



**Australian Government**

**Comcare**

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# **CORPORATE PLAN**

**2020–2021**

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## Contact us

To obtain further information contact:

### Corporate Strategy

Comcare  
 GPO Box 9905 Canberra ACT 2601  
 1300 366 979  
 [www.comcare.gov.au](http://www.comcare.gov.au)



# Contents

<b>CEO's Introduction</b>	<b>4</b>
<b>Purpose</b>	<b>5</b>
<b>Key activities</b>	<b>7</b>
<b>Operating context</b>	<b>9</b>
Environment	9
Cooperation	11
Capability	12
Risk oversight and management	15
Subsidiaries	15
<b>Performance</b>	<b>16</b>
<b>Appendix</b>	<b>19</b>



## CEO's Introduction

As the accountable authority of Comcare, I present the Comcare Corporate Plan for 2020–21, which covers the reporting period 2020–2024 as required under section 35(1)(b) of the *Public Governance, Performance and Accountability (PGPA) Act 2013*.

Comcare continues to undertake a broad range of activities, all aimed at delivering on our purpose to promote and enable safe and healthy work. Our five strategic priorities are focused on ensuring continuing excellence and leadership as a national workers' compensation authority and work health and safety regulator.

We will continue to engage and collaborate with our stakeholders in responding to and recovering from the COVID-19 pandemic. To date, our response to the pandemic has tested and confirmed our strategic priorities.

I look forward to working with my colleagues in Comcare and our many collaboration partners to deliver on our purpose and priorities, as set out in this plan.

**Susan Weston**  
Chief Executive Officer

Comcare acknowledges the traditional owners and custodians of country throughout Australia and acknowledges their continuing connection to land, sea and community. We pay our respects to the people, the cultures and the elders past, present and emerging.

## Purpose

Comcare has several important roles. We are a work health and safety regulator, a scheme administrator and an insurer and claims manager. We also have essential enabling roles, focused on the capability and capacity of our own workforce and on supporting engagement and better practice approaches to health and safety across our scheme.

We:

- deliver functions specified in the Work Health and Safety Act 2011 (WHS Act) and the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act)
- manage claims in relation to the *Asbestos-related Claims (Management of Commonwealth Liabilities) Act 2005* (ARC Act) and Parliamentary Injury Compensation Scheme (PICS) established under the *Parliamentary Entitlements Act 1990*
- provide support through expert advice and services to the Safety, Rehabilitation and Compensation Commission and the Seafarers Safety, Rehabilitation and Compensation Authority (Seacare Authority).

For this Plan, Comcare has reviewed, revised and aligned its purpose and outcome statement to:

## Promote and enable safe and healthy work

This new purpose unites Comcare's key functional activities, and is supported by new strategic priorities that reflect our strategic intent across our diverse business.

During the life of this plan our work will be aligned to five strategic priorities that support our new outcome statement. These priorities reflect that there are multi-factorial, multi-layered connections between the different functions of Comcare along the prevention–early intervention–injury management–compensation and rehabilitation continuum.

Figure 1: Comcare's purpose and strategic priorities



# Key activities

To support our new purpose and achieve our five new strategic priorities, we will be specifically focused on the following key activities during the life of the plan:

**TABLE 1: Comcare key activities**



## Excellence in service provision

- Delivering key initiatives within the *Claims Management Improvement Plan*
- Implementing and evaluating the *Comcare Education and Engagement Strategy*
- Delivering key projects within the *ICT Strategy 2019–2023 (ICT Strategy)*, including a contact centre model
- Embedding a client focused delivery model for Legal services
- Providing WHS information and advice through Inspectorate engagement activities
- Supporting better practice governance for the Safety, Rehabilitation and Compensation Commission and Seacare Authority



## Engagement with our stakeholders

- Regularly engaging with employers and other scheme participants using targeted communication channels
- Continuing the Collaborative Partnership to improve work participation for people with a temporary or permanent injury, illness or disability
- Continuing to implement the *Comcare Workplace Mental Health Strategy*
- Continuing ongoing engagement with the Administrative Appeals Tribunal (AAT) with a focus on resolving disputes promptly and minimising harm for participants
- Progressing a targeted, risk-based program of regulatory engagement



