

**Australian National University**

**Claims Management System Audit**

**April 2019**

**Final Report**

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## Audit Scope

**Organisation**

The Australian National University (the ANU)

**Site/Workplace**

Chancellery Building, East Road Acton, ACT

**Scope of Audit**

The audit examined the ANU's claims management systems, processes and outcomes to validate that the ANU is meeting its license conditions and complying with the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act).

The period of audit was 1 July 2018 (licence commencement) to 1 April 2019.

17 files were examined by the auditor. These files were randomly selected from a list of all claims where some activity had occurred during the audit period.

The scope of the audit was limited to the requirements of Comcare's Claims Management System Audit Tool July 2014<sup>1</sup>. the tool was developed by Comcare for determining authorities.

**Audit Boundary**

The audit did not assess the adequacy of system controls within and surrounding the ANU's claims and rehabilitation management information system (Figtree) or other Corporate System/s (eg HRMIS/FMIS); or claim estimates.

**Audit Approach**

The audit included the following approaches:

- Identification and assessment of all relevant policies and procedures as they relate to claims management and any other relevant supporting documentation;
- An interview with personnel with claims management responsibilities (including claims managers).
- Detailed testing of 17 claim files.

Overall audit findings are based on the identification of issues that are considered to be systemic<sup>2</sup> rather than isolated incidents.

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<sup>1</sup> Comcare PUB114 Published 1 July 2014.

<sup>2</sup> The auditor spoke to a member of Comcare's Authorisation and audit team to moderate some of the audit findings.

**Audit Criteria**

This audit assessed the claims management system against 31 criteria grouped within five elements:

1. Commitment and Corporate Governance (3 criteria);
2. Planning (5 criteria);
3. Implementation (17 criteria);
4. Measurement and evaluation (5 criteria); and
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 ANU has documented procedures in place however there are no cases to test that the ANU 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 licensee.

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** has been made. These findings, while representing a non-fulfilment of a requirement, are recognised as being of lower risk to the organisation.

**Date(s) of audit**

1 to 5 April 2019 (onsite)

**Auditor/s**

Nicola Sheehan, Niche Government Consulting and Assurance

**Client contacts:**

Jessica Sakul, Senior Account Manager Self Insurance, Scheme Management Group.

**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.

**Acknowledgement:**

Niche Consulting wishes to acknowledge the cooperation and assistance provided by the ANU management and staff and thank them for their contribution to the audit process.

## EXECUTIVE SUMMARY

The ANU holds a self-insurance licence under the Safety, Rehabilitation and Compensation Act, 1988.

The purpose of the audit was to examine the ANU's conformance and compliance in claims within a management systems framework and within the conditions of licence and the requirements of the Safety, Rehabilitation and Compensation Act, 1988. (SRC Act).

The criteria applied were from the Safety, Rehabilitation and Compensation Commission's Claims Audit Tool.

The ANU's Claims Management System (CMS) was last audited in January 2019.

Of the 30 criteria tested at this audit there were 25 findings of conformance, 1 finding of non-conformance and 1 finding of conformance with observation. Criteria 3.11 (Transitional Provisions) is not applicable to the ANU and criteria 3.10, 3.13, 3.14 and 3.15 were not able to be verified due to lack of relevant activity on the files examined.

The audit found that the ANU is performing in accordance with the SRC Act and its self-insurance licence conditions.

The ANU has achieved a 96 per cent conformance rating for its 2019 post-licence Claims Management System audit.

The ANU's strong performance in this audit is reflective of its documented commitment to:

- ensuring claims are determined promptly and all stakeholders are informed of determinations in a clear manner and to be fully compliant with the requirements of the SRC Act);
- assisting an external claims management provider to manage claims in an equitable, timely and efficient manner, consistent with applicable legislation and self-insurance requirements.
- providing employees with relevant information about claims management including their rights and obligations;
- maintaining confidentiality of personal information in accordance with applicable legislation; and

- engaging appropriately qualified experts, both internally and externally.

