



2022 Comcare Licensee Audit

Australian National University

FINAL REPORT

Rehabilitation Management System Audit

Audit Date: 11 January 2023

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rehabilitation

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Scope of Review/Audit

- Organisation:** Australian National University ('ANU')
- Site/Workplace:** Chancery Building 10A, The Australian National University Canberra ACT 2601
- Scope of Audit:** The review/audit examined the University's rehabilitation management system, processes and outcomes to validate that ANU is meeting its licence conditions and is complying with the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act) and the *Guidelines for Rehabilitation Authorities 2019* (the Guidelines).
13 rehabilitation case files were examined by the auditors. These files were selected from a total list of 13 rehabilitation case files where some activity had occurred in the previous 12 months.
The review/audit encompassed a review of all relevant policies and procedures as they relate to rehabilitation and return to work management and any other relevant, supporting documentation.
Overall findings are based on the identification of issues that are considered to be systemic rather than isolated incidents.
- Audit Criteria:** This review/audit assessed the rehabilitation management system against five elements:
1. Commitment and Corporate Governance (3 criteria)
 2. Planning (4 criteria)
 3. Implementation (13 criteria)
 4. Measurement and Evaluation (6 criteria)
 5. Review and Improvement (1 criterion)
- Ratings:** The findings in the review/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: 11 January 2023

Auditors: Sophie Anastasov, Ritu Barhmi and Cathy Jordan, BRM Risk Management Pty Ltd ("BRM")

Client Contacts: Ingrid Krauss, Manager, Injury Prevention and Wellbeing, Work Environment Group, ANU

Record of Audit: This report contains a summary of the review/audit outcomes. Detailed information is not recorded in the report. A record of the documentation and records sighted, persons interviewed, observations and auditor comments are retained on the auditor's file.

Acknowledgment: BRM Risk Management Pty Ltd wishes to acknowledge the cooperation and assistance provided by the management and staff of ANU and thank them for their contribution to the review/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.

Overall, the file audit found that the rehabilitation files continue to be very well managed.

The ANU has continued to provide a high level of rehabilitation management practices and strong performance, in particular the early intervention processes that has enabled assisting injured employees to return to work quickly and safely following a work-related injury. Return to work planning and suitable duties plans commence immediately following injury and receipt of the first medical certificate. Rehabilitation programs were developed quickly and supported by S36 assessments where appropriate.

Regular communication with the employee, the workplace, treating doctor and workplace rehabilitation provider (WRP) was clear in documentation to ensure successful rehabilitation program development and implementation.

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

- ANU Policy: Rehabilitation and compensation,
- ANU Policy: Fitness for Work,
- ANU Procedure: Rehabilitation and compensation,
- ANU Procedure: Return to Work,
- ANU Procedure: Management of Non-Work Related Injury and Illness,
- ANU Guideline: Early Intervention Assistance,
- Rehabilitation Manual,
- Governance and Reporting
- Effective management and implementation of early intervention program.
- People and Culture Division and Work Environment Group Business Plan 2022

A total of 13 files were reviewed. These files were the total list of rehabilitation case files where some activity had occurred in the previous 12 months.

This audit did not identify any non-conformances. Four observations were identified and are detailed below.

The audit period reviewed was from 1 January 2022 to 31 December 2022.

This audit has been conducted in line with Comcare's RMS audit workbook, version 3.0, February 2021.

Non-Conformances

No non-conformances were identified during the review/audit.

Observations

Four observations were identified during the review/audit. They are:

Criterion	Observation
3.7	The rehabilitation program template requires amendment to ensure that a review date is included. Supervisor contact details must clearly be documented in the rehabilitation program.
3.9	File audit found eight individual findings where the start date of the rehabilitation program was stated as "Date the delegate signs". The actual date the rehabilitation program starts must be stated.
3.13	Figtree files are not always up to date. Bulk uploads of documents occurred during the audit period.
4.3	ANU does not have a procedure for auditing the CMS or RMS.

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

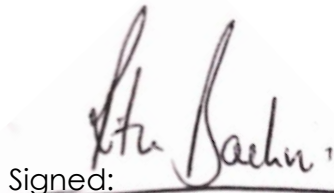
	Number of criteria	% of assessed criteria
Conformance (with 4 Observations)	25	100%
Non-conformance	0	
Not able to verify	2	
Not applicable	0	

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

The auditors invite ANU to discuss any aspect of this audit with the auditors.



