHS Claims Management Senior Consultant

- Comcare Claims Management Group (CMG) SRC Legislative Training Guide 2025/26
- Comcare SRC Legislative Training Guidance, July 2022
- ComLearn training history Pamela Perussich, 8/1/26
- ComLearn training history, Ravivanh Phanprachit, 8/1/26
- Credentialing and training, 2024
- FOCUS staff performance reviews
- PULSE Module - Responding to staff injury and illness in the workplace, training for Supervisors
- ANU Claims Management Core Capabilities and Training

Comment:

The Service Level Agreement with Comcare requires that claims management functions are performed by personnel who possess the necessary skills, qualifications, experience and legislative knowledge to undertake duties under the SRC Act and Comcare Scheme requirements. The requirements relating to the qualifications, experience and capability of Comcare claims management personnel are documented through role-specific position descriptions and supporting competency and capability frameworks.

Comcare advise that claims managers must demonstrate the following job-specific capabilities to perform their roles effectively:

Role: Claims Manager (APS5)

- Demonstrated ability to develop and apply in-depth knowledge of relevant legislation, policies and procedures, and to exercise sound judgement in decision-making and advice.
- Ability to analyse information and data to support evidence-based recommendations.
- Experience in managing issues and complaints and providing clear, practical advice.
- Experience in mentoring and sharing knowledge with others.
- Demonstrated capability to deliver a high standard of customer service, including active listening and empathy.

ComLearn training history records the completion of role-relevant legislative and scheme-specific training by claims management personnel, demonstrating ongoing development and maintenance of competence in the application of the SRC Act and Comcare Scheme requirements. The training history provides evidence that staff have completed mandatory and refresher training aligned to their claims management responsibilities.

Compliance with the legislation

Criterion 3.5

The determining authority complies with the provisions of the SRC Act when making decisions on claims, including:

- (i) determining claims accurately and quickly
- (ii) determining claims in writing with adequate terms and reasons
- (iii) ensuring there is equity of outcomes resulting from administrative practices used by Comcare.

Finding: Conformance

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024
- File audit

Comment:

The ANU Claims Management Manual sets out clear requirements for making decisions on claims, issuing determinations, and ensuring equitable outcomes, consistent with the SRC Act and Comcare Scheme expectations.

The Manual requires that claims decisions are made by authorised delegates in accordance with legislative requirements, having regard to all relevant evidence and Comcare guidance. Decision-making is supported by ANU's documented decision-making framework and quality assurance arrangements (refer Section 6 – Decision-making framework and quality assurance).

The Manual requires that all claims determinations are issued in writing and clearly articulate:

- the terms of the determination,
- the reasons for the decision, including how evidence and legislation were applied, and
- advice regarding review and reconsideration rights.

These requirements are reinforced through documented procedures for reconsiderations and reviews (refer Section 11 – Reconsiderations) and are evidenced through standardised determination templates and file documentation practices.

The Manual requires that claims management and administrative practices support equitable and consistent outcomes. This is achieved through:

- consistent application of legislative provisions,
- use of standardised procedures and templates,
- adherence to natural justice principles (refer Section 8.13.20 – Natural justice), and
- communication and consultation requirements that support fairness and transparency (refer Section 8.13.15 – Communication and complaints).

These controls are designed to ensure that claims decisions administered by Comcare on ANU's behalf result in fair, consistent and comparable outcomes for employees in similar circumstances.

File audit:

The audit confirmed that claims decisions were made in accordance with the principles of equity, good conscience and the substantial merits of each individual case, supporting fair and consistent administrative decision-making practices.

Determinations clearly outlined the terms of the determination, the reasons for the determination, and advice informing employees that, if dissatisfied with the outcome, they may request a reconsideration under subsection 62(2) of the SRC Act. Determination templates were applied consistently across files and were assessed as compliant with the legislative requirements of the Act.

Of the 14 files applicable to this criterion, the file audit identified 2 findings, specifically:

- 1 finding where a determination included an incorrect attachment; and
- 1 finding where a determination was not issued in a timely manner.

Criterion 3.6

The determining authority complies with the provisions of the SRC Act when using its powers or meeting statutory obligations under that Act.

