



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).

Ten (10) 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 2021.

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: 7 – 18 February 2022

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 4660 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.

Ten (10) files were selected for audit, which were 100% of files with rehabilitation activity in the period 1 January – 31 December 2021. 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	Observations
3.6	<ul style="list-style-type: none">• There was a delay in sending the initial needs assessment report to the General Practitioner. Impacted by working off campus / COVID lock down and reduced access to fax and mailing facilities for distribution to medical providers.• There was a delay in sending the initial needs assessment report to the employee.
3.7	<ul style="list-style-type: none">• Rehabilitation alteration signed by the delegate 25/11/2011 (typo incorrect date). Document corrected to 25/11/2021.• Delays in time noted in some distribution of initial needs assessment report and signed delegate documents (return to work plan, amendments, closure forms). Impacted by working off campus / COVID lock down and reduced access to fax and mailing facilities for distribution to medical providers (3 observations).• Closure form had incorrect date for date final goal achieved (23/12/2022). Document amended to 23/12/2021.

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

	Number of criteria	% of assessed criteria
Conformance (with 7 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: 25/02/2022

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
Planning for legislative compliance	2.2	Conformance
Setting objectives and targets	2.3	Conformance
Plans to achieve objectives and targets	2.4	Conformance
3. Implementation		
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 with 2 observations
Rehabilitation programs	3.7	Conformance with 5 observations
Suitable employment	3.8	Conformance
Determinations in accordance with the SRC Act	3.9	Conformance
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
4. Measurement and Evaluation		
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

AUDIT ELEMENT / CRITERION DESCRIPTION	Criterion	Rating
Communicating audit results	4.5	Conformance
Providing reports to Comcare and Commission as requested	4.6	Conformance
5. Review and Improvement		
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 13/09/2024 https://policies.anu.edu.au/ppl/document/ANUP_013007
- ANUP_000432, Policy: Work health and safety, v8, effective 8/4/16, rev 13/6/22 https://policies.anu.edu.au/ppl/document/ANUP_000432
- ANUP_014609, Policy: Fitness for Work, v1, effective 03/11/2020, rev 2/11/2023 https://policies.anu.edu.au/ppl/document/ANUP_014609
- ANUP_000667, Procedure: Rehabilitation and compensation, effective 4/6/18, rev 13/09/2026 https://policies.anu.edu.au/ppl/document/ANUP_000667

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>

The Policy: Rehabilitation and Compensation and the Procedure: Rehabilitation and Compensation were both reviewed and updated in the policy library during this reporting period to reflect operational changes for the delivery of programs at the ANU.

CORPORATE GOVERNANCE

Criterion 1.2

The rehabilitation management system provides for internal and external accountability.

Finding: Conformance

Evidence:

- ANU Executive Structure, 08/02/2021 <https://www.anu.edu.au/files/resource/OVC210009%20SeniorManOrgChart%20v2.pdf>
- Work Environment Group Organisational Structure, 04/01/2022
- 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)
 - 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 March 2021 - 28 February 2022
- ANUP_015808, Procedure: Work health and safety committees and representatives, v2, effective 07/05/2020, rev 01/07/2023
- Annual Report 2020
- Work Health and Safety Council Report, for the period 1 January - 31 December 2021
- Self-Insurance Annual Performance Report 1 January – 31 December 2021
- 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 30/06/2021
 - WRP SLA for the provision of workplace rehabilitation provider services between The ANU and IPAR, signed 30/06/2021
- Procedure: WHS Audit, v5, effective 20/07/2020, rev 19/07/2023.
- Individual Case File Audit

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 29/04/2025
- Rehabilitation Management System Risk Register, v6, effective 20/12/2021, rev 20/12/22
- WHS Annual 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 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, Chief People Officer, 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.

Rehabilitation staffing within the team has not changed since the previous auditing period, role requirements have not changed, and so all delegation schedules have remained the same.

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, v5.0, 20/12/21, rev 20/12/22
- Incident notification email
- Early Intervention Assistance Information Pack
- ANU Workers' Compensation Claim Pack, v6.0, approved 20/12/20, rev 20/12/22
- Rehabilitation Manual, v15, approved 03/08/2021, review 03/08/2022

- 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)
 - 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 30/06/2021
 - WRP SLA for the provision of workplace rehabilitation provider services between The ANU and IPAR, signed 30/06/2021

Comment:

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

The University'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 13/09/2024
- People and Culture Business Plan 2022
- Work Environment Group Business Plan 2022
- Work Environment Obligations Register.
- Licensee Compliance and Performance Improvement (LCPI) annual report, 1 March 2021 - 28 February 2022.
- WHS Performance Annual Report 1 January – 31 December 2021.