*Strengths*

The ANU has established and implemented strong processes for communicating with employees about the status of their claims including calling employees prior to making adverse decisions. Regular communication between claims officers and rehabilitation case managers was also evident in case notes on Figtree;

The ANU has a comprehensive Claims Manual and an extensive suite of template letters, checklists and calculators;

The ANU has an effective internal audit program which meant that most of the issues identified during the course of this audit had already been identified and were being actioned prior to the commencement of this audit.

*Weaknesses*

The Figtree system has a range of limitations of functionality for records management, which has resulted in some claim records being stored in a shared drive; and

Claim determinations do not always contain adequate reasons.

**Non-Conformances**

The audit made one finding of non-conformance:

Criterion	Non-conformance
3.17	1. The audit identified the following deficiencies under this criterion: <ul style="list-style-type: none"> <li>Claim files stored in Figtree are incomplete; and</li> <li>personal claim records are being stored in WEG’s local shared drive; the process/protocol for storing documents on the shared drive and the transfer of documentation to the ERMS when claims are closed are not documented in the ANU’s Claims Manual.</li> </ul>

**Observations**

The audit made 1 observation:

Criterion	Observation
3.5	1. The ANU is not always compliant with section 61 of the SRC Act because some determinations do not always contain adequate reasons.

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

	Number of criteria	% of assessed criteria

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Conformance	25	96%
Non-Conformance	1	4%
Not able to Verify	4	
Not Applicable	1	

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

The auditor invites the ANU to discuss any aspect of this audit with the auditor.

**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
Documented procedures	2.2	Conformance
Planning for legislative compliance	2.3	Conformance
Setting objectives and targets	2.4	Conformance
Plans to achieve objectives and targets	2.5	Conformance
<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
Determinations in accordance with the Act	3.5	Conformance with Observation
Powers under the Act	3.6	Conformance
Initial liability	3.7	Conformance
Determining incapacity	3.8	Conformance
Determining benefits	3.9	Conformance
Determining permanent impairment	3.10	Not able to Verify
Transitional provisions	3.11	Not Applicable
Reconsiderations	3.12	Conformance
Reasonable opportunity	3.13	Not able to Verify
Claim reviews	3.14	Not able to Verify



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Surveillance	3.15	Not able to Verify
Privacy and confidentiality	3.16	Conformance
Reporting, records, documentation	3.17	Non Conformance
<b>4. Measurement and evaluation</b>		
Monitoring planned objectives	4.1	Conformance
Internal audits	4.2	Conformance
Outcomes of audits are actioned, reviewed	4.3	Conformance
Communicating audit results	4.4	Conformance
Providing reports to Comcare and Commission as requested	4.5	Conformance
<b>5. Review and improvement</b>		
Continuous improvement	5.1	Conformance

## ELEMENT 1: COMMITMENT AND CORPORATE GOVERNANCE

### 1.1 Documented Commitment

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

**Finding:** Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p>
<b>Comment:</b>	<p>The ANU's Policy – Rehabilitation and Compensation, effective 4 June 2018 was approved by the Vice Chancellor. It contains a commitment to the CMS through a documented commitment by senior executive. The Policy covers WHS , RMS and CMS. The CMS component contains a commitment to ensuring claims:</p> <ul style="list-style-type: none"> <li>• are determined promptly and all stakeholders are informed of determinations in a clear manner and to be fully compliant with the requirements of the Safety Rehabilitation and Compensation Act 1988 (Cth) (SRC Act);</li> <li>• assisting an external claims management provider to manage claims in an equitable, timely and efficient manner, consistent with applicable legislation and self-insurance requirements. This will be achieved by:</li> <li>• defining, documenting and communicating the areas of accountability and responsibility for executive, senior managers and employees involved in the claims management process;</li> <li>• providing our people with relevant information about claims management including their rights and obligations;</li> <li>• maintaining confidentiality of personal information in accordance with applicable legislation;</li> <li>• engaging appropriately qualified experts, both internally and externally.</li> </ul>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