Signed:
Sophie Anastasov



Signed:
Ritu Barhmi



Signed:
Cathy Jordan

Date: 7 March 2023

Table of Criteria

Audit element/criterion description	Criterion	Rating
1. Commitment and Corporate Governance		
Documented commitment	1.1	Conformance
Internal and external accountability	1.2	Conformance
Identify, assess and control risk	1.3	Conformance
2. Planning		
Delegation schedule	2.1	Conformance
Planning for legislative compliance	2.2	Conformance
Setting objectives and targets	2.3	Conformance
Plans to achieve objectives and targets	2.4	Conformance
3. Implementation		
Adequate resources	3.1	Conformance
Communication—relevant stakeholders	3.2	Conformance
Employees are aware of rights	3.3	Conformance
Training and competency	3.4	Conformance
Early intervention	3.5	Conformance
Rehabilitation assessments	3.6	Conformance
Rehabilitation programs	3.7	Conformance with 1 Observation
Suitable employment	3.8	Conformance
Determinations in accordance with the SRC Act	3.9	Conformance with 1 Observation
Employee non-compliance	3.10	Not able to verify
Reconsiderations	3.11	Not able to verify
Privacy and confidentiality	3.12	Conformance
Reporting, records, documentation	3.13	Conformance with 1 Observation
4. Measurement and Evaluation		
Monitoring core rehabilitation activities	4.1	Conformance
Monitoring provider performance	4.2	Conformance

Audit element/criterion description	Criterion	Rating
Internal audits	4.3	Conformance with 1 Observation
Outcomes of audits are actioned, reviewed	4.4	Conformance
Communicating audit results	4.5	Conformance
Providing reports to Comcare and Commission as requested	4.6	Conformance
5. Review and Improvement		
Continuous improvement	5.1	Conformance

ELEMENT 1: Commitment and Corporate Governance

Documented Commitment

Criterion 1.1

The rehabilitation authority sets the direction for its rehabilitation management system through a documented commitment by senior executive.

Finding: Conformance

Evidence:

- ANU Executive and College Structure, dated 27 October 2022
- ANUP_013007, Policy: Rehabilitation and compensation, v4, effective 13/9/21, rev 13/9/26
- ANUP_000432, Policy: Work health and safety, v10, effective 23/11/22, rev 23/11/27
- ANUP_014609, Policy: Fitness for Work, v3, effective 3/11/20, rev 2/11/25
- ANUP_000405, Policy: Disability, v9, effective 8/9/20, rev 31/12/25
- ANUP_000667, Procedure: Rehabilitation and compensation, v13, effective 13/9/21, rev 13/9/26
- ANUP_017614 - Procedure: Return to Work, v6, effective 13/9/21, rev 13/9/26
- ANUP_000683, Procedure: Management of Non-Work Related Injury and Illness, v16, effective 8/9/22, rev 8/9/27
- ANUP_000760, Guideline: Early Intervention Assistance, v14, effective 10/5/22, rev 10/5/27

Comment:

ANU sets the direction for its rehabilitation management system through a documented commitment by senior executive.

The Rehabilitation and Compensation Policy is current and was approved by the position of Vice Chancellor on 13 September 2021. The policy is due to be reviewed by 13/9/26.

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)."

The Policy outlines commitments to:

- Preventing workplace injuries and illnesses by providing a safe and healthy working environment.

- Providing systems that support early reporting of injury and intervention procedures that enable injured staff to stay at work or return to work as soon as possible in line with medical guidelines.
- Ensure that prompt independent determination of a claim is made.
- Facilitating participation in an injury or illness management program appropriate to an injured or ill employee's medical recovery.
- Providing employees with relevant information about claims and injury management including their rights and obligations.
- Provide claim and rehabilitation services that are compliant with legislation and performance standards.
- Continuous monitoring of claims and rehabilitation services.

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

Corporate Governance

Criterion 1.2

The rehabilitation management system provides for internal and external accountability.

Finding: Conformance

Evidence:

- ANU Executive and College Structure, dated 27 October 2022
- People and Culture Division Organisational Charts, 15/6/22
- ANU Grant of Licence, Comcare, dated 04/12/17
- Email from Comcare re Established licensee notification, dated 01/07/20
- ANU Strategic Plan 2021 – 2025
- People and Culture Division Plan on a Page 2022
- Licensee Compliance and Performance Improvement (LCPI) report, Annual Report for 1 March 2021-28 February 2022, signed Professor Brian Schmidt, Vice-Chancellor, dated 15/3/22.
- ANU Performance Report – Australian National University (ANU), LKPI QUARTER 2 2021–2022
- Self Insurance Progress Report 2021 for the period 1 January - 31 December 2021
- ANU Annual Report 2021
- SRCC LKPI ANU - Q3 2021-22 Performance Report Final,
- ANU Licence Compliance Performance Improvement Report 1 March 2021-28 February 2022_Signed
- Position descriptions:
 - WHS Claims Management Senior Consultant (no document control)

- Associate Director, Work Environment (no document control)
- Claims Manager (Comcare), 29/10/2020
- Manager, Injury and Claims
- Rehabilitation Case Manager (no document control)
- Team Leader, Injury Management & Rehabilitation (no document control)
- Pre-Employment Work Environment Report: Rehabilitation Case Manager (no document control)
- WHS Performance - Health and Safety Council Report, for the period 1 January - 31 December 2021
- ANUP_015808, Procedure: Work health and safety committees and representatives, v6, effective 07/05/20, rev 01/07/25
- Deed Of Agreement – Shedule 7, Change proposal For Claims Managed Services And The Provision Of Other Associated Specialised Services, dated 30/08/2021
- Internal ANU RMS Internal Audit Report, signed by Ingrid Krauss 28/02/2021
- Internal ANU RMS Internal Audit Report, signed by Ingrid Krauss 25/02/2022
- Individual Case File Audit template
- Monthly case file review template
- ANUP_015807 Procedure: Work health and safety audit, v6, effective 20/07/20, rev 19/07/25
- Work Environment Group Business Plan 2022
- SLA's
 - Letter of engagement with BRM Risk Management, 26/05/22
 - Workplace Rehabilitation Provider: Service Level Agreement provided when an initial referral is sent and updated in accordance with guideline and fee changes (template)

