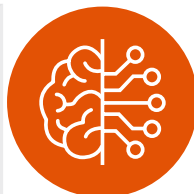




**Australian Government**

**Comcare**

# **Corporate plan 2025–26**



## Disclaimer

The material contained in this publication provides guidance to people, agencies and other entities in the [Comcare scheme](#) and to inform the general public.

Comcare frequently updates our publications, so please return to the [Comcare website](#) as required to ensure you have the latest information.

While we make every effort to ensure that this material is accurate and current, the material is general in nature and not provided as professional advice. You should carefully evaluate the accuracy, completeness and relevance of material for your purposes, and seek appropriate professional advice for your circumstances.

## Publication details

Published by Comcare  
© Commonwealth of Australia 2025

ISSN 1832-0260 (online)  
ABN 41 640 788 304 (Comcare)

With the exception of the Commonwealth Coat of Arms and where otherwise noted, all material presented in this document is provided under **Creative Commons Attribution 4.0 International licence**.



The details of the relevant licence conditions and the full legal code for the licence are available on the [Creative Commons website](#).

Contact Comcare if you have an enquiry about this licence or use of any material on this website.

## Use of the Coat of Arms

Guidelines for use of the Commonwealth Coat of Arms are published by the Department of Prime Minister and Cabinet.


## Contact us

Enquiries regarding the licence and any use of this document are welcome at:

Corporate Strategy

Comcare

 GPO Box 9905 Canberra ACT 2601

 1300 366 979

 [www.comcare.gov.au](http://www.comcare.gov.au)

For the latest disclaimer and copyright advice please visit the [Comcare website](#).

## Acknowledgement of country

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 and present.

Healing Hands

by Dion Devow of DDesigns



# Contents

## Introduction 1

## About Comcare 2

Purpose	3
Governing legislation	3
Core roles, services and enabling functions	3
Our scheme	5
Comcare Strategy 2024–2028	6
Strategic and enabling priorities	7
Strategy delivery	9

## Performance 12

Planning and performance framework	12
Performance governance and results	13
Regulator performance	13
Performance measures and targets	14

## Operating context 26

Environment	26
Cooperation	27
Capability	28
Risk oversight and management	31

## Appendix A – Corporate plan content requirements 33

## List of tables

Table 1: Summary of our core roles	3
Table 2: Summary of key services and enabling functions	4
Table 3: Result key for targets	13
Table 4: Summary of change drivers most likely to impact Comcare’s environment	26
Table 5: Example of Comcare’s cooperative relationships and partnerships	27
Table 6: Comcare’s strategic risks and mitigation activities	32
Table 7: Corporate Plan compliance index	33

## List of figures

Figure 1: ‘About Comcare’ summary infographic	2
Figure 2 – Planning and performance framework	12
Figure 3: Comcare People Strategy vision, Target Outcomes and Employee Experience	28
Figure 4: Comcare office locations	29
Figure 5: Comcare ICT and Digital Strategy Guiding Principles and Priorities	30



# Introduction

---

As the accountable authority of Comcare, I present our 2025–26 Corporate Plan which covers the reporting periods 2025–26 to 2028–29 as required under section 35(1)(b) of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act).

Our Corporate Plan is our primary external planning document that provides Parliament, the public and our clients, and stakeholders with an understanding of our:

- purpose, roles and services, values and scheme
- roles and responsibilities
- strategy – including strategic priorities, key activities and aspirations
- operating context
- performance measures and targets.

In 2025–26, we continue to embed and deliver towards the Comcare Strategy 2024–2028 and our strategic priorities – prevent work-related injuries and deliver better return to work outcomes.

**Michael Duke**

**Acting Chief Executive Officer (CEO) and Accountable Authority for Comcare**

# About Comcare

Figure 1 summarises key information about Comcare that is referenced throughout our Corporate Plan.



Figure 1: 'About Comcare' summary infographic

# Purpose

Comcare is the national work health and safety regulator and workers' compensation authority.

The Comcare scheme provides a system for work health and safety, rehabilitation and workers' compensation for the Australian Government and self-insured licensees.

Our purpose is to **promote and enable safe and healthy work**. Our purpose brings together our business and engages our clients and stakeholders around injury prevention, early intervention, injury recovery, return to work and work health and safety regulation.

## Governing legislation

Comcare is established under the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act). We have functions and responsibilities under both the SRC Act and the *Work Health and Safety Act 2011* (WHS Act), which includes regulatory functions and compliance and enforcement powers.

## Core roles, services and enabling functions

Our legislated functions and responsibilities shape our core roles as a regulator, claims manager, scheme manager and insurer summarised in table 1.

