



**2018/2019 Comcare Licensee Audit**

**Australian National University**

**FINAL REPORT**

**Rehabilitation Management System Audit**

**Audit Date: 15 – 17 January 2019**

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**rehabilitation**

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## Scope of Audit

<b>Organisation:</b>	Australian National University ('ANU')
<b>Site/Workplace:</b>	Work Environmental Group, Building 10B Lower Ground, East Street, Acton, Canberra, ACT
<b>Scope of Audit:</b>	<p>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 <i>Safety, Rehabilitation and Compensation Act 1988</i> (SRC Act) and the <i>Guidelines for Rehabilitation Authorities 2012</i> (the Guidelines).</p> <p>16 rehabilitation case files were examined by the auditors. These files were randomly selected from a list of 26 rehabilitation case files where some activity had occurred in the previous 12 months.</p> <p>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. An interview was also conducted with rehabilitation staff.</p> <p>Overall findings are based on the identification of issues that are considered to be systemic rather than isolated incidents.</p>
<b>Audit Criteria:</b>	<p>This audit assessed the rehabilitation management system against five elements:</p> <ol style="list-style-type: none"><li>1. Commitment and Corporate Governance (3 criteria)</li><li>2. Planning (4 criteria)</li><li>3. Implementation (13 criteria)</li><li>4. Measurement and Evaluation (6 criteria)</li><li>5. Review and Improvement (1 criterion)</li></ol>
<b>Ratings:</b>	<p>The findings in the audit report have been classified and marked as follows:</p> <p><b>Conformance</b>—indicates that the criterion has been met.</p> <p><b>Non-conformance</b>—indicates that the criterion has not been met.</p> <p><b>Not able to verify</b>—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><b>Not Applicable</b>—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 <b>Observation</b> may be</p>

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:** 15 – 17 January 2019
- Auditors:** Sophie Anastasov and Fiona van Ree, BRM Risk Management Pty Ltd
- Client Contacts:** Ingrid Krauss, Manager Injury Prevention and Rehabilitation, ANU
- Record of Audit:** This report contains a summary of the audit 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 Australian National University and thank them for their contribution to the audit 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. BRM was commissioned to audit ANU's rehabilitation management system, processes and outcomes in accordance with Comcare's Rehabilitation Management System audit tool.

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. Prior to becoming a self-insurer, ANU was a premium payer in the Comcare scheme and required to have a Rehabilitation Management System in place. Since obtaining its licence for self-insurance, ANU have reviewed, updated and implemented a number of improvement initiatives.

There were a number of positive features of the rehabilitation management system which are listed below, and further detailed in the body of this report:

- ANU Rehabilitation Authority Delegations, signed 18/12/18, Professor Brian Schmidt, Vice-Chancellor,
- Policy: Rehabilitation and compensation
- Policy: Disability,
- Policy: Fitness for Work,
- Policy: Work health and safety,
- Policy: Risk Management,
- ANU Rehabilitation Manual
- Guideline: Early Intervention Assistance,
- Procedure: Return to Work,
- Procedure: Rehabilitation and compensation,
- HR Division 2018 Business Plan
- Work Environment Group Business Plan 2019 (Draft)
- ANU Workers Compensation Claim Pack
- Work Environment Group Organisational Structure, Position Descriptions and Performance Reviews
- Regular monthly and quarterly performance reporting
- ANU Corrective Action Plan

Sixteen files were randomly selected from a population of 22 files with relevant activity over the preceding 12 months. File review identified four exceptions related to criterion 3.7 where there were gaps in rehabilitation planning activities. In these instances, the employee had capacity for suitable employment or modified duties.

The audit period reviewed was from 1 July 2018 to 14 January 2019.

## NON-CONFORMANCES

No areas of non-conformances were identified during the audit.

## OBSERVATIONS

One observation was identified during the audit.

Criterion	Observation
3.7	Rehabilitation programs were not provided where the employee was certified as fit for suitable duties.

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

	Number of criteria	% of assessed criteria
Conformance (with 1 Observation)	25	100%
Non-conformance	0	Nil
Not able to verify	2	
Not applicable	0	

An action plan, which includes completion/review dates and responsibilities, must be developed by 31 March 2019 to address each of the audit findings.

The auditors invite Australian National University to discuss any aspect of this audit with the auditors.