Comment:

Internal Accountability is demonstrated through the following:

- Position descriptions
- Organisational structure - People and Culture Division Organisational Charts
- Rehabilitation Management System audit report – internal reports
- WHS Performance - Health and Safety Council Report

External Accountability is demonstrated through the following:

- SLA's with external parties:
 - Comcare approved WRP's – Service Level Agreement provided when an initial referral is sent and updated in accordance with guideline and fee changes (template)

- Deed Of Agreement – Schedule 7, Change proposal For Claims Managed Services And The Provision Of Other Associated Specialised Services, dated 30/08/2021
- Letter of engagement from BRM Risk Management, 26/05/22
- Licensee Compliance Performance Improvement Report, 2022
- KPI reports for Licensees

Criterion 1.3

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

Finding: Conformance

Evidence:

- ANUP_000462, Policy: Risk Management, v10, effective 29/04/21, rev 29/04/26
- RMS Risk Management Plan, Risk Register, dated 20/12/22, rev 20/12/23
- WHS Performance Report to University Council – Example
- Safety, Rehabilitation and Compensation Guidelines for Rehabilitation Authorities, 2019
- Audit & Risk Management Committee intranet site

Comment:

ANU have an overall ANU Corporate Governance Risk approach as detailed in the Risk Management Framework. The University's risk management policy document (describes the commitment and process for determining and assessing risks.

The RMS risk management plan has been developed for the delivery of the rehabilitation management system. Areas where risks are identified include:

- Licensee Key Performance Indicators
- Staff numbers
- Recruitment
- Retention
- Program Budget
- Incident Investigations
- Senior Management commitment
- Legislative changes
- Information technology systems
- Legal - AAT

The plan identifies the risk, sources and impacts, the current risk treatment strategies, the rating, controls, owner, timeframes and status.

ELEMENT 2: Planning

Administrative arrangements

Criterion 2.1

The rehabilitation authority has a delegation schedule, signed by the principal officer, as per section 41A of the SRC Act.

Finding: Conformance

<p>Evidence:</p> <ul style="list-style-type: none">• Vice Chancellor Delegation of Rehabilitation Authority, signed by Acting Vice-Chancellor, Professor Wheeler, dated 22/12/2022• Delegations Extract Report• File audit
<p>Comment:</p> <p>ANU has a delegation instrument signed by Acting Vice-Chancellor, Professor Wheeler, dated 22/12/2022.</p> <p>This delegation instrument, delegates all functions and powers as a Rehabilitation Authority, to:</p> <ul style="list-style-type: none">• Chief People Officer• Deputy Chief People Officer (People, Safety and Wellbeing)• Manager Injury, Prevention and Wellbeing and• Rehabilitation Case Manager
<p>File Audit:</p> <p>File audit confirmed compliance with this criterion. Rehabilitation determinations and reconsiderations are signed by persons with appropriate delegation.</p>

Rehabilitation planning

Criterion 2.2

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

Finding: Conformance

<p>Evidence:</p> <ul style="list-style-type: none">• ANUP_013007, Policy: Rehabilitation and compensation, v4, effective 13/9/21, rev 13/9/26
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- ANUP_000667, Procedure: Rehabilitation and compensation, v13, effective 13/9/21, rev 13/9/26
- Claims and Rehabilitation Management Systems, Legislation Register, v5.0, approved 03/11/2022, rev 03/11/23
- Incident notification email
- Early Intervention Assistance Information and Funding Pack, approved 15/07/22, rev 15/07/23
- ANU Workers' Compensation Claim Pack, approved 20/12/22, rev 20/12/23
- Safety, Rehabilitation and Compensation Guidelines for Rehabilitation Authorities, 2019
- Rehabilitation Manual, v16, approved 03/08/22, review 03/08/23 - 10.1 Natural Justice and Procedural Fairness
- Safety, Rehabilitation & Compensation (SRC) Act 1988
- Safety, Rehabilitation & Compensation Regulation 2002
- Position descriptions:
 - Manager, Injury, Prevention and Wellbeing
 - Rehabilitation Case Manager (no document control)
 - WHS Claims Management Senior Consultant (no document control)
 - Associate Director, Work Environment (no document control)
 - Claims Manager (Comcare), 29/10/2020
 - Manager, Injury and Claims
 - Team Leader, Injury Management & Rehabilitation (no document control)
 - Pre-Employment Work Environment Report: Rehabilitation Case Manager (no document control)
- ANU Intranet page <https://services.anu.edu.au/human-resources/health-safety/workers-compensation-at-anu/forms>
- ANU Intranet page <https://www.anu.edu.au/about/governance/frameworks-disclosures/policy-governance-framework>
- People and Culture Division Plan on a Page 2022
- SLA's
 - Letter of engagement with BRM Risk Management, 26/05/22
 - Workplace Rehabilitation Provider: Service Level Agreement template unsigned

Comment:

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

The Rehabilitation and Compensation policy contains a commitment to ensuring claim determinations are fully compliant with the requirements of the Safety Rehabilitation and Compensation Act 1988.