**Table 1: Summary of our core roles**

Core Roles	
<b>Regulator</b>	<p>We are the national work health and safety regulator with functions and powers for compliance and enforcement under the WHS Act and SRC Act.</p> <p>Our Compliance and Enforcement Policy sets out our approach to our regulatory functions and powers and guides our decisions on when and how we undertake specific activities.</p> <p>Our compliance and enforcement activities, in relation to both work health and safety and workplace rehabilitation, combine proactive and reactive components, and are grouped into 4 main streams:</p> <ul style="list-style-type: none"><li>• providing information and advice</li><li>• making authorisation and approval decisions</li><li>• monitoring the extent of compliance in the jurisdiction</li><li>• investigating alleged or potential contraventions.</li></ul>
<b>Scheme Manager</b>	<p>We manage the Comcare workers' compensation scheme by:</p> <ul style="list-style-type: none"><li>• monitoring and maintaining legislation and developing policy and guidance</li><li>• providing advice to the Minister on the operation and effectiveness of the SRC Act and the administration of the WHS Act</li><li>• collating, curating and analysing 'whole-of-scheme' data, identifying trends to ensure we achieve sustainable and better practice arrangements</li><li>• approving and monitoring workplace rehabilitation providers who operate in the scheme</li><li>• recovering costs for the functions we and the Safety, Rehabilitation and Compensation Commission (SRCC) perform</li><li>• providing support through expert advice and services to the SRCC and the Seafarers Safety, Rehabilitation and Compensation Authority (Seacare Authority), and supporting the SRCC to manage and monitor self-insured licensees.</li></ul>
<b>Claims Manager</b>	<p>As a claims manager, we:</p> <ul style="list-style-type: none"><li>• manage workers' compensation claims for Australian Government agency employees under the SRC Act including delegated claims services arrangements</li><li>• manage liabilities for common-law asbestos related conditions under the <i>Asbestos-related Claims (Management of Liabilities) Act 2005</i> (ARC Act) for the Australian Government</li><li>• administer the Parliamentary Injury Compensation Scheme which provides injury compensation coverage for Australian Government parliamentarians and the Prime Minister's spouse.</li></ul>
<b>Insurer</b>	<p>We set and collect premiums specific to each Australian Government agency to meet our claims liability and claims administration costs.</p>

Education and engagement are key services we offer and deliver to our clients and stakeholders to promote and enable safe and healthy work.

We also have essential enabling functions that inform and support delivery of our core roles, provide corporate services and ensure we meet our government responsibilities.

Our key services and enabling functions are summarised in table 2.

**Table 2: Summary of key services and enabling functions**

Key Services	
<b>Education</b>	Our education services are designed to empower participants to build practical skills and knowledge to create safe and healthy work environments, drive employee engagement, participation and productivity. Our training programs cover a range of topics relating to work health and safety and workers' compensation and are available in various formats.
<b>Engagement</b>	Our engagement services are broad and range from national events, forums and webinars, website guidance and social media to targeted workplace visits and direct advice and support. Overall, these services provide opportunities to communicate, collaborate, partner and work with our clients and stakeholders and to promote best practice in safe and healthy work.
<b>Enabling functions</b>	
Strategy   Research   Portfolio   Programs and Projects   Performance   Policy   Legal   Governance   Risk   Assurance   Integrity Compliance   People   Property   Security   Finance   Procurement   Technology   Information Management	

## Our scheme

Our scheme provides a system for work health and safety, rehabilitation and compensation for employers in Australia and operates over a broad range of occupations and industries including government services, defence, law enforcement, transport, logistics, financial, banking services, health services, manufacturing, construction, telecommunications and postal services.

It encompasses 2 separate jurisdictions, each delivering consistent outcomes to a diverse range of employees.

Our workers' compensation scheme covers:

- employees of Australian Government agencies and authorities
- employees of corporations and Commonwealth authorities which hold a license granted by the SRCC (including ACT Government).

Our work health and safety scheme covers:

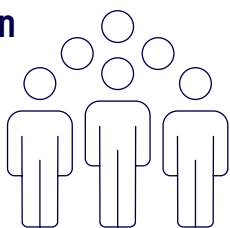
- employees of Australian Government agencies and authorities
- employees of some corporations which hold a license granted by the SRCC
- employees of private companies with majority Commonwealth ownership
- members of the Australian Defence Force (ADF) while not at war (including reservists and cadets).

As of 30 June 2025, our scheme comprised of:

### Workers' compensation scheme coverage

**491,781**

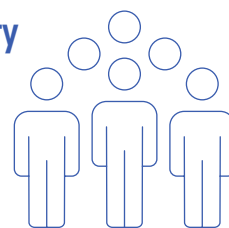
Full time equivalent  
employees



### Work health and safety scheme coverage

**459,841**

Full time equivalent  
employees





# Comcare Strategy 2024–2028

The nature of work and workplaces is evolving, so are the types of workplace injuries and illnesses, including an increase in psychological injuries.

We need to meet the service expectations of employees, employers and other stakeholders, while also considering the opportunities of advances in technology and implications of the evolving cyber security landscape.