Signed:  
**Sophie Anastasov**



Signed:  
**Fiona van Ree**

Date: 30 January 2019

## 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
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
<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:

- Guideline: Early Intervention Assistance, ANUP\_000760, v10, effective 8/4/16, rev 8/4/19
- Letter 4/12/17 from Comcare regarding Notice of grant of a licence to the Australian National University under Part VIII of the Safety, Rehabilitation and Compensation Act 1988 (SRC Act)
- Policy: Disability, ANUP\_000405, v7, effective 2/8/16, rev 31/12/17
- Policy: Fitness for Work, ANUP\_014609, v1, effective 10/11/16, rev 10/11/19
- Policy: Rehabilitation and compensation, ANUP\_013007, v2, effective 4/6/18, rev 4/6/21
- Policy: Work health and safety, ANUP\_00432, v6, effective 8/4/16, rev 8/4/19
- Policy: Risk Management, ANUP\_000462, v5, effective 1/7/09, rev 26/8/16
- WHS & Rehabilitation Policy, 5/4/16, signed by Brian Schmidt, Vice-Chancellor
- Procedure: Return to Work, ANUP\_017614, v2, effective 15/3/18, rev 15/3/21
- Procedure: Rehabilitation and compensation, ANUP\_000667, v11, effective 4/6/18, rev 4/6/21
- Procedure: Management of Non-Work Related Injury and Illness, ANUP\_000683, v6, effective 12/7/11, rev 30/9/15
- Change Implementation Plan, WEG, HR Division, 5 July 2018

#### Comment:

The ANU "Policy: Rehabilitation and compensation" was approved by the University's Vice-Chancellor, April 2016. The policy sets the direction for the ANU's rehabilitation and claims management systems through a documented commitment by senior executive.

The policy includes commitments to:

- Preventing workplace injuries and illnesses by providing a safe and healthy working environment;
- Providing early reporting systems and intervention procedures that will enable injured employees to stay at work or return to work as soon as possible in line with medical guidelines;
- Facilitating the durable return to work of employees, by assisting with the safe and early integration back into the workplace, and minimisation of time away from the workplace;
- Defining, documenting and communicating the areas of accountability and responsibility for executive, senior managers and employees involved in the rehabilitation process;
- Advising our people of their rights and responsibilities for injury management;

- Facilitating participation in an injury or illness management program appropriate to an injured or ill employee's medical recovery;
- Providing our people with relevant information about injury management including their rehabilitation rights and obligations;
- Maintaining confidentiality of personal information in accordance with applicable legislation;
- Managing claims in an equitable, timely and efficient manner, consistent with applicable legislation and self-insurance requirements;
- Complying with applicable injury management and rehabilitation legislation; and
- Engaging appropriately qualified experts, both internally and externally, to assist in the management of injury.

Policies and procedures are available to all staff through the ANU website.

## **CORPORATE GOVERNANCE**

### **Criterion 1.2**

The rehabilitation management system provides for internal and external accountability.

### **Finding: Conformance**

#### **Evidence:**

- RMS Audit Report, 13 - 15 November 2018, completed by Comcare
- RMS Audit Report, 7 - 8 March 2018, completed by BRM
- Certificate of Compliance with the Guidelines for Rehabilitation Authorities 2012, signed by Vice-Chancellor 13/4/18
- Email 10/1/19 from Ingrid Krauss to Comcare forwarding ANU's RMS Corrective Action Plan 2018
- Rehabilitation Management System Corrective Action Plan 2018 - 2019
- SRC Act Self-Insurance Claims Management System Transition Plan, v16.0, review 1/9/18
- Position descriptions:
  - Associate Director, Work Environment (no document control)
  - Manager, Injury Prevention and Management, 1/7/18
  - 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)
- ANU Executive Structure, 5/11/18
- Work Environment Group Organisational Structure, 1/7/18
- ANU Performance Report, Quarter 1 2018-19
- Work Environment Group, Workers Compensation Status Report, Quarter 2, 1 January - 30 June 2018
- Work Health and Safety Council Report (draft template)
- Work Health and Safety Council Report, for the period 1 January - 31 August 2018
- SLAs:

- Rehabilitation Management System Audit Service Level Agreement - Administrative Guidelines for the conduct of audits at the ANU, v2.0, approved 1/3/18, rev 1/3/19
- SLA: Letter of engagement with BRM Risk Management, 18/6/18
- Deed of agreement for claims managed services and the provision of other associated specialised services: between ANU and Comcare, signed 25/1/18
- Schedule 7 - Deed of agreement change proposal, approved 29/6/18, to be reviewed 23/7/18, not signed
- SLA between Preventative Approach Pty Ltd and The ANU - Equipment Lease Option Extension Agreement, 23/12/15, signed
- Service Proposal For the provision of Health Surveillance/Monitoring and Occupational Health Services, Prepared for Australia National University April 2017
- Template: Workplace Rehabilitation Provider Service Level Agreement - Service Level Agreement for the provision of workplace rehabilitation provider services for The ANU, v1.0, approved 4/1/19, review 4/1/20
- WRP SLA for the provision of workplace rehabilitation provider services between The ANU and APM, signed 6/11/18
- WRP SLA for the provision of workplace rehabilitation provider services between The ANU and Rehabilitation Services, signed 14/11/18
- Performance and Development Reviews:
  - Justin Donley
  - Start date: 15/12/17, Adele Anderson
  - Start date: 17/4/18, Lucy Ochieng
  - Start date: 31/1/18, Ingrid Krauss