The ANU has a range of policies and procedures that cover injury management under the SRC Act including application of natural justice principles. ANU Rehabilitation Manual details the requirements of the SRC Act. Position Descriptions of personnel with responsibility for rehabilitation management contain a requirement for legislative compliance.

The ANU Legislation Register records any legislative change and policy advice issued by Comcare or the Safety Rehabilitation Compensation Commission that may impact on ANU's Rehabilitation Management system.

Criterion 2.3

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

Finding: Conformance

Evidence:

- People and Culture Division plan on a page 2022
- Work Environment Group Business Plan 2022
- Work Environment Group Obligations Register, 2022
- ANUP_013007, Policy: Rehabilitation and compensation, v4, effective 13/9/21, rev 13/9/26
- Licensee Compliance and Performance Improvement (LCPI) report, Annual Report for 1 March 2021-28 February 2022, signed Professor Brian Schmidt, Vice-Chancellor, dated 15/3/22.

Comment:

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

Objectives and targets of the People and Culture division are documented in their 2022 plan on a page.

The Work Environment Group business plan 2022 documents actions to be taken for the areas of safety, injury prevention, injury management, claims management and disability. Outcome measures and timeframes are provided against each action. Key performance indicators (KPIs) are detailed within the plan. Rehabilitation outcome measures include:

- Injury Management Team – Internal Measures on early intervention assistance, return to work outcomes, return to work timeframes, incapacity, and suitable duties.
- Customer service feedback – measure customer service satisfaction with injury management services.
- Workplace rehabilitation provider performance including return to work outcomes, timeframes, costs, durability, and customer service feedback.

Measures for non-compensable case management services have also been developed and are documented in the business plan.

Criterion 2.4

The rehabilitation authority establishes plans to:

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

Finding: Conformance

Evidence:

- Performance Development Review accountabilities established WEG staff
- ANU Strategic Plan 2021 – 2025
- People and Culture Division Plan on a Page 2022
- Work Environment Group Business Plan 2022
- Work Environment Group Obligations Register, 2022
- ANUP_013007, Policy: Rehabilitation and compensation, v4, effective 13/9/21, rev 13/9/26
- ANUP_000667, Procedure: Rehabilitation and compensation, v13, effective 13/9/21, rev 13/9/26
- Position descriptions:
 - Manager, Injury, Prevention and Wellbeing
 - Rehabilitation Case Manager (no document control)
 - WHS Claims Management Senior Consultant (no document control)
 - Associate Director, Work Environment (no document control)
 - Claims Manager (Comcare), 29/10/2020
 - Manager, Injury and Claims
 - Team Leader, Injury Management & Rehabilitation (no document control)
 - Pre-Employment Work Environment Report: Rehabilitation Case Manager (no document control)
- Rehabilitation Manual, v16, approved 03/08/22, review 03/08/23

Comment:

Refer to comments against criterion 2.3.

ELEMENT 3: Implementation

Resources

Criterion 3.1

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

Finding: Conformance

Evidence:

- Rehabilitation Manual, v16, approved 03/08/22, review 03/08/23
- Position descriptions:
 - Manager, Injury, Prevention and Wellbeing
 - Rehabilitation Case Manager (no document control)
 - WHS Claims Management Senior Consultant (no document control)
 - Associate Director, Work Environment (no document control)
 - Claims Manager (Comcare), 29/10/2020
 - Manager, Injury and Claims
 - Team Leader, Injury Management & Rehabilitation (no document control)
 - Pre-Employment Work Environment Report: Rehabilitation Case Manager (no document control)

Comment:

Staff levels are determined based on the current claim numbers and complexity. The status of active rehabilitation cases is updated weekly by Rehabilitation Case Managers.

Direct case review meetings are conducted weekly with each staff member of the rehabilitation team within WEG. Caseloads are reviewed with each individual staff member to manage workloads levels, provide coaching and assistance as required to deal with complex matters. There are currently 2 Rehabilitation Case Managers that report to the Manager, Injury Prevention and Wellbeing.

ANU also provides \$50,000 to support the early intervention program. The funding was increased to \$1300 per person in 2022, in response to increasing medical and treatment fees.

Communication and awareness

Criterion 3.2

The rehabilitation authority defines and communicates responsibilities to relevant stakeholders.

