



Australian  
National  
University

# Internal Audit Report

## Australian National University

### Rehabilitation Management System Audit

**Audit Period: 1 January – 31 December 2021**

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## Scope of Audit

**Organisation:** Australian National University ('ANU')

**Scope of Audit:** The audit examined ANU's rehabilitation management system, processes and outcomes to validate that ANU is meeting its licence conditions and is complying with the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act) and the *Guidelines for Rehabilitation Authorities 2019* (the Guidelines).

Sixteen (16) rehabilitation case files were examined by the auditor, which included all files where some activity had occurred in the 12 month period 1 January – 31 December 2020.

The audit encompassed a review of all relevant policies and procedures as they relate to rehabilitation and return to work management and any other relevant, supporting documentation.

Overall findings are based on the identification of issues that are considered to be systemic rather than isolated incidents.

**Audit Criteria:** This audit assessed the rehabilitation management system against five elements:

1. Commitment and Corporate Governance (3 criteria)
2. Planning (4 criteria)
3. Implementation (13 criteria)
4. Measurement and Evaluation (6 criteria)
5. Review and Improvement (1 criterion)

**Ratings:** The findings in the audit report have been classified and marked as follows:

**Conformance**—indicates that the criterion has been met.

**Non-conformance**—indicates that the criterion has not been met.

**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.

**Not Applicable**—indicates that the criterion does not apply to the organisation.

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.

**Date(s) of Audit:** 1 – 31 January 2021

**Auditor:** Ingrid Krauss, Manager Injury and Claims

## Executive Summary

The Australian National University (ANU) 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. The University employs approximately 4500 full time equivalent staff. The main campus is in Canberra, and this is where most staff are employed. ANU has approximately 20,000 students.

ANU has a well-developed Rehabilitation Management System in place with supporting policies, processes and operational processes.

Sixteen files (16) were selected for audit, which were 100% of files with rehabilitation activity in the period 1 January – 31 December 2020. Outcomes from the audit conducted are as follows:

### NON-CONFORMANCES

No non-conformances were identified during the audit.

### OBSERVATIONS

A number of observations were identified during the audit. They are:

Criterion	Observation
3.7	Program amendment document was not distributed to claimant for a number of months, corrected after it was identified this had not occurred.
3.9	Work trial agreement was signed by all parties after the commencement date of the work trial arrangements (within 3 days of commencing). The work trial document is an element of the rehabilitation program – of which delegate signature was as per commencement date of program (meeting compliance requirements).
3.13	Files found across two systems – Figtree and shared drive. Minor findings of documents in shared drive that had not been uploaded to Figtree to ensure all documents can be found in one file system. This has subsequently been corrected.

In summary, for the 27 criteria within the rehabilitation management audit tool, the outcomes are:

	Number of criteria	% of assessed criteria
Conformance (with 6 Observations)	25	100%
Non-conformance	0	Nil
Not able to verify	2	
Not applicable	0	

Observation and action items required have been communicated with the injury management team



Signed:

**Ingrid Krauss**

Date: 28/02/2021

## Table of Criteria

AUDIT ELEMENT / CRITERION DESCRIPTION	Criterion	Rating
<b>1. Commitment and Corporate Governance</b>		
Documented commitment	1.1	Conformance
Internal and external accountability	1.2	Conformance
Identify, assess and control risk	1.3	Conformance
<b>2. Planning</b>		
Delegation schedule	2.1	Conformance
Planning for legislative compliance	2.2	Conformance
Setting objectives and targets	2.3	Conformance
Plans to achieve objectives and targets	2.4	Conformance
<b>3. Implementation</b>		
Adequate resources	3.1	Conformance
Communication—relevant stakeholders	3.2	Conformance
Employees are aware of rights	3.3	Conformance
Training and competency	3.4	Conformance
Early intervention	3.5	Conformance
Rehabilitation assessments	3.6	Conformance
Rehabilitation programs	3.7	Conformance with 1 observation
Suitable employment	3.8	Conformance
Determinations in accordance with the SRC Act	3.9	Conformance with 1 observation
Employee non-compliance	3.10	Not able to verify
Reconsiderations	3.11	Not able to verify
Privacy and confidentiality	3.12	Conformance
Reporting, records, documentation	3.13	Conformance with 1 observation
<b>4. Measurement and Evaluation</b>		
Monitoring core rehabilitation activities	4.1	Conformance
Monitoring provider performance	4.2	Conformance
Internal audits	4.3	Conformance
Outcomes of audits are actioned, reviewed	4.4	Conformance