**Comment:**

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

- Job descriptions and Performance Development Reviews/plans for all staff involved in the injury management process
- Work Environment Group Organisational Structure
- Consultation mechanisms for employees regarding the rehabilitation management system through WHS committees and representatives
- Regular reporting to the executive group on progress of the Rehabilitation Management system
- Internal file case reviews are undertaken on a fortnightly basis by the Team Leader
- Audit plans and outcomes presented to senior executives
- Corrective action plan 2018-2019 addressing the outcome of BRM's's review in March and Comcare in November 2018

*External:*

- SLA's exist with relevant external parties including health services, equipment providers , figtree and auditors. Service level agreements are now in place with workplace rehabilitation providers.
- RMS audit report was conducted by BRM Risk Management in March 2018 and by Comcare in November 2018. Following these audits Corrective Action Plans were developed.

- Certificate of Compliance with the *Guidelines for Rehabilitation Authorities 2012* signed by the Vice Chancellor 21/7/17

### Criterion 1.3

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

### Finding: Conformance

#### Evidence:

- Appendix 15: Individual case file audit (template)
- Procedure: Work health and safety audit, ANUP\_015807, v3, effective 1/7/17, rev 1/7/20
- WHS ANU Audit Schedule 2018-20
- HR Division 2018 Business Plan
- Work Environment Group Business Plan 2019 (Draft)
- Policy: Risk Management, ANUP\_000462, v5, effective 1/7/09, rev 26/8/16
- Procedure: Risk Management, ANUP\_000495, v6, effective 1/7/09, rev 26/8/16
- Work Environment Group, Workers Compensation Status Report, Quarter 2, 1 January - 30 June 2018
- Work Health and Safety Council Report (draft template)
- Work Health and Safety Council Report, for the period 1 January - 31 August 2018
- Rehabilitation Management System, Australian National University, Risk Management Plan, v4.0, 21/12/18, rev 21/12/19
- Change Implementation Plan, WEG, HR Division, 5 July 2018

#### Comment:

Comcare's November 2018 audit found the following observation:

The ANU RMS risk management plan does not include risks associated with being a self-insurer.

The ANU's risk register has been updated in December 2018 to include considerations to self-insurance licence requirements. Risks noted include quarterly LKPI reporting requirements, data reporting requirements and conflict of interest with regard to AAT legal matters.

Staff within WEG are involved at each stage of the risk register. The policy and procedure describe the process for determining and assessing risks.

## 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:

- Delegation Extract & Report, printed 17/1/19
- Memo dated 7/3/16 to Professor Brian Schmidt, Vice-Chancellor, from Dr Nadine White, Director HR Division regarding ANU Case Manager Delegations, signed 23/3/16
- Memo dated 24/10/18 to Professor Brian Schmidt, Vice-Chancellor, from Dr Nadine White, Director HR regarding ANU Rehabilitation Authority Delegations, signed 14/11/18
- Memo dated 12/12/18 to Professor Brian Schmidt, Vice-Chancellor, from Dr Nadine White, Director HR regarding ANU Rehabilitation Authority Delegations, not signed
- Memo dated 12/12/18 to Professor Brian Schmidt, Vice-Chancellor, from Dr Nadine White, Director HR regarding ANU Rehabilitation Authority Delegations, signed 18/12/18
- File audit

##### Comment:

Comcare's November 2018 audit found the following non-conformance:

"The ANU rehabilitation delegation instrument:

- Does not include all staff with rehabilitation responsibilities
- Has not assigned the reconsideration powers and functions under s62 of the SRC Act to an officer or employee of the ANU".

Comcare also found the following observation:

"The ANU delegation instrument does not reflect the current position titles."

ANU has updated its delegation schedule, signed by the principal officer, Vice Chancellor Professor Brian Schmidt on 18/12/18 as per section 41A of the SRC Act.

