



2018/2019 Comcare Licensee Audit

Australian National University

FINAL REPORT

Claims Management System Audit

Audit Date: 15 – 17 January 2019

claims

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Scope of Audit

Organisation: Australian National University ('ANU')

Site/Workplace: Work Environmental Group, Building 10B Lower Ground, East Street, Acton, Canberra, ACT

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

16 claim files were examined by the auditors. These files were randomly selected from a list of all claim files where some activity had occurred in the previous 12 months.

The audit encompassed a review of all relevant policies and procedures as they relate to claims management and any other relevant supporting documentation. An interview was also conducted with claims management staff.

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

Audit Criteria: This audit assessed the 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)
5. Review and improvement (1 criterion)

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

Conformance—indicates that the criterion has been met.

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

Not able to verify— indicates that the organisation has documented procedures in place however there are no cases to test that the organisation has followed those procedures. It is expected that this classification will only be used in limited circumstances and where applied, the reasons for the finding will be explained by the auditor.

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

Where a criterion has been met but the auditor has identified a 'once off' situation or a 'minor' deviation from the documented management system or reference criterion, an **Observation** may be

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

Date(s) of audit: 15 – 17 January 2019

Auditors: Sophie Anastasov and Fiona van Ree, BRM Risk Management Pty Ltd (“BRM”)

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 wishes to acknowledge the cooperation and assistance provided by the management and staff of Australian National University and thanks them for their contribution to the audit process.

Executive Summary

Australian National University (ANU) has held a self-insurance licence under the Safety, Rehabilitation and Compensation Act 1988 (SRC Act) since 1 July 2018. Their licence is due to expire on 30 June 2026.

ANU has partnered with and engaged Comcare as a service provider to undertake the claims management activities on its behalf.

This audit has confirmed that ANU has undertaken a significant amount of activity to implement a Claims Management System and to close out the observations previously identified in their Claims Management System pre-license report. All activities identified within the SRC Act Self-Insurance transition plan were identified as completed.

ANU's Work Environment Group have coordinated the development and implementation of documentation, systems and processes to enable the operation of the Claims Management System. This includes the development of policies and procedures, Claims Management Manual, templates, job descriptions, operational plans, performance targets and service level agreements with relevant providers. Most of the operational claims management processes and service standards are detailed in the Deed of Agreement between Comcare and the ANU.

The audit identified five non-conformances and four observations. The non-conformances were largely found following the file audit component of the audit program. Exceptions identified included delays in determining incapacity in the first few months following the transition to self-insurance. Standard template letters/determinations were found to be incomplete, not clearly specifying reasons for decisions, and did not accurately advise the employee of their rights and responsibilities.

ANU does not currently have a documented procedure for paying compensation to injured employees. Audit was unable to verify the employees' NWE calculations, incapacity entitlement and changes due to EBA increases or indexation.

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

NON-CONFORMANCES

A number of non-conformances were identified during the audit. They are:

Criterion	Non-conformance
2.2	ANU do not have a documented procedure for paying compensation to injured employees.
3.3	ANU does not communicate the employees' rights and obligations effectively.
3.5	ANU does not comply with the provisions of the SRC Act when making decisions on claims.
3.8	ANU does not comply with the provisions of the SRC Act when determining liability for incapacity.

Criterion	Non-conformance
3.9	ANU does not comply with the provisions of the SRC Act when determining liability for benefits, including medical and the like expenses.

OBSERVATIONS

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

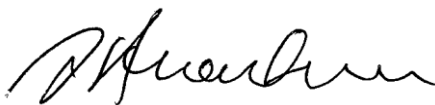
Criterion	Observations
2.3	ANU should review the Claims Management Manual and remove references to activities by or for the employer as ANU is now the determining authority.
2.5	The University is yet to formalise its Work Environment Group Business Plan to incorporate the plans necessary to achieve CMS targets and objectives, promote continuous improvement and provide for effective claims management arrangements.
3.12	ANU should ensure that reconsideration of own motion is undertaken in accordance with the requirements specified in the Claims Management Manual.
3.13	ANU to review its procedure on determining no present liability and consider advising the employee in writing and providing copies of relevant medical information indicating no present liability prior to issuing a determination.

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

	Number of criteria	% of assessed criteria
Conformance (with 4 Observations)	22	81.5%
Non-conformance	5	18.5%
Not able to verify	3	
Not applicable	1	

An action plan, which includes completion/review dates and responsibilities, must be developed by 31 March 2019 to address each of the above audit findings – and any individual file findings where an error in entitlement was identified.

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



Signed:
Sophie Anastasov



Signed:
Fiona van Ree

Date: 30 January 2019

Note: Where a licensee has outsourced its claims management arrangements, the licensee is required under the conditions of licence to conduct at least once every year a performance audit of the Claims Manager and to provide the Commission with a written report on the Claims Manager's performance within six weeks of completion of each audit.