## Prevention and early intervention across our scheme

- Building and delivering contemporary engagement, training and education services that promote prevention and early intervention
- Demonstrating national leadership in prevention and early intervention
- Applying and translating evidence-based prevention and early intervention into better practice
- Promoting mental health and wellbeing in the workplace
- Supporting injured workers to recover and return to work (RTW) in accordance with Safe Work Australia's (SWA's) *National RTW Strategy 2020–2030*
- Conducting proactive and targeted regulation and inspections in accordance with SWA's *National Australian Work Health and Safety Strategy 2021–2022*



## Insight driven and risk and evidence-based practice

- Utilising intelligence and risk analysis to inform and prioritise regulatory activities
- Designing and delivering innovative and evidence-based research, programs and initiatives to support the jurisdiction
- Reviewing the clinical panel to ensure optimal effectiveness and outcomes
- Embedding a portfolio management approach for Comcare's key activities and projects
- Developing and implementing a knowledge management approach
- Continuing to mature our data governance, capability and technology in line with our *Data Strategy 2019–2022*



## Being adaptive and sustainable in the face of change

- Delivering an adaptive, secure, digital environment which supports our agency to service the needs of our stakeholders in an efficient and effective way
- Delivering a range of pilots, services and changes—designed to prevent, treat and support mental health related hazards and injury as it presents across our scheme
- Reviewing our Premium Model
- Embedding our new learning management system (LMS) and developing a blended education offering for the jurisdiction to support national better practice and compliance
- Implementing changes to claims management practice, capability and systems to improve current and future outcomes



# Operating context

## Environment

Our scheme covers a broad range of occupations and industries including government services, defence, law enforcement, transport, logistics, financial, banking services, manufacturing, construction, telecommunications and postal services. As at 30 June 2020, our scheme comprised 397,496 full-time equivalent (FTE) employees covered under the SRC Act, and 415,827 FTE employees under the WHS Act. We had 211 employers covered under the SRC Act and 224 employers under the WHS Act.

Like many agencies and, as a result of pandemic, we have had to rapidly change the way we work and deliver our scheme and services with a greater utilisation of our technology platform and digital channels.

Our workforce has successfully transitioned to flexible working arrangements, and early indications are that our approach of balancing flexibility with responsibility is helping to achieve both organisational outcomes and allowing more flexibility for our people.

We are promoting innovation and better practice across our operations to achieve our purpose of promoting and enabling safe and healthy work. We are striving to find better ways to prevent injury and support timely, safe and sustainable return to work. This is particularly important in a complex operating environment characterised by a struggling economy, workplace transformation, technological change and mental health issues.

The recent deployment of our new online learning management system—Comcare LMS—will enable us to continue delivering learning and development through virtual channels like webinars and online training modules.

In June 2020, we officially opened two new offices—in Darwin and Launceston—as part of the Government’s decentralisation agenda. Expanding into the Northern Territory and Tasmania has enabled us to increase our national footprint. It will enhance our service delivery and enable us to be more responsive to our stakeholders’ needs and expectations, which will also support our new priorities.

Responding to the continuing pandemic will be our key focus. Given the range of industries in our jurisdiction, the impacts of the pandemic have created additional economic uncertainty and this may be seen in return to work and fund performance.

Table 2 on the following page summarises our operating environment, our key stakeholders and the internal interactions that help to ensure we remain adaptive and responsive to expectations.

