Australian Government

Comcare

Prevention Strategy

2022-2025

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Enquiries

Enquiries regarding the licence and any use of this document are welcome at: Comcare GPO Box 9905 Canberra ACT 2601 ABN: 41 640 788 304
Ph: 1300 366 979 Email: general.enquiries@comcare.gov.au

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Comcare's purpose

Comcare works with employers, workers and their representatives, providers and other stakeholders to improve work health, safety and rehabilitation. Our aim is to make workplaces safer and healthier by preventing harm, supporting early intervention, encouraging adoption with better practice guidance and ensuring effective compliance with the WHS legislative framework. We also strive to improve work health and safety outcomes through programs that encourage and promote the **health benefits of good work**.

Our role

- Work health and safety regulator
- Scheme administrator
- Insurer and claims manager

The scheme includes:

- Workers' compensation; and
- Work Health and Safety

Good work *is fair, respectful and balances job demands, autonomy and job security. Good work accepts the importance of culture and traditional beliefs. It is characterised by safe and healthy work practices and it strikes a balance between the interests of individuals, employers and society. It requires effective change management, clear and realistic performance indicators, matches the work to the individual and uses transparent productivity metrics.*[1]

Our purpose

Promote and enable safe and healthy work

Comcare's strategic priorities

- Excellence in service provision
- Engagement with our stakeholders
- **Prevention and early intervention across our scheme**
- Insights driven and risk and evidence-based practice
- Being adaptable and sustainable in the face of change

Our activities

Delivering our core services including claims management, work health and safety regulation and education and training.

- Implementing and monitoring the Comcare Prevention Strategy
- Continuing to implement workplace mental health initiatives and promote mental health in the workplace
- Demonstrating national leadership in prevention and early intervention.

[1] Royal Australian College of Physicians (2017). Consensus Statement on the Health Benefits of Good Work.

Our prevention approach

The *Comcare Prevention Strategy 2022-2025 (the Strategy)* is for all workplaces in the Comcare scheme. The Strategy aims to provide a coordinated pathway to support workplaces to prevent harm and enable a culture of health and safety, compliance and reporting. With the changing nature of work, emerging workplace risks and new evidence in better practice, the Strategy will maintain a strong commitment to the prevention of workplace harm and early intervention.

We will achieve the Strategy's aim by:

- Working collaboratively with the scheme and stakeholders to identify risks to work health and safety, prevent workplace harm and reduce its impact
- Encouraging and supporting the scheme to interact with Comcare's prevention and early intervention focused programs and services
- Using data-led, systems-focused, and evidence-based approaches
- Maintaining alignment with Safe Work Australia's Australian WHS Strategy and other relevant legislative frameworks, strategies and policies
- Influencing Comcare's relevant programs of work including our regulatory priorities.

The most recent Safe Work Australia (SWA) comparative performance data shows that Comcare has the lowest injury incidence and frequency rates of any jurisdiction.[2] However, more can be done.

We aspire to zero lives lost in the workplace — preventable workplace death is never acceptable.

The key to supporting workplaces to prevent harm and enable a culture of safety and reporting is to focus on what will make the biggest impact. The Strategy outlines the top prevention priorities including actions and intended outcomes that will guide Comcare's efforts to support workplaces.

The identification of priorities in this Strategy does not limit Comcare's focus on other risks and industries.

The Strategy is informed and driven by data and intelligence to identify the top priorities where we can have the biggest impact on preventing workplace harm. This is where:

- The prevalence of workplace harm is persistent across multiple sectors and workplaces in our scheme
- The prevalence of workplace harm is worsening
- New issues, hazards and risks to safe and healthy work are emerging
- There is a high risk of long duration off work due to a work-related injury or disease.

[2] Safe Work Australia. Comparative Performance Reporting: Work Health and Safety Reporting, 23rd edition.

A framework for action

Aim

To provide a coordinated pathway to support workplaces to prevent harm and enable a culture of health and safety, compliance and reporting.

Comcare Prevention Strategy 2022-2025

Actions

- Increasing awareness and providing information
- Building skills and capability
- Improving systems
- Driving compliance

Top priorities

- Bullying and harassment including workplace sexual harassment
- Work demands
- Body stressing

Evaluating progress

- Monitor data and trends for:
  - Lead indicators
  - Lag indicators
- Track activity measures

Key enablers

Communication and engagement

Targeted and impactful external communication on prevention and early intervention.

Culture and leadership

Drive a culture of healthy and safe workplaces through a demonstrable commitment to prevention and early intervention.

Partnerships and collaboration

Joint approach to supporting workplaces and delivering key initiatives focused on prevention and early intervention.

Compliance and enforcement

Monitor and enforce compliance with the *Work Health and Safety Act 2011*and *Work Health and Safety Regulations 2011.*

Research and evidence

Targeted and timely research that provides the latest evidence and better practice.

Data and intelligence

Improved use of data to inform the prevention approach and track progress and outcomes.