Table of Criteria

AUDIT ELEMENT / CRITERION DESCRIPTION	Criterion	Rating
1. Commitment and Corporate Governance		
Documented commitment	1.1	Conformance
Internal and external accountability	1.2	Conformance
Identify, assess and control risk	1.3	Conformance
2. Planning		
Delegation schedule	2.1	Conformance
Documented procedures	2.2	Non-Conformance
Planning for legislative compliance	2.3	Conformance with 1 Observation
Setting objectives and targets	2.4	Conformance
Plans to achieve objectives and targets	2.5	Conformance with 1 Observation
3. Implementation		
Adequate resources	3.1	Conformance
Communication—relevant stakeholders	3.2	Conformance
Employees are aware of rights	3.3	Non-Conformance
Training and competency	3.4	Conformance
Determinations in accordance with the Act	3.5	Non-Conformance
Powers under the Act	3.6	Conformance
Initial liability	3.7	Conformance
Determining incapacity	3.8	Non-Conformance
Determining benefits	3.9	Non-Conformance
Determining permanent impairment	3.10	Not able to verify
Transitional provisions	3.11	Not Applicable
Reconsiderations	3.12	Conformance with 1 Observation
Reasonable opportunity	3.13	Conformance with 1 Observation
Claim reviews	3.14	Conformance
Surveillance	3.15	Not able to verify

AUDIT ELEMENT / CRITERION DESCRIPTION	Criterion	Rating
Privacy and confidentiality	3.16	Conformance
Reporting, records, documentation	3.17	Conformance
4. Measurement and Evaluation		
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	Not able to verify
Providing reports to Comcare and Commission as requested	4.5	Conformance
5. Review and Improvement		
Continuous improvement	5.1	Conformance

ELEMENT 1: Commitment and Corporate Governance

DOCUMENTED COMMITMENT

Criterion 1.1

The determining authority sets the direction for its claims 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
- 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: Health, Safety and Wellbeing, ANUP_000432, v5, effective 8/4/16, rev 8/4/19
- Policy: Rehabilitation and compensation, ANUP_013007, v2, effective 4/6/18, rev 4/6/21
- Policy: Risk Management, ANUP_000462, v5, effective 1/7/09, rev 26/8/16
- Procedure: Management of Non-Work Related Injury and Illness, ANUP_000683, v6, effective 12/7/11, rev 30/9/15
- Procedure: Rehabilitation and compensation, ANUP_000667, v11, effective 4/6/18, rev 4/6/21
- Procedure: Return to Work, ANUP_017614, v2, effective 15/3/18, rev 15/3/21

Comment:

The Rehabilitation and compensation policy commenced 4 June 2018 and was approved by the Vice-Chancellor.

The policy "sets the direction for the University's rehabilitation and claims management systems through a documented commitment by senior executive which is aligned to the organisation's overall values, vision and business objectives". The policy also states, "the University's aim is to provide rehabilitation and claims management services which are fully compliant with legislation and the performance standards and measures for Comcare workers compensation self-insurance licensees, as detailed by the Safety Rehabilitation and Compensation Commission (SRCC)."

CORPORATE GOVERNANCE

Criterion 1.2

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

Finding: Conformance

Evidence:

- Email 27/11/18 from Actuary regarding claims for discussion
- Email 8/8/18 from Comcare FW: CDW Load: ANU: September 2018 - Success
- Position descriptions:

- Associate Director, Work Environment (no document control)
- Claims Manager (Comcare), 20/7/16
- Manager, Injury Prevention and Management, 1/7/18
- Rehabilitation Case Manager (no document control)
- Team Leader, Injury Management & Rehabilitation (no document control)
- WHS Claims Management Senior Consultant (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
- Procedure: Work health and safety committees and representatives, ANUP_015808
- Annual Report 2017
- ANU Comcare Workers' Compensation Self-Insurance Project, Quarterly Progress Reports: 2/2/18, 3/5/18, 3/8/18, 2/11/18
- University Work Health and Safety Committee Report, for the period 1 January - 31 December 2017
- Work Environment Group, Workers Compensation Status Report, Quarter 3, 1 January - 30 September 2018
- Work Health and Safety Council Report, for the period 1 January - 31 October 2018
- SLAs:
 - Letter of engagement for the Actuarial Advice for the Australian National University's Self-Insured Workers Compensation Liabilities, 14/11/18, signed 15/11/18
 - Claims 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
 - Deed of agreement for claims managed services and the provision of other associated specialised services: between ANU and Comcare, draft 20/12/18
 - Memo 28/11/18: Exercising an option to extend the deed of agreement with Comcare for the provision of claims managed services, signed 13/12/18
 - Schedule 7 - Deed of agreement change proposal, approved 29/6/18, to be reviewed 23/7/18, not signed
 - Australian National University – workers' compensation and related matters Master Costs Agreement, letter issued 23/9/18, not signed
 - Email 14/12/18 regarding legal firms - forwarding capability statements and fee statements
 - McInnes Wilson Lawyers, 10/12/18 (information pack)
 - Moray & Agnew Lawyers: Capability Statement for the Australian National University, December 2018
 - Sparke Helmore: Australian National University, Capability Statement, July 2018
 - 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

- Performance and Development Reviews:
 - Justin Donley
 - Start date: 15/12/17, Adele Anderson
 - Start date: 17/4/18, Lucy Ochieng
 - Start date: 23/8/18, Lisa McLoughlin
 - Start date: 31/1/18, Ingrid Krauss

Comment:

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

Internal:

- Job descriptions (both WEG and Comcare) and performance and development plans of staff
- Organisational structures for WEG and the ANU Executive
- Injury management, rehabilitation and compensation procedure
- Regular internal reporting

External:

- SLA's with contracted Claims Manager, Comcare
- SLA with external auditor, BRM
- Contract arrangement with AM Actuaries
- Letter of engagement with Sparke Helmore for legal services

Criterion 1.3

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

Finding: Conformance

Evidence:

- Assessing Clinical Justification (template)
- Liability Calculator Tool (instructions)
- Appendix 15: Individual case file audit (template)
- Example of internal claim file audit, 1/7/18
- Internal claim file audit tool (no document control)
- 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)
- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19 - 6 Decision Making Framework and Quality Assurance
- 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
- QA Email template, 26/10/18
- ANU Comcare Workers' Compensation Self-Insurance Project, Quarterly Progress Reports: 2/2/18, 3/5/18, 3/8/18, 2/11/18

- Work Environment Group, Workers Compensation Status Report, Quarter 3, 1 January - 30 September 2018
- Work Health and Safety Council Report, for the period 1 January - 31 October 2018
- Claims Management System, Australian National University, Risk Management Plan, v3.0, approved 4/1/19, rev 4/1/20

Comment:

The contractual arrangements with Comcare will mitigate a number of risks, however a risk register has also been established. ANU has a corporate governance risk approach policy that applies to all areas of the university. This is supported by a procedure that sets out the ANU's risk framework and guidance material for dealing with risk. The policy and procedure describe the process for determining and assessing risks.

A specific risk management plan for the Claims Management System has also been developed. It contains a risk register and treatment plan. The risk register demonstrates that the University monitors and addresses risks identified.

ELEMENT 2: Planning

ADMINISTRATIVE ARRANGEMENTS

Criterion 2.1

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

Finding: Conformance

Evidence:

- Memo dated 24/10/18 to Professor Brian Schmidt, Vice-Chancellor, from Dr Nadine White, Director HR regarding ANU Workers Compensation Delegations, signed 14/11/18
- Memo dated 12/12/18 to Professor Brian Schmidt, Vice-Chancellor, from Dr Nadine White, Director HR regarding ANU Workers Compensation Delegations, not signed
- Memo dated 12/12/18 to Professor Brian Schmidt, Vice-Chancellor, from Dr Nadine White, Director HR regarding ANU Workers Compensation Delegations, signed 18/12/18
- SLA 's:
 - Deed of agreement for claims managed services and the provision of other associated specialised services: between ANU and Comcare, signed 25/1/18
 - Deed of agreement for claims managed services and the provision of other associated specialised services: between ANU and Comcare, draft 20/12/18
 - Memo 28/11/18: Exercising an option to extend the deed of agreement with Comcare for the provision of claims managed services, signed 13/12/18
 - Schedule 7 - Deed of agreement change proposal, approved 29/6/18, to be reviewed 23/7/18, not signed
- File audit

Comment:

ANU has a delegation instrument signed by Professor Brian Schmidt, Vice Chancellor of the Australian National University. This delegation was revised and signed on 18/12/18. Schedule A of the delegation instrument provides specific delegations to Comcare's Claims Services Officers, the Team Leader and the Reconsiderations Officer. Delegations to ANU staff are also identified.

Schedule B of the delegation's instrument outlines the financial authorities provided to Comcare.

Criterion 2.2

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

Finding: Non-Conformance

Evidence:

- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19
- Procedure: Management of Non-Work Related Injury and Illness, ANUP_000683, v6, effective 12/7/11, rev 30/9/15
- Procedure: Workers' compensation beneficiary trust accounts, ANUP_018025, v2, effective 1/7/18, rev 1/7/21

Comment:

ANU do not have fully documented procedures for paying compensation to injured employees. The process for determining and paying incapacity to employees has not yet been properly documented. A procedure should be developed for incapacity payments that includes details regarding interaction with payroll and pay cycles, an understanding of the various wage agreements (EBAs), an understanding of the various allowances and shift entitlements, and the interaction with sites to obtain details of hours worked etc.

There are procedures explained in the Claims Management Manual for calculating the ability to earn incapacity payments (page 506); determining liability for ongoing incapacity payments for current employees (page 541); and for ex-employees (page 543), however, the documented processes for paying incapacity payments are deficient and do not contain the specific details referred to above.

ANU has a procedure for establishing a beneficiary trust account and for paying benefits into Worker's Compensation beneficiary trust accounts of deceased employees.

ANU's procedure for paying medical invoices and receipts is detailed in section 8.4.19 of the Claims Management Manual.

ANU utilise the Figtree system. Currently payments made by ANU are manually entered and stored within Figtree.

Non-Conformance 1:

ANU do not have a documented procedure for paying compensation to injured employees.

CLAIMS MANAGEMENT PLANNING

Criterion 2.3

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 with 1 Observation

Evidence:

- Position descriptions:
 - Associate Director, Work Environment (no document control)
 - Claims Manager (Comcare), 20/7/16
 - Manager, Injury Prevention and Management, 1/7/18
 - Rehabilitation Case Manager (no document control)
 - Team Leader, Injury Management & Rehabilitation (no document control)
 - WHS Claims Management Senior Consultant (no document control)
 - Pre-Employment Work Environment Report: Rehabilitation Case Manager (no document control)
- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19 - 8.14.20 Natural Justice
- SLAs:
 - Deed of agreement for claims managed services and the provision of other associated specialised services: between ANU and Comcare, draft 20/12/18
 - Deed of agreement for claims managed services and the provision of other associated specialised services: between ANU and Comcare, signed 25/1/18
 - Memo 28/11/18: Exercising an option to extend the deed of agreement with Comcare for the provision of claims managed services, signed 13/12/18
 - Schedule 7 - Deed of agreement change proposal, approved 29/6/18, to be reviewed 23/7/18, not signed

Comment:

ANU has developed a Claims Management Manual and procedures to ensure its practices comply with the SRC Act. The Claims Management Manual has been adopted from the Comcare manual and should remove references to activities by or for the employer as ANU is now the determining authority.