<b>AUDIT ELEMENT / CRITERION DESCRIPTION</b>	<b>Criterion</b>	<b>Rating</b>
Communicating audit results	4.5	Conformance
Providing reports to Comcare and Commission as requested	4.6	Conformance
<b>5. Review and Improvement</b>		
Continuous improvement	5.1	Conformance

## ELEMENT 1: Commitment and Corporate Governance

### DOCUMENTED COMMITMENT

#### Criterion 1.1

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

#### Finding: Conformance

##### Evidence:

- ANUP\_013007, Policy: Rehabilitation and compensation, v2, effective 4/6/18, rev 4/6/21
- ANUP\_000432, Policy: Work health and safety, v8, effective 8/4/16, rev 13/6/22
- ANUP\_014609, Policy: Fitness for Work, v1, effective 03/11/2020, rev 2/11/2023
- ANUP\_000667, Procedure: Rehabilitation and compensation, v11, effective 4/6/18, rev 4/6/21

##### Comment:

ANU sets the direction for its rehabilitation management system through several documented commitments by senior executives, as detailed in the evidence list. Policies and procedures are available to all staff through the ANU website <https://policies.anu.edu.au/ppl/index.htm>

### CORPORATE GOVERNANCE

#### Criterion 1.2

The rehabilitation management system provides for internal and external accountability.

#### Finding: Conformance

##### Evidence:

- ANU Executive Structure, 9/8/19
- Work Environment Group Organisational Structure, 04/01/2021
- Position descriptions:
  - WHS Claims Management Senior Consultant (no document control)
  - Associate Director, Work Environment (no document control)
  - Manager, Injury and Claims (no document control)
  - Rehabilitation Case Manager (no document control)
  - Team Leader, Injury Management & Rehabilitation (no document control)
  - Pre-Employment Work Environment Report: Rehabilitation Case Manager (no document control)
  - Claims Manager (Comcare), 20/7/16
- Licensee Compliance and Performance Improvement (LCPI) annual report, 1 July 2018 - 28 February 2020
- ANU Performance Report, Quarter 4 2019-2020
- ANUP\_015808, Procedure: Work health and safety committees and representatives, v2, effective 07/05/2020, rev 01/07/2023
- Annual Report 2019
- Work Health and Safety Council Report, for the period 1 January - 31 December 2020

- Work Environment Group, Workers Compensation Status Report, July 2020 (quarterly report)
- SLAs:
  - Consultancy Agreement with AM Actuaries, commencement 14/10/2020
  - WRP SLA for the provision of workplace rehabilitation provider services between The ANU and APM, signed 02/07/2020
  - WRP SLA for the provision of workplace rehabilitation provider services between The ANU and IPAR, signed 01/07/2020
- Procedure: WHS Audit, v5, effective 20/07/2020, rev 19/07/2023.
- External Audit report – January 2020
- ANU Corrective Action Plan – January 2020
- Individual Case File Audit
- Monthly case file review template

**Comment:**

ANU's rehabilitation management system provides for internal and external accountability via:

*Internal:*

- Documented WHS Governance Structure
- Senior executive reporting
- Data reporting
- Job descriptions
- Regular team and individual meetings to monitor performance requirements and outcomes.
- Organisational structures for ANU Executive and WEG
- Corrective action plans following internal audits.

*External:*

- SLA's with external parties:
  - AM Actuaries
  - Service agreements with accredited workplace rehabilitation providers
- LCPI report
- Documented procedures relating to audit

**Criterion 1.3**

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

**Finding: Conformance**

**Evidence:**

- ANUP\_000462, Policy: Risk Management, v5, effective 1/7/09, rev 22/12/19
- ANUP\_000495, Procedure: Risk Management, v6, effective 1/7/09, rev 22/12/19
- Rehabilitation Management System Risk Register, v5, effective 20/12/2020, rev 20/12/21
- Workers Compensation Quarterly Reports
- WHS Performance Report to University Council
- Attendance at self-insurance licensee forums meetings or regular meetings with scheme management representative
- Monthly Claim review meetings with claim delegates



- Calendar invitations – evidence of meetings with WRPs
- Calendar invitations – evidence of meetings with College and Divisional areas for case reviews

**Comment:**

ANU identifies, assesses and controls risks to the rehabilitation management system as per detailed in the risk register. Identified risks are reported to senior executive following systems and case file regular reviews.