We established the Comcare Strategy 2024–2028 (Comcare Strategy) in 2024–25 to ensure we can respond to the issues of today while adapting for the future. It builds on the important work we're already doing and continuing to evolve our services with our clients' needs at the centre.

The Comcare Strategy focuses our efforts and investments to deliver against, and make an impact towards, 2 strategic priorities to achieve our purpose:

- Prevent work-related injuries
- Deliver better return to work outcomes.

Our strategic priorities reflect the different functions of Comcare and how we approach the prevention, early intervention, injury management, compensation and rehabilitation continuum.

Our enabling priorities are drivers to build capability and ensure we can effectively deliver our strategic priorities:

- Making data driven decisions
- Uplifting leadership, effectiveness and efficiency
- Delivering client-centric services.

## Strategic Roadmap

Our internal Strategic Roadmap presents a forward plan of programs, projects and initiatives that will make a real impact in preventing workplace injuries and delivering better return to work outcomes to achieve our purpose, where our enabling priorities will be harnessed to support this.

The Strategic Roadmap drives our enterprise planning process, ensuring we are focusing on the right things at the right time, and is expected to adjust over time based on emerging priorities.

## Organisational values

Our organisational values, together with the Australian Public Service Values and Code of Conduct, are foundational to how we work and deliver our strategy. They are:

- Earn and strengthen trust
- Strive to have a positive impact
- Collaborate and innovate
- Act with integrity and respect.

# Strategic and enabling priorities

## Strategy elements

Key activities and aspirations explain the scope and direction of the strategic and enabling priorities.

Intended results, performance measures and targets have been set for each priority and will be used to measure performance towards delivering our strategy to achieve our purpose. These are described in the [performance section](#) of our Corporate Plan.

We are actively monitoring risks aligned to our priorities and values. These are described in the [risk oversight and management section](#) of our Corporate Plan.



### Strategic priority: Prevent work-related injuries

#### Key activity

Be a leader in prevention of psychological injuries in particular, and increase our influence, appropriately sharing insights to more effectively drive positive change with employers and employees.

#### 2028 aspiration

We are a national leader in prevention of psychological injuries and illness, actively sharing learnings and resources that can be applied by workplaces and used by other regulators. We influence policy and seamlessly collaborate to unify and promote our prevention approach.



### Strategic priority: Deliver better return to work outcomes

#### Key activity

Improve return to work outcomes focusing on psychological injuries, influencing and collaborating to deliver support and interventions that better meet the recovery needs of employees.

#### 2028 aspiration

We partner with our stakeholders to provide leading return to work guidance and services, significantly improving return to work outcomes for employees.



## Enabling priority: Making data-driven decisions

### Key activity

Uplift technological capabilities to enable easy access to meaningful insights from data that support both strategic decisions and day-to-day operations, and transparent and consistent engagement.

### 2028 aspiration

We are a data-led organisation, appropriately leveraging technology and AI to derive and apply insights in our strategy setting and day-to-day operations. Our technology is accessible, building the client experience through the capacity for self-service.



## Enabling priority: Uplifting leadership, effectiveness and efficiency

### Key activity

Reinforce the organisation's purpose, with impact through empowered leadership and decision making at all levels. Optimise our governance, performance, funding and resource allocation models.

### 2028 aspiration

We have strong alignment on our purpose and take individual ownership to lead and make informed decisions. We have clear governance with responsive quality assurance and a forward plan of the resourcing required to deliver on our priorities.



## Enabling priority: Delivering client-centric services

### Key activity

Uplift our organisational capability to co-design and deliver services that anticipate and meet client needs and adapt to changing circumstances.

### 2028 aspiration

We use feedback and insights about clients' preferences to shape our strategy and embed positive connections. We co-design accessible services to provide clients with a personalised experience that is continuously improved.

# Strategy delivery

## Delivering towards our strategic priorities

We actively contribute to the national work health and safety and return to work agendas by aligning with the priorities of Safe Work Australia's [National Work Health and Safety Strategy 2023 – 2033](#) and [National Return to Work Strategy 2020 – 2030](#) and the risks and trends specific to our scheme, when defining our approach.

Our strategic priorities are embedded across Comcare – from our programs, projects and initiatives through to our day-to-day operations. This section summarises important work we have underway to deliver towards our strategic priorities and prevent work-related injuries and deliver better return to work outcomes.

## Comcare's Prevention and Return to Work Action Plan

We have developed a Prevention and Return to Work Action Plan that defines key initiatives to be delivered that will make a real impact in preventing workplace injuries and delivering better return to work outcomes.

We will use the Action Plan to communicate with and guide scheme employers to prioritise, implement and champion initiatives related to prevention and return to work, and to work together on activities that will drive improvements. Some of the initiatives for 2025–26 include:

- 'Act early to support your workers' – new early intervention framework
- Improving our engagement with treating health practitioners
- Becoming an establishment partner of the National Centre for Workplace Mental Health and Wellbeing
- Developing a claims management coaching framework
- Evaluating our 'Building Safety and Integrity Capability Across the APS' initiative centred around good work design and considering next steps for embedding.