Finding: Not able to verify

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024
- File audit

Comment:

The ANU Claims Management Manual provides the following guidance:

Section 57 – Medical examinations -(Section 10 – Independent medical examinations)

The Manual sets out procedures for requiring an employee to attend a medical examination under section 57 of the SRC Act. It requires that section 57 powers are exercised by authorised delegates and supported by appropriate medical or factual grounds. Decisions to require an examination must be issued as written determinations, consistent with legislative requirements and the Guide for Arranging Rehabilitation Assessments and Requiring Examinations 2024. Determinations are required to clearly outline the purpose of the examination, the legislative basis, and the employee's obligations, and must be documented on the claim file. The process is supported by standard templates and quality assurance controls to ensure consistency, procedural fairness, and compliance with the Guide.

Section 58 – Requesting information - (Section 9 – Obtaining information)

The Manual establishes procedures for requesting information under section 58 of the SRC Act. Requests must be relevant to the management or determination of a claim and issued in writing, clearly identifying the legislative authority relied upon and the information

required. Correspondence is required to specify the documents or information sought, include a section 58 notice, and allow a 28-day response period. Employees are advised of their obligation to provide the information and the potential consequences of non-compliance.

Section 59 – Releasing information - (Section 8.13 – Communication, complaints and natural justice)

The Manual sets out requirements for the release of information under section 59 of the SRC Act. Information may only be released where permitted under the Act and for lawful claims management purposes. Decisions to release information must be consistent with natural justice principles, including fairness, transparency and proportionality, and must comply with confidentiality and privacy obligations. Records of all information released are required to be maintained on the claim file. Requests for one or two documents held on the claim file are to be completed within 5 days, while requests for the full claim file, additional material, or matters requiring legal advice must be acknowledged within 5 days and finalised within 28 days, with the requester advised where additional time is required.

File audit:

File audit found no activity relevant to this criterion.

Criterion 3.7

The determining authority complies with the provisions of the SRC Act and the SRC Regulations when determining initial liability.

Finding: Conformance

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024:
 - 7. Initial liability
 - 10. Claims for work related death
- Liability calculator tool
- File audit

Comment:

The ANU Claims Management Manual sets out procedures for assessing and determining initial liability for workers' compensation claims in accordance with the SRC Act. It requires that initial liability decisions are made by authorised delegates and are supported by relevant medical and factual evidence.

The Manual identifies the following key considerations when determining liability under section 14 of the SRC Act:

- Employee status: Establishing that the claimant meets the definition of an employee under section 5 of the Act at the time of the alleged injury.

- Existence of an injury or disease: Determining whether an injury or disease exists as defined under sections 5A or 5B, including the nature and diagnosis of the condition, supported by medical evidence.
- Employment connection: Assessing whether the injury arose out of or in the course of employment, or, in the case of disease, whether employment contributed to a significant degree, in accordance with section 5B.
- Application of exclusionary provisions: Considering whether any exclusions apply, including whether the injury was intentionally self-inflicted or arose as a result of serious and wilful misconduct, consistent with sections 6 and 7 of the Act.
- Consideration of all relevant evidence: Ensuring that all available medical, factual and employment evidence is considered, including incident reports, medical certificates, clinical information, and employment or payroll records.
- Procedural fairness and documentation: Issuing determinations by an authorised delegate, in writing, with adequate terms and reasons explaining how the evidence and legislative tests were applied, and including advice regarding review and reconsideration rights.

The Manual also outlines procedures for managing claims arising from a work-related death, ensuring that entitlements are assessed and administered in accordance with the SRC Act. Claims managers are required to establish that the employee's death resulted from an injury or disease arising out of, or in the course of, employment, or that employment contributed to a significant degree to the death, in accordance with the relevant liability provisions.

In addition to determining liability, claims managers must identify and assess the eligibility of dependants and other entitled persons, having regard to dependency status, and the relationship to the deceased employee. All relevant medical, factual and employment evidence must be obtained and considered to support the determination.

Work-related death claims are required to be managed with heightened sensitivity and appropriate governance oversight. Decisions must be made by authorised delegates and issued in writing, clearly outlining the basis for liability, the entitlements determined, and the reasons for the decision.

File audit:

The file audit confirmed that claims met the requirements of section 54, including the receipt of a valid medical certificate, a written notice of injury, and confirmation that the claimant met the definition of an employee under section 5 of the SRC Act.

Section 14 liability determinations clearly identified the date of injury, including deemed dates for disease-based claims, and specified the accepted injury. Each determination outlined the terms of the decision, the reasons for the determination, and the applicable legislative provisions. A notice of rights accompanied each determination.

All initial liability decisions were issued within the statutory timeframes in accordance with section 11A.