### 1.2 Internal and external accountability

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

**Finding:** Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p>
<b>Comment:</b>	<p><i>Internal accountability</i></p> <p>The Position Descriptions of personnel with responsibility for claims management document their accountabilities.</p> <ul style="list-style-type: none"> <li>• The ANU's Policy – Rehabilitation and Compensation, contains a commitment to defining, documenting and communicating the areas of accountability and responsibility for executive, senior managers and employees involved in the claims management process. The ANU has an audit work schedule and the results of audits are communicated to the executive. Comcare provides the ANU with quarterly progress reports as per the Deed. Reports contain progress of work against milestones, issues and risk logs which must be prepared and maintained.</li> <li>• The ANU's WHS committee agenda 14 August 2018 demonstrated that the ANU's transition to self insurance was an agenda item.</li> </ul> <p>The Work Environment Group (WEG) Workers' compensation status report (as at 31 December 2018). contains a summary of claims management strategies.</p> <p>The WEG organisation Structure (as at July 2018) demonstrates that the Manager, Injury and Claims has responsibility for the ANU's claims management function. This position reports to the Associate Director WEG. The audit was advised that this position reports to the vice-chancellor via the Director HR and the Chief Operating Officer (COO).</p> <p>The WEG provides an annual report to the Work Health and Safety Council. The report for the period 1 January to 31 December 2018 provided the council with an overview of its claims performance for 2018 which included performance against Comcare's Licensee KPIs (LKPIs) and targets. The audit was advised that the ANU's goal is to meet 5/7 LKPIs.</p> <p><i>External accountability</i></p> <p>The ANU has submitted to Comcare its Licensee Compliance and Performance Improvement Annual</p>

	<p>Report for the period 1 July 2018-28 February 2019.</p> <p>The ANU has a Deed with Comcare for Claims Managed Services which documents the responsibilities and service standards for both parties. The ANU provided Comcare with a copy its internal audit report from the internal audit conducted by BRM in February 2019. The ANU provides quarterly reports to Comcare as per its deed with Comcare.</p> <p>The ANU has agreements in place for the engagement of audit, legal and actuarial services.</p>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

### 1.3 Identify, Assess and Control Risk

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

**Finding:** Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p>
<b>Comment:</b>	<p>The ANU has a number of mechanisms for identifying, assessing and managing risks to its CMS:</p> <ul style="list-style-type: none"> <li>• The ANU has identified high-risk determinations that must undergo quality assurance by a team leader.</li> <li>• internal file checklists are used for quality assurance (QA) and claim review processes; and internal and external audits of its CMS;</li> </ul> <p>Quarterly progress reports from Comcare attach a risk log which must be prepared and maintained as per clause 9.6 of the Deed.</p> <p>The ANU has a Claims Management System Risk Management Plan that was most recently reviewed and approved on 4 January 2019.</p>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

## ELEMENT 2: PLANNING

### 2.1 Delegation Schedule

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

**Finding:** Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p> <p><b><u>File Audit</u></b></p> <p>A sample of 17 files was audited, no departures from this criterion were identified.</p>
<b>Comment:</b>	<p>The ANU has Workers Compensation Delegations pursuant to 108H of the SRC Act signed by Professor Brian Schmidt Chancellor of the ANU on 14 November 2018. Powers under the SRC Act have been delegated to claims personnel listed in schedule 9 of the ANU’s Deed with Comcare.</p> <p>Table 2 in Schedule B of the Deed sets financial limitations for each payment type.</p>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

### 2.2 Documented Procedures

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

**Finding:** Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p>
<b>Comment:</b>	<p>The Audit found that the ANU has documented procedures for paying compensation to employees, providers of medical treatment and other recipients. These are contained in the ANU Claims Management</p>

	<p>Manual.</p> <p>Procedures for paying compensation to injured employees.</p> <p>Procedures for paying compensation to providers of medical treatment and procedures for paying compensation to dependants of deceased employees and other recipients.</p> <p>The ANU has a suite of template letters some of which are relevant to this criterion:</p> <ul style="list-style-type: none"> <li>• Accept/decline benefits under section 16;</li> <li>• Accept aids and appliances; and</li> <li>• Accept/decline benefits under section 16; and</li> <li>• Accept/decline benefits under sections 29 and 39.</li> </ul>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