**TABLE 2 Environmental trends influencing our approach**

Trends	Implications	Opportunities and Challenges
<b>The evolving industry landscape</b>	<p>Changes in the working environment including:</p> <ul style="list-style-type: none"> <li>• employee expectations and perceptions of work</li> <li>• mental health issues</li> <li>• the ageing workforce</li> <li>• the gig economy characterised by short-term roles and contractors</li> <li>• working from home.</li> </ul>	<p>We are agile to face the changes by committing to be a learning organisation.</p> <p>Using our strategic partnerships to drive outcomes and contribute to national conversations in response to workplace risks and challenges.</p> <p>Using data analytics including through our new Data Strategy, and research capabilities to inform evidence-based responses.</p> <p>Using data analytics and risk-based regulation to respond to changes in the work environment.</p>
<b>Technology</b>	<p>Increasing digitisation and use of big data and artificial intelligence is changing workforce capability requirements.</p> <p>Increased availability of telehealth services.</p> <p>New opportunities for data sharing and an increasing cyber security risk that impact the efficiency and effectiveness of our operations.</p>	<p>Monitoring occupational risks and any changes brought about by the changing nature of work.</p> <p>Investing in technology to maintain a flexible and agile workforce and information and communications technology capability.</p> <p>Continuing to enhance our cyber security vigilance and resilience.</p>
<b>Stakeholder expectations</b>	<p>Our reputation and value proposition to our stakeholders and the demand for our service offerings.</p> <p>Changing scheme demographics and service delivery models.</p>	<p>Being a leader within the insurance industry and regulatory environment through informed best practice, research and innovation.</p> <p>Understanding our stakeholders’ needs and sharing our knowledge and experience with them and potential new stakeholders.</p> <p>Recognising the increase in demand for customer-centric service models and reviewing our capability, efficient and effective service offerings and outcome focused practices.</p>
<b>Economic situation and reforms</b>	<p>Impacts on interest rates and the cost of inflation directly affect Comcare’s liabilities and other economic parameters.</p> <p>Dynamics of policy and national reforms, and their cross-sectoral impacts.</p> <p>Judicial rulings which impact the Government, our stakeholders and Comcare.</p> <p>The Australian Public Service Review and modernisation.</p> <p>Review of the WHS model laws.</p>	<p>Investing in research.</p> <p>Being a leader in workers’ compensation reform, contributing to the national conversation in addressing emerging health issues within the workplace.</p> <p>Remaining organisationally agile to deliver reforms, to meet stakeholder needs and to effectively implement Government decisions, using better practice principles.</p>

## Cooperation

Comcare engages and collaborates with a wide range of stakeholders at strategic and operational levels toward achieving our purpose of promoting and enabling safe and healthy work. We consider both external and internal stakeholders for all activities and projects. We give high priority to the strategic management of these relationships in alignment with our organisational purpose and strategic priorities.

In accordance with our Stakeholder Engagement Framework, we seek to communicate, collaborate, partner, influence and work with our stakeholders in a manner that ensures we are:

- service oriented and stakeholder centric
- consistent and responsive
- an industry leader and trusted institution.

Our approaches to engagement include:

- informing or educating through communication
- gathering feedback and working together to reach a solution
- involving stakeholders throughout the process to ensure issues, concerns and insights are understood
- working with others to develop and implement solutions and joint plans for action
- actively supporting and contributing to the aligned efforts of external forums, groups, committees and individuals.

Comcare will continue to engage widely across our jurisdiction. Our key engagement priorities during the period of this plan include:

- continuing to collaborate with Safe Work Australia and the Heads of Workplace Safety Authorities to provide guidance and support on pandemic response and recovery
- continuing to provide leadership through chairing the Heads of Workers' Compensation Authorities group

- responding to annual Employer Satisfaction Survey feedback
- delivering our Comcare National Conference—Creating a safer workplace together—in May 2021
- ongoing participation in Collaborative Partnership for Work Participation initiatives
- delivering the projects and initiatives detailed in the *Comcare Research Plan 2018–2022* with various partners
- implementing and evaluating the expanded NewAccess workplaces program in partnership with Beyond Blue.