### 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:

- Position descriptions:
  - Associate Director, Work Environment (no document control)
  - Manager, Injury Prevention and Management, 1/7/18

- 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)
- Rehabilitation Manual, v5.0, approved 21/12/18, review 21/12/19 - 10.1 Natural Justice and Procedural Fairness
- Procedure: Management of Non-Work Related Injury and Illness, ANUP\_000683, v6, effective 12/7/11, rev 30/9/15
- Claims and Rehabilitation Management Systems, Australian National University, Legislation Register, v1.0, approved 31/10/18, review 31/10/19
- Service Proposal For the provision of Health Surveillance/Monitoring and Occupational Health Services, Prepared for Australia National University April 2017
- WRP SLA for the provision of workplace rehabilitation provider services between The ANU and APM, signed 6/11/18
- WRP SLA for the provision of workplace rehabilitation provider services between The ANU and Rehabilitation Services, signed 14/11/18

**Comment:**

ANU recognises legislative obligations and plans for legislative and regulatory compliance, having regard to any policy advice that Comcare or the Commission may issue. At the highest level, the Vice-Chancellor has overall responsibility for ensuring legislative compliance.

The Manager Injury and Claims monitors SRC legislative changes and obligations. There are a range of policies and procedures that cover rehabilitation and injury management under the SRC Act.

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.

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 rehabilitation 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:**

- HR Division 2018 Business Plan
- Work Environment Group Business Plan 2019 (Draft)
- ANU Performance Report, Quarter 1 2018-19
- Service Proposal For the provision of Health Surveillance/Monitoring and Occupational Health Services, Prepared for Australia National University April 2017

- WRP SLA for the provision of workplace rehabilitation provider services between The ANU and APM, signed 6/11/18
- WRP SLA for the provision of workplace rehabilitation provider services between The ANU and Rehabilitation Services, signed 14/11/18

**Comment:**

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

The HR Division 2018 Business Plan specifically details that services will be provided for injury prevention, injury management, staff with disability and health and wellbeing. Key performance measures are identified for rehabilitation including:

- Lost time injury frequency rate (LTIFR)
- Medical treated (sic)injury frequency rate (MTIFR)
- Likely future claims cost/forward liability
- Licensee key performance indicators (LKPI) 100%
- Average time lost per LTI(days)\*/LTI>1 week lost
- RTW to pre-injury duties 90%
- Audit result National Audit Tool (NAT) - 80%
- Mandatory training – 100%

The WEG Operational Plan 2018 details specific programs in the three main areas of safety, injury prevention and injury management. Injury management KPI's, outcome measures and timeframes are detailed in the plan. A draft 2019 plan has been developed.

**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:**

- HR Division 2018 Business Plan
- Work Environment Group Business Plan 2019 (Draft)
- Email 10/1/19 from Ingrid Krauss to Comcare forwarding ANU's RMS Corrective Action Plan 2018
- Rehabilitation Management System Corrective Action Plan 2018 - 2019
- SRC Act Self-Insurance Claims Management System Transition Plan, v16.0, review 1/9/18
- Position descriptions:
  - Associate Director, Work Environment (no document control)
  - Manager, Injury Prevention and Management, 1/7/18
  - 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)
- Rehabilitation Manual, v5.0, approved 21/12/18, review 21/12/19

- ANU Performance Report, Quarter 1 2018-19
- Policy: Rehabilitation and compensation, ANUP\_013007, v2, effective 4/6/18, rev 4/6/21
- Procedure: Rehabilitation and compensation, ANUP\_000667, v11, effective 4/6/18, rev 4/6/21
- Service Proposal For the provision of Health Surveillance/Monitoring and Occupational Health Services, Prepared for Australia National University April 2017
- WRP SLA for the provision of workplace rehabilitation provider services between The ANU and APM, signed 6/11/18
- WRP SLA for the provision of workplace rehabilitation provider services between The ANU and Rehabilitation Services, signed 14/11/18

**Comment:**

The Policy: Rehabilitation, ANUP\_013007, reflects the overall commitment of the senior executive team.

The WEG operational plan deliverables detail the requirement for this criterion and the injury management team work to these deliverables. The Rehabilitation Manual compliments these plans and all WEG staff work performance is monitored and reviewed at individual performance reviews.

Following audits ANU Corrective Action Plans are developed and implemented, and regular meetings and reviews are held to identify continuous improvement opportunities.

## ELEMENT 3: Implementation

### RESOURCES

#### Criterion 3.1

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

#### Finding: Conformance

**Evidence:**

- Change Implementation Plan, WEG, HR Division, 5 July 2018
- Figtree Issues Log, 2017-18
- Rehabilitation Manual, v5.0, approved 21/12/18, review 21/12/19

**Comment:**

ANU allocates adequate resources to support its rehabilitation management system. A detailed review of staffing was undertaken and a restructure of the WEG occurred in May to July 2018.