### 2.3 Planning for legislative compliance

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

**Finding:** Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p>
<b>Comment:</b>	<p>The ANU's Policy – Rehabilitation and Compensation, contains a commitment to ensuring claim determinations are fully compliant with the requirements of the Safety Rehabilitation and Compensation Act 1988.</p> <p>The ANU has a suite of template letters, checklists and calculators that facilitate consistency and compliance with the SRC Act.</p> <p>The ANU's Policy – Rehabilitation and Compensation, contains a commitment to ensuring claims: are determined promptly and all stakeholders are informed of determinations in a clear manner and to be fully compliant with the requirements of the Safety Rehabilitation and Compensation Act 1988.</p> <p>The Position Descriptions of personnel with responsibility for claims management contain a requirement for legislative compliance.</p> <p>The ANU has identified high risk determinations that</p>

	must undergo quality assurance by a team leader.
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

## 2.4 Setting objectives and targets

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

**Finding:** Conformance

<b>Evidence</b>	<b><u>Documentary Evidence</u></b> The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.
<b>Comment:</b>	The Position Descriptions of personnel with responsibility for claims management document outcomes required by the position.  Schedule 2 of the Deed between the ANU and Comcare for claims Management services (version 2) contains key performance indicators for the ANU's CMS.  The ANU's HR Division 2019 Business Plan does not include claims management in any of its services or initiatives. The plan does, however, contain Comcare's LKPIs as performance measures for prevention and rehabilitation key initiatives.  Table 6 of the WEG Business Plan 2019 contains Claims Management Initiatives and outcome measures.
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

## 2.5 Plans to achieve objectives and targets

The determining authority establishes plans to: achieve its objectives and targets; promote continuous improvement; and provide for effective claims management arrangements.

**Finding:** Conformance

<b>Evidence</b>	<b><u>Documentary Evidence</u></b> The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each
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	document.
<b>Comment:</b>	<p>The Audit found that the ANU has established plans to achieve its objectives and targets; promote continuous improvement; and provide for effective claims management arrangements. These include:</p> <ul style="list-style-type: none"> <li>• HR Division 2019 Business Plan;</li> <li>• WEG Business Plan 2019; and</li> <li>• CMS Corrective Action Plan 2018-2019.</li> </ul>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

## ELEMENT 3: IMPLEMENTATION

### 3.1 Adequate Resources

The determining authority shall identify and provide the resources required to implement, maintain, and improve its claims management programs. Resources include human resources and specialised skills, technology and financial resources

**Finding:** Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p>
<b>Comment:</b>	<p>The WEG organisation Structure (as at July 2018) demonstrates that the ANU has 4 personnel with responsibility for claims management. This includes 2 Comcare Claims Managers, a claims management senior consultant and the Manager Injury and Claims.</p> <p>Table 6 of the WEG Business Plan 2019 contains Claims Management Initiatives one of which is “review workload levels and workforce profiling to ensure correct staffing levels are in place for claims management services.</p>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

### 3.2 Communication – Relevant Stakeholder



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Communication is a key element of successful claims management outcomes and all stakeholders must understand their role and responsibilities in the claims management process.

The determining authority shall define, document and communicate the areas of accountability and responsibility of all personnel involved in the claim’s management function. Where service providers are involved, these areas of accountability and responsibility shall also be clarified.

**Finding:** Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p> <p><b><u>File Audit</u></b></p> <p>A sample of 17 files was audited. No departures from this criterion were identified.</p>
<b>Comment:</b>	<p>The ANU’s Policy – Rehabilitation and Compensation, contains a commitment to ensuring:</p> <ul style="list-style-type: none"> <li>• all stakeholders are informed of determinations in a clear manner; and</li> <li>• Providing our people with relevant information about claims management.</li> </ul> <p>The ANU has a suite of template letters some of which are relevant to this criterion.</p> <p>The Position Descriptions of personnel with responsibility for claims management documents their responsibilities.</p> <p>Table 6 of the WEG Business Plan 2019 contains Claims Management Initiatives one of which is “ensure that information resources and website locations are kept updated with changes to ensure that relevant stakeholders are kept informed of the claims management process under self-insurance”.</p>
<b>Observations:</b>	n/a
<b>Non-Conformances:</b>	n/a

### 3.3 Employees are aware of rights

The determining authority communicates relevant information regarding the claims management process