Figure 2: Comcare's external stakeholders



AAT	Administrative Appeals Tribunal	HWSA	Heads of Workplace Safety Authorities
ACCI	Australian Chamber of Commerce and Industry	ICA	Insurance Council of Australia
AGD	Attorney-General's Department	IME	Independent Medical Examiners
AIG	Australian Industry Group	OAIC	Office of the Australian Information Commissioner
AMA	Australian Medical Association	PCBU	Person Conducting Business or Undertaking
APSC	Australian Public Service Commission	RACGP	Royal Australian College of General Practitioners
CDPP	Commonwealth Director of Public Prosecutions	RCM	Rehabilitation Case Managers
DTA	Digital Transformation Agency	SES	Senior Executive Service, Australian Public Service
FCC	Federal Circuit Court	SRCC	Safety, Rehabilitation and Compensation Commission
HR	Human Resources	SWA	Safe Work Australia
HSR	Health and Safety Representatives	WHS	Work Health and Safety
HWCA	Heads of Workers' Compensation Authorities		

## Capability

We have invested in enhancing our governance frameworks, financial management and expanding the use of technology for improved service delivery. Our success is contingent on our people and the recognition and development of their skills, knowledge and experience.

We are continually improving the way we operate through:

- leadership and facilitation of initiatives to improve injury prevention, early intervention and claims management approaches
- people management and building consistency in our leadership cohort
- improving our information management systems and practices
- maturing our project management capability by implementing an enterprise portfolio management approach to ensure our change work is aligned to our strategic priorities and purpose
- focusing on stakeholder engagement
- building our legal capability to deliver expert advice and actively manage legal risk.

## Our values

Along with revising our purpose and strategic priorities, we have also revised our organisational values which are underpinned by the APS values.

Figure 3: Comcare's values



## Our people

In order to successfully perform our role and deliver Comcare’s business outcomes, our *People Strategy 2019–2022* identifies focus areas to shape our culture and capability now and into the future. The strategy aims to achieve our purpose through a professional, agile, flexible and capable workforce which is empowered and engaged to deliver customer-centric and regulatory services that promote and enable safe and healthy work. The following factors are critical for us to successfully deliver on our purpose and priorities:

- **A flexible and agile workforce**—in the way we deliver our services, how we adapt and respond to our changing environment, and how we manage our workforce.
- **Capability to deliver business outcomes**—our workforce must have the right capabilities to deliver on our priorities now and also into the future.
- **A safe and healthy workplace**—we are committed to working collaboratively with our employees to create, foster and provide a rewarding, safe and healthy workplace.
- **Integrating Comcare’s values**—our employees demonstrate and maintain behaviours that are consistent with our values—acting with integrity and respect, collaborating and innovating, and striving to have a positive impact.

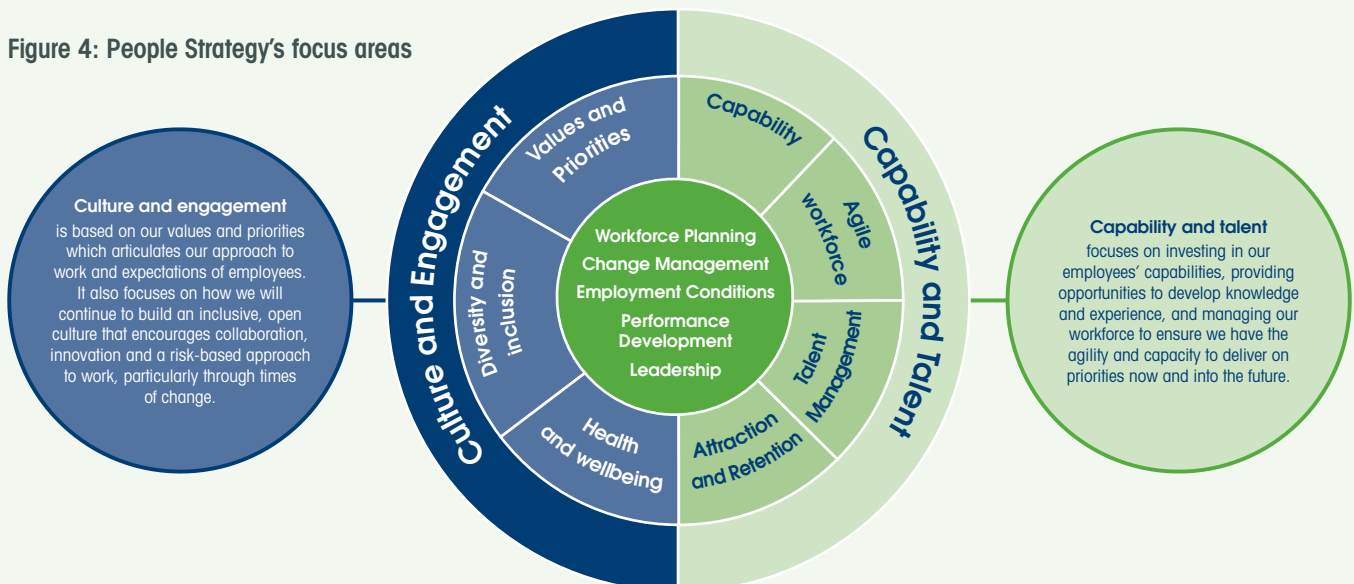
Our focus is to embed the Comcare values in our business through the leadership behaviours of every individual.