Direct case review meetings are conducted fortnightly with each staff member of the rehabilitation team within WEG. Caseloads are reviewed with each individual staff member to ensure effective management of workloads levels.

Currently the rehabilitation team within WEG consists of 4 staff:

- 1 Team Leader – Injury Management and Rehabilitation
- 2 Rehabilitation Case Managers

- 1 Case Manager – Psych-social

It is considered that ANU is adequately resourced to effectively manage its rehabilitation caseload.

## **COMMUNICATION AND AWARENESS**

### **Criterion 3.2**

The rehabilitation authority defines and communicates responsibilities to relevant stakeholders.

### **Finding: Conformance**

#### **Evidence:**

- ANU Workers Compensation Claim Pack, v4.0, approved 10/12/18, rev 30/6/19
- Email 10/1/19 from Ingrid Krauss to Comcare forwarding ANU's RMS Corrective Action Plan 2018
- Rehabilitation Management System Corrective Action Plan 2018 - 2019
- SRC Act Self-Insurance Claims Management System Transition Plan, v16.0, review 1/9/18
- Position descriptions:
  - Associate Director, Work Environment (no document control)
  - Manager, Injury Prevention and Management, 1/7/18
  - 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)
- Rehabilitation Manual, v5.0, approved 21/12/18, review 21/12/19
- Meetings scheduled (recurring monthly) various, 2018
- Procedure: Return to Work, ANUP\_017614, v2, effective 15/3/18, rev 15/3/21
- Procedure: Rehabilitation and compensation, ANUP\_000667, v11, effective 4/6/18, rev 4/6/21
- Rehabilitation Management System Audit Service Level Agreement - Administrative Guidelines for the conduct of audits at the ANU, v2.0, approved 1/3/18, rev 1/3/19
- SLA: Letter of engagement with BRM Risk Management, 18/6/18
- Service Proposal For the provision of Health Surveillance/Monitoring and Occupational Health Services, Prepared for Australia National University April 2017
- WRP SLA for the provision of workplace rehabilitation provider services between The ANU and APM, signed 6/11/18
- WRP SLA for the provision of workplace rehabilitation provider services between The ANU and Rehabilitation Services, signed 14/11/18
- Workplace Rehabilitation Providers - initial referral email including standard of service

**Comment:**

ANU defines and communicates responsibilities to relevant stakeholders.

ANU's Rehabilitation Policy and Procedures clearly sets out responsibilities of all levels of staff.

The intranet pages contain extensive information on early intervention and rehabilitation 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.

Following an injury, a Workers' Compensation Claim Pack is provided to the employee. This information pack includes information on rehabilitation and the responsibilities of the employee.

SLA's exist with external providers and standards expected from Workplace Rehabilitation Providers (WRPs) are detailed in the Rehabilitation manual and referral email.

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:**

- Rehabilitation Manual, v5.0, approved 21/12/18, review 21/12/19
- Procedure: Return to Work, ANUP\_017614, v2, effective 15/3/18, rev 15/3/21
- File audit

**Comment:**

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

Comcare's November 2018 audit found the following observation:

"The ANU's frequently asked questions does not include information regarding s36 determinations."

ANU's response:

"All versions to be replaced within the Rehabilitation Manual (resource attachments) and documents / forms on the intranet page reviewed and updated."

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

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.

As stated in 3.2, the 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 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:

- Position descriptions:
  - Associate Director, Work Environment (no document control)
  - Manager, Injury Prevention and Management, 1/7/18
  - 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)
- Course Overview (OHS28) WHS and Injury Management for Supervisors
- Email 21/12/18 from Lisa McLoughlin re Minutes 12/12/18 (Figtree update training)
- Inducting your new staff, A guide for Supervisors
- Injury Management - Coaching guidelines (user guide)
- Injury Management - What I need to know as a supervisor (user guide)
- WEG Credentialing Training (training records 2018 and 2019, and presentations)

##### 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. Staff qualifications include occupational therapy, nursing, exercise physiology and psychology. This is a requirement detailed in the relevant position descriptions.

All staff have Performance Development Reviews completed on an annual basis, which include training and skills development. All staff have completed the required Comcare training. A training matrix lists completed courses and qualifications.

## EARLY INTERVENTION

### Criterion 3.5

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

#### Finding: Conformance

##### Evidence:

- Guideline: Early Intervention Assistance, ANUP\_000760, v10, effective 8/4/16, rev 8/4/19
- Rehabilitation Manual, v5.0, approved 21/12/18, review 21/12/19 - 5 Early Intervention Assistance (EIA)

- File audit

**Comment:**

ANU implements an early intervention program, including the early identification and notification of injury.