Finding: Conformance

Evidence:

- ANUP_013007, Policy: Rehabilitation and compensation, v4, effective 13/9/21, rev 13/9/26
- Rehabilitation Manual, v16, approved 03/08/22, review 03/08/23
- ANUP_000667, Procedure: Rehabilitation and compensation, v13, effective 13/9/21, rev 13/9/26
- ANU Workers' Compensation Claim Pack, approved 20/12/22, rev 20/12/23
- Template Letters
- Position descriptions:
 - Manager, Injury, Prevention and Wellbeing
 - Rehabilitation Case Manager (no document control)
 - WHS Claims Management Senior Consultant (no document control)
 - Associate Director, Work Environment (no document control)
 - Claims Manager (Comcare), 29/10/2020
 - Manager, Injury and Claims
 - Team Leader, Injury Management & Rehabilitation (no document control)
- Pre-Employment Work Environment Report: Rehabilitation Case Manager (no document control)
- ANU intranet:
 - ANU Policy Library <https://policies.anu.edu.au/ppi/index.htm>
 - Health and Safety <https://services.anu.edu.au/human-resources/health-safety>
 - Injury Management <https://services.anu.edu.au/human-resources/health-safety/injury-management>
 - Performance Development Review process <https://services.anu.edu.au/human-resources/perform-develop/career-performance-and-development-process-cpdp>.
- SLA's
 - Letter of engagement with BRM Risk Management, 26/05/22
 - Workplace Rehabilitation Provider: Service Level Agreement template - unsigned

Comment:

The ANU has defined, documented and communicated the areas of accountability and responsibility of all personnel involved in the rehabilitation function.

Rehabilitation responsibilities and accountability are included in position descriptions.

The ANU's policies, procedures, Rehabilitation Manual clearly documents responsibilities of all stakeholders. The ANU intranet pages contain comprehensive information on workers' compensation and rehabilitation under the SRC Act and is accessible to all employees. All key policies and procedures are provided in the Policy Library and links to external legislative information are also provided.

A claim pack is provided to all staff members who wish to submit a worker's compensation claim. This pack details extensive information about the process.

Service agreements with external providers clearly communicate expectations and responsibilities.

Criterion 3.3

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

Finding: Conformance**Evidence:**

- Rehabilitation Manual, v16, approved 03/08/22, review 03/08/23
- ANUP_000667, Procedure: Rehabilitation and compensation, v13, effective 13/9/21, rev 13/9/26
- ANU Workers' Compensation Claim Pack, approved 20/12/22, rev 20/12/23
- Template Letters
- ANUP_000760, Guideline: Early Intervention Assistance, v14, effective 10/5/22, rev 10/5/27
- File audit

Comment:

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

Intranet pages contain extensive relevant information regarding the rehabilitation process that is accessible to all ANU employees (see comments under 3.2). All policies and procedures are available on the intranet as well as links to the legislative information and Comcare.

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

The employee claims pack includes information about employee rights and obligations.

File Audit:

File audit confirmed that a notice of rights and obligations accompanied all rehabilitation determinations issued to employees. Correspondence and emails from the employee were responded to in a timely manner.

File audit confirmed compliance with this criterion.

Training**Criterion 3.4**

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

Finding: Conformance**Evidence:**

- Credentialing Training document 2022
- PULSE Module - Responding to Staff Injury and Illness in the Workplace, dated 11/11/19
- ANU User Guide - Injury Management Coaching Guidelines for RCMs

Comment:

Rehabilitation case managers employed are required to have a health professional qualification or otherwise extensive experience in the area of occupational rehabilitation.

Credentialing Training document describes team member staff qualifications and includes status of mandatory and professional development training.

Injury Management Coaching Guidelines Rehabilitation has been developed for Case Managers (RCMs) at the ANU to assist with coaching supervisors who have responsibilities for assisting staff with an injury or illness. It provides an overview of the coaching process and guidance about both facilitating and motivating to meet their responsibilities to their staff who have an injury or illness.

Early intervention**Criterion 3.5**

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

Finding: Conformance**Evidence:**

- ANUP_000760, Guideline: Early Intervention Assistance, v14, effective 10/5/22, rev 10/5/27
- Rehabilitation Manual, v16, approved 03/08/22, review 03/08/23

- File audit

Comment:

The ANU early intervention assistance (EIA) Fund is available to all staff and centrally managed by the Work Environment Group. It is designed to assist staff presenting with initial or early symptoms of injury or illness by providing funding to access medical treatment/management as early as possible after notification of an injury/illness.

This process is separate to submitting a workers compensation claim. People accessing early intervention can choose to lodge a claim whenever they wish and a claim form is provided to all people claiming early intervention to ensure their right to claim compensation is not impeded.

File Audit:

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

Rehabilitation activity including rehabilitation assessments, return to work planning and rehabilitation programs commenced as soon as practicable following the injury, and well before liability determination.

Early treatment and consideration of suitable duties plans commences immediately following report of injury.

File audit confirmed compliance with this criterion.

Rehabilitation assessments

Criterion 3.6

The rehabilitation authority effectively uses the provisions of section 36 to conduct rehabilitation assessments in accordance with the SRC Act and the Guidelines.

Finding: Conformance

Evidence:

- Rehabilitation Manual, v16, approved 03/08/22, review 03/08/23
- File audit

Comment:

Section 6.3 of the Rehabilitation Manual details the provisions of section 36 to conduct rehabilitation assessments. It advises the process for determining whether a section 36 assessment or examination is required, where it is not required and arranging a rehabilitation assessment. It advises "ANU RCM can arrange a rehabilitation assessment or examination once a claim is lodged and prior to liability being determined when the injury appears to be work related and there is an incapacity for work or impairment. The purpose of a rehabilitation assessment or examination is to provide the rehabilitation case manager with an expert, impartial and informed written opinion about whether an employee is capable of undertaking, or continuing to undertake, a rehabilitation program."