## ELEMENT 2: Planning

### ADMINISTRATIVE ARRANGEMENTS

**Criterion 2.1**

The rehabilitation authority has a delegation schedule, signed by the principal officer, as per section 41A of the SRC Act.

**Finding: Conformance**

**Evidence:**

- Memo dated 12/12/18 to Professor Brian Schmidt, Vice-Chancellor, from Dr Nadine White, Director HR regarding ANU Workers Compensation Delegations, signed 18/12/18
- Delegations Report 186, 14/11/19
- File audit including observation of standard letters and templates

**Comment:**

The ANU has a delegation schedule signed by The Vice Chancellor. Under the Safety, Rehabilitation and Compensation Act 1988, the Vice Chancellor is the Rehabilitation Authority of the Australian National University (ANU) and holds the powers under that authority. Application of appropriate delegation authority is supported via the use of standard letter and form templates.

**File Audit:**

File audit confirmed compliance with this criterion.

### REHABILITATION PLANNING

**Criterion 2.2**

The rehabilitation 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 and Rehabilitation Management Systems, Legislation Register, v4.0, 20/12/20, rev 20/12/21
- Incident notification email
- Early Intervention Assistance Information Pack
- ANU Workers' Compensation Claim Pack, v6.0, approved 20/12/20, rev 20/12/21
- Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21
- ANU Intranet page <https://services.anu.edu.au/human-resources/health-safety/workers-compensation-at-anu/forms>

- Position descriptions:
  - WHS Claims Management Senior Consultant (no document control)
  - Associate Director, Work Environment (no document control)
  - Manager, Injury and Claims (no document control)
  - Rehabilitation Case Manager (no document control)
  - Team Leader, Injury Management & Rehabilitation (no document control)
  - Pre-Employment Work Environment Report: Rehabilitation Case Manager (no document control)
  - Claims Manager (Comcare), 20/7/16
- SLAs:
  - Consultancy Agreement with AM Actuaries, commencement 14/10/2020
  - WRP SLA for the provision of workplace rehabilitation provider services between The ANU and APM, signed 02/07/2020
  - WRP SLA for the provision of workplace rehabilitation provider services between The ANU and IPAR, signed 01/07/2020

**Comment:**

All identified legislation requirements are documented in the Legislation Register and compliance obligations are included in all relevant procedures and documentation.

The ANU's Rehabilitation Manual provides operational and legislative information to ensure legislative compliance and natural justice.

Position descriptions require demonstrated knowledge of both the SRC Act and the Work Health and Safety Act 2011, experience and legislative competence to be maintained.

SLA's with external providers require compliance with SRC Act.

**Criterion 2.3**

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

**Finding: Conformance**

**Evidence:**

- ANUP\_013007, Policy: Rehabilitation and compensation, v2, effective 4/6/18, rev 4/6/21
- Human Resources Divisional (HRD) Business Plan 2021
- Work Environment Group Business Plan 2021
- Work Environment Obligations Register.
- Licensee Compliance and Performance Improvement (LCPI) annual report, 1 March 2019 - 28 February 2020.

**Comment:**

ANU sets objectives and targets and identifies key performance measures for its rehabilitation management system, through policy documents, business plans and LCPI reporting.

**Criterion 2.4**

The rehabilitation authority establishes plans to:

- (i) achieve its objectives and targets
- (ii) promote continuous improvement
- (iii) provide for effective rehabilitation arrangements.