The Rehabilitation Manual 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.

A hazard 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. The Guideline details the provisions and process for obtaining assistance under this fund.

File audit confirmed compliance with this criterion.

**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**

**Evidence:**

- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19 - 9.2 Rehabilitation Assessments (s36)
- Rehabilitation Manual, v5.0, approved 21/12/18, review 21/12/19 - 6.3 Rehabilitation Assessment or Examination
- Procedure: Return to Work, ANUP\_017614, v2, effective 15/3/18, rev 15/3/21
- Service Proposal For the provision of Health Surveillance/Monitoring and Occupational Health Services, Prepared for Australia National University April 2017
- WRP SLA for the provision of workplace rehabilitation provider services between The ANU and APM, signed 6/11/18
- WRP SLA for the provision of workplace rehabilitation provider services between The ANU and Rehabilitation Services, signed 14/11/18
- File audit

**Comment:**

ANU effectively uses the provisions of section 36 to conduct rehabilitation assessments in accordance with the SRC Act and the Guidelines. The Section 6 of the Rehabilitation Manual provides guidelines on section 36 rehabilitation assessments, examinations and determinations.

File audit confirmed compliance with this criterion.

## 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

#### Evidence:

- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19 - 9.3 Rehabilitation Programs (s37)
- Rehabilitation Manual, v5.0, approved 21/12/18, review 21/12/19:
  - 6.3 Rehabilitation Assessment or Examination
  - 6.8 Rehabilitation Program Planning and development
- Procedure: Return to Work, ANUP\_017614, v2, effective 15/3/18, rev 15/3/21
- Service Proposal For the provision of Health Surveillance/Monitoring and Occupational Health Services, Prepared for Australia National University April 2017
- WRP SLA for the provision of workplace rehabilitation provider services between The ANU and APM, signed 6/11/18
- WRP SLA for the provision of workplace rehabilitation provider services between The ANU and Rehabilitation Services, signed 14/11/18
- File audit

#### Comment:

Section 6.8 of ANU's Rehabilitation Manual details rehabilitation program planning and development, Section 6.9 clearly outlines the process for developing a rehabilitation program. Section 6.10 outlines the rehabilitation program implementation, and section 6.11 outlines the processes for rehabilitation program monitoring and review.

File audit demonstrated that rehabilitation programs were developed in consultation with all parties, goals responsibilities and timeframes were explained clearly to all parties, and section 37(3) a-h was clearly addressed in a separate page attached to the program. The documented consideration of the elements of section 37(3)(a) – (h) was of a high standard, detailed and specific to the employee.

File documentation provided clear evidence of consultation between the workplace parties, employee, WRP and treating doctor in the development of rehabilitation programs. Return to work goals were clearly defined and agreed to be all parties.

Of the 15 files applicable to this criterion, file audit found 4 individual exceptions where the employee was certified as fit for suitable duties however there were no return to work activity or rehabilitation programs in place.

#### Observation 1:

Rehabilitation programs were not provided where the employee was certified as fit for suitable duties.

## **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, v5.0, approved 21/12/18, review 21/12/19 - 6.8 Rehabilitation Program Planning and development
- Procedure: Return to Work, ANUP\_017614, v2, effective 15/3/18, rev 15/3/21
- 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 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**

##### **Evidence:**

- Rehabilitation Manual, v5.0, approved 21/12/18, review 21/12/19
- File audit

##### **Comment:**

Determinations made under section 36 and section 37 met the requirements of the SRC Act.

File audit demonstrated that all determinations in the audit period were in writing and gave adequate reasons and were signed by the delegate prior to commencement of the rehabilitation program or section 36 assessment.

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 confirmed compliance with this criterion.

### 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, v5.0, approved 21/12/18, review 21/12/19 - 8 Employee Non-Compliance with Rehabilitation
- File audit

##### Comment:

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 (detailed in section 8 of the manual).

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.

There were no files in the sample audited where non-compliance had occurred.

### 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, v5.0, approved 21/12/18, review 21/12/19 - 8 Employee Non-Compliance with Rehabilitation
- Memo dated 12/12/18 to Professor Brian Schmidt, Vice-Chancellor, from Dr Nadine White, Director HR regarding ANU Rehabilitation Authority Delegations, signed 18/12/18
- File audit

##### Comment:

Comcare November 2018 audit identified the following observation:

"The ANU has not reviewed all associated documents to reflect the proposed amended delegations."