Comcare is committed to the principles of equity and diversity, ensuring that all employees have access to our services and programs, and that our workforce is representative of the broader Australian community. Our People Strategy Action Plan, Reconciliation Action Plan and Accessibility Action Plan, together with the Diversity Working Group, support Comcare’s diverse and inclusive workforce.

Over the next four years, Comcare will further develop and strengthen our:

- **Customer-centric culture**—working with our stakeholders is the very essence in achieving our purpose. We are focused on developing our communication and finding innovative ways to deliver our service offerings to anticipate, manage and support our stakeholder needs.
- **Leadership capability**—this will empower our current and future leaders to set expectations and model behaviours that enhance Comcare’s culture.
- **Data management, analysis and interpretation**—this critical area underpins our evidence-based approach to our work. A whole-of-organisation plan is in place to improve governance, systems and capability in data management and analysis, including through implementing our Data Strategy.
- **Change management**—improving our approach to change and ensuring we have the capability to adapt and effectively manage change will contribute to a flexible and agile workforce that embraces continuous improvement.
- **Portfolio management**—our project and portfolio management capability are maturing into an enterprise portfolio management approach to:
  - » strengthen our ability to embrace emergent change
  - » enhance our decision making by aligning and balancing project investments
  - » maximise our business value
  - » ensure our efforts are aligned with our strategic priorities
  - » effectively manage our resources to realise benefits.

Figure 4: People Strategy’s focus areas



## Our technology

Comcare's ICT Strategy builds on the existing Comcare *Digital Strategy 2015–2020*. It aligns with the Australian Government's digital transformation agenda and *Digital Continuity 2020 Policy*. The ICT Strategy will establish key ICT platforms and capabilities that will promote innovation, deliver insight and underpin comprehensive customer-centric services.

The ICT Strategy consists of six workstreams that will modernise ICT and information management processes. Each workstream contributes to delivering key capabilities that allow Comcare to become an industry leader by providing easy to use services to our stakeholders. The ICT Strategy aligns with our current challenges and future priorities.

Figure 5: ICT Strategy workstreams



- **Cyber security**—secure, safe and resilient ICT landscape
- **Platform**—highly adaptive cloud-based platform to underpin business needs
- **Knowledge**—business insight maximised across the data lifecycle
- **Stakeholder management**—improve understanding and service delivery with a single customer view
- **Digital services**—transact online in a simple and efficient manner
- **Enabled workforce**—efficiency through contemporary tools, automation and streamlined business processes.

During 2020–21, several key ICT platforms and projects will allow for digital engagement and transacting in more efficient ways, including:

- an omni-channel contact centre to manage communication between Comcare and our stakeholders
- a customer relationship management (CRM) solution to provide a single view of the customer
- enhancing cyber safety of employees and information with advanced end-point protection and a stronger cyber security culture
- redesigning and modernising the approach to data warehousing and data analytics
- migrating cloud ready applications to Software as a Service (SaaS) providers
- making paper records digital and expanding paperless work practices.

These improvements in capability will provide the foundation to deliver the remainder of the ICT Strategy and ensure the agency can fulfil its purpose and deliver better services.