Of the 6 files applicable to this criterion, the audit identified 1 finding where a claim for a secondary condition was notified by the employee's psychologist, however liability for the secondary condition was not determined.

Criterion 3.8

The determining authority complies with the provisions of the SRC Act when determining liability for incapacity.

Finding: Conformance

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024 – Section 8.16 Incapacity Payments
- File audit

Comment:

Section 8.16 of the ANU Claims Management Manual provides clear procedures for the calculation of Normal Weekly Earnings (NWE) and the determination and payment of incapacity compensation, in accordance with the *Safety, Rehabilitation and Compensation Act 1988 (SRC Act)*.

Normal Weekly Earnings are required to be determined under the SRC Act. Claims staff are required to consider verified employment information, including the employee's ordinary earnings and normal hours of work immediately prior to incapacity. Earnings data is obtained from internal payroll systems to ensure accuracy and consistency. The Manual provides the procedural framework to support the application of the SRC Act and ensure legislative compliance.

It recognises that NWE is not a static figure and establishes a clear process for reviewing and adjusting NWE where an employee's circumstances change. This ensures that incapacity payments remain accurate and reflect the employee's current entitlements over time.

Incapacity payments must be supported by a documented determination made in accordance with the SRC Act. The calculation of incapacity payments is based on the assessed NWE, with appropriate consideration given to any actual earnings received during periods of partial incapacity. The Manual requires explicit consideration of an employee's ability to earn, particularly where the employee retains some work capacity.

Incapacity entitlements are subject to ongoing review. Changes in medical capacity, employment arrangements, or earnings require reassessment to ensure payments remain accurate and aligned with the employee's current entitlement.

The Manual also sets out clear procedural requirements for the accrual of leave entitlements where an employee is absent from work on approved workers' compensation leave. It addresses the management of leave accruals during periods of compensation leave, ensuring alignment with legislative obligations and applicable employment conditions.

During the first 45 weeks of compensation, sick leave and recreation leave entitlements continue to accrue as if the employee were not absent from work. The employee's absence due to compensable incapacity does not interrupt the accrual of these ordinary leave entitlements, ensuring employees are not disadvantaged while recovering from a work-related injury.

Additionally, the Manual provides that long service leave entitlements continue to accrue for the entire period of compensation leave, without limitation. Long service leave accrual is treated as continuous service for the full duration of the employee's compensable absence, regardless of the length of time spent on workers' compensation leave.

File audit:

The file audit confirmed that calculations and determinations are made correctly in relation to sections 8 and 19.

Of the 6 files applicable to this criterion, file audit found 1 finding where weekly incapacity compensation payments were made during the audit period; however, no formal incapacity determinations were recorded or retained on the claim file.

Criterion 3.9

The determining authority complies with the provisions of the SRC Act when determining liability for benefits, including medical expenses.

Finding: Conformance

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024
- File audit

Comment:

The ANU Claims Management Manual establishes clear and structured procedures for making determinations under sections 16, 17(5), 18, 29, 39 and 108E(a) of the SRC Act.

Section 8.4 of the Manual sets out detailed procedures for determining liability for reasonable medical treatment under section 16 of the SRC Act. Claims decision-makers are required to assess whether claimed treatment is reasonable, necessary and obtained in relation to a compensable injury.

It also specifies processes for determining liability for travel to and from medical treatment, including the assessment of necessity, reasonableness of costs, and appropriate supporting evidence.

For claims involving prescribed children, Section 10 of the Manual provides procedures for determining entitlement to weekly benefit payments under section 17(5) of the SRC Act. Decision-makers must confirm eligibility, dependency status, and required supporting documentation before authorising payments.

Section 10 also includes procedures for determining liability for funeral expenses payable under section 18 of the SRC Act where a compensable death has occurred. Claims staff are required to verify entitlement, confirm reasonable expenses, and ensure payments are made in accordance with legislative limits.

All funeral expense determinations must be processed promptly to minimise administrative burden on dependants and representatives.

Section 8.12 the Manual sets out structured procedures for determining liability for household services and attendant care under section 29 of the SRC Act. Decision-makers

must assess medical evidence, functional capacity, and the necessity of services in relation to the compensable injury. Requirements for obtaining supporting assessments (such as occupational therapy reports), evaluating reasonableness of services and costs are clearly outlined.