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:**

- People and Culture Business Plan 2022
- Work Environment Group Business Plan 2022
- Work Environment Obligations Register.
- Rehabilitation Management System: Corrective Action Plan January 2021
- ANUP_013007, Policy: Rehabilitation and compensation, v2, effective 4/6/18, rev 1/09/2024
- Procedure: Rehabilitation and Compensation effective 4/6/18, rev 13/09/2026
https://policies.anu.edu.au/ppl/document/ANUP_000667
- Rehabilitation Manual, v15, approved 03/08/2021, review 03/08/2022
- 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)
 - 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 People and Culture Business 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, v15, approved 03/08/2021, review 03/08/2022
- 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)
 - 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 2 staff:

- Manager Injury and Claims
- 2 Rehabilitation Case Managers

Further support to the team is provided by the Senior Consultant Claims Management and 2 claims officers (as part of a 3rd party contract with Comcare).

It is considered that ANU is adequately resourced to effectively manage its rehabilitation caseload, considering the number of receipted claims in each year (20 claims in 2021). During 2021 there were 10 claims with rehabilitation activity. The University continues to reduce active claims numbers. As at 31 December 2021 there are 39 active claims compared to 47 at the same time in 2020.

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 13/09/2024 https://policies.anu.edu.au/ppl/document/ANUP_013007
- Procedure: Rehabilitation and Compensation effective 4/6/18, rev 13/09/2026 https://policies.anu.edu.au/ppl/document/ANUP_000667
- ANU Workers' Compensation Claim Pack, v6.0, approved 20/12/20, rev 20/12/22
- 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 30/06/2021
 - WRP SLA for the provision of workplace rehabilitation provider services between The ANU and IPAR, signed 30/06/2021

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:**

- ANUP_013007, Policy: Rehabilitation and compensation, v2, effective 4/6/18, rev 13/09/2024 https://policies.anu.edu.au/ppl/document/ANUP_013007
- Procedure: Rehabilitation and Compensation effective 4/6/18, rev 13/09/2026 https://policies.anu.edu.au/ppl/document/ANUP_000667
- Rehabilitation Manual, v15, approved 03/08/2021, review 03/08/2022
- ANU Workers' Compensation Claim Pack, v6.0, approved 20/12/20, rev 20/12/22
- 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 courses

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.

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, v15, approved 03/08/2021, review 03/08/2022
- 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. Performance against the key performance indicator occurs every 8-week period and reported with the University Council Report.

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.

During this audit year, customer service feedback was noted about streamlining the early intervention process, and a 'fast track' system was introduced for EIA requirements less than \$300 in costs to reduce the administrative burden of low cost reimbursements (1-2 medical / treatment costs). This is now implemented into standard process.

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 with 2 observations

Evidence: <ul style="list-style-type: none">• Rehabilitation Manual, v15, approved 03/08/2021, review 03/08/2022• File audit
Comment: <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>
File Audit: <p>There were six (6) files eligible for this criterion. File audit confirmed compliance.</p>
Observations: <ul style="list-style-type: none">• There was a delay in sending the initial needs assessment report to the General Practitioner. Impacted by working off campus / COVID lock down and reduced access to fax and mailing facilities for distribution to medical providers.• There was a delay in sending the initial needs assessment report to the employee.

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 5 observations

Evidence: <ul style="list-style-type: none">• Claims Management Manual, v3, 30/04/2020, due for rev 30/04/2022:<ul style="list-style-type: none">○ 9.3 Rehabilitation Programs (s37)• Rehabilitation Manual, v15, approved 03/08/2021, review 03/08/2022<ul style="list-style-type: none">○ 6.3 Rehabilitation Assessment or Examination○ 6.8 Rehabilitation Program Planning and development• Procedure: Return to Work, ANUP_017614, v2, effective 15/3/18, review 13/09/2024• SLAs:<ul style="list-style-type: none">○ WRP SLA for the provision of workplace rehabilitation provider services between the ANU and APM, signed 30/06/2021○ WRP SLA for the provision of workplace rehabilitation provider services between the ANU and IPAR, signed 30/06/2021• File audit
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<p>Comment:</p> <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 Guidelines for Rehabilitation Authorities 2019.</p> <p>The Procedure: Return to work was reviewed during the audit period and updated to reflect minor improvements in wording for responsibilities.</p>
<p>File Audit:</p> <p>Of the nine files (9) applicable to this criterion, file audit confirmed compliance with one observation.</p>
<p>Observations:</p> <ul style="list-style-type: none"> • Rehabilitation alteration signed by the delegate 25/11/2011 (typo incorrect date). Document corrected to 25/11/2021. • Delays in time noted in some distribution of initial needs assessment report and signed delegate documents (return to work plan, amendments, and closure forms). Impacted by working off campus / COVID lock down and reduced access to fax and mailing facilities for distribution to medical providers (3 observations). • Closure form had incorrect date for date final goal achieved (23/12/2022). Document amended to 23/12/2021.