Recognition of ANU's obligations appears in the injury/claims management policy.

ANU has a Deed of Agreement with Comcare which ensures that Comcare will have primary responsibility for recognising and ensuring legislative and regulatory compliance and have mechanisms in place for keeping abreast of Comcare and Commission policy advice.

Observation 1:

ANU should review the Claims Management Manual and remove references to activities by or for the employer as ANU is now the determining authority.

Criterion 2.4

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

Finding: Conformance

Evidence:

- HR Division 2018 Business Plan
- Work Environment Group Business Plan 2019 (Draft)
- Email 8/8/18 from Comcare FW: CDW Load: ANU: September 2018 - Success
- ANU Performance Report, Quarter 1 2018-19
- Policy: Rehabilitation and compensation, ANUP_013007, v2, effective 4/6/18, rev 4/6/21
- SLAs:
 - Deed of agreement for claims managed services and the provision of other associated specialised services: between ANU and Comcare, draft 20/12/18
 - Deed of agreement for claims managed services and the provision of other associated specialised services: between ANU and Comcare, signed 25/1/18
 - Memo 28/11/18: Exercising an option to extend the deed of agreement with Comcare for the provision of claims managed services, signed 13/12/18
 - Schedule 7 - Deed of agreement change proposal, approved 29/6/18, to be reviewed 23/7/18, not signed

Comment:

The Rehabilitation and Compensation Policy sets the direction for the Team by committing to provide claims management services which are fully compliant with legislation and the performance standards and measures for Comcare workers compensation self-insurance licensees, as detailed by the Safety Rehabilitation and Compensation Commission (SRCC). ANU and Comcare collectively have objectives and targets for performance measures with regard to the claims management system. The Key Performance Measures detailed in the Deed of Agreement (page 78) provide the overall standards required. The Draft Work Environment Group – Business Plan 2019 outlines key initiatives the Business Unit undertakes for safety, injury prevention, rehabilitation and workers compensation claims management. The plan includes the licensee KPI's and key initiatives to be undertaken to meet these KPI's.

Criterion 2.5

The determining authority establishes plans to:

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

Finding: Conformance with 1 Observation

Evidence:

- HR Division 2018 Business Plan
- Work Environment Group Business Plan 2019 (Draft)

- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19
- ANU Performance Report, Quarter 1 2018-19
- Policy: Rehabilitation and compensation, ANUP_013007, v2, effective 4/6/18, rev 4/6/21
- SLAs:
 - Deed of agreement for claims managed services and the provision of other associated specialised services: between ANU and Comcare, draft 20/12/18
 - Deed of agreement for claims managed services and the provision of other associated specialised services: between ANU and Comcare, signed 25/1/18
 - Memo 28/11/18: Exercising an option to extend the deed of agreement with Comcare for the provision of claims managed services, signed 13/12/18
 - Schedule 7 - Deed of agreement change proposal, approved 29/6/18, to be reviewed 23/7/18, not signed

Comment:

Refer to comments against criterion 2.4.

Observation 2:

The University is yet to formalise its Work Environment Group Business Plan to incorporate the plans necessary to achieve CMS targets and objectives, promote continuous improvement and provide for effective claims management arrangements.

ELEMENT 3: Implementation

RESOURCES

Criterion 3.1

The determining authority allocates adequate resources to support its claims management system.

Finding: Conformance

Evidence:

- Position descriptions:
 - Associate Director, Work Environment (no document control)
 - Claims Manager (Comcare), 20/7/16
 - Manager, Injury Prevention and Management, 1/7/18
 - Rehabilitation Case Manager (no document control)
 - Team Leader, Injury Management & Rehabilitation (no document control)
 - WHS Claims Management Senior Consultant (no document control)
- Pre-Employment Work Environment Report: Rehabilitation Case Manager (no document control)
- ANU Comcare Workers' Compensation Self-Insurance Project, Quarterly Progress Report: 2/2/18, 3/5/18, 3/8/18, 2/11/18

Comment:

A detailed workforce analysis of staffing and workload requirements is conducted on an annual basis.

ANU currently employs:

- 1 Manager, Injury and Claims
- 1 Claims Management Senior Consultant
- 2 Claims Services Officers (Comcare staff).

The Comcare Claims Services Officers (CSO's) are co-located with ANU staff at ANU premises.

ANU regularly review the workers compensation claim numbers and complexity, incident reports, staff seeking the early intervention process and training requirements.

ANU has invested in the Figtree management system that provides interface with work health and safety, early intervention, rehabilitation and claims management. ANU regularly provides feedback to Figtree for upgrades to better support the claims management system.

COMMUNICATION AND AWARENESS

Criterion 3.2

The determining 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
- Position descriptions:
 - Associate Director, Work Environment (no document control)
 - Claims Manager (Comcare), 20/7/16
 - Manager, Injury Prevention and Management, 1/7/18
 - Rehabilitation Case Manager (no document control)
 - Team Leader, Injury Management & Rehabilitation (no document control)
 - WHS Claims Management Senior Consultant (no document control)
- Pre-Employment Work Environment Report: Rehabilitation Case Manager (no document control)
- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19
- Procedure: Return to Work, ANUP_017614, v2, effective 15/3/18, rev 15/3/21
- Deed of agreement for claims managed services and the provision of other associated specialised services: between ANU and Comcare, draft 20/12/18
- Deed of agreement for claims managed services and the provision of other associated specialised services: between ANU and Comcare, signed 25/1/18
- Memo 28/11/18: Exercising an option to extend the deed of agreement with Comcare for the provision of claims managed services, signed 13/12/18
- Schedule 7 - Deed of agreement change proposal, approved 29/6/18, to be reviewed 23/7/18, not signed
- File audit

Comment:

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

ANU's intranet pages provide extensive information. All key policies and procedures are available on the Policy Library. Links to external documents relevant to Comcare are also provided.