Section 8.11 of the Manual provides detailed procedural guidance for determinations under section 39 of the SRC Act relating to alterations or modifications to a place of residence, workplace or vehicle, as well as the provision of aids and appliances.

Determinations must consider medical and functional evidence, reasonableness of proposed costs, and whether the alteration or aid is necessary as a result of the compensable injury. The Manual requires appropriate assessments, quotation processes where relevant, and written determinations supported by evidence and recorded on the claim file.

Section 6 and section 8 of the Manual reinforces the obligation under section 108E(a) of the SRC Act to ensure that compensation and other amounts are paid accurately and quickly. This requirement underpins all claims procedures and decision-making processes within the Manual.

Procedural controls include:

- timely determinations,
- verification of entitlements before payment,
- quality assurance of decisions,
- documentation of calculations and approvals, and
- monitoring and review processes to identify and correct errors.

Decisions must be formally documented, supported by medical and factual evidence, and communicated in accordance with legislative requirements.

File audit:

The file audit confirmed that Section 16 determinations were generally issued for limited services and defined periods, with regular review and extension of approved medical services in line with individual claim requirements.

Of the 14 files assessed against this criterion, the audit identified two findings:

- 1 finding where medical treatment was approved and paid without a documented Section 16 determination, and
- 1 finding where Section 16 payments were made outside the periods approved by an existing determination.

Criterion 3.10

The determining authority complies with the provisions of the SRC Act when determining liability for permanent impairment.

Finding: Not able to verify

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024 - 8.17 Permanent Impairment
- File audit

Comment:

Section 8.17 of the ANU Claims Management Manual sets out the procedural framework for the assessment and determination of Permanent Impairment (PI) entitlements under the *Safety, Rehabilitation and Compensation Act 1988 (SRC Act)*.

The Manual establishes that permanent impairment claims are assessed only where liability for the underlying compensable injury has been accepted. Decision-makers are required to ensure that the employee's condition has reached a level of maximum medical improvement before progressing an assessment, unless interim or exceptional circumstances apply.

Permanent impairment assessments must be conducted in accordance with the relevant Permanent Impairment Guides prescribed under the SRC Act. The Manual provides procedures for registering a permanent impairment claim, arranging assessments with appropriately qualified medical practitioners, and ensuring that assessments are limited to compensable conditions only.

The Manual requires that medical assessments be evidence-based and that impairment ratings are calculated strictly in line with the applicable Guides. Where multiple impairments exist, the Manual outlines the need to apply the appropriate methodology to determine a combined impairment rating.

Once assessment reports are received, claims staff must evaluate the medical evidence and make a formal determination regarding permanent impairment entitlement. Determinations must be made in writing, clearly set out the basis of the decision, and advise the employee of their review rights.

Where entitlement is established, the Manual sets out procedures for calculating and processing permanent impairment lump sum payments and, where applicable, non-economic loss payments. Payments must be accurately calculated, properly authorised, documented on the claim file, and issued in accordance with legislative requirements.

The Manual also addresses circumstances where liability for permanent impairment may be rejected, and includes procedural guidance for managing disputes, reconsiderations and review processes relating to permanent impairment determinations.

File audit:

File audit found no activity relevant to this criterion.

Criterion 3.11

The determining authority complies with Part X of the SRC Act, the transitional provisions, particularly in relation to determining permanent impairment and incapacity benefits.

Finding: Not Applicable

Comment:

As transitional provisions relate to the changeover from legislation preceding the SRC Act, Part X of the SRC Act does not apply.

Criterion 3.12

The determining authority complies with the provisions of the SRC Act, the SRC Regulations and any specific licence conditions (if applicable), when managing reconsiderations.

Finding: Conformance

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024 - 11. Reconsiderations
- File audit

Comment:

Section 11 of the ANU Claims Management Manual sets out the procedures for managing reconsiderations of determinations made under the Safety, Rehabilitation and Compensation Act 1988 (SRC Act).

The Manual advises that a person may request reconsideration of a reviewable decision made under the SRC Act, consistent with Part VI of the SRC Act, including section 62 (requests for reconsideration). The Manual sets out processes for receiving, registering and assessing reconsideration requests, including checks to confirm whether requests are lodged within the statutory timeframe or whether an extension of time is required.

The Manual details procedures for:

- requesting Reconsideration Management Services from Comcare where appropriate,
- undertaking a reconsideration on ANU's own motion, consistent with section 62 of the SRC Act, and
- assessing applications for extensions of time, as permitted under the Act.