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

<p>Evidence:</p> <ul style="list-style-type: none"> • Rehabilitation Manual, v15, approved 03/08/2021, review 03/08/2022 • ANUP_017614 Return to Work Procedure, V2, effective 15/03/18, review 13/09/2024 • File audit
<p>Comment:</p> <p>The ANU Rehabilitation Manual clearly outlines the requirement to provide suitable employment under the SRC Act.</p> <p>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</p>
<p>File Audit:</p> <p>File audit confirmed compliance with this criterion.</p>

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

<p>Evidence:</p> <ul style="list-style-type: none"> • Rehabilitation Manual, v15, approved 03/08/2021, review 03/08/2022 • Letter templates and forms • File audit
<p>Comment:</p> <p>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.</p>
<p>File Audit:</p> <p>File audit confirmed compliance with this criterion.</p>

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

<p>Evidence:</p> <ul style="list-style-type: none"> • Rehabilitation Manual, v15, approved 03/08/2021, review 03/08/2022 – Section 8 Employee Non-Compliance with Rehabilitation • Letter templates • File audit
<p>Comment:</p> <p>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.</p> <p>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.</p> <p>Standard letter templates and forms have been implemented to support compliance to this criterion.</p>
<p>File Audit:</p> <p>File audit found no activity relevant to this criterion.</p>

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

<p>Evidence:</p> <ul style="list-style-type: none"> • Rehabilitation Manual, v15, approved 03/08/2021, review 03/08/2022 – Section 8 Employee Non-Compliance with Rehabilitation • Comcare Deed of Agreement - Reconsideration Services, dated 01/07/2022
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- 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

Evidence:

- Rehabilitation Manual, v15, approved 03/08/2021, review 03/08/2022
- ANUP_010007, Policy: Privacy, v11, effective 1/1/15, rev 30/08/2021
- File audit

Comment:

ANU maintains the confidentiality of information and applies legislative requirements. ANU has a privacy policy, which reflects the requirements of the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* and acts in accordance with its legal obligations.

File Audit:

File audit confirmed compliance with this criterion.

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

Evidence:

- Rehabilitation Manual, v15, approved 03/08/2021, review 03/08/2022 – Section 9 ANU Records Management
- File audit

File Audit:

File audit confirmed compliance with this criterion. Files are stored across two systems – Figtree and shared drive.

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

Evidence: <ul style="list-style-type: none">• Rehabilitation Manual, v15, approved 03/08/2021, review 03/08/2022• Work Health and Safety Council Reports 2021
Comment: <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">• Quarterly review of WEG deliverables as detailed on WEG business plan• Quarterly reporting of safety and rehabilitation progress in line with the People and Culture business plan• Quarterly reporting to the WHS University Committee Meeting• Monthly review of Figtree incident, injury and claims management system reporting;• Monthly case file reviews; and• Quarterly - Individual case file auditing.

Criterion 4.2

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

Finding: Conformance

Evidence: <ul style="list-style-type: none">• Rehabilitation Manual, v15, approved 03/08/2021, review 03/08/2022• SLAs:<ul style="list-style-type: none">○ WRP SLA for the provision of workplace rehabilitation provider services between The ANU and APM, signed 30/06/2021○ WRP SLA for the provision of workplace rehabilitation provider services between The ANU and IPAR, signed 30/06/2021• File audit
Comment: <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">• Regular monitoring of costs and outcomes• Updates to Service Level agreements• Annual evaluation of WRP services• Statistical analysis• Internal audit of rehabilitation costs (including standard proforma tool)

Current service level agreements have been executed and reviewed and updated annually. Detailed performance analysis of referrals to WRPs has not been required during this audit period due to the low number of rehabilitation referrals made. Case review and monitoring of performance has continued.

File Audit:

File audit confirmed compliance with this criterion confirming regular reporting, feedback and consultation on individual rehabilitation cases. 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.

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 2020 - 2022
- Individual Case File Audit

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 February 2022 an internal audit program was conducted for the period 1 January – 31 December 2021. 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:

- Rehabilitation Management System internal audit report – February 2021
- ANU Rehabilitation Management System Corrective Action Plan 2021

Comment:

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

<p>Evidence:</p> <ul style="list-style-type: none">• ANU Intranet https://services.anu.edu.au/human-resources/health-safety/rehabilitation-management-system-audit
<p>Comment:</p> <p>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:</p> <ul style="list-style-type: none">• WHS Policy Committee Meetings• College, School and Divisional Work Health and Safety Committees• Technical and Advisory Committees• Staff intranet pages

Criterion 4.6

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

Finding: Conformance

<p>Evidence:</p> <ul style="list-style-type: none">• Safety Rehabilitation and Compensation Commission - quarterly performance reporting against the Lead Key Performance Indicators• Safety Rehabilitation and Compensation Commission - annual report 1 March 2021 – 28 February 2022
<p>Comment:</p> <p>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.</p>

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:

- People and Culture Business Plan 2022
- Work Environment Group Business Plan 2022
- Work Environment Obligations Register
- ANUP_015807 Procedure: WHS Audit, v5, effective 20/07/2020, rev 19/07/2023.
- Rehabilitation Manual, v15, approved 03/08/2021, review 03/08/2022

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.