## Research

Research provides an evidence-base and growing knowledge to support employers, workers, and other stakeholders to promote and enable safe and healthy work. Our [Research Plan Towards 2026](#) provides a framework to guide our activities, including key themes that were identified through stakeholder engagement, as areas of national importance.

Our partnership approach leverages industry and academic expertise, supports the inclusion of co-design and lived experience, and ensures outcomes are translated for the jurisdiction.

## Education and engagement through events

Our diverse [training programs](#) cover a range of topics related to work health and safety, workers' compensation and rehabilitation, and are designed to provide participants with practical skills and knowledge to create safe and healthy work environments, drive employee engagement, participation and productivity.

We host a rolling [program of events](#) and forums that provide opportunities to share expertise, drive best practice and offer participants the opportunity to network with industry peers and take part in various discussions and activities. Our flagship events, the Comcare National Conference and National Work Health and Safety Awards, are hosted on a biennial schedule.

## Proactive approach to work health and safety regulation

The aim of our proactive regulatory approach is to support and promote the conditions that enable duty holders to meet their duties and obligations under the work health and safety legislation. Through our preventive approach to managing work health and safety risks, we aim to assist employers in our jurisdiction to proactively reduce the potential for harm to occur.

We set annual regulatory priorities to ensure additional focus is placed on specific work health and safety risks, with a prevention focus, to incorporate into the planning and delivery of national and regional engagement activities.

Five regulatory priorities have been identified for 2025–26:

1. Psychosocial hazards
2. Contractor management
3. Silica and other airborne contaminants
4. Workplace violence and aggression
5. WHS management systems.

## Legislative reform

An independent review of Comcare's workers' compensation scheme and our establishing legislation, the SRC Act, commenced in 2024.

The review will identify potential reforms to improve outcomes for injured employees and ensure the Comcare scheme has the flexibility to respond to new and emerging workplace practices.

We are supportive of modernising and futureproofing the scheme and will proactively engage with the outcomes of the review and continue to provide our expertise and knowledge to support the process.

Comcare will continue to support our jurisdiction to understand and comply with changes that might arise from implementation of agreed recommendations from the review of model work health and safety laws, with further changes to improve incident notification provisions in the model WHS laws expected.

## Delivering towards our enabling priorities

This section summarises work planned to uplift essential capabilities aligned to our enabling priorities that will drive improvements to how we plan, design and deliver initiatives and services for our clients and stakeholders centred around preventing work-related injuries and delivering better return to work outcomes.

### Making data-driven decisions

Our Data and Analytics Strategy 2024–2026 aims to strengthen decision making across Comcare through actionable insights and enhanced data and analytics capability. It will achieve this enterprise-wide uplift through a program of projects and improvement initiatives with a clear focus on making data-driven decisions to deliver better return to work outcomes and prevent work-related injuries.

More information about our Data and Analytics Strategy in the [capability section](#) of our Corporate Plan.

### Uplifting leadership, effectiveness and efficiency

Our People Strategy 2028, as well as our ICT and Digital Strategy 2028, are driving a range of projects and initiatives that will enhance our people experience and foundational ICT. More information on these strategies is available in the [capability section](#) of our Corporate Plan.

We also plan to make improvements to our fraud and corruption framework, cost recovery model and processes for procurement and contract management.

### Delivering client-centric services

Feedback from our clients and stakeholders drive improvement to our services and operations and are the focus of our performance measures for this priority. Our annual Employer survey measures employers' attitudes, experiences, and perceptions of Comcare. We're implementing a new mechanism to gather feedback on the employee's experience with our claims management systems.

We will adopt a client service design and delivery maturity model that will guide continuous improvement to build our service design capability and maturity into the future.

# Performance

Intended results, performance measures and targets have been set for each priority and will be used to measure performance towards delivering our strategy to achieve our purpose.

Our performance measures and targets were revised in 2024–25 as part of developing the Comcare Strategy.

We are committed to 13 performance measures and 15 targets for 2025–26.

## Planning and performance framework

Figure 2 represents the internal and external strategic and operational planning documents we prepare and deliver based on decisions made through our enterprise planning process. It includes the Commonwealth Performance Framework publications required under the PGPA Act.

We monitor and report on performance towards our plans throughout the reporting period.