The Manual advises that reconsiderations be undertaken by a delegate who was not involved in the original determination. All relevant evidence, including any new information provided by the applicant, must be reviewed and the SRC Act correctly applied to the facts of the case before a reconsideration decision is made.

Following completion of a reconsideration, the Manual requires the issue of a written reconsideration decision, which must set out:

- the outcome of the reconsideration,

- the reasons for the decision, and
- the applicant's further review rights.

A reconsideration decision must be made within 30 days of receipt of a valid reconsideration request.

Where an applicant remains dissatisfied, the Manual advises of the right to apply for merits review by the Administrative Appeals Tribunal, in accordance with Part VI of the SRC Act.

File audit:

Of the 2 files applicable to this criterion, file audit found 1 finding where a reconsideration request received and acknowledged, however there was with no evidence of a completed reconsideration decision or formal withdrawal. The matter however was resolved with the employee with no outstanding issues.

Claims reviews

Criterion 3.13

The determining authority provides employees with a reasonable opportunity to provide information or comment when claims for on-going liability are being assessed or reviewed.

Finding: Not able to verify

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024 - 8.13.20 Natural justice
- File audit

Comment:

Section 8.13.20 of the ANU Claims Management Manual sets out the requirement to apply natural justice principles to all claims decision-making under the Safety, Rehabilitation and Compensation Act 1988 (SRC Act).

The Manual requires that, before making an adverse or potentially adverse determination, employees must be:

- informed of the proposed decision and the reasons for it, and
- provided with a reasonable opportunity to respond, including the ability to comment on information or evidence that may affect the outcome.

Decision-makers are required to genuinely consider any response received before finalising a determination. All relevant communications, considerations, and outcomes must be documented on the claim file to support transparency, review rights, and audit assurance.

File audit:

File audit found no activity relevant to this criterion.

Criterion 3.14

Claim reviews are timely, made accurately and guided by equity, good conscience and the substantial merits of each case without regards to technicalities.

Finding: Conformance

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024:
 - 5. Claims Management Strategy
 - 8.18 Claims review
 - 6. Decision making framework and quality assurance
- Determination quality assurance template
- File audit

Comment:

Section 5 of the ANU Claims Management Manual outlines ANU's overarching Claims Management Strategy, which provides a structured and holistic approach to managing workers' compensation claims in accordance with the SRC Act.

Claims are managed across defined strategic streams (including initial determination, return to work and recovery, finalisation, and long-term review), with the approach tailored to the nature, complexity and duration of each claim. The strategy emphasises early intervention, regular review, evidence-based decisions and collaboration with injured employees and stakeholders to support sustainable outcomes.

Section 8.18 sets out the procedures for conducting claims reviews, including internal review of ongoing claims and reviewable determinations. The Manual establishes service level standards, procedural steps and documentation requirements.

Claims reviews focus on confirming ongoing liability, evaluating entitlement to benefits, and identifying whether circumstances have changed (such as medical capacity or employment status). Review outcomes must be clearly documented, communicated to the employee, and include advice on further review or reconsideration rights where applicable.

Section 6 provides the Decision-Making Framework and Quality Assurance (QA) structure that underpins claims determinations. It requires decision-makers to base determinations on legislation, policy, medical and factual evidence, and to apply principles of natural justice and procedural fairness.

The Manual sets out QA requirements based on the risk profile of decisions, including mandatory QA checks for high-risk and adverse determinations. Ongoing monitoring, peer review and supervisor oversight are used to ensure accuracy, consistency and compliance. This framework supports transparency, reduces review risk, and strengthens defensibility of decisions made under the SRC Act.

File audit:

File audit confirmed that file reviews and activity was undertaken frequently.
Of the 16 files applicable, file audit confirmed compliance with this criterion.

Surveillance**Criterion 3.15**

The determining authority has a policy on the use of covert surveillance and complies with its requirements. The policy must include:

- (i) on whose authority approval may be granted
- (ii) detailed instruction on the manner in which covert surveillance is to be conducted
- (iii) a requirement that any operative undertaking covert surveillance on behalf of the determining authority has been issued with, and has agreed to, written instructions on the policy.

Finding: Not able to verify**Evidence:**

- ANU Claims Management Manual, v4.0, 8 May 2024 - 12.4 Covert surveillance
- ANU Procedure Surveillance - ANU Policy Library - Procedure - Surveillance procedure
- File audit

Comment:

Section 12.4 of the ANU Claims Management Manual sets out strict controls governing the use of covert surveillance in the management of workers' compensation claims. The Manual makes clear that covert surveillance is a serious and exceptional investigative measure and may only be considered where there is a reasonable basis to suspect fraud or non-compliance and where less intrusive investigative options have been considered and documented.

