

Rehabilitation Management System Corrective Action Plan 2018 - 2019

An external audit of the Rehabilitation Management System, Australian National University (ANU), was conducted on the 13-15 November 2018. The following corrective action plan addresses follow up actions to be implemented in response to observations identified in the audit report dated 7 December 2018. There were one conformances identified as part of the audit conducted.

Non-Conformance and Observation

Non-Conformance	Corrective action	Date to be Completed	Current Status	Evidence
Criterion 2.1. The rehabilitation authority has a delegation schedule, signed by the principal officer, as per section 41A of the SRC Act.				
<p><i>The ANU rehabilitation delegation instrument does not include all staff with rehabilitation responsibilities</i> The Team Leader who has rehabilitation responsibilities has no delegation under the current delegation instrument.</p>	<p>An updated rehabilitation delegation schedule was signed by the Vice Chancellor on the 14 November 2018 - including the revised roles and titles within the Work Environment Group.</p>	21/12/2018	Completed	Attachment A
	<p>There were two delegation determinations made by Justin Donley for the audit period - which need to be re-issued.</p> <ul style="list-style-type: none"> - Rehabilitation program for claim no 0000007 - Closure form for claim no 111796801 <p>These documents have now been re-issued and signed by an alternate rehabilitation delegate within the team - who held delegation for this period.</p>	21/12/2018	Completed	Attachment B
<p><i>The ANU rehabilitation delegation instrument does not reflect the current position titles.</i> The delegation instrument should reflect the correct position title, that is the Manager Injury Prevention and Rehabilitation is now referred to as MIC.</p>	<p>An updated rehabilitation delegation schedule was signed by the Vice Chancellor on the 14 November 2018 - including the revised roles and titles within the Work Environment Group.</p>	21/12/2018	Completed	Attachment A

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Non-Conformance	Corrective action	Date to be Completed	Current Status	Evidence
Criterion 2.1. The rehabilitation authority has a delegation schedule, signed by the principal officer, as per section 41A of the SRC Act.				
<i>Suspension provisions</i>				
The current wording of the rehabilitation delegation instrument essentially provides all the delegates with the power to undertake suspension activity under s36 (4) and s37 (7) for employee non-compliance. The Rehabilitation Manual provides the administrative control, detailing that the MIC is the 'suspension delegate'.	Rehabilitation manual to be updated confirming that all rehabilitation delegates have the power to issue the suspension delegation, but that this is to be actioned by any position as detailed in the rehabilitation delegation schedule, but the person enacting the suspension should be a delegate other than the person who made the s36/s37 determination.	21/12/2018	Completed	Attachment C - Section 8
<i>Reconsideration powers</i>				
The ANU has not assigned the reconsideration powers and functions under s62 of the SRC Act to an officer or employee of the ANU.				
The ANU will need to review its rehabilitation delegation instrument and ensure that the powers and functions under s62 are assigned to an officer or employee of the ANU.	An updated rehabilitation delegation schedule was provided to the Vice-Chancellor (VC) on the 12 December 2018 - revising the s62 delegation to the Manager Injury and Claims and the Associate Director Work Environment Group.	21/12/2018	Completed	Attachment D
	For an updated rehabilitation delegation schedule to be signed by the VC - including the revised s62 delegations to be assigned to an officer or employee of the ANU.	31/01/2019	Completed	Attachment D
	For the internal delegation framework to add s62 powers to specific roles only - revised internal rehabilitation delegation 186 (a) and 186 (b). To be completed once the delegation schedule is signed by the VC.	31/04/2019	Completed	

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Non-Conformance	Corrective action	Date to be Completed	Current Status	Evidence
Criterion 2.1. The rehabilitation authority has a delegation schedule, signed by the principal officer, as per section 41A of the SRC Act.				
Within the scope of this audit a request for reconsideration was made in relation to a s37 determination issued by ANU on 29 August 2018. The reconsideration decision was undertaken by the third-party claims provider; Comcare. Comcare does not have the delegation to do so.	For the reconsideration letter reference number: 48973 to be re-issued, signed by an officer of the University, for Claim No 1111279/2.	22/12/2018	Completed	Attachment E

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Observations

Observation	Corrective action	Date to be Completed	Current Status	Evidence
Criterion 1.3. The rehabilitation authority identifies, assesses and controls risks to the rehabilitation management system.				
The ANU RMS risk management plan does not include risks associated with being a self-insurer.	The ANU risk management plan has been reviewed and updated for the Claims and Rehabilitation Management Systems - with considerations for risks associated with being a self-insurer.	21/12/2018	Completed	Attachment F

Observation	Corrective action	Date to be Completed	Current Status	Evidence
Criterion 3.3. The rehabilitation authority communicates relevant information regarding the rehabilitation process to its employees including their rights and obligations.				
The University's frequently asked questions does not include information regarding s36 determinations.	For the frequently asked questions information sheet to be updated. All versions to be replaced within the Rehabilitation Manual (resource attachments) and documents / forms on the intranet page reviewed and updated.	21/12/2018	Completed	Attachment G