ANU has a claims pack explaining the scheme, including processes and entitlements; and roles and responsibilities of stakeholders. The claims pack includes:

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

The Deed of Agreement with Comcare clearly defines the responsibilities of Comcare and ANU in the claims management process.

Criterion 3.3

The determining authority communicates relevant information regarding the claims management process including:

- (i) ensuring that employees are aware of their legislative rights and obligations in relation to workers' compensation
- (ii) ensuring that employees are informed of the status of their claims
- (iii) ensuring consultation occurs between all parties in regards to the claims management process.

Finding: Non-Conformance**Evidence:**

- Procedure: Return to Work, ANUP_017614, v2, effective 15/3/18, rev 15/3/21
- File audit

Comment:

Evidence of consultation between the Claims Manager, CSO and rehabilitation staff was noted on the claims reviewed. Acknowledgement letters are sent to the employee on receipt of a claim detailing contact person and the claims reference number.

All determinations issued contained a reference to appeal rights (reconsiderations). The reference in the actual determination however was not correct as it referenced a "reconsidered" decision.

Most determinations issued had a separate page detailing the employee's rights and responsibilities. This attachment "Your rights regarding a determination" stated "To request a reconsideration of a determination you must submit a request for reconsideration form found on the university's website within 30 days of receiving the determination". This is not correct as a request for reconsideration only needs to be submitted in writing within 30 days of receipt of a determination. For example, a letter or email. This process also differs from ANU's reconsideration process under their RMS.

Additionally, the advice provides incorrect statements about the rights of the employer. As ANU is now both the employer and the determining authority, the process described in the notice of rights regarding the employer having the same rights to request a reconsideration of the determination is incorrect.

Further, this advice only details the reconsideration process and does not detail the AAT process, following an unsuccessful reconsideration.

ANU should:

- Review and update their standard determination templates to accurately refer to and advise the reconsideration process
- Review and update "Your rights regarding a determination" attachment;
- Ensure all determinations are accompanied by a notice of rights and obligations.

File audit also found 6 individual exceptions where a notice of rights did not accompany a determination sent to the employee.

Non-conformance 2:

ANU does not communicate the employees' rights and obligations effectively.

TRAINING

Criterion 3.4

The determining 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)
 - Claims Manager (Comcare), 20/7/16
 - Manager, Injury Prevention and Management, 1/7/18
 - Rehabilitation Case Manager (no document control)
 - Team Leader, Injury Management & Rehabilitation (no document control)
 - WHS Claims Management Senior Consultant (no document control)
- Pre-Employment Work Environment Report: Rehabilitation Case Manager (no document control)
- ANU Comcare Workers' Compensation Self-Insurance Project: Stage 2 Transition in Services – Final Training Plan and Training Schedule (workshops May 2018)
- CALM Capability Framework, v1.0, 6/5/16 (Comcare)
- CALM Legislative Training Matrix, March 2017 (Comcare)
- Claims Manager Competency Workbook, v3.0, March 2017 (Comcare)
- Email 21/12/18 from Lisa McLoughlin re Minutes 12/12/18 (Figtree update training)
- Email 3/12/18 from Comcare to Ingrid Krauss re Comcare training docs
- NTT Data, Course: ANU - Base Comcare System Training (User Guide), v1.0, 12/3/18

Comment:

The Deed of Agreement – ANU and Comcare details that staff have the necessary skills, competency and experience to manage claims and that staff allocated to manage ANU claims are properly qualified and experienced.

The relevant position descriptions require staff to have knowledge of the SRC Act. The Comcare Claims Manger positions manages a portfolio of claims and makes determinations consistent with the Safety, Rehabilitation and Compensation Act 1988 (SRC Act) and/or Asbestos-related Claims (Management of Commonwealth Liabilities) Act 2005 (ARC Act). The ANU's WHS Claims Management Senior Consultant is responsible for overseeing the University claims management system delivery model and the governance arrangements for claims management services and the delivery of the claims management system.

ANU ensured training of WEG personnel prior to the commencement of their self-insurance licence.

COMPLIANCE WITH THE LEGISLATION

Criterion 3.5

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

- (i) determining claims accurately and quickly
- (ii) determining claims in writing with adequate terms and reasons
- (iii) ensuring there is equity of outcomes resulting from administrative practices used by Comcare.

Finding: Non-Conformance

Evidence:

- File audit

Comment:

ANU does not comply with the provisions of the SRC Act when making decisions on claims, including:

- (i) determining claims accurately and quickly; and
- (ii) determining claims in writing with adequate terms and reasons

Overall determinations were found to be brief, and not clearly specifying the reasons for decisions. Section 14 determinations did not reference entitlement to sections 16 or 19 where there was evidence of medical treatment and incapacity payment entitlements (where relevant) at the time of liability determination.

Section 8 determinations did not provide adequate terms and reasons in calculating NWE and NWH, the number of weeks used, total pay over the period and overtime and/or shift components were not provided.

The table provided in the incapacity determinations did not include actual earnings, % of NWE payable or identifying reasons for adjustments to the amounts payable such as increases in EBA's, or adjustments due to annual leave, public holidays or sick leave unrelated to the compensable injury. There was also no advice regarding the 45 week count or for those claims in excess of 45 weeks the rate of NWE applicable.