## Finding: Conformance

### Evidence:

- Human Resources Divisional (HRD) Business Plan 2021
- Work Environment Group Business Plan 2021
- Work Environment Obligations Register.
- Rehabilitation Management System: Corrective Action Plan January 2020
- ANUP\_013007, Policy: Rehabilitation and compensation, v2, effective 4/6/18, rev 4/6/21
- Procedure: Rehabilitation and Compensation
- Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21
- Position descriptions:
  - WHS Claims Management Senior Consultant (no document control)
  - Associate Director, Work Environment (no document control)
  - Manager, Injury and Claims (no document control)
  - Rehabilitation Case Manager (no document control)
  - Team Leader, Injury Management & Rehabilitation (no document control)
  - Pre-Employment Work Environment Report: Rehabilitation Case Manager (no document control)
  - Claims Manager (Comcare), 20/7/16
- Performance Development Review accountabilities established WEG staff

### Comment:

ANU has established plans to achieve its objectives and targets; promote continuous improvement; and provide for effective claims management arrangements as demonstrated through the HR Division plan, WEG plan and the corrective action plans developed following audits.

## ELEMENT 3: Implementation

### RESOURCES

#### Criterion 3.1

The rehabilitation authority allocates adequate resources to support its rehabilitation management system.

## Finding: Conformance

### Evidence:

- Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21
- Position descriptions:
  - WHS Claims Management Senior Consultant (no document control)
  - Associate Director, Work Environment (no document control)
  - Manager, Injury and Claims (no document control)
  - Rehabilitation Case Manager (no document control)
  - Team Leader, Injury Management & Rehabilitation (no document control)
  - Pre-Employment Work Environment Report: Rehabilitation Case Manager (no document control)
  - Claims Manager (Comcare), 20/7/16

**Comment:**

ANU allocates adequate resources to support its rehabilitation management system. Staff levels are determined based on number of active rehabilitation cases and complexity. Monitoring of active cases is updated on a weekly basis.

Currently the rehabilitation team within WEG consists of 4 staff:

- 1 Team Leader – Injury Management and Rehabilitation (on temporary transfer within the Human Resources Division until 31/12/2021)
- 2 Rehabilitation Case Managers

It is considered that ANU is adequately resourced to effectively manage its rehabilitation caseload, considering the number of receipted claims in each year.

Early intervention services form part of the ANU rehabilitation management system and funding has been dedicated to support this activity.

ANU uses the Figtree system which interfaces work health and safety, early intervention, rehabilitation and claims management functions to cover key requirements of the SRC Act.

## **COMMUNICATION AND AWARENESS**

### **Criterion 3.2**

The rehabilitation authority defines and communicates responsibilities to relevant stakeholders.

### **Finding: Conformance**

**Evidence:**

- ANUP\_013007, Policy: Rehabilitation and compensation, v2, effective 4/6/18, rev 4/6/21
- Procedure: Rehabilitation and Compensation
- Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21
- ANU Workers' Compensation Claim Pack, v6.0, approved 20/12/20, rev 20/12/21
- Template Letters
- ANU intranet:
  - ANU Policy Library <https://policies.anu.edu.au/ppl/index.htm>
  - Health and Safety <https://services.anu.edu.au/human-resources/health-safety>
  - Injury Management <https://services.anu.edu.au/human-resources/health-safety/injury-management>
  - Performance Development Review process <https://services.anu.edu.au/human-resources/perform-develop/career-performance-and-development-process-cpdp>.
- SLAs:
  - Consultancy Agreement with AM Actuaries, commencement 14/10/2020
  - WRP SLA for the provision of workplace rehabilitation provider services between The ANU and APM, signed 02/07/2020
  - WRP SLA for the provision of workplace rehabilitation provider services between The ANU and IPAR, signed 01/07/2020

**Comment:**

ANU defines and communicates responsibilities to relevant stakeholders. ANU has provided a range of documents demonstrating that employees are provided with or have access to information regarding stakeholder responsibilities.

The ANU intranet pages contain comprehensive information on workers' compensation and rehabilitation under the SRC Act and is accessible to all employees. All key policies and

procedures are provided in the Policy Library and links to external legislative information are also provided.

A claim pack is provided to all staff members who wish to submit a worker's compensation claim. This pack details extensive information about the process, including:

- ANU - Workers' Compensation Claim Form
- ANU - Authority to Collect, Use and Disclose Personal Information
- ANU - Frequently Asked Questions (FAQ's)
- Medical Certificate of Capacity
- ANU - Claim for Time Off Work Form
- ANU - Medical Services Claim Form

Service agreements with external providers clearly communicate expectations and responsibilities. Position descriptions set out the responsibilities of rehabilitation staff.