These documents include:

- 'The Delegation Extract and Report. This will require amendment to reflect the changes in the delegation instrument.
- Page 75 of the Rehabilitation Manual. This will require review to reflect the changes in the delegation instrument. The Rehabilitation Manual currently states that cases

which are complex or have a conflict of interest may be referred to Comcare's reconsideration team as per the Deed of Agreement arrangements.

- The deed of agreement for claims managed services and the provision of other associated specialised services. Schedule 3 – Fees and Expenses (Time and Materials) page 103 (last dot point) states that 'reconsideration management services provided by Comcare's Disputed Claims Team, includes ...an employer's decision in relation to rehabilitation of a worker'."

These actions have been undertaken by ANU. A revised delegation was signed by Professor Brian Schmidt on 18/12/18.

The Rehabilitation Manual has been updated to reflect the 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.

There were no files in the sample audited where a reconsideration or reconsideration own motion had occurred.

## **CONFIDENTIALITY**

### **Criterion 3.12**

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

#### **Finding: Conformance**

##### **Evidence:**

- Rehabilitation Manual, v5.0, approved 21/12/18, review 21/12/19
- ANU privacy Policy. ANUP\_010007. Version 6
- File audit

##### **Comment:**

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.

Section 9 of the Rehabilitation Manual provides guidance on ANU records Management.

No foreign documentation was identified in the files provided.

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:**

- ANU Performance Report, Quarter 1 2018-19

- Rehabilitation Manual, v5.0, approved 21/12/18, review 21/12/19 - 9 ANU Records Management
- File audit

**Comment:**

ANU largely maintains its Rehabilitation Files on FigTree. A back up of the files is also stored on the WEG teams shared drive.

This audit was undertaken by reviewing the Figtree files only.

The Figtree electronic file management system commenced on 1/7/17 and full transition to Figtree is expected by 1 July 2019. Figtree can be accessed through the university's webpage. Rehabilitation files are created and accessed through the unique incident number and claim number. Rehabilitation file documents are stored under the case notes section within Figtree and identified under Injury Management.

Section 9 of the Rehabilitation Manual provides guidance on ANU records Management.

The indexing of documents and protection from deletion are inherent features of the Figtree electronic file management. All documents uploaded are identified with a user-id and a date and time stamp. Any changes to those documents are electronically recorded.

Of the 16 files applicable to this criterion, file audit found 1 individual exceptions.

Overall, file audit confirmed compliance with this criterion.

## 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:**

- HR Division 2018 Business Plan
- Work Environment Group Business Plan 2019 (Draft)
- Meetings scheduled with claims delegates to conduct case reviews, 2018
- Work Environment Group, Workers Compensation Status Report, Quarter 2, 1 January - 30 June 2018
- Work Health and Safety Council Report (draft template)
- Work Health and Safety Council Report, for the period 1 January - 31 August 2018
- ANU Strategic Plan 2017 - 2021

**Comment:**

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:

- Quarterly review of WEG deliverables as detailed on WEG operational plan
- Quarterly reporting of safety and rehabilitation progress to the Chief Operating Officer (COO)
- Quarterly reporting to the WHS University Committee Meeting

#### **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:**

- Rehabilitation Manual, v5.0, approved 21/12/18, review 21/12/19 - 7.4 Review Meetings - Workplace Rehabilitation Providers (WRPs)
- Meetings scheduled (recurring monthly) various, 2018
- Service Proposal For the provision of Health Surveillance/Monitoring and Occupational Health Services, Prepared for Australia National University April 2017
- WRP SLA for the provision of workplace rehabilitation provider services between The ANU and APM, signed 6/11/18
- WRP SLA for the provision of workplace rehabilitation provider services between The ANU and Rehabilitation Services, signed 14/11/18
- Email 24/7/18 from Lucy Ochieng to Julia Hethorn regarding initial contacts for rehabilitation case
- Emails in discussion with WRP regarding file management progress, 2018
- Workplace Rehabilitation Provider Internal Audit (template)
- Workplace Rehabilitation Providers - initial referral email including standard of service
- Internal file and case review examples, 2018
- File audit

##### **Comment:**

Comcare's November 18 audit reported the following observation:

"The ANU has not developed a structured approach to monitoring WRPs against the SLAs." ANU have undertaken a number of initiatives to develop and implement a structured approach to monitoring WRP performance. These include:

- Update to Rehabilitation Manual to include the monitoring of WRP performance.
- Creation of templates.
- Updates to Service Level agreements
- Development of WRP audit tool
- Inclusion of WRP monitoring in WEG business Plan
- Additional reporting to executive.

File review confirmed regular reporting, feedback and consultation on individual rehabilitation cases, some with written monthly reports on file. Numerous emails and file notes on the file also demonstrated the active monitoring of the rehabilitation providers' performance in terms of quality of service delivery, costs, progress reports and outcomes.