## Risk oversight and management

Effective risk oversight and management is an integral part of all aspects of Comcare’s business. It drives and supports our ability to effectively deliver on our strategic priorities over the period of this plan.

Comcare’s *Risk Oversight and Management Policy* and framework is applied to all our activities and aligns with the *Commonwealth Risk Management Policy* and the international risk management standard (ISO 31000:2018). Our Audit and Risk Committee provides independent oversight, ensuring compliance with the processes applicable to Comcare’s risk management framework.

Comcare’s Executive Committee is responsible for monitoring and maintaining our Strategic Risk Register for managing risks relating to the achievement of our priorities. Our strategic risks are based upon focus areas aligned to our strategic priorities where risk may arise in our operating environment.

Comcare has identified treatments, including strategies, to mitigate risks for each focus area as shown in the table below.

**TABLE 3 Comcare’s risk focus areas and mitigation strategies**

Focus area	Description	Risk mitigation strategies
<b>Capability</b>	The resources required to achieve our purpose and priorities.	Comcare is implementing a range of strategies to ensure we are insight driven, adaptive and sustainable and enhance our service delivery.  Our portfolio management approach will guide the implementation of new capabilities.
<b>Culture</b>	The application of our values and the behaviours of our employees.	Comcare’s Executive Committee supports the implementation of our new values.  Our People Strategy will support the Executive in driving change in the organisation. Our new Service Charter will set clear standards for our employees.
<b>Governance</b>	The approaches we use for making decisions, assigning accountability, setting standards and monitoring outcomes.	Comcare is reviewing its governance arrangements to ensure we are focused on our priorities and our decision making is guided by principles and based on the best available information.  Our performance monitoring is being strengthened through the implementation of revised performance measures.  We are also actively monitoring emerging issues in our operating environment to ensure risks are identified and managed.
<b>Stakeholders</b>	The parties we engage with, work with and deliver services to.	Comcare has a new Stakeholder Engagement Framework to enhance our engagement and collaboration with stakeholders. This is underpinned by targeted strategies for key stakeholders and ongoing efforts to build partnerships with industry and professional bodies.  We will continue to use our marketing capability, forums and events to engage with our stakeholders and enhance understanding of our scheme and jurisdiction.

## Subsidiaries

Comcare does not have any subsidiary bodies.



# Performance

The following table summarises Comcare’s performance measure and targets against which we will monitor our progress toward delivering our strategic priorities and achieving our purpose.

**TABLE 4 Comcare’s performance measures and targets**

Performance measure	2020–21 target	2021–22 and beyond
We provide quality services to all our stakeholders	<ul style="list-style-type: none"> <li>a) Stakeholder satisfaction rating of 85 per cent or more</li> <li>b) 85 per cent or more evaluated entities report improved WHS outcomes as a result of Comcare’s regulatory activities</li> <li>c) 100 per cent of activities are delivered within statutory timeframes, where applicable</li> <li>d) Safety, Rehabilitation and Compensation Commission satisfaction with support provided by Comcare</li> <li>e) Seacare Authority satisfaction with support provided by Comcare</li> </ul>	As per 2020–21
Our Administrative Appeals Tribunal (AAT) litigation program resolves disputes promptly and with integrity	<ul style="list-style-type: none"> <li>a) Proportion of AAT litigation with a successful outcome is 55 per cent or greater</li> <li>b) 50 per cent of matters are progressed to hearing or finalised within 12 months</li> </ul>	5% increase each financial year
We consistently manage Commonwealth asbestos-related disease claims with more equitable and efficient outcomes	<ul style="list-style-type: none"> <li>a) 95 per cent of resolution payments are made within 10 days of receipt of relevant information</li> <li>b) Asbestos-related disease common law settlements are monitored to ensure consistency and equity</li> </ul>	As per 2020–21
We deliver contemporary education and engagement services that promote and enable safe and healthy work	<ul style="list-style-type: none"> <li>a) 80 per cent of attendees have their engagement, training and education needs met</li> <li>b) increase in employer reach, engagement and change in behaviour with Comcare’s education services</li> <li>c) annual increase in customer reach and engagement across Comcare’s external communication channels</li> </ul>	As per 2020–21
We design and deliver innovative and prevention focused initiatives that promote and enable safe and healthy work	<p>Initiatives are assessed as having a positive influence on:</p> <ul style="list-style-type: none"> <li>a) Worker/employer satisfaction</li> <li>b) Impact on health outcomes and recovery and/or</li> <li>c) Access to evidence-based better practice</li> </ul>	As per 2020–21