**Finding:** Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p> <p><b><u>File Audit</u></b></p> <p>A sample of 17 files was audited, all determinations contain a paragraph notifying employees of their right to request a reconsideration if they are dissatisfied with a decision.</p> <p>File notes and correspondence demonstrated that employees are notified of their rights and responsibilities through receipt of a claims pack. Employees are also kept informed of the status of their claims throughout the claim process. This includes initial claim determination, benefit determination and reconsiderations.</p> <p>No Departures from this criterion were identified.</p>
<b>Comment:</b>	<p>The ANU's Policy – Rehabilitation and Compensation contains a commitment to ensuring all stakeholders are informed of determinations in a clear manner.</p> <p>The ANU has a claims pack that is provided to injured employees who have indicated that they would like to lodge a workers' compensation claim. The pack contains:</p> <ul style="list-style-type: none"> <li>• ANU – Workers Compensation Claim Form;</li> <li>• ANU – Authority to collect, use and disclose personal information;</li> <li>• ANU Frequently Asked Questions;</li> <li>• Medical Certificate of Capacity;</li> <li>• ANU – Claim for Time Off Work Form; and</li> <li>• ANU – medical services Claim Form.</li> </ul>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

### 3.4 Training and Competency

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

**Finding:** Conformance.

<b>Evidence</b>	<b><u>Documentary Evidence</u></b>
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	The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.
<b>Comment:</b>	<p>The ANU's Policy – Rehabilitation and Compensation contains a commitment to engaging appropriately qualified experts, both internally and externally. The Position Descriptions of claims personnel document requisite qualifications, experience and capabilities. The audit was provided with the following documents as evidence for this criterion:</p> <ul style="list-style-type: none"> <li>• Comcare's CALM Capability Framework;</li> <li>• Comcare's Claims Manager Competency Workbook; and</li> <li>• Comcare's CALM Legislative Training matrix.</li> </ul> <p>these documents demonstrate that the ANU has identified training requirements for claims personnel. The audit was also provided with adequate evidence to verify that claims officers have attended relevant training.</p>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

### 3.5 Determinations in accordance with the Act

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

**Finding:** Conformance with observation

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p> <p><b><u>File Audit</u></b></p> <p>A sample of 17 files was audited. Departures from this criterion were identified. on all the files examined.</p> <p><b><u>Refer to Individual File Findings</u></b></p>
<b>Comment:</b>	<p>The ANU's Policy – Rehabilitation and Compensation contains a commitment to ensuring claims are determined promptly in an equitable, timely and efficient manner, consistent with applicable legislation and self-insurance requirements. and employees are informed of determinations in a clear manner to be fully compliant with the requirements of the Safety Rehabilitation and Compensation Act 1988.</p> <p>The ANU has a suite of templates for determination decisions which facilitate compliance with the</p>

	<p>legislation when making decisions on claims.</p> <p>File audit demonstrated that the ANU is not compliant with section 61(1)(a) and(b) of the SRC Act when making determinations by not including a notice with determinations setting out:</p> <ul style="list-style-type: none"> <li>• The terms of the determination; and</li> <li>• the reasons for the determination.</li> </ul> <p>The audit acknowledges that the ANU had identified these deficiencies prior to the commencement of this audit during an external audit of its CMS conducted by BRM in January 2019 and the ANU is addressing this issue in the CMS Corrective Action Plan 2018-2019. The audit therefore is making an observation for this criterion rather than a finding of non-conformance.</p>
<b>Observation 1:</b>	The ANU is not always compliant with section 61 of the SRC Act because some determinations do not always contain adequate reasons.
<b>Non-conformances:</b>	n/a

### 3.6 Powers under the Act

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

**Finding:** Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p> <p><b><u>File Audit</u></b></p> <p>A sample of 17 files was audited, the ANU had exercised its powers under the SRC Act on 4 of the files examined. This was predominantly the use of section 57 for arranging medical examinations. No departures from this criterion were identified.</p>
<b>Comment:</b>	<p>The ANU has a suite of template letters some of which are relevant to this criterion:</p> <ul style="list-style-type: none"> <li>• Section 58 information requests</li> </ul> <p>The ANU Claims Management Manual (page 42 has a comprehensive procedure for arranging a medical examination.</p>
<b>Observations:</b>	n/a

<b>Non-conformances:</b>	n/a
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### 3.7 Initial Liability