Steps are included for arranging a rehabilitation assessment including who is legally qualified to provide an assessment / examination, who to select, how to locate a suitable legally qualified provider, and completion of the section 36 assessment examination form (determination).

The assessment report should detail:

- "The employee's capability of undertaking a rehabilitation program;
- A professional opinion about whether or not the employee requires, is capable of undertaking, or should continue to undertake a rehabilitation program ;
- Any recommendations relating to the type of rehabilitation program to implement for the employee; and
- Any other information that may assist the rehabilitation case manager in providing or arranging the rehabilitation for the employee."

The Manual also advises that the outcomes of the assessment must be notified and a copy of the report be provided to the employee / treating health practitioner.

Appropriate references are made to the Rehabilitation Guidelines 2019.

File Audit:

File audit confirmed rehabilitation assessments were organised under section 36 and undertaken by workplace rehabilitation providers.

Section 36 assessment reports outlined the employee's capacity for work, the rehabilitation goals and timeframes for achievement, specific duties and timeframes.

File audit found one instance where the section 36 determination was sent to the employee by the delegate, however the determination was not signed by the delegate.

Rehabilitation programs

Criterion 3.7

The rehabilitation authority provides rehabilitation programs in accordance with section 37 of the SRC Act and the Guidelines.

Finding: Conformance with 1 Observation

Evidence:

- Rehabilitation Manual, v16, approved 03/08/22, review 03/08/23
- ANUP_017614 - Procedure: Return to Work, v6, effective 13/9/21, rev 13/9/26
- File audit

Comment:

Section 6.8 of the Rehabilitation Manual advises "The Rehabilitation Program is a document that outlines the overall structure of an injured employee's rehabilitation plan. It details services and activities that will assist the injured employee to recover from their injury/illness. The rehabilitation program outlines interim and long-term goals, responsibilities of all parties within the process and captures timeframes and anticipated outcomes."

Section 6.9 advises that the “Rehabilitation Program document is developed in consultation with the injured employee, WRP, rehabilitation case manager, supervisor/manager and after consultation with the treating doctor.”

A written draft is to be provided to all parties before making a determination, section 37(3)(a) to (h) must be addressed, goals responsibilities and timeframes are included and explained to all parties, copies of the signed rehabilitation program be provided to all parties and determinations must be signed by the delegate and should not be completed retrospectively.

File Audit:

Overall ANU provides rehabilitation programs in accordance with section 37 of the SRC Act and the Guidelines.

All files included documented evidence of the consideration of section 37(3)(a)-(h).

Of the 13 files applicable to this criterion, file audit found 8 individual findings:

- 7 findings where the rehabilitation program did not provide a review date or supervisor contact details in accordance with the Rehabilitation Guidelines
- 1 finding where the consideration to section 37(3)(a) to (h) documented did not reference current capacity

Observation:

The rehabilitation program template requires amendment to ensure that a review date is included. Supervisor contact details must clearly be documented in the rehabilitation program.

Suitable employment

Criterion 3.8

The employer takes all reasonable steps to provide employees with suitable employment or to assist employees to find such employment.

Finding: Conformance

Evidence:

- Rehabilitation Manual, v16, approved 03/08/22, review 03/08/23
- ANUP_017614 - Procedure: Return to Work, v6, effective 13/9/21, rev 13/9/26
- File audit

Comment:

The ANU Rehabilitation Manual clearly outlines the requirement to provide suitable employment under the SRC Act.

The aim of the rehabilitation process is to return injured employees to their pre-injury duties in their own workplace. A 'return to work hierarchy' is applied and detailed in the rehabilitation manual.

File Audit:

ANU takes all reasonable steps to provide employees with suitable employment or to assist employees to find such employment. Suitable employment was provided to all applicable files reviewed. Where the employee's employment with ANU was separated, there was clear documentation and activity supporting the employee with job placement with other employers.

File audit confirmed compliance with this criterion.

Determinations, Suspensions and Reconsiderations

Criterion 3.9

The rehabilitation authority makes determinations in accordance with the SRC Act:

- (i) that are in writing and give adequate reasons;
- (ii) that are signed by the delegate;
- (iii) that are not retrospective.

Finding: Conformance with 1 Observation

Evidence:

- Rehabilitation Manual, v16, approved 03/08/22, review 03/08/23
- File audit

Comment:

Chapter 6 of ANU's Rehabilitation Manual accurately describes the process for determinations under the SRC Act. Section 6.9.2 provides the process for section 37 determinations. It advises that the "Rehabilitation Case Manager must exercise their delegation and document the determination to provide, alter or cease a rehabilitation program with regard to Section 37(3) a-h of the Act. The rehabilitation program must include details of the case manager, and where applicable, the supervisor and workplace rehabilitation provider. It must also include review dates, and if applicable, the reasonable steps being taken by the employer to provide the employee, or assist the employee to find, suitable employment..... All determinations must be signed by the delegate on the date of commencement of the program - and should not be completed retrospectively."

The ANU uses template section 36 and section 37 determinations that satisfies that the determinations are in writing, and give adequate reasons.