Performance measure	2020–21 target	2021–22 and beyond
Our proactive regulatory activity is targeted and prevention focused	<ul style="list-style-type: none"> <li>a) Regulatory priorities continue to be addressed through a multi-year, nationally coordinated regulatory activity program of work</li> <li>b) Data and intelligence analysed quarterly to identify emerging issues within Comcare’s jurisdiction</li> </ul>	<ul style="list-style-type: none"> <li>a) Comcare’s regulatory priority program results in improved compliance rates in the jurisdiction</li> <li>b) Data and intelligence are analysed quarterly to identify emerging issues within Comcare’s jurisdiction</li> <li>c) Regulatory priorities are identified via a comprehensive analysis of data, intelligence and stakeholder consultation and a multi-year program of work is developed to address them</li> </ul>
We undertake strategic research and national cross-sector collaboration to promote and enable safe and healthy work	<ul style="list-style-type: none"> <li>a) Strategic research and cross sector collaboration initiatives are developed and delivered</li> <li>b) Maintain and build stakeholder engagement across government, private sector and academia</li> <li>c) Partnerships deliver strategic insights for the business</li> </ul>	As per 2020–21
We drive national work health and safety compliance using a targeted, risk-based approach	<ul style="list-style-type: none"> <li>a) 100 per cent of incident notifications involving the death of a person result in a monitoring compliance activity</li> <li>b) 100 per cent of incident notifications assessed as extreme or high-risk result in a monitoring compliance activity</li> <li>c) Comcare undertakes a follow-up verification inspection in 95 per cent of instances where an inspection has identified corrective actions to be undertaken to eliminate or minimise, as far as reasonably practicable, the risk of future incidents occurring</li> </ul>	As per 2020–21
Our scheme identifies and adopts better practices which enable and promote safe and healthy work	Through engagement with our stakeholders and utilising an evidence-based approach, better practice initiatives are identified, our advice is adopted and is assessed as enabling safe and healthy work	As per 2020–21

Performance measure	2020–21 target	2021–22 and beyond
Our scheme is sustainable as evidenced through outcomes achieved by scheme participants (including financial and return to work outcomes)	<ul style="list-style-type: none"> <li>a) Target administrative cost ratio within 15 to 25 per cent</li> <li>b) Average Commonwealth premium rate = 1 per cent of payroll</li> <li>c) Minimum funding ratio of 110 per cent</li> <li>d) Comcare scheme return to work rate = 85 to 95 per cent</li> <li>e) Comcare scheme notional premium rate = 0.94 per cent</li> </ul>	As per 2020–21
Our workforce is engaged, capable and supported in their mental health and well-being	<ul style="list-style-type: none"> <li>a) Comcare’s employee engagement rating at the organisational level meets or exceeds that from the previous year</li> <li>b) Comcare’s well-being rating at the organisational level meets or exceeds that from the previous year</li> <li>c) The majority of managers consider that their work group has the appropriate skills, capabilities and knowledge to perform well</li> </ul>	As per 2020–21


# Appendix

This Corporate Plan has been prepared in accordance with the requirements of:

- subsection 35(1) of the PGPA Act 2013 and;
- the PGPA Rule 2014.

The following table details the requirements met by the Comcare Corporate Plan and the page reference(s) for each requirement.

Requirement	Page
Introduction	4
• Statement of preparation	4
• the reporting period for which the plan is prepared	4
• the reporting periods covered by the plan	4
Purposes	5
Key activities	7
Operating context	9
• Environment	9
• Capability	12
• Risk oversight and management	15
• Cooperation	11
• Subsidiaries	15
Performance	16



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