The Manual requires that all covert surveillance activities comply with the Commonwealth Covert Surveillance in Commonwealth Administration Guidelines and be conducted in accordance with ANU's documented processes. Requests to conduct surveillance must be formally initiated by an authorised delegate and approved by the Director, Human Resources prior to any surveillance being undertaken.

Strict confidentiality requirements apply. Surveillance information must not be stored on the claim file and must instead be retained in a separate sensitive file within ANU's Electronic Records Management System (ERMS). Approval documentation and records of surveillance activity must be retained, regardless of outcome, to support governance, oversight and audit assurance.

The ANU Surveillance Procedure, provides the broader institutional framework governing surveillance activities across the University. The procedure establishes requirements to ensure surveillance is conducted lawfully, proportionately and only where justified.

The procedure reinforces that surveillance activities must be:

- authorised by an appropriate delegate,
- limited to the defined purpose,
- conducted in accordance with applicable legislation and guidelines, and
- managed in a manner that protects privacy, confidentiality and procedural fairness.

In the claims context, this procedure operates in conjunction with the Claims Management Manual to ensure that any surveillance undertaken for workers' compensation purposes is appropriately approved, tightly controlled, and subject to governance and record-keeping requirements.

File audit:

File audit found no activity relevant to this criterion.

Confidentiality

Criterion 3.16

The determining authority maintains the confidentiality of information and applies legislative requirements.

Finding: Conformance

Evidence:

- ANU Privacy Policy
- Comcare Privacy Policy
- ANU Claims Management Manual, v4.0, 8 May 2024 – Section 8.13.14.2 – Privacy
- File audit

Comment:

The ANU Privacy Policy sets out the University's commitment to protecting the privacy and confidentiality of personal information collected, held, used and disclosed in the course of its activities, including workers' compensation and rehabilitation functions.

The policy requires ANU to:

- collect personal information lawfully, fairly and only where necessary for University functions;
- use and disclose personal information only for the purpose for which it was collected, or where otherwise authorised by law;
- take reasonable steps to ensure personal information is accurate, up-to-date and complete; and
- store personal information securely, protecting it from misuse, loss, unauthorised access or disclosure.

The policy also confirms that individuals have the right to access and seek correction of their personal information, subject to legislative exemptions. Privacy complaints are

managed in accordance with Privacy Act 1988 (Cth) and internal governance arrangements.

The ANU Claims Management Manual Section 8.13.14.2 – Privacy confirms that the handling of personal information within claims management is governed by the Privacy Act 1988 and the Australian Privacy Principles (APPs).

The Manual defines *personal information* in line with the Privacy Act and recognises that claims management activities routinely involve sensitive personal information, including medical, employment and financial records. It emphasises that all ANU employees involved in claims management have individual responsibilities to protect privacy.

The section requires that personal information be:

- collected, used and disclosed lawfully and only for authorised purposes;
- handled in accordance with ANU's Privacy Policy;
- protected from unauthorised access, misuse or inappropriate disclosure; and
- accessed only where there is a legitimate business need.

The Manual also notes ANU's obligation to:

- ensure staff understand and comply with privacy obligations,
- respond appropriately to privacy complaints, and
- report privacy breaches to the Office of the Australian Information Commissioner (OAIC) where required.

File audit:

The file audit confirmed that case files did not contain records relating to other employees, ensuring confidentiality and compliance with privacy requirements.

ANU utilises the FigTree claims management system which incorporates robust security controls to prevent unauthorised access. These controls include mandatory user authentication and audit trails to monitor system activity. These measures support the protection of sensitive information in accordance with legislative and organisational privacy obligations.

Of the 16 files applicable to this criterion, the file audit confirmed compliance.

Document and file management

Criterion 3.17

The determining authority maintains the relevant level of reporting, records and/or documentation to support its claims management programs and legislative compliance.

Finding: Conformance with Observation

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024:
 - 6. Decision making framework and quality assurance
 - 14. ANU records management
- Determination quality assurance template
- File audit

Comment:

Section 14 of ANU Claims Management Manual establishes that ANU's claims records must be properly maintained across approved systems (Figtree, shared drives, and ERMS) and managed in line with defined administrative record-keeping standards, forming a key component of compliance and audit assurance under the Claims Management Manual.