All determinations incorrectly referenced the employee's rights and obligations in the text of the determination as it referenced "If you disagree with the reconsidered determination". Gaps were also identified where "the section of the SRC Act that your incapacity payments have been determined under" was left blank.

Exceptions were also identified regarding the timeliness of the determinations, however these largely related to the initial transitional period as most were issued in September 2018 and related to incapacity periods from commencement of the license. As detailed in criterion 2.2, there is currently no written incapacity procedure currently in place and this continues the risk of incapacity determinations being undertaken inconsistently and untimely.

ANU should review:

- Standard determination templates to ensure the determination includes adequate terms and reasons for the determinations made;
- Include references to section 16 and section 19 when it is clear that there is an entitlement to these benefits when the section 14 determination is made.
- Include details of how the NWE was calculated in the section 8 determination.
- Provide further information in the incapacity determinations including actual earnings, % of NWE payable, and reasons for adjustments to the amounts payable. Include advice regarding the 45 week count.

Non-conformance 3:

ANU does not comply with the provisions of the SRC Act when making decisions on claims.

Criterion 3.6

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

Finding: Conformance

Evidence:

- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19:
 - 7.5.3 Procedure for arranging a medical examination
 - 7.9 Third Party Recovery
 - 8.14.11 Procedure for actioning a section 59 request
 - 8.14.2 Procedure for requesting information from an employee using section 58
 - 8.15 Overpayments and Recoveries
- File audit

Comment:

In relation to section 57, section 8.8 of the Claims Management Manual details the relevant processes required including a procedure for actioning non-attendance or obstruction of a medical examination, and suspension processes.

Section 8.14 of the Claims Management Manual details the process and procedure for requesting information from an employee using section 58 of the SRC Act. Only factual and specific information or documents which are relevant to a claim made by, or in relation to, an employee may be requested. When managing a section 58 request the Claims Manager must be satisfied that the information exists, and request the employee provide

the information within 28 days after the date of the notice. All requests made under section 58 must be sent by registered post.

Section 8.14 of the Claims Management Manual also provides the procedure for actioning requests made under section 59 of the SRC Act. There are specified timeframes for the processing of section 59 requests:

- 5 days if the request is for one or two documents
- 28 days for the entire file or if legal advice is required
- All section 59 requests are to be acknowledged within 5 days

Of the 16 files applicable to this criterion, file audit found one individual exception where a request for reimbursement for travel expenses to a section 57 examination was made. Audit was unable to verify if the request had been actioned.

Criterion 3.7

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

Finding: Conformance

Evidence:

- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19 - 7 Initial Liability
- File audit

Comment:

The Claims Management Manual provides comprehensive information on determining initial liability, including what constitutes a compliant claim. Section 7 of the Claims Management Manual provides information relating to initial liability including legislative, service standards, first principles and other general information.

File audit confirmed compliance with this criterion.

Criterion 3.8

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

Finding: Non-Conformance

Evidence:

- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19
- File audit

Comment:

ANU requires that an employee submit medical evidence in order for the delegate to consider liability for incapacity payments.

ANU currently do not have complete procedures for the calculation and determination of incapacity payments.

There is also no documentation advising that sick leave and recreation leave continues to accrue within the first 45 weeks of compensation, and long service leave accrues during the entire period of compensation.

Initial section 8 determinations were not evident on all relevant files, and updated section 8 determinations did not occur following increase in NWE as a result of EBA increases. Of the 12 files applicable to this criterion, file audit found 13 individual exceptions across 8 files:

- 8 exceptions related to audit unable to verify incapacity payments
- 4 exceptions where audit was unable to determine section 8 calculations
- 1 exception where duplication of determination was made

As detailed in criterion 2.2, ANU should develop procedures for calculating and determining incapacity, and include procedures for the application of sick leave, recreation leave and long service leave.

ANU should also review its process for determining sections 8 and 9 and review the relevant template determinations to ensure accuracy.

Non-conformance 4:

ANU does not comply with the provisions of the SRC Act when determining liability for incapacity.

Criterion 3.9

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

Finding: Non-Conformance

Evidence:

- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19
- File audit

Comment:

The Claims Management Manual provides guidance for claims staff in relation to s16, s17(5), s18, s29, s39 and s108E(a).

Section 8.4 of the Claims Management Manual provides information about the Medical Treatment and Examinations. This includes what is reasonable medical treatment, determining liability for medical treatment, process for accepting and rejecting medical treatment and payment of invoices and receipts.

Reimbursement of medical and the like expenses incurred by the employee were made without a specific section 16 determination in writing for those services. ANU staff advised that as a general section 16 determination was made regarding general medical and the like that a separate determination was not required.

Subsection 61(2) of the SRC Act provides that payments direct to a treatment provider do not require a determination. However, that is a specific exception to the normal requirement for a determination under subsection 61(1), including reimbursement to the employee. Where the account is a reimbursement claim by the employee, or where the amount to be approved differs from the amount of the invoice, a formal determination under section 16 should be issued and sent to the employee. ANU should review its procedure regarding S16 determinations when reimbursing employees for medical and the like treatment.

Of the 14 files applicable to this criterion, file audit found 6 individual exceptions across 4 files where there was no evidence of a section 16 determination being made for surgery or other treatments.

Non-conformance 5:

ANU does not comply with the provisions of the SRC Act when determining liability for benefits, including medical and the like expenses.