### **Criterion 3.3**

The rehabilitation authority communicates relevant information regarding the rehabilitation process to its employees including their rights and obligations.

### **Finding: Conformance**

#### **Evidence:**

- Procedure: Rehabilitation and Compensation
- Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21
- ANU Workers' Compensation Claim Pack, v6.0, approved 20/12/20, rev 20/12/21
- Template Letters
- File audit

#### **Comment:**

Rehabilitation procedures clearly outline the responsibilities of managers, senior managers and rehabilitation case managers and providers.

Standard letter and form templates are consistently used to ensure communication of rights and obligations when determinations are issued.

The employee claims pack details employee rights and obligations.

New staff are provided an induction guide and a required to attend a "Welcome to New Staff" program and complete mandatory online testing.

Intranet pages contain extensive relevant information regarding the rehabilitation process that is accessible to all ANU employees. All policies and procedures are available on the intranet as well as links to the legislative information and Comcare.

#### **File Audit:**

File audit confirmed compliance with this criterion.

## **TRAINING**

### **Criterion 3.4**

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

### **Finding: Conformance**

#### **Evidence:**

- ANUP000843 Induction Guide and Checklist

- Credentialing and Training Matrix
- PULSE on line training 'Responding to Staff Injury and Illness in the Workplace'
- Supervisor Injury Management Guide
- Career development internal training course

**Comment:**

ANU identifies training requirements, develops and implements training plans and ensures personnel are competent.

Rehabilitation case managers have health professional qualifications or extensive experience in occupational rehabilitation. This is a requirement detailed in the relevant position descriptions.

Qualifications and training completed by the Rehabilitation personnel are maintained centrally via a spreadsheet. Required training for Rehabilitation Case Managers is ANU Privacy Act Training, Comcare 'Rehabilitation Case Management', with staff also supported to attend Comcare's 'SRC Act in a Day', and Mental Health First Aid. The Team Leader Injury Management and Rehabilitation is required to attend 'New Supervisor' training and Comcare Forums.

Supervisors have access to an online training module '*Responding to Staff Injury and Illness in the Workplace*' which provides guidance on responsibilities, roles, and the assistance which can be provided by the injury management team.

**EARLY INTERVENTION**

**Criterion 3.5**

The rehabilitation authority implements an early intervention program, including the early identification and notification of injury.

**Finding: Conformance**

**Evidence:**

- Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21
- File audit

**Comment:**

ANU has implemented "Early Intervention Assistance" (EIA) which is an internal process separate to submitting a workers compensation claim. EIA assists staff with the early identification and notification of injury and provides access to funding for medical management as early as possible.

*The Rehabilitation Manual – 5 Early Intervention Assistance* details the early intervention processes and assistance. Early Intervention involves providing an injured employee support and injury management as soon as possible after the injury occurs.

An incident notification form is completed by the employee or supervisor and within 24 hours a rehabilitation case manager contacts the employee to discuss assistance available and commence the early intervention process.

The Early Intervention Assistance Fund is available to all staff. It is managed by the Work Environment Group and is designed to provide immediate support and medical treatment to staff irrespective of whether a claim for compensation is made.

**File Audit:**

File audit confirmed compliance for those claims that had an injury date within the audit period.

## REHABILITATION ASSESSMENTS

### Criterion 3.6

The rehabilitation authority effectively uses the provisions of section 36 to conduct rehabilitation assessments in accordance with the SRC Act and the Guidelines.

#### Finding: Conformance

<b>Evidence:</b> <ul style="list-style-type: none"><li>• Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21</li><li>• File audit</li></ul>
<b>Comment:</b> <p>ANU effectively uses the provisions of section 36 to conduct rehabilitation assessments in accordance with the SRC Act and the Guidelines. Section 6 of the Rehabilitation Manual provides guidelines on section 36 rehabilitation assessments, examinations and determinations and is in line with the <i>Guidelines for Rehabilitation Authorities 2019</i>.</p>
<b>File Audit:</b> <p>There were fourteen (14) files eligible for this criterion. File audit confirmed compliance.</p>

## REHABILITATION PROGRAMS

### Criterion 3.7

The rehabilitation authority provides rehabilitation programs in accordance with section 37 of the SRC Act and the Guidelines, and ensures consultation occurs between all parties in regards to the rehabilitation process.