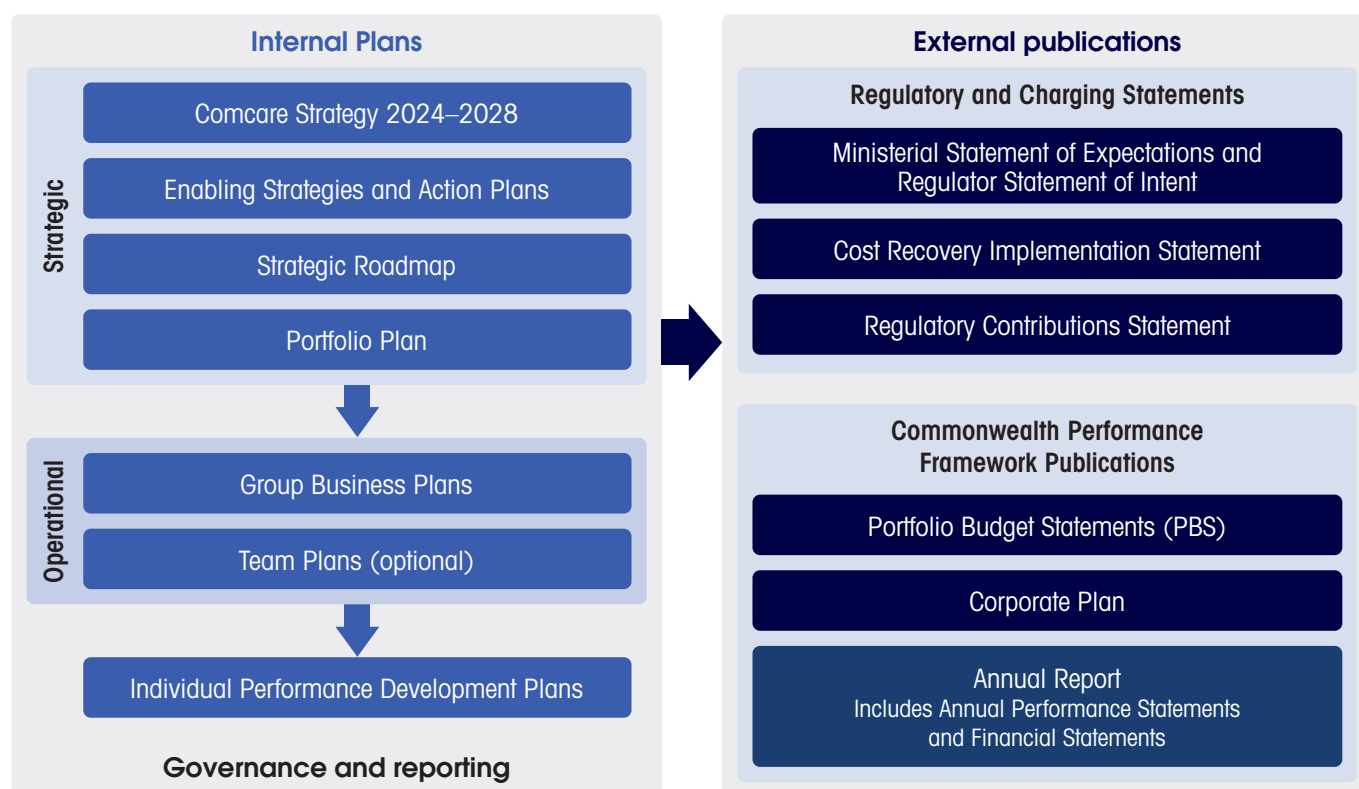


Figure 2 – Planning and performance framework

Comcare is represented in the [Employment and Workplace Relations PBS 2025–26](#). Our purpose 'promote and enable safe and healthy work' is also our outcome statement for the PBS.

Performance information in the PBS is replicated in this section in our Corporate Plan to ensure consistency and provide a clear read between the publications.

## Performance governance and results

Our performance measures and targets are governed by Comcare's Executive Committee and Audit and Risk Committee. Performance measures and targets are reviewed and confirmed annually through our enterprise planning process, with quarterly performance monitoring.

Targets represented continue over the 4-year span of this Corporate Plan, unless otherwise specified.

A result will be determined for each target against the performance measures at the end of the reporting period. Our performance result key is in table 3. The results will be reported in our Annual Performance Statements in our Annual Report.

**Table 3: Result key for targets**

Result key	
<b>Baseline result</b>	Baseline result established in the first year of reporting.
<b>Achieved</b>	The target set for the reporting period was achieved.
<b>Not achieved</b>	The target set for the reporting period was not achieved.
<b>Partially achieved</b>	The target set for the reporting period was partially achieved. This result will only be used for qualitative targets that are based on specific data sets. Success criteria will be determined internally at the start of the reporting period.
<b>Data not available</b>	Complete data was not available to assess the result prior to publishing of the Annual Report. The result will be confirmed in the Annual Report in the following period.

## Regulator performance

Comcare has work health and safety regulatory functions under the WHS Act and workplace rehabilitation provider regulatory functions under the SRC Act.

We are committed to applying the 3 principles of regulator best practice through delivery of our strategy and regulatory operations, as required by [Department of Finance Resource Management Guide 128 – Regulator Performance](#). They are:

- Principle 1: Continuous Improvement and building trust
- Principle 2: Risk-based and data driven
- Principle 3: Collaboration and engagement.