File audit confirmed compliance with this criterion.

## 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:**

- Appendix 15: Individual case file audit (template)
- Procedure: Work health and safety audit, ANUP\_015807, v3, effective 1/7/17, rev 1/7/20
- WHS ANU Audit Schedule 2018-20
- Rehabilitation Management System Audit Service Level Agreement - Administrative Guidelines for the conduct of audits at the ANU, v2.0, approved 1/3/18, rev 1/3/19
- SLA: Letter of engagement with BRM Risk Management, 18/6/18

The conditions of licence require ANU conduct annual internal audits of their rehabilitation management system.

The Audit Procedure requires that audits are performed by competent personnel as well as the requirement to develop corrective action plans to address deficiencies identified at audit.

An annual external audit schedule and service level agreement with BRM Risk Management has been developed.

### 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:**

- RMS Audit Report, 13 - 15 November 2018, completed by Comcare
- RMS Audit Report, 7 - 8 March 2018, completed by BRM
- Email 10/1/19 from Ingrid Krauss to Comcare forwarding ANU's RMS Corrective Action Plan 2018
- Rehabilitation Management System Corrective Action Plan 2018 - 2019
- SRC Act Self-Insurance Claims Management System Transition Plan, v16.0, review 1/9/18

**Comment:**

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

A corrective action plan was developed following Comcare's audit in November 2018. The Vice-Chancellor was advised of the outcomes of the November 2018 audit and the corrective actions.

Audit outcomes are reported at University Council, Chief Operating Officer, and WHS University Committee meetings.

**Criterion 4.5**

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

**Finding: Conformance**

**Evidence:**

- ANU intranet page

**Comment:**

ANU communicates the outcomes and results of rehabilitation management system audits to its employees. This is done via ANU's intranet and through a range of staff committee meetings, including WHS Policy Committee meetings, HR leader Forums, and Technical and Advisory Committees.

**Criterion 4.6**

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

**Finding: Conformance**

**Evidence:**

- Certificate of Compliance with the Guidelines for Rehabilitation Authorities 2012, signed by Vice-Chancellor 13/4/18
- Licensee forums and meetings with Comcare regarding transition plan monitoring

**Comment:**

Comcare approved ANU to be a Licensee from 1 July 2018. Part of this process required regular documentation to be provided to Comcare to ensure a fully compliant system. ANU is required to report unit record data of claims activity on a monthly basis. The Figtree system is the source of data that is provided to Comcare's Data Warehouse.

## **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:**

- RMS Audit Report, 13 - 15 November 2018, completed by Comcare
- RMS Audit Report, 7 - 8 March 2018, completed by BRM
- Email 10/1/19 from Ingrid Krauss to Comcare forwarding ANU's RMS Corrective Action Plan 2018
- Rehabilitation Management System Corrective Action Plan 2018 - 2019
- SRC Act Self-Insurance Claims Management System Transition Plan, v16.0, review 1/9/18
- Figtree Issues Log, 2017-18
- Licensee forums and meetings with Comcare regarding transition plan monitoring
- Letter 4/12/17 from Comcare regarding Notice of grant of a licence to the Australian National University under Part VIII of the Safety, Rehabilitation and Compensation Act 1988 (SRC Act)
- Rehabilitation Manual, v5.0, approved 21/12/18, review 21/12/19
- Procedure: Management of Non-Work Related Injury and Illness, ANUP\_000683, v6, effective 12/7/11, rev 30/9/15
- Procedure: Return to Work, ANUP\_017614, v2, effective 15/3/18, rev 15/3/21

**Comment:**

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

A number of policy documents have been reviewed and updated including the Policy: Rehabilitation and Compensation; the development and implementation of a Return to Work Procedure and a revision of the Early Intervention Assistance guideline document. Following the Comcare November 2018 audit findings, ANU updated the rehabilitation delegation schedule, revised the WEG business plan, updated the RMS risk register, implemented SLA's with WRP's, and developed an internal WRP audit tool.

Additional rehabilitation performance measures have been added to the WEG Business Plan 2019 and there have been further updates to the rehabilitation manual, detailing standardised operating procedures for injury management services at the ANU, updates to the rehabilitation reconsideration process and WRP performance monitoring.

Staff development has continued with the provision of training, fortnightly case reviews, development of training for ANU supervisors including the development of a user guide and coaching framework. Performance outcomes of rehabilitation management System are monitored at several levels within the University and is detailed throughout this report, through regular monthly and quarterly reporting mechanisms from University Council meetings, to various committee meetings and other staff forums.