#### Finding: Conformance with 1 observation

<b>Evidence:</b> <ul style="list-style-type: none"><li>• Claims Management Manual, v3, 30/04/2020, due for rev 30/04/2022:<ul style="list-style-type: none"><li>○ 9.3 Rehabilitation Programs (s37)</li></ul></li><li>• Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21<ul style="list-style-type: none"><li>○ 6.3 Rehabilitation Assessment or Examination</li><li>○ 6.8 Rehabilitation Program Planning and development</li></ul></li><li>• Procedure: Return to Work, ANUP_017614, v2, effective 15/3/18, rev 15/3/21</li><li>• SLAs:<ul style="list-style-type: none"><li>○ WRP SLA for the provision of workplace rehabilitation provider services between The ANU and APM, signed 02/07/2020</li><li>○ WRP SLA for the provision of workplace rehabilitation provider services between The ANU and IPAR, signed 01/07/2020</li></ul></li><li>• File audit</li></ul>
<b>Comment:</b> <p>ANU effectively uses the provisions of section 37 to conduct rehabilitation programs in accordance with the SRC Act and the Guidelines. The Rehabilitation Manual provides guidelines on section 37 and is in line with the <i>Guidelines for Rehabilitation Authorities 2019</i>.</p>
<b>File Audit:</b> <p>Of the 11 files applicable to this criterion, file audit confirmed compliance with one observation.</p>

**Observation:**

Program amendment document was not distributed to claimant for a number of months, corrected after it was identified this had not occurred.

**SUITABLE EMPLOYMENT****Criterion 3.8**

The employer takes all reasonable steps to provide employees with suitable employment or to assist employees to find such employment.

**Finding: Conformance****Evidence:**

- Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21
- ANUP\_017614 Return to Work Procedure, V2, effective 15/03/18, review 15/03/21
- File audit

**Comment:**

The ANU Rehabilitation Manual clearly outlines the requirement to provide suitable employment under the SRC Act.

Workplace rehabilitation aims to return injured employees to their pre-injury duties in their own workplace. A 'return to work hierarchy' is applied and detailed in the rehabilitation manual. Where return to original workplace is not possible, alternate work areas are sourced through the Human Resource Managers within various Colleges and Divisions. The manual also outlines the process for identifying alternative employment with external organisations

**File Audit:**

File audit confirmed compliance with this criterion.

**DETERMINATIONS, SUSPENSIONS AND RECONSIDERATIONS****Criterion 3.9**

The rehabilitation authority makes determinations in accordance with the SRC Act and the Guidelines:

- (i) that are in writing and give adequate reasons
- (ii) that are signed by the delegate
- (iii) that are not retrospective.

**Finding: Conformance with 1 observation****Evidence:**

- Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21
- Letter templates and forms
- File audit

**Comment:**

Chapter 6 of ANU's Rehabilitation Manual accurately describes the process for determinations under the SRC Act. ANU utilises template forms when making section 36 and section 37 determinations that satisfied the requirements of the SRC Act to be valid and enforceable.

**File Audit:**

File audit confirmed compliance with this criterion.



**Observation:**

Work trial agreement was signed by all parties after the commencement date of the work trial arrangements (within 3 days of commencing). The work trial document is an element of the rehabilitation program – of which delegate signature was as per commencement date of program (meeting compliance requirements).

**Criterion 3.10**

The rehabilitation authority makes determinations in relation to employee non-compliance in accordance with the SRC Act, Guidelines and their written policy and procedures.

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

- Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21 – Section 8 Employee Non-Compliance with Rehabilitation
- Letter templates
- File audit

**Comment:**

Section 8 of ANU's Rehabilitation manual provides clear guidance on making determinations in relation to employee non-compliance in accordance with the SRC Act, Guidelines and other written policies or procedures.

The manual provides guidance on non-compliance factors to consider and what constitutes a reasonable excuse. It also details that in the event of suspension of entitlement that medical expenses will continue to be paid.