Our commitment has been formalised through the Ministerial Statement of Expectation issued to Comcare and our corresponding Regulatory Statement of Intent, available on our [website](#).

Our performance measures reference alignment to the regulator best practice principles where they apply.



# Performance measures and targets



## Strategic priority: Prevent work-related injuries

### Key activity

Be a leader in prevention of psychological injuries in particular, and increase our influence, appropriately sharing insights to more effectively drive positive change with employers and employees.

### 2028 aspiration

We are a national leader in prevention of psychological injuries and illness, actively sharing learnings and resources that can be applied by workplaces and used by other regulators. We influence policy and seamlessly collaborate to unify and promote our prevention approach.

### Intended results

- Our proactive prevention initiatives drive positive change with employers and employees.
- Our compliance and enforcement activities influence positive health and safety outcomes.

### Performance measure 1

Prevention initiatives are targeted and inform insights to share with the jurisdiction.

### 2025–26 Target

Evaluation confirms planned outcomes of prevention initiatives are achieved and insights are shared with the jurisdiction.

### Rationale

We proactively design and deliver a range of targeted prevention initiatives as part of our effort to prevent work-related injuries, improve work health and safety outcomes and drive positive change with employers and employees.

We will measure the impact and demonstrate value by evaluating prevention initiatives using the framework designed in 2024–25. We will promote outcomes so our learnings can be applied by workplaces and other regulators, and to drive continuous improvement.

This performance measure was introduced when Comcare revised its performance framework in 2024–25. The current target reflects the next stage of establishment considering the deliverables achieved in the first year of reporting.

Aligns to regulator performance best practice principles 1, 2 and 3.

### Measure type

Quantitative and qualitative, effectiveness measure.

### Methodology

Evaluation of prevention initiatives, agreed at the commencement of the reporting period, against Comcare's evaluation framework. Evaluation outcomes will be summarised into a format to communicate externally.

### Data sources

Internal planning, governance, reporting and evaluation documentation.

Regulatory data from the Integrated Regulatory Information System.

Qualtrics survey data.

### Changes since last period

- Minor revision to wording of the performance measure to focus on the intended outcome.
- Target revised to reflect the next stage in maturity of evaluating prevention initiatives using the framework designed in 2024–25.

### 2024–25 Performance Measure

Evaluation confirms planned outcomes of targeted prevention initiatives are achieved and inform insights to share with the jurisdiction.

### 2024–25 Target

Design and implement an evaluation framework to measure positive change in employers and employees.

## Performance measure 2

Average Commonwealth premium rate.

### 2025–26 Target

1% of payroll or lower.

#### Rationale

The final premium pool is the total premium to be charged across all entities in the Comcare insured scheme in respect of forecast claims from injuries and diseases sustained in the financial year. Agencies can, among other things, reduce their premiums by reducing claim costs through prevention of work-related injuries. Changes to the premium rate can represent the effectiveness of our prevention initiatives for employers in our Scheme.

This performance measure with the current target has been reported as part of Comcare's performance framework since 2019–20. The target was set based on data available at the time of planning.

Aligns to regulator performance best practice principle 1.

#### Measure type

Quantitative, effectiveness.

#### Methodology

Premium pool divided by the indicative estimated payroll for the premium year.

#### Data sources

Commonwealth agency payroll submissions data and actuarial premium reports.

#### Changes since last period

Nil.

**Performance measure 3**

Improved work health and safety knowledge, systems and practices as a result of Comcare’s activities.

**2025–26 Targets**

- a. 100% of compliance and enforcement activities where employer non-compliance is observed are monitored until the employer achieves compliance.
- b. 70% employers that report improved work health and safety knowledge, systems and practices as a result of Comcare’s activities.

**Rationale**

We deliver a range of proactive and reactive work health and safety compliance and enforcement activities in line with our Compliance and Enforcement Policy. Changes to an entity’s level of compliance between Comcare’s initial inspection and subsequent verification inspection, together with direct feedback from entities on improvements to their work health and safety systems as a result of our activities, provides a strong measure of how we are driving and influencing positive health and safety outcomes.

This performance measure was introduced when Comcare revised its performance framework in 2024–25. The target has been set considering baseline results obtained in the first year of reporting.

Aligns to regulator performance best practice principles 1, 2 and 3.

**Measure type**

Quantitative, effectiveness.

**Methodology**

Target a: Percentage of employers that resolved non-compliance identified during initial inspection, confirmed during a subsequent verification inspection.

Target b: Average of the total positive response rate to agreed questions in Comcare’s Employer Survey.

**Data sources**

Target a: Integrated Regulatory Information System data and Inspector Reports.

Target b: Comcare Employer Survey Results.

**Changes since last period**

- Minor revision to performance measure language to ensure alignment with revised targets.
- Target revised to be 2 specific and measurable targets considering the baselines established in 2024–25.
- Minor revision to methodology language to clarify the intent.