Criterion 3.10

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

Finding: Not able to verify

Evidence:

- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19 - 8.18 Permanent Impairment
- File audit

Comment:

The Claims Management Manual provides guidance on assessing claims for permanent impairment and non-economic loss, in relation to sections 24 to 28. An election only needs to be made to pursue common law.

File audit found no activity relevant to this criterion.

Criterion 3.11

The determining authority complies with Part X of the SRC Act, the transitional provisions, particularly in relation to determining permanent impairment and incapacity benefits.

Finding: Not Applicable

Comment:

Part X of the SRC Act does not apply to ANU.

Criterion 3.12

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

Finding: Conformance with 1 Observation

Evidence:

- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19 - 11 Reconsiderations
- File audit

Comment:

The delegation schedule provides that reconsiderations may be done by reconsideration officers. Section 62 allows for a reconsideration of own motion to be made by the original decision maker.

Of the 3 files applicable to this criterion, file audit found 3 individual exceptions across 2 files:

- 2 instances where the reconsideration of own motion does not detail the initial determined entitlement and amounts to show the actual change being made; and
- 1 instance where the audit was unable to verify the accuracy of the reconsideration.

In these instances, the reconsideration of own motion was not undertaken in accordance with the procedure detailed in the Claims Management Manual.

Observation 3:

ANU should ensure that reconsideration of own motion is undertaken in accordance with the requirements specified in the Claims Management Manual.

CLAIMS REVIEWS

Criterion 3.13

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: Conformance with 1 Observation

Evidence:

- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19 - 8.14.19 Procedure for determining no present liability
- File audit

Comment:

Section 8.14.19 of the Claims Management Manual details ANU's procedure for determining no present liability. The procedure requires telephone contact with the employee advising the intention to determine no present liability and provide opportunity for natural justice by allowing 14 days for the employee to provide further medical evidence in support of their claim. A further telephone call is to be made to the employee's treater inviting them to comment on the medical evidence on which the determination would be based – a copy of the medical evidence should be sent to the treater. Following 14 days a follow up phone call should be made to the employee advising outcome and where applicable a determination of no present liability to be sent to the employee.

Natural Justice or procedural fairness is a legal requirement that applies to all government decision making.

File audit found 1 individual exception where fair opportunity was not provided to the employee prior to determining no present liability.

Observation 4:

ANU to review its procedure on determining no present liability and consider advising the employee in writing and providing copies of relevant medical information indicating no present liability prior to issuing a determination.

Criterion 3.14

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

Finding: Conformance

Evidence:

- ANU Worker's Compensation Claim Review (template)
- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19 - 6 Decision Making Framework and Quality Assurance
- QA Email template, 26/10/18
- File audit

Comment:

Service level standards for file reviews are detailed in the Deed of Agreement with Comcare. The Claims Management Manual details that the Team Leader is to conduct a monthly audit of 2 claims per CSO. A quality assurance process details the types of claims examined and includes claims categorised into high risk determinations, medium risk determinations and low risk determinations, and details the level of quality control for those claims. File audit confirmed ongoing reviews of all active claims.

SURVEILLANCE

Criterion 3.15

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

- on whose authority approval may be granted
- detailed instruction on the manner in which covert surveillance is to be conducted
- a requirement that any operative undertaking covert surveillance on behalf of the determining authority has been issued with, and has agreed to, written instructions on the policy.

Finding: Not able to verify

Evidence:

- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19 - 12.4 Covert Surveillance
- Procedure: Surveillance, ANUP_018028, v1, effective 1/7/18, rev 1/7/21
- File audit

Comment:

Approval to conduct surveillance must be approved by the Director Human Resources (DHR).

The Surveillance Procedure outlines the processes required to instigate a request for surveillance including completion of 'Application to conduct surveillance for workers compensation purposes' which must be completed and signed by the appropriate nominated officer.

"Consultants conducting covert optical surveillance activities on behalf of the University will be issued with written instructions on the University's procedure, guidelines and standards as applicable and detailed in the Claims Management Manual, and will be required to agree with these conditions prior to proceeding."

File audit found no activity relevant to this criterion.

CONFIDENTIALITY

Criterion 3.16

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

Finding: Conformance

Evidence:

- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19 - 8.14.12 Privacy and managing information
- Policy: Privacy, ANUP_010007, v6, effective 1/1/15, rev 31/12/17
- Privacy, August 2017 (Comcare)
- File audit
- Workplace observation – management of electronic records

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. The Deed of Agreement with Comcare includes sections on confidentiality. Section 16 details that confidential information is not to be disclosed. Schedule 4 outlines the type of information considered as confidential and schedule 6 outlines the deed of confidentiality undertaking and consent process.

File audit confirmed compliance with this criterion.

DOCUMENT AND FILE MANAGEMENT

Criterion 3.17

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

Finding: Conformance

Evidence:

- Claims Management Manual, v1.0, approved 1/7/18, rev 1/7/19:
 - 6 Decision Making Framework and Quality Assurance
 - 14 ANU Records Management
- Policy: Records and archives management, ANUP_001233, v4, effective 27/8/99, rev 12/5/18
- QA Email template, 26/10/18

- File audit

Comment:

ANU has a documented procedure for archiving, storage and maintenance of files, and document control.