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

**Finding:** Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p> <p><b><u>File Audit</u></b></p> <p>A sample of 17 files was audited. 10 of the files examined had initial liability determined during the audit period. There were no claims for death, loss or damage to property in the sample. 2 departures from this criterion were identified.</p> <p><u>Refer to Individual File Findings</u></p>
<b>Comment:</b>	<p>The ANU's Claims Management Manual (page 41 has a procedure for determining initial liability under section 14.</p> <p>The ANU also has a suite of template letters some of which are relevant to this criterion:</p> <ul style="list-style-type: none"> <li>• Section 14 decline liability</li> <li>• Accept liability</li> <li>• Decline liability secondary condition</li> <li>• Section 14 Determination deceased</li> <li>• Criterion 3.7 – Initial liability</li> </ul>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

### 3.8 Determining Incapacity

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

**Finding:** Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each</p>
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	document.  <b><u>File Audit</u></b> A sample of 17 files was audited, 6 of the files examined contained incapacity determinations made during the audit period. No departures from this criterion were identified.
<b>Comment:</b>	There were insufficient records filed in Figtree to test this criterion when examining files on Figtree during fieldwork because section 8 and 19 calculators and relevant back ground documentation are held on the shared g:drive and not Figtree. The auditor requested documents stored in the g:drive in order to test whether section 8 and section 19 determinations comply with the provisions of the SRC Act. No significant departures from this criterion were identified.  The ANU's Claims Management Manual contains detailed procedures for determining normal weekly earnings under section 8 and incapacity benefits under section 19.  The ANU has a suite of template letters and calculators some of which are relevant to this criterion: Determination of incapacity-0-35 weeks; Section 19 Determination of incapacity 35-44 weeks; Section 19 +45 weeks; Section 19 – Determination of ability to earn; Section 19 Calculator; and Employee Incapacity Calculation Sheet.
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

### 3.9 Determining Benefits

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

**Finding:** Conformance

<b>Evidence</b>	<b><u>Documentary Evidence</u></b> The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.  <b><u>File Audit</u></b>
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	<p>A sample of 17 files was audited, 6 of the files examined had benefits determined during the audit period. Only one departure from this criterion was identified.</p> <p><u>Refer to Individual File Findings</u></p>
<b>Comment:</b>	<p>The ANU has a suite of template letters, forms some of which are relevant to this criterion:</p> <ul style="list-style-type: none"> <li>• Medical Services Claim Form</li> <li>• Section 16 accept treatment</li> <li>• Decline invoice</li> <li>• Accept aids and appliances</li> <li>• Accept/decline benefits under section 16</li> <li>• Accept/decline benefits under section 29 and 39</li> <li>• Section 29 – acknowledging and determining household help</li> </ul> <p>Accept/decline benefits under section 16</p> <ul style="list-style-type: none"> <li>• Accept/decline benefits under section 29 and 39</li> <li>• medical Services Claim Form.</li> </ul>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

### 3.10 Determining Permanent Impairment

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

**Finding:** Not able to verify

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p> <p><b><u>File Audit</u></b></p> <p>A sample of 17 files was audited, none of the files examined had permanent impairment determined in the audit period, therefore conformance with this criterion could not be verified.</p>
<b>Comment:</b>	<p>The ANU's Claims Management Manual (page 542-564) contains detailed procedures for determining permanent impairment and non-economic loss.</p> <p>The ANU has a suite of template letters, calculators and forms some of which are relevant to this criterion:</p>

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	<ul style="list-style-type: none"> <li>• Section 45 Election Form</li> <li>• Section 24 – PI Rejected</li> </ul>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

### 3.12 Reconsiderations

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

**Finding:** Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p> <p><b><u>File Audit</u></b></p> <p>A sample of 17 files was audited, five of the files examined contained a reconsideration decision. one departure from this criterion was identified.</p> <p><b><u>Refer to Individual File Findings</u></b></p>
<b>Comment:</b>	<p>The ANU’s Claims Management Manual (page 652) contains detailed procedures for undertaking reconsiderations. The ANU also has a suite of template letters some of which are relevant to this criterion:</p> <ul style="list-style-type: none"> <li>• Section 62 – Reconsideration of own motion.</li> </ul>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