File Audit:

File audit confirmed that all determinations were in writing, set out the terms of the determination, the reasons for the decision and a statement of the right to reconsideration. The determinations were signed by delegated officers.

Of the 15 files applicable to this criterion, file audit found 9 individual findings where the start date of the rehabilitation program was blank or was stated as "Date the delegate signs". The actual date the rehabilitation program start must be provided.

Audit was unable to determine whether rehabilitation programs were retrospectively signed by the delegate as a start date was not advised.

Observation:

File audit found eight individual findings where the start date of the rehabilitation program was stated as "Date the delegate signs". The actual date the rehabilitation program start must be stated.

Criterion 3.10

The rehabilitation authority makes determinations in relation to employee non-compliance in accordance with the SRC Act, the Guidelines and their written policy and procedures.

Finding: Not able to verify

Evidence:

- Rehabilitation Manual, v16, approved 03/08/22, review 03/08/23
- File audit

Comment:

Section 8 of ANU's Rehabilitation manual provides clear guidance on making determinations in relation to employee non-compliance in accordance with the SRC Act, Guidelines and other written policies or procedures.

The manual provides guidance on non-compliance factors to consider and what constitutes a reasonable excuse. Clear steps are provided for the process to be undertaken for both non-compliance of section 36 and section 37 determinations.

File Audit:

File audit found no activity relevant to this criterion.

Criterion 3.11

The rehabilitation authority complies with the provisions of the SRC Act when managing reconsiderations of determinations or reconsiderations of own motion (criterion applicable to licensees only).

Finding: Not able to verify

Evidence:

- Rehabilitation Manual, v16, approved 03/08/22, review 03/08/23
- File audit

Comment:

Section 10.1.1 provides information regarding requests for reconsideration. It advises that the employee has the right to request a review/reconsideration of a determination made by the rehabilitation delegate. Once a request is received a reviewable decision must be made within 30 days of receiving the request for reconsideration.

File Audit:

File audit found no activity relevant to this criterion.

Confidentiality**Criterion 3.12**

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

Finding: Conformance**Evidence:**

- Rehabilitation Manual, v16, approved 03/08/22, review 03/08/23
- ANUP_010007, Policy: Privacy, v13, effective 06/05/22, rev 06/05/27
- File audit

Comment:

ANU maintains the confidentiality of information and applies legislative requirements.

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

The ANU's Policy – Rehabilitation and Compensation contains a commitment to maintaining confidentiality of personal information in accordance with applicable legislation.

Section 10.3 of the Rehabilitation Manual addresses privacy and states “The ANU takes its privacy obligations very seriously and is committed to meeting the highest standards when collecting, storing, using and disclosing personal information”.

All records at the ANU are stored within shared file system, which is designed to store and manage all University records. These records are protected through a file security system, which restricts access to records. For workers compensation files, these privacy settings ensure that only selected staff are able to view, edit or delete information. Additionally, Figtree is used by the University for the reporting and management of safety, injury management and claims management data. Access to Figtree is restricted to individual user ID and access levels.

File Audit:

File audit confirmed compliance with this criterion.

Document management

Criterion 3.13

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

Finding: Conformance with 1 Observation

Evidence:

- Rehabilitation Manual, v16, approved 03/08/22, review 03/08/23
- File audit

Comment:

As stated in criterion 3.12, the ANU store rehabilitation file documents in both the university's shared file system and in Figtree.

This audit was undertaken by reviewing the Figtree files only. Rehabilitation files are created and accessed through the unique incident number and claim number. Rehabilitation file documents are stored under the case notes section within Figtree and identified under Injury Management.

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 9 of the Rehabilitation Manual describes ANU records management utilising the Figtree system.

Rehabilitation Management System documents were observed to contain version control identifiers and scheduled review dates.

File Audit:

File audit found that there was a bulk upload of documents on Figtree on single dates during the audit period on each file reviewed. Whilst the documentation was stored on the University's shared file system, the Figtree files may not be fully up to date.

The expectation is that the Figtree file is always up to date and effectively mirrors the shared file system documents.

Observation:

Figtree files are not always up to date. Bulk uploads of documents occurred during the audit period.

ELEMENT 4: Measurement and Evaluation

Monitoring

Criterion 4.1

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

Finding: Conformance

Evidence:

- Rehabilitation Manual, v16, approved 03/08/22, review 03/08/23
- WHS Performance - Health and Safety Council Report, for the period 1 January - 31 December 2021
- People and Culture Division Plan on a Page 2022
- Work Environment Group Business Plan 2022

Comment:

The Work Environment Group has planned objectives and performance measures for its RMS. Performance against these measures is reported quarterly to the senior executive, and to the Vice Chancellor through the University Council Meeting. Regular reporting of planned objectives and performance measures is as follows:

- Monthly review of LKPI's.
- Quarterly review of WEG deliverables as detailed in the Business Plan.
- Quarterly reporting to WHS Committee meetings
- Reporting to University Council
- Annual reporting from Chief People Officer to DVCIC

Criterion 4.2

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

Finding: Conformance

Evidence:

- Workplace Rehabilitation Provider – Annual Case Review for 1 January to 31 December 2022
- WRP feedback emails File audit

Comment:

Section 7.6 of the Rehabilitation Manual details requirements for monitoring performance of Workplace Rehabilitation Providers (WRPs) and includes mechanisms for:

- Regular monitoring of costs and outcomes
- Updates to Service Level agreements
- Annual evaluation of WRP services
- Statistical analysis
- Internal audit of rehabilitation costs (including standard proforma tool)

Workplace Rehabilitation Provider Annual Case Reviews for APM and IPAR was provided as evidence. The document details the number of cases referred, program cost per claim, program timeframe per claim, program outcome per claim, service provision and further recommendations.