2024–25 Performance Measure	2024–25 Target
Percentage of entities that report improved work health and safety practices as a result of Comcare’s compliance and enforcement activities.	Establish a baseline and define targets for 2025–26 and beyond.



## Strategic priority: Deliver better return to work outcomes

### Key activity

Improve return to work outcomes focusing on psychological injuries, influencing and collaborating to deliver support and interventions that better meet the recovery needs of employees.

### 2028 aspiration

We partner with our stakeholders to provide leading return to work guidance and services, significantly improving return to work outcomes for employees.

### Intended results

- Our decisions are timely on claims for compensation.
- Our support and interventions lead to employees in our scheme returning to work.

### Performance measure 4

Determinations on injury and disease claims for compensation are made within statutory timeframes.

#### 2025–26 Target

100% of determinations are made within:

- 20 calendar days for injury claims
- 60 calendar days for disease claims.

### Rationale

Statutory timeframes for making determinations on injury and disease claims for compensation came into effect on 1 April 2024 through changes to the *Safety Rehabilitation and Compensation Regulations 2019* (SRC Regulations). Comcare's ability to make timely decisions on claims for compensation demonstrates our commitment to support one component of the return-to-work process for employees.

This performance measure was introduced when Comcare revised its performance framework in 2024–25. The target has been set considering statutory requirements.

### Measure type

Quantitative, efficiency.

### Methodology

Calculation of the number of days taken to make a determination on a claim, from the date of receipt of the claim, by the target timeframes. Exclude the days not counted for the reasons specified under Section 11A (3) of the SRC Regulations.

### Data sources

Comcare's internal claims management system and the Commission Data Warehouse.

### Changes since last period

- Targets combined to clarify the overall target with the dot points representing the legislated timeframes that must be achieved.

#### 2024–25 Performance Measure

Percentage of determinations on injury and disease claims for compensation are made within statutory timeframes.

#### 2024–25 Target

- 100% of determinations made for injury claims are made within 20 calendar days.
- 100% of decisions made for disease claims are made within 60 calendar days.

## Performance measure 5

Return to work rate.

### 2025–26 Target

85% for accepted claims initially determined within the previous 24 months.

#### Rationale

Comcare's return to work rate is an indicator of how effective our support and interventions are to better meet the recovery needs of employees.

This performance measure and current target has been reported as part of Comcare's performance framework since 2020–21. The target was set considering data available at the time of planning.

#### Measure type

Quantitative, effectiveness.

#### Methodology

The percentage and volume of accepted claims that have experienced return to work outcomes.

#### Data sources

Comcare's internal claims management system and the Commission Data Warehouse.

#### Changes since last period

Nil.



## Enabling priority: Making data driven decisions

### Key activity

Uplift technological capabilities to enable easy access to meaningful insights from data that support both strategic decisions and day-to-day operations, and transparent and consistent engagement.

### 2028 aspiration

We are a data-led organisation, appropriately leveraging technology and AI to derive and apply insights in our strategy setting and day-to-day operations. Our technology is accessible, building the client experience through the capacity for self-service.

### Intended result

- Our data capability matures over time.

### Performance measure 6

Data and analytics maturity rating.

### 2025–26 Target

Data maturity rating of '3 – Defined'.

### Rationale

Increases to our data maturity level demonstrates progress towards achieving our aspiration to be a data-led organisation.

This performance measure was introduced when Comcare revised its performance framework in 2024–25. The target has been set considering the baseline maturity assessment obtained in the first year of reporting.

Aligns to regulator performance best practice principle 2.

### Measure type

Qualitative, effectiveness.

### Methodology

Self-assessed maturity rating against the Australian Public Service (APS) Data Maturity Assessment Tool (DMAT).

### Data sources

Annual data maturity assessment documentation.

### Changes since last period

- Methodology changed in 2024–25 to base our maturity on the APS DMAT instead of Comcare's own data and analytics maturity model.
- Performance measure and target language revised to reflect the new methodology, with the target reflecting the APS DMAT maturity scale baseline result achieved in 2024.
- These changes were agreed during 2024–25 and used as the performance measure and target in our 2024–25 Annual Performance Statements.

### 2024–25 Performance Measure

Maturity rating against Comcare's Data & Analytics Maturity Model.

### 2024–25 Target

Data maturity rating of level 2 or above.

**Performance measure 7**

Employers that report satisfaction with access to our data and reporting products.

**2025–26 Target**

70%.

**Rationale**

Stakeholder feedback demonstrates performance towards enabling transparent and consistent engagement with our data and reporting products.

This is a new performance measure introduced when Comcare revised its performance framework in 2024–25. The target has been set considering the baseline result obtained in the first year of reporting.

Aligns to regulator performance best practice principle 2.

**Measure type**

Quantitative, effectiveness.