### 3.13 Reasonable Opportunity

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

**Finding:** Not able to Verify



<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p> <p><b><u>File Audit</u></b></p> <p>A sample of 17 files was audited, none of the files examined had ongoing liability assessed or reviewed during the audit period. Therefore, compliance with this criterion is not able to be verified.</p>
<b>Comment:</b>	The ANU's Claims Management Manual (page 583) contains detailed procedures for claim reviews.
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

### 3.14 Claim Reviews

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

**Finding:** Not able to Verify

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p> <p><b><u>File Audit</u></b></p> <p>A sample of 17 files was audited, none of the files examined had been subject to a claim review during the audit period. Therefore, compliance with this criterion is not able to be verified.</p>
<b>Comment:</b>	The ANU's Claims Management Manual (page 583) contains detailed procedures for claim reviews including natural justice (page 434).
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

### 3.15 Surveillance

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

**Finding:** Not able to Verify

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p> <p><b><u>File Audit</u></b></p> <p>A sample of 17 files was audited, none of the files examined had been subject to surveillance during the audit period. Therefore, compliance with this criterion could not be verified.</p>
<b>Comment:</b>	<p>The ANU has a Surveillance Procedure which states that authority to approve surveillance must be approved by the Director, HR. It has detailed instructions on the manner in which covert surveillance will be conducted and the requirement that any operative undertaking covert surveillance has been issued with and has agreed to written instructions on the policy.</p>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

### 3.16 Privacy and confidentiality

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

**Finding:** Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p> <p><b><u>File Audit</u></b></p> <p>A sample of 17 files was audited. No departures from this criterion were identified.</p>
<b>Comment:</b>	<p>The ANU's Policy – Rehabilitation and Compensation contains a commitment to maintaining confidentiality of personal information in accordance with applicable legislation.</p> <p>Part 16.4 of the Deed of Agreement between the ANU and Comcare for claims Management services (version 2) contains the obligations of Comcare in relation to Privacy including:</p> <p>Compliance with the requirements of the Protective</p>

	Security Policy Framework and the Information Security Manual; compliance with the security procedures for the protection of Security of Classified Information and Material relating to the Services.
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

### 3.17 Reporting, Records, documentation

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

**Finding:** Non-Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p> <p><b><u>File Audit</u></b></p> <p>A sample of 17 files was audited, the audit identified departures from this criterion on all the files examined.</p>
<b>Comment:</b>	<p>Figtree is the ANU’s claims management system and the official claim file for the retention of workers’ compensation cases and should contain all claim documentation. The audit found, however, that some claim records are stored in Figtree and others in a less secure shared drive. The audit was advised that this practice is necessary due to the lack of a document management module within Figtree that would allow for all documentation to be easily provided externally when necessary (for example in the case of a request for a file under section 59 of the SRC Act).The audit acknowledges that this limitation with Figtree was identified prior to the commencement of this audit and the ANU has held discussions with Figtree in regards to creating a document storage module, to which they advised this is underway, with the estimated time for completion as yet undetermined.</p> <p>The audit acknowledges that specific evidence required for testing section 8 and section 19 determinations was readily accessible from the shared drive and provided to the auditor when requested. The audit found that storing claims documentation on a shared drive does not meet the requirements of this criterion because a shared drive does not have the</p>

	<p>capability to date or time stamp, index or track documents or protect them from deletion or modification.</p> <p>The audit was advised that the folders used in the shared drive are locked down and only accessible by staff with responsibility for the CMS. This was not verified by the auditor. The audit was advised that claim files (including records stored in the shared drive) are transferred to the ANU's ERMS once the claim file is closed. This process is not documented in the ANU's claims manual.</p>
<b>Observations:</b>	n/a
<b>Non-conformance 1</b>	<p>The audit identified the following deficiencies under this criterion:</p> <ul style="list-style-type: none"> <li>• Claim files stored in Figtree are incomplete; and</li> <li>• personal claim records are being stored in WEG's local shared drive; the process/protocol for storing documents on the shared drive and the transfer of documentation to the ERMS when claims are closed are not documented in the ANU's Claims Manual.</li> </ul>