File Audit:

File audit confirmed the presence of regular emails to and from WRP's confirming regular communication.

File audit confirmed compliance with this criterion.

Auditing and reporting

Criterion 4.3

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

Finding: Conformance with 1 Observation

Evidence:

- ANUP_015807 Procedure: Work health and safety audit, v6, effective 20/07/20, rev 19/07/25
- ANU Internal RMS Internal Audit Report 2022
- RMS Case file audit template

Comment:

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

ANU undergo external audits by the Comcare self-insurance team for the safety, rehabilitation and claims management systems, as part of the licensee requirements for the first two years of licence, and then at year 6.

Additionally BRM have been engaged to do an independent internal audit of the University's RMS. BRM's last audit was undertaken in 2020.

Observation:

ANU does not have a procedure for auditing the CMS or RMS that includes:

- How auditors are selected, and the competency requirements

- Timing of audits
- Monitoring and implementation of corrective actions
- Reporting results to senior management
- Reporting results to employees.

Criterion 4.4

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

Finding: Conformance

Evidence:

- WHS Performance – Annual Council Report
- ANU Internal RMS Internal Audit Report 2022

Comment:

The WHS Performance - Annual Council Report, advises that during 2021, internal audits were conducted of the Rehabilitation Management System, with no non-conformances identified.

Senior executive is kept informed of the rehabilitation management system's performance, including, but not limited to, presentation of the audit findings and outcomes of corrective actions. Rehabilitation management system performance is discussed at the following senior executive meetings:

- Quarterly reporting to WHS Committee meetings
- Reporting to University Council
- Annual reporting from Chief People Officer to DVCIC

Criterion 4.5

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

Finding: Conformance

Evidence:

- ANU Intranet <https://services.anu.edu.au/human-resources/health-safety/rehabilitation-management-system-audit>
- Work Health and Safety Council Report – Annual 2021 Calendar Year

Comment:

Results of the internal RMS audit for the ANU undertaken in the audit period was communicated to all staff through the intranet page.

Additionally, RMS audit results are provided as an attachment to the University Council Report for communicating to executive and as an attachment to the University WHS Committee for communicating to executive and staff.

Criterion 4.6

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

Finding: Conformance

Evidence:

- SRCC LKPI ANU - Q3 Performance Report Final
- ANU Licence Compliance Performance Improvement Report 1 March 2021-28 February 2022_Signed
- Licensee Compliance and Performance Improvement (LCPI) report, Annual Report for 1 March 2021-28 February 2022, signed Professor Brian Schmidt, Vice-Chancellor, dated 15/3/22.

Comment:

Reports are provided to the Commission/Comcare as they relate to rehabilitation.

ELEMENT 5: Review and Improvement

Continuous improvement

Criterion 5.1

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

Finding: Conformance

Evidence:

- Customer Service Survey 2022
- Work Environment Group Business Plan 2022
- Work Environment Group Obligations Register, 2022
- ANUP_015807 Procedure: Work health and safety audit, v6, effective 20/07/20, rev 19/07/25
- Workplace Rehabilitation Provider – Annual Case Review for 1 January to 31 December 2022
- Rehabilitation Manual, v16, approved 03/08/22, review 03/08/23

- Workplace adjustments - Staff information guide for Staff and Supervisors
- Figtree Email Processor

Comment:

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

Regular reporting of operational activity, objectives and KPI's together with internal / external auditing identifies areas requiring continuous improvement.

The Work Environment Group has conducted the following continuous improvement activities in the audit period:

- Reviewed and updated the Rehabilitation Manual
- Reviewed and updated the Procedure: Management of Non-Work Related Injury and Illness
- Reviewed and updated the Guideline: Early Intervention Assistance
- Approval of Early Intervention Assistance Information and Funding Pack
- Workplace adjustment information guides developed for staff and supervisors
- Updated delegations
- Regular meetings with HR staff and / or managers within Colleges and Divisions who have staff members undergoing injury management
- Regular meetings with the employee relations team to discuss complex case management matters
- Updated RMS risk register
- Continued monthly meetings with Figtree and attendance at Figtree Systems User Group Meetings
- Comcare suite of 'Recovery and Return to Work' videos were added to the ANU website
- Attended Figtree demonstration of new functions to improve system efficiency, and obtained approval to obtain the new Email Processor Function
- Conducted annual satisfaction surveys and detailed improvement activities
- Reviewed and updated Standard Letter Templates
- Attended Comcare Rehabilitation Management Forums, Comcare Mental Health Community of Practice Sessions; and Participation in webinars