ANU utilise the Figtree system for its claims management functions. Figtree can be accessed through the university's webpage. Claims files are created and accessed through the unique incident number. Claims information is segmented in the following tabs:

1. Claim – general claim information
2. Claim 2 – incident details
3. Medical certificates – details and attached scanned copies
4. NWE
5. Finance – transaction details and estimates
6. Witness
7. Case notes – notes and most file documents
8. Task tracker
9. Permanent Impairment
10. Medical appointment
11. Investigations
12. Audits
13. Reconsiderations
14. Appeal
15. Court
16. Letters
17. System notes.

Regular feedback and communication between Figtree and ANU occur to better improve Figtree as a claims management system. A Figtree issues log has been developed and regularly reviewed and updated.

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.

Section 14 of the Claims Management Manual details the procedures for the ANU record management, including all electronic records management, such as Figtree. The Claims Management Manual includes instruction on the updating of Figtree as part of specific individual claims management procedures.

Of the 16 files applicable to this criterion, file audit found 2 individual exceptions.

ELEMENT 4: Measurement and Evaluation

MONITORING

Criterion 4.1

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

Finding: Conformance

Evidence:

- HR Division 2018 Business Plan
- Work Environment Group Business Plan 2019 (Draft)
- ANU Comcare Workers' Compensation Self-Insurance Project, Quarterly Progress Reports: 2/2/18, 3/5/18, 3/8/18, 2/11/18
- Work Environment Group, Workers Compensation Status Report, Quarter 3, 1 January - 30 September 2018
- Work Health and Safety Council Report, for the period 1 January - 31 October 2018
- ANU Strategic Plan 2017 - 2021

Comment:

Performance against measures is reported quarterly to the senior executive and the Vice Chancellor through the University Council meeting. Other regular monitoring and reporting includes:

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

Comcare staff are located at ANU and regularly review and monitor the planned objectives and performance measures. The Deed of Agreement with Comcare also provides a formal review mechanism of KPI's and quarterly progress performance reports.

AUDITING AND REPORTING

Criterion 4.2

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

Evidence:

- Appendix 15: Individual case file audit (template)
- Example of internal claim file audit, 1/7/18
- Internal claim file audit tool (no document control)
- Procedure: Work health and safety audit, ANUP_015807, v3, effective 1/7/17, rev 1/7/20

- WHS ANU Audit Schedule 2018-20
- Claims 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

Comment:

The conditions of licence require ANU conduct annual internal audits of their claims 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.

Section 16 of the claim manual details the auditing service standards required and references the ANU's procedure for auditing. As part of the regular quality reviews, Team Leaders are required to undertake an audit of at least 2 claims per CSO on a monthly basis. An annual external audit schedule and service level agreement with BRM Risk Management has been developed.

Criterion 4.3

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

Evidence:

- ANU Comcare Workers' Compensation Self-Insurance Project, Quarterly Progress Reports: 2/2/18, 3/5/18, 3/8/18, 2/11/18
- Agenda, University WHS Committee: 14/8/18, 6/11/18

Comment:

Senior executive is kept informed of the claims management system's performance, including, but not limited to, presentation of the audit findings and outcomes of corrective actions.

This is the first CMS audit for ANU. The CMS pre-licence audit results from August 2017 were communicated to senior executive as part of the University Council and a corrective action plan was developed and actioned.

Criterion 4.4

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

Finding: Not able to be verified

Comment:

This is ANU's first CMS Audit. Therefore, this criterion is not able to be verified.

Criterion 4.5

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

Evidence:

- Email 8/8/18 from Comcare FW: CDW Load: ANU: September 2018 - Success

Comment:

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.

ANU's AAT Procedure sets out the requirement to notify Comcare of any proceedings brought against it, and the provisions regarding submissions to a court or tribunal.

ANU's Figtree system enables scheme significant matters to be flagged.

ELEMENT 5: Review and Improvement

CONTINUOUS IMPROVEMENT

Criterion 5.1

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

Evidence:

- Email 27/11/18 from Actuary regarding claims for discussion
- Email 13/9/18 from Kristie Abdel-Massih re Request for Access to Financial Systems ANUP_000859.docx; Workers comp payment spreadsheet.xlsx
- Email 19/11/18 from Lisa McLoughlin to Eric Li re CTOW form
- Email 6/11/18 from Ingrid Krauss to Lisa McLoughlin re invoice reports
- Calendar invite 10/9/18 re Weekly injury / Claims Management Meeting
- Email 29/8/18 from NTT Data re Figtree Issues Log
- Procedure: Management of Non-Work Related Injury and Illness, ANUP_000683, v6, effective 12/7/11, rev 30/9/15
- ANU Comcare Workers' Compensation Self-Insurance Project, Quarterly Progress Reports: 2/2/18, 3/5/18, 3/8/18, 2/11/18

Comment:

ANU presented a number of documents to demonstrate that it implements continuous improvement strategies.

Performance outcomes of the CMS will be monitored at a number of levels within the University. At the senior executive level, system performance is monitored through:

- University Council meeting;
- University Executive;
- Senior Management Group meeting;
- Service Division Directors and General Managers meeting;
- WCSI Project Steering Group meeting;
- WHS University Committee; and
- WHS meetings and advisory groups within Colleges and Divisions.

The Work Environment Group monitors the CMS performance and identifies areas of improvement through:

- Weekly meetings with the Comcare Team Leader and key WEG stakeholders;
- Review and update of the key performance measurements and key business deliverables for the claims management system as part of the WEG Business Plan 2019 implementation of internal audit tool;
- Regular meetings with the finance / remunerations of the University to improve the process for payment of incapacity, streamline invoice payments and to gain access to internal reporting of accounts paid; and
- Figtree issues log and evidence of correspondence with NTT Data Systems.