ANU maintains claims documentation across:

- The Figtree system, which is the primary claims management system; and
- The ANU shared drive, where supporting claims documentation is also held.
- In addition, ANU uses an Electronic Records Management System (ERMS) for storing records, supporting formal records governance requirements.

Section 14 specifies that administrative standards apply to claims record management. These standards govern how claims records are handled, maintained, and stored to ensure consistency and compliance.

File audit:

The file audit only reviewed the documentation that was stored on the FigTree system. This was found to be complete. Documentation and data were found to be accurately saved. Of the 16 files applicable, file audit confirmed compliance with this criterion.

Observation:

The following documents require review:

- ANU Claims Management Manual, v4.0, 8 May 2024 – references AAT rather than ART
- ANU Workers' Compensation Claim Pack, v7.0, 12/12/25, next review 12/12/25 – review date appears to be a typographical error

ELEMENT 4: Measurement and evaluation

Monitoring

Criterion 4.1

The determining authority monitors planned objectives and performance measures for core claims management activities.

Finding: Conformance

Evidence:

- ANU Claims Management System, v7, 26/11/25, next review 26/11/27
- ANU Strategic Plan 2021 - 2025
- Claim Management Strategy
- Safety & Wellbeing Plan 2024-2026
- Licensee quarterly performance report - ANU Quarter 1 2025-26
- LCPI report, 2024/25
- ANU Claims Management Manual, v4.0, 8 May 2024 - 15. Reporting
- ANU Self-insurance Progress Report for Council, 1 January to 31 December 2024
- ANU WHS Performance Report 1 January - 30 June 2025
- WHS Performance at ANU 2024 Calendar Year, prepared January 2025

Comment:

ANU monitors planned objectives and performance measures for core claims management activities through a series of reports which include Comcare quarterly licensee performance reports.

Section 15 of the ANU Claims Management Manual v4.0 establishes the requirements and governance expectations for claims management reporting at ANU, with a focus on accountability, oversight, and legislative compliance under the SRC Act.

The Safety and Wellbeing (S&W) team have clear objectives and defined performance measures for the Claims Management System (CMS) to support effective oversight and accountability. Performance against these measures is monitored and formally reported on a quarterly basis to the senior executive. In addition, CMS performance is reported to the Vice-Chancellor through the University Council, which meets every eight weeks, ensuring regular executive-level and governance oversight of claims management performance.

The ANU WHS Performance Report outlines progress against the Safety and Wellbeing Plan 2024–2026, which is structured around three focus areas: Systems, Capability and People.

The ANU Self-insurance Progress Report for Council provides Council with an overview of the University's performance and progress as a workers' compensation self-insurer. Its purpose is to inform Council about the operation of ANU's self-insurance arrangements

including the effectiveness of safety, rehabilitation and claims management systems, and to support Council oversight of compliance, cost, and performance outcomes.

Auditing and reporting

Criterion 4.2

The determining authority conducts an audit program – performed by competent personnel, and in accordance with the requirements of the Commission and Comcare – to measure performance of its claims management system.

Finding: Conformance

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024 - 16. Auditing
- ANU Procedure: work health and safety audit, 6/1/26, next review 6/1/31
- CMS audit report, January 2025, completed by BRM
- ANU Claims and Rehabilitation Management System Audit, External Audit Service Level Agreement, v2.0, 12/12/25, next review 12/12/26
- Letter of engagement with BRM for audit services, 25 June 2025

Comment:

Section 16 of the ANU Claims Management Manual outlines the framework for auditing the Claims Management System to ensure compliance with legislative, licence and policy requirements. The manual provides for both internal and external audits, including file reviews and system audits, to assess the quality, accuracy and timeliness of claims management activities. Audit outcomes are documented and used to identify opportunities for improvement, with findings addressed through corrective actions and ongoing quality assurance processes.

BRM have been engaged to undertake ANU's external audit.

Criterion 4.3

Audit outcomes are appropriately documented and actioned. The determining authority reports to senior executive on its claims management system performance, including audit outcomes.