**Methodology**

Total positive response rate to an agreed question in Comcare’s Employer Survey.

**Data sources**

Annual Comcare Employer Survey Results.

**Changes since last period**

- Target revised to a specific target, informed by the baseline established in 2024–25.

2024–25 Performance Measure	2024–25 Target
Percentage of stakeholders that report satisfaction with access to our data and reporting products.	Establish a baseline and define targets for 2025–26 and beyond.





## Enabling priority: Uplifting leadership, effectiveness and efficiency

### Key activity

Reinforce the organisation's purpose, with impact through empowered leadership and decision making at all levels. Optimise our governance, performance, funding and resource allocation models.

### 2028 aspiration

We have strong alignment on our purpose and take individual ownership to lead and make informed decisions. We have clear governance with responsive quality assurance and a forward plan of the resourcing required to deliver on our priorities.

### Intended results

- Our leaders are effective and our people are aligned to our purpose.
- Our scheme is financially sustainable.

### Performance measure 8

Leadership performance ratings.

### 2025–26 Target

80%.

#### Rationale

This measure indicates employee sentiment on Comcare's leadership during the reporting period.

This is a new performance measure introduced when Comcare revised its performance framework in 2024–25. The target has been set considering the baseline result obtained in the first year of reporting and APS averages.

#### Measure type

Quantitative, effectiveness.

#### Methodology

Average of the total positive response rate to agreed questions in Comcare's results for the APS Employee Census Survey.

#### Data sources

Annual APS Employee Census results for Comcare.

#### Changes since last period

- Methodology clarified in 2024–25 to base the result solely on APS Employee Census survey results and select questions rather than an index score.
- Minor revisions to performance measure language to align with APS Employee Census terminology.
- Target revised to be specific and measurable based on the baseline established in 2024–25.

#### 2024–25 Performance Measure

Leadership index ratings.

#### 2024–25 Target

Establish a baseline and define targets for 2025–26 and beyond.



**Performance measure 9**

Employee engagement with Comcare’s purpose and objectives rating.

**2025–26 Target**

85%.

**Rationale**

This measure indicates employee sentiment on engagement with Comcare’s purpose and objectives during the reporting period.

This is a new performance measure introduced when Comcare revised its performance framework in 2024–25. The target has been set considering baseline result obtained in the first year of reporting and APS averages.

**Measure type**

Quantitative, effectiveness.

**Methodology**

Total positive response rate to an agreed question in Comcare’s APS Employee Census Survey.

**Data sources**

Annual APS Employee Census results for Comcare.

**Changes since last period**

- Methodology clarified in 2024–25 to base the result solely on APS Employee Census survey results and a select question rather than an index score.
- Minor revisions to performance measure language to align with APS Employee Census terminology.
- Target revised to be specific and measurable based on the baseline established in 2024–25.

2024–25 Performance Measure	2024–25 Target
Employee engagement with Comcare’s purpose and objectives scores.	Establish a baseline and define targets for 2025–26 and beyond.

### Performance measure 10

Minimum funding ratio.

#### 2025–26 Target

110% (minimum threshold).

#### Rationale

The funding ratio, based on Comcare's claims liabilities, is used to measure the financial sustainability of the compensation scheme.

This performance measure and current target has been reported as part of Comcare's performance framework since 2020–21. The target was set considering data available at the time of reporting.

#### Measure type

Quantitative, efficiency.

#### Methodology

Total assets (Comcare Retained funds + Consolidated Revenue Fund) / Net outstanding claims liability calculated by independent actuary.

#### Data sources

Financial statements and liability valuation report.

#### Changes since last period

Nil.

### Performance measure 11

Administrative cost ratio.

#### 2025–26 Target

15 – 25%.

#### Rationale

The administrative cost ratio represents efficiency of Comcare's insurance and claims management operations.

This performance measure and current target has been reported as part of Comcare's performance framework since 2020–21. The target was set considering data available at the time of reporting.

#### Measure type

Quantitative, efficiency.

#### Methodology

Administration costs / (Administration costs + Claims costs), based on Safe Work Australia's Comparative Performance Monitoring (CPM) methodology.

#### Data sources

Commonwealth Agency Payroll submissions, actuarial premium reports, Comcare's financial management system data, Comcare's claims management system.

#### Changes since last period

Nil.



## Enabling priority: Delivering client-centric services

### Key activity

Uplift our organisational capability to co-design and deliver services that anticipate and meet client needs and adapt to changing circumstances.

### 2028 aspiration

We use feedback and insights about clients' preferences to shape our strategy and embed positive connections. We co-design accessible services to provide clients with a personalised experience that is continuously improved.

### Intended results

- Our clients are satisfied with our services.
- Our client service design and delivery capability matures over time.

### Performance measure 12

Overall client satisfaction with services.

#### 2025–26 Target

- a. Employer satisfaction rating of 75%.
- b. Implement Comcare's mechanism for measuring employee satisfaction.