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Observation	Corrective action	Date to be Completed	Current Status	Evidence
Criterion 3.3. The rehabilitation authority communicates relevant information regarding the rehabilitation process to its employees including their rights and obligations.				
The notice of rights, which includes 'frequently asked questions', provides information to employees and is provided to the employee as part of the claim pack and attached to determinations. The 'frequently asked questions' only refers to determinations made under s37. If this document is provided for all rehabilitation determinations, then the ANU should review this and include reference to s36 determinations.	For the notice of rights used by the rehabilitation delegates to be updated making reference to determinations under s36. Versions to be replaced within the Rehabilitation Manual (resource attachments).	21/12/2018	Completed	Attachment C - Section 11
While the ANU has a guide to assist supervisors induct new staff there appears to be very little information provided on the rehabilitation process or access to support if injured at work.	Information guide for supervisors to be developed - providing assistance with the injury management process. To be made available on the intranet site.	15/01/2019	Completed	Attachment H
	For a supervisor coaching framework to be developed - to be used as a guide for injury management staff providing direct assistance to supervisors.	15/01/2019	Completed	Attachment I

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Observation	Corrective action	Date to be Completed	Current Status	Evidence
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]				
The ANU has not reviewed all associated documents to reflect the proposed amended delegations.				
The Delegation Extract and Report. This will require amendment to reflect the changes in the delegation instrument.	An updated rehabilitation delegation schedule was provided to the Vice-Chancellor (VC) on the 12 December 2018 - revising the s62 delegation to the Manager Injury and Claims and the Associate Director Work Environment Group.	21/12/2018	Completed	Attachment D
	For an updated rehabilitation delegation schedule to be signed by the VC - including the revised s62 delegations to be assigned to an officer or employee of the ANU.	31/01/2019	Completed	Attachment D
	For the internal delegation framework to add s62 powers to specific roles only - revised internal rehabilitation delegation 186 (a) and 186 (b). To be completed once the delegation schedule is signed by the VC.	30/04/2019	Completed	
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.	Rehabilitation manual to be updated confirming the arrangements for rehabilitation reconsiderations. The Manager Injury and Claims or the Associate Director Work Environment Group are the roles that can issue reconsideration decisions.	21/12/2018	Completed	Attachment C - Section 10.1.1.

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Observation	Corrective action	Date to be Completed	Current Status	Evidence
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]				
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’.	The Deed of Agreement is to be updated confirming the arrangements for rehabilitation reconsiderations. Review may be conducted by Comcare as part of third party arrangement, but then provided to the University delegate to issue the reconsideration decision.	15/01/2019	Completed	Attachment J - page 105 (DRAFT)
	The Deed of Agreement (revision v 2.0) Schedule 7 Change Request is to be signed by both parties (ANU and Comcare) following delegate and stakeholder final approvals.	31/05/2019	Completed	Attachment K - Signed Schedule 7 Change Request provided to Comcare (awaiting Comcare signature)

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Observation	Corrective action	Date to be Completed	Current Status	Evidence
Criterion 4.2. The rehabilitation authority monitors rehabilitation providers' performance in terms of quality of service delivery, costs, progress reports and outcomes.				
The ANU has not developed a structured approach to monitoring WRPs against the SLAs.	For the process for monitoring WRP performance to be documented in the ANU Rehabilitation Manual - following consultation with the injury management team. Process and templates are to be available in the manual.	15/01/2019	Completed	Attachment L - Section Section 7.4
	For the service level agreement for WRPs to be updated, requesting that summary performance reporting be provided at case closure for individual cases and on request as required.	15/01/2019	Completed	Attachment M
	For WRPs who have previously signed an SLA agreement for the University, and any new WRPS who have recently commenced the provision of services for the ANU, to be reissued with the revised version of the SLA (Attachment M), pending Comcare external auditor feedback requested on the updated version.	31/03/2019	Completed	Attachment N
The file review did not see evidence of a structured approach to assessing WRP performance or a review of the services against cost and relevance for each case.	For a process for tracking WRP performance for individual cases to be implemented within the injury management team - with a focus on cost and quality service provision. A WRP audit tool is to be developed.	15/01/2019	Completed	Attachment O
	For the process for monitoring WRP performance to be documented in the ANU Rehabilitation Manual - following consultation with the injury management team. Process and templates are to be available in the manual.	15/01/2019	Completed	Attachment L - Section Section 7.4

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Observation	Corrective action	Date to be Completed	Current Status	Evidence
Criterion 4.2. The rehabilitation authority monitors rehabilitation providers' performance in terms of quality of service delivery, costs, progress reports and outcomes.				
Ongoing review of performance measures is to drive Rehabilitation Management System outcomes.	For a review and update of the WEG Business Plan 2019 to detail a number of rehabilitation performance outcomes and measures that could be included to monitor performance. This can be used in conjunction with the LKPIs for rehabilitation - by providing qualitative data for measures.	15/01/2019	Completed	Attachment P
	For additional rehabilitation performance measures to be added to executive reporting for WHS - University Council Report and University WHS Committee Reporting - draft revised report to be developed.	15/01/2019	Completed	Attachment Q
	For additional rehabilitation performance measures to be added to executive reporting for WHS - University Council Report and University WHS Committee Reporting - revised reporting to commence following feedback requested from the Comcare external audit team.	28/02/2019	Completed	Attachment Q

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