Finding: Conformance

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024:
 - 15. Reporting
 - 16. Auditing
- CMS audit report, January 2025, completed by BRM

- ANU Self-insurance Progress Report for Council, 1 January to 31 December 2024
- ANU WHS Performance Report 1 January - 30 June 2025
- WHS Performance at ANU 2024 Calendar Year, prepared January 2025

Comment:

Section 16 of the ANU Claims Management Manual advises that a Corrective Action Plan (CAP) is prepared following an audit, as required, having regard to the audit findings. The CAP is drafted by the Senior Consultant, Claims Management, and is monitored through to completion. Outcomes of external audits are reported to senior management via the periodic Council report and the WHS Committee, and are communicated to staff through publication on the ANU website at Claims Management System Audit – Staff Services – ANU.

The ANU Self-insurance Progress Report for Council provides Council with information on audit outcomes as well as other claims management system performance measures, supporting Council oversight of the self-insurance and claims management arrangements.

The ANU WHS Performance Report (1 January – 30 June 2025) notes that an external file audit of the Claims Management System was conducted in January 2025, achieving 100% conformance with one observation, and confirms that a corrective action plan has been completed to address the audit finding.

Criterion 4.4

The determining authority communicates the outcomes and results of claims management system audits to its employees.

Finding: Conformance

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024 - 16. Auditing
- WHS Performance at ANU 2024 Calendar Year, prepared January 2025
- Intranet – audit reports and associated corrective action plans since 2019
- LCPI report, 2024/25

Comment:

The results of the Claims Management System (CMS) audit undertaken during the audit period were communicated to all staff via the ANU intranet, ensuring organisation-wide awareness of audit outcomes and key findings.

The CMS audit results are also provided as an attachment to the University Work Health and Safety (WHS) Committee, enabling communication of audit outcomes to both executive and staff representatives and facilitating discussion, oversight, and follow-up actions as required.

Criterion 4.5

The determining authority provides the Commission or Comcare with reports or documents as requested. This includes informing Comcare as soon as practicable of any proceedings brought by them, or against them, in relation to a matter arising in respect of a claim managed by them under the SRC Act.

Finding: Conformance

Evidence:

- LCPI report, 2024/25
- Claims Data Warehouse (CDW) submissions,

Comment:

ANU provides the Commission or Comcare with reports or documents as requested.

ELEMENT 5: Review and improvement

Continuous improvement

Criterion 5.1

The determining authority analyses claims management system performance outcomes against documented objectives to determine areas requiring improvement and promotes and implements continuous improvement strategies.

Finding: Conformance

Evidence:

- ANU Claims Management Manual, v4.0, 8 May 2024
- CMS audit report, January 2025, completed by BRM
- ANU Strategic Plan 2021 - 2025
- Claim Management Strategy
- Safety & Wellbeing Plan 2024-2026
- LCPI report, 2024/25
- ANU Self-insurance Progress Report for Council, 1 January to 31 December 2024
- ANU Claims and Rehabilitation Management System Audit, External Audit Service Level Agreement, v2.0, 12/12/25, next review 12/12/26
- ANU Claims Management System, v7, 26/11/25, next review 26/11/27
- ANU Policy: Disability, 15/12/25, next review 15/12/30
- ANU Procedure: Management of Non Work-Related Injury, Illness and Disability, 6/8/25, next review 6/8/30

- ANU Procedure: work health and safety audit, 6/1/26, next review 6/1/31
- ANU Procedure: Work health and safety committees and representatives, 6/1/26, next review 6/1/31
- ANU Rehabilitation Management System, v16, 12/12/25, next review 12/12/26
- ANU Self-insurance Progress Report for Council, 1 January to 31 December 2024
- ANU Workers' Compensation Claim Pack, v7.0, 12/12/25, next review 12/12/25
- ANU Workplace Adjustments Funding Pack, v1.0, 11/11/25, next review 11/11/26

Comment:

ANU reviews Claims Management System (CMS) performance against documented objectives to identify improvement opportunities and implement continuous improvement initiatives.

Over the past 12 months, the Safety and Wellbeing team has supported continuous improvement through regular engagement with key stakeholders and systems, including ongoing meetings with Figtree and Comcare Claims Managers, participation in system user forums, review of alternative claims management system options, and updates to standard correspondence and processes. Legislative and Comcare guidance changes have been implemented as required, supported by targeted training and professional development.

The Senior Consultant, Claims Management actively contributes to sector-wide improvement through participation in Comcare self-insurance forums and membership of the Safety, Rehabilitation and Compensation Licensees Association. Policies and procedures have also been reviewed and updated to ensure they address identified improvement opportunities and incorporate changes in legislation and Comcare guidance. These are detailed in the evidence section above.