Top priorities

Bullying and harassment

Bullying and harassment as a prevention priority includes workplace sexual harassment.

Bullying and harassment accounted for a third of all accepted claims related to mental stress in 2020–21. Mental stress is one of the top five causes of compensation claims in the Comcare scheme and associated with higher claims costs involving longer periods off work and increased healthcare needs. Safe Work Australia data shows that bullying and harassment occurred most frequently in the public administration and safety sector.[3] Bullying and harassment, including workplace sexual harassment can cause psychological and physical harm. These harmful behaviours are identified as psychosocial hazards in the *Model Code of Practice: Managing psychosocial hazards at work.*

Psychosocial hazards arise from or in relation to:

- The design or management of work
- The working environment
- Machinery, equipment, appliances, tools at a workplace
- Workplace interactions or behaviours; and
- May cause harm.

33%

of mental stress claims in 2020-21 were related to bullying and harassment[4]

Psychological claims on average, account for the highest costs in the scheme[4]

Workplace bullying is repeated, unreasonable behaviour directed towards a worker or group of workers, that creates a risk to health and safety.

Workplace sexual harassment is defined as any unwelcome sexual advance, request for sexual favours or conduct of a sexual nature where a reasonable person, having regard to all the circumstances, would anticipate the possibility that the person harassed would be offended, humiliated or intimidated.

Harassment towards any person in the workplace is never acceptable.

[3] Safe Work Australia. 2019. Psychosocial health and safety and bullying in Australian workplaces (5th edition).

[4] Data refers to accepted claims across the scheme and based on full financial years when the claim was received.

Action areas

- Build datasets and intelligence to understand psychosocial hazards and risks that contribute to bullying and harassment in the Comcare scheme.
- Use research and data to inform and design impactful initiatives.
- Develop and deliver education, training and guidance on preventing and managing bullying and harassment, respect and civility and workplace sexual harassment.
- Work with employers, workplaces, workers and their representatives to foster and strengthen a **systems-based approach** for the prevention of bullying and harassment.
- Monitor and enforce compliance with duties and obligations to prevent and manage bullying and harassment, and where relevant, investigate alleged or potential contraventions.
- Implement a proactive psychosocial inspectorate stream.
- Drive engagement with relevant regulators and other stakeholders to develop consistent approaches towards prevention, early intervention and management of bullying and harassment.

Systems of work and systems-based approaches refers to the set of policies, procedures and plans that systematically manages health and safety at work and can help to prevent or minimise harm and ill health from workplace operations.

Outcomes

- Establish a positive reporting culture across workplaces, noting this may result in a corresponding short-term increase in reports of bullying and harassment and sexual harassment in the Comcare scheme.
- Improve knowledge across the jurisdiction of the nature and drivers of workplace bullying and harassment, and of the duties and obligations to prevent and manage these risks.
- Demonstrable improvements in the systems of work in the Comcare scheme that seek to prevent and address workplace bullying and harassment.
- Define clear and efficient pathways for early resolution once bullying and harassment is reported to Comcare and before it leads to further harm.

Top priorities

Work demands

Work demands or pressures are the second highest driver of mental stress claims in the Comcare scheme for the last ten years and are trending upwards. This trend may continue to worsen with the changing nature of work including the challenges of remote, onsite or hybrid work models and the blurred lines between personal and work lives. Workers' compensation claims for mental health injury or illness often have poorer recovery and return to work outcomes.

Harm related to work demands may be due to the presence of one or more psychosocial hazards. Individually these hazards may not result in harm. Where they exist in combination, over a sustained period or as a severe instance, they have the capacity to cause harm.

37%

of all employees with a mental injury claim in 2020-21 were not working[5]

18%

increase over the last 3 years from 2018-19 in claims related to work demands[5]

Work demands may include role overload, unrealistic time pressures, ambiguity or conflict, cognitive and emotional demands of the job, conflict arising from tasks or relationships, poor organisational justice and change management, and the environmental conditions.

[5] Data refers to accepted claims across the scheme and based on full financial years when the claim was received.

Action areas

- Promote and encourage adoption of Comcare's early intervention and mental health-related programs and services.
- Drive adoption of systems-based approaches in the Comcare scheme that prioritise health and safety and enable good work design.
- Develop resources and training that support workplaces to prevent and manage psychosocial hazards related to work demands and foster mentally healthy workplaces.
- Identify areas for a tailored prevention approach by undertaking data analysis on the risks related to work demands in the Comcare scheme.
- Engage effectively through:
  - delivering forums and webinars to share best practice including the Inter-departmental Forum on Mental Health, Mental Health Community of Practice and Safe Work Month
  - activities of the psychosocial inspectorate program and regulatory approaches that support proactive and compliance-based practices.