## ELEMENT 4: MEASUREMENT AND EVALUATION

### 4.1 Monitoring planned objectives

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

**Finding:** Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p>
<b>Comment:</b>	<p>WEG has planned objective and performance measures for the ANU's CMS. Performance against these measures is reported quarterly to the senior executive, and to the Vice Chancellor through University Council meetings which are held every eight weeks. The audit was advised that claims management measures have now been integrated into existing reporting measures.</p> <p>The ANU's annual report to the Work Health and Safety Council 1 January to 31 December 2018 provided the Council with an overview of its claims'</p>

	performance for 2018. The ANU conducts Monthly reviews of claims management Licensee Key Performance Indicators (LKPIs) from Figtree as per CDW requirements.
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

#### 4.2 Internal audits

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

**Finding:** Conformance

<b>Evidence</b>	<b><u>Documentary Evidence</u></b> The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.
<b>Comment:</b>	The ANU's Audit Schedule 2018-2020 demonstrates that the ANU conducts an audit program in accordance with the requirements of the SRCC and its self-insurance licence. The ANU's CMS was audited by an external auditor (BRM) in January 2019.
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

#### 4.3 Outcomes of audits are actioned, reviewed

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

**Finding:** Conformance

<b>Evidence</b>	<b><u>Documentary Evidence</u></b> The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.
<b>Comment:</b>	The Audit found that the CMS Corrective Action Plan 2018-2019 was developed to action the outcomes of the CMS audit conducted by BRM in January 2019. The audit was advised that CMS audit results were

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	provided as an attachment to the March 2019 University Council Report for communicating to executive and as an attachment to the University WHS Committee in May 2019 for communicating to executive and staff.
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

#### 4.4 Communicating audit results

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

**Finding:** Conformance

<b>Evidence</b>	<b><u>Documentary Evidence</u></b> The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.
<b>Comment:</b>	The audit found that both BRM's audit report and corrective action plan were communicated to employees via the intranet page at link <a href="https://services.anu.edu.au/human-resources/health-safety/workers-compensation-at-anu/claims-management-system-pre-licence-audit">https://services.anu.edu.au/human-resources/health-safety/workers-compensation-at-anu/claims-management-system-pre-licence-audit</a>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

#### 4.5 Providing reports to Comcare and the Commission as requested

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

**Finding:** Conformance

<b>Evidence</b>	<b><u>Documentary Evidence</u></b> The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.
<b>Comment:</b>	As required as a condition of licence the ANU prepared and submitted to Comcare a Licensee Compliance and Performance Improvement Annual

	<p>Report for the period 1 July 2018-28 February 2019 the report was signed by Professor Brian Schmidt CEO Executive Manager on 27 March 2019.</p> <p>The audit was provided with an email from Comcare to the ANU verifying that its CDW data upload was a success.</p>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a

## ELEMENT 5: CONTINUOUS IMPROVEMENT

### 5.1 Continuous Improvement

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

**Finding:** Conformance

<b>Evidence</b>	<p><b><u>Documentary Evidence</u></b></p> <p>The audit examined the documents listed in Appendix A. The relevant criterion is recorded against each document.</p>
<b>Comment:</b>	<p>The Audit found that the ANU analyses claims management system performance outcomes against documented objectives to determine areas requiring improvement and promotes and implements continuous improvement strategies.</p> <p>Examples of continuous improvements during the audit period include:</p> <ul style="list-style-type: none"> <li>• BRM audit and corrective action plan;</li> <li>• Figtree issues log;</li> <li>• Implementation of internal audit tool;</li> <li>• Updated Figtree training;</li> <li>• updated training and resource development for claims management staff, including systems based training;</li> <li>• WEG Business Plan 2019;</li> <li>• Review and update of the key performance measurements and key business deliverables for</li> </ul>

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	<p>the CMS;</p> <ul style="list-style-type: none"> <li>• Workers compensation invoice processing enhancement discussions; and</li> <li>• Obtained legal firm capability statements and fee schedules as part of the WEG Business Plan 2019;</li> <li>• Creation of new codes to assist with financial reporting; and</li> <li>• Development of a claims strategy matrix to implement a risk rating for each claim and then prioritise actions to be taken.</li> </ul>
<b>Observations:</b>	n/a
<b>Non-conformances:</b>	n/a