Standard letter templates and forms have been implemented to support compliance to this criterion.

**File Audit:**

File audit found no activity relevant to this criterion.

**Criterion 3.11**

The rehabilitation authority complies with the provisions of the SRC Act when managing reconsiderations or reconsiderations of own motion. [Criterion applicable to licensees only].

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

- Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21 – Section 8 Employee Non-Compliance with Rehabilitation
- Comcare Deed of Agreement - Reconsideration Services, 11/11/19, review 30/06/20
- Letter templates
- File audit

**Comment:**

The Rehabilitation Manual reflects self-insurance arrangements and clearly details the arrangements and procedures for the reconsideration and review of decisions, including the location, classification and expertise of the person(s) who has responsibility for these functions, and the relationship of the reviewer to the initial decision maker.

**File Audit:**

File audit found no activity relevant to this criterion.

## **CONFIDENTIALITY**

### **Criterion 3.12**

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

#### **Finding: Observation**

<b>Evidence:</b> <ul style="list-style-type: none"><li>• Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21</li><li>• ANUP_010007, Policy: Privacy, v6, effective 1/1/15, rev 31/12/17</li><li>• File audit</li></ul>
<b>Comment:</b> <p>ANU maintains the confidentiality of information and applies legislative requirements. ANU has a privacy policy which reflects the requirements of the <i>Privacy Amendment (Enhancing Privacy Protection) Act 2012</i> and acts in accordance with its legal obligations.</p>
<b>File Audit:</b> <p>File audit confirmed compliance with this criterion.</p>

## **DOCUMENT MANAGEMENT**

### **Criterion 3.13**

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

#### **Finding: Conformance with 1 observation**

<b>Evidence:</b> <ul style="list-style-type: none"><li>• Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21 – Section 9 ANU Records Management</li><li>• File audit</li></ul>
<b>Comment:</b> <p>Files found across two systems – Figtree and shared drive. Minor findings of documents in shared drive that had not been uploaded to Figtree to ensure all documents can be found in one file system. This has subsequently been corrected.</p>
<b>File Audit:</b> <p>File audit confirmed compliance with this criterion.</p>

## **ELEMENT 4: Measurement and Evaluation**

### **MONITORING**

#### **Criterion 4.1**

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

#### **Finding: Conformance**

<p><b>Evidence:</b></p> <ul style="list-style-type: none"> <li>• Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21</li> <li>• Work Environment Group, Workers Compensation Status Report, July 2020 (quarterly report)</li> <li>• Work Health and Safety Council Reports 2020</li> </ul>
<p><b>Comment:</b></p> <p>ANU monitors planned objectives and performance measures for core rehabilitation management activities. Performance against measures is reported quarterly to the senior executive and the Vice Chancellor through the University Council meeting. Other regular monitoring and reporting include:</p> <ul style="list-style-type: none"> <li>• Quarterly review of WEG deliverables as detailed on WEG business plan</li> <li>• Quarterly reporting of safety and rehabilitation progress in line with the HR business plan</li> <li>• Quarterly reporting to the WHS University Committee Meeting</li> <li>• Monthly review of Figtree incident, injury and claims management system reporting;</li> <li>• Monthly case file reviews; and</li> <li>• Quarterly - Individual case file auditing.</li> </ul>

#### Criterion 4.2

The rehabilitation authority monitors rehabilitation providers' performance in terms of quality of service delivery, costs, progress reports and outcomes.