Outcomes

- Establish a positive reporting culture across workplaces.
- Reduce stigma related to workplace mental health and improve early help-seeking behaviour.
- Achieve better systems of work across the Comcare scheme that focus on managing psychosocial hazards.
- Improve knowledge on assessing and managing risk factors that contribute to psychosocial hazards related to work demands.
- Enhance workplace capability to apply good work design principles and support mentally healthy workplaces.
- Successfully collaborate with leading experts, workers and their representatives, and workplaces to inform, develop and design mental health initiatives and resources for the Comcare scheme.

Top priorities

Body stressing

Body stressing injuries have consistently remained the leading contributing factor to workplace harm across the Comcare scheme. Safe Work Australia data also shows that it is one of the most common causes of workplace injuries. In the Comcare scheme, the leading mechanism of body stressing injuries is manual handling and computer work, mostly affecting shoulders and lower back. The continually changing nature of work and an ageing workforce brings new pressures that may see a further rise in body stressing injuries.

42%

of all claims were related to body stressing in 2020-21[6]

11%

increase over the last 3 years from 2018-19 in claims related to body stressing[6]

Action areas

- Develop, promote and encourage adoption of Comcare guidance and information on managing risk factors related to body stressing injuries.
- Develop and deliver new resources on good work design that:
  - contribute effectively to systems-based approaches in workplace injury prevention
  - strengthen and support the prevention capability of managers.
- Undertake data analysis and review evidence to:
  - understand the causes of body stressing injuries in high-risk settings in the Comcare scheme
  - minimise these risks in consultation with workplaces, workers and their representatives
  - develop tailored prevention approaches.
- Deliver regulatory programs for high-risk settings.
- Establish a detailed understanding of the links between body stressing injuries and secondary psychological impacts or conditions.

[6] Data refers to accepted claims across the scheme and based on full financial years when the claim was received.

Body stressing injuries are associated with repetitive and strenuous work. It commonly leads to musculoskeletal disorders and may have negative psychosocial impacts.

Outcomes

- Increase workplace awareness of the relationship between good work design and prevention of body stressing injuries.
- Improve knowledge across the scheme on the:
  - leading mechanisms for body stressing injuries and related psychosocial impacts
  - the benefits and importance of system-based approaches to injury prevention.
- Support and enhance manager capability to recognise the common mechanisms of body stressing injuries, prevent harm and provide early support.
- Foster collaboration and consultation with workplaces including workers and their representatives to eliminate or minimise risks that contribute to body stressing injuries in high-risk settings.

Measuring outcomes

By 2025, we want to see improvements in preventable workplace harm and early intervention across the scheme. To do this, we will use an iterative approach to benchmark, measure and evaluate outcomes and impacts. Ongoing data collection and analysis will enable identification, development and reporting against lead indicators, lag indicators and Comcare's activity-based measures.

Over the next three years, our focus will be on raising awareness and driving positive behaviour change through strategic outputs, targeted engagement, and effective communication. This focus, along with establishing baseline measures will support progress towards long-term outcomes and impacts.

- Lead indicators help to predict and prevent future occurrence of injury or illness, and forecast trends. They can indicate increased risk of poor outcomes in health and safety. Examples include survey tools, safety climate indicators, exposure to psychosocial hazards and training attendance rates.
- Lag indicators measure the occurrence and frequency of injury and illness. They typically include outcomes-based data and can point to failures in prevention and early intervention. Examples include incident and workers' compensation data.

Short-term outcomes: Year 1

- Drive stronger leadership commitment across the scheme, towards healthy and safe work and enabling a positive reporting culture.
- Increase scheme adoption and engagement with Comcare's prevention and early intervention focused programs, initiatives and activities.
- Increase knowledge across workplaces of good work design principles and the importance of civility and respect at work.
- Increase knowledge across the scheme of duties and obligations to prevent workplace harms including the importance of systems-based approaches to prevention.

Medium-term outcomes: Years 2-3

- Improve and maintain compliance with safe systems of work that seek to prevent workplace harm and support early intervention.
- Improve the skills and capabilities of managers and supervisors to prevent and address workplace harm.
- Improve compliance across the jurisdiction with duties and obligations that support the prevention of workplace harm.
- Improve transparency and consistency in reporting bullying and harassment, sexual harassment and work demands across the scheme.

Long-term outcomes: Years 4-5

- Prevent workplace harm and reduce its impacts over time by driving improvements to:
  - lessen injuries and harm related to mental stress attributed to bullying and harassment, sexual harassment and/or work demands
  - lessen injuries and harm related to body stressing
  - early intervention efforts across all workplaces to support safe and sustainable return to work and recovery.
- Maintain and drive continuous improvements in maturing systems that focus on health and safety.

Long-term impacts:

- Improve earlier and sustainable return to work
- Reduce serious injuries and harm in workplaces
- Reduce worker fatalities.

What's next

Future revisions of the Comcare Prevention Strategy will:

- be informed by our progress
- focus on long-term outcomes and impacts
- test relevance of existing priorities and identify new priorities as data and trends emerge
- feature new programs or services that support our prevention efforts.