#### Finding: Conformance

<p><b>Evidence:</b></p> <ul style="list-style-type: none"> <li>• Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21</li> <li>• Workplace Rehabilitation Provider – Quarterly Review Summary 1 July – 30 Sept 2020</li> <li>• SLAs: <ul style="list-style-type: none"> <li>○ WRP SLA for the provision of workplace rehabilitation provider services between The ANU and APM, signed 02/07/2020</li> <li>○ WRP SLA for the provision of workplace rehabilitation provider services between The ANU and IPAR, signed 01/07/2020</li> </ul> </li> <li>• Examples of feedback to WRPs (email)</li> <li>• File audit</li> </ul>
<p><b>Comment:</b></p> <p>Section 7.6 of the Rehabilitation Manual details requirements for monitoring performance of Workplace Rehabilitation Providers (WRPs) and includes mechanisms for:</p> <ul style="list-style-type: none"> <li>• Regular monitoring of costs and outcomes</li> <li>• Updates to Service Level agreements</li> <li>• Annual evaluation of WRP services</li> <li>• Statistical analysis</li> <li>• Internal audit of rehabilitation costs (including standard proforma tool)</li> </ul> <p>Current service level agreements have been executed and are regularly reviewed and updated.</p>
<p><b>File Audit:</b></p> <p>File audit confirmed compliance with this criterion confirming regular reporting, feedback and consultation on individual rehabilitation cases, some with written monthly reports on file. Emails and file notes on the file demonstrated the active monitoring of the rehabilitation providers' performance in terms of quality of service delivery, costs, progress reports and outcomes.</p>

## **AUDITING AND REPORTING**

### **Criterion 4.3**

The rehabilitation 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 rehabilitation management system.

#### **Finding: Conformance**

##### **Evidence:**

- ANUP\_015807 Procedure: WHS Audit, v5, effective 20/07/2020, rev 19/07/2023.
- ANU audit schedule 2018 - 2020
- Individual Case File Audit
- Monthly case file review template

##### **Comment:**

The conditions of licence require The ANU to conduct an audit program of their rehabilitation management system. The WHS Audit Procedure and ANU audit schedule detail the process to which audit activity should take place. During 2020 an internal audit program was conducted. The internal audit was conducted by the Manager Injury and Claims, who is an independent party within the Work Environment Group. The auditor has completed training in WHS Lead Auditor and Quality Management System (QMS) Lead Auditor.

### **Criterion 4.4**

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

#### **Finding: Conformance**

##### **Evidence:**

- BRM Rehabilitation Management System audit report – January 2020
- ANU Rehabilitation Management System Corrective Action Plan – 2019-2020

##### **Comment:**

A corrective action plan have been established following an external audit in January 2020. These plans have been communicated to Comcare and are available to all personnel via the intranet.

Audit reports and corrective action plans are provided to ANU Senior Executive as attachments to the University Council Report and the University WHS Committee papers. Regular reporting of these improvement actions and progress is reported to senior management

### **Criterion 4.5**

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

#### **Finding: Conformance**

##### **Evidence:**

- ANU Intranet <https://services.anu.edu.au/human-resources/health-safety/rehabilitation-management-system-audit>

**Comment:**

Results of rehabilitation audit results within the ANU are communicated to all staff through the current governance and meeting arrangements for distribution of health and safety information with key stakeholders:

- WHS Policy Committee Meetings;
- College, School and Divisional Work Health and Safety Committees;
- Technical and Advisory Committees;
- HR Leader Forums;
- Staff intranet pages

**Criterion 4.6**

The rehabilitation authority provides the Commission or Comcare with reports or documents as requested.

**Finding: Conformance****Evidence:**

- Safety Rehabilitation and Compensation Commission - quarterly performance reporting against the Lead Key Performance Indicators
- Safety Rehabilitation and Compensation Commission - annual report 1 March 2019 - 29 February 2020

**Comment:**

Monthly Commission Data Warehouse (CDW) submissions are made by the ANU.

The ANU also provides quarterly and annual reports and any additional information as requested by Comcare.

## **ELEMENT 5: Review and Improvement**

### **CONTINUOUS IMPROVEMENT**

**Criterion 5.1**

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

**Finding: Conformance****Evidence:**

- Human Resources Divisional (HRD) Business Plan 2021
- Work Environment Group Business Plan 2021
- Work Environment Obligations Register
- ANUP\_015807 Procedure: WHS Audit, v5, effective 20/07/2020, rev 19/07/2023.
- Comcare Regulator Audit November 2019
- BRM Rehabilitation Management System audit report – January 2020
- ANU Rehabilitation Management System Corrective Action Plan – 2019-2020
- Rehabilitation Manual, v14, approved 29/10/20, review 29/10/21
- Workplace Rehabilitation Provider – Quarterly Review Summary 1 July – 30 Sept 2020

**Comment:**

The ANU continues to provide ongoing monitoring of injury statistics, early intervention analysis, customer service feedback – which all contribute to continuous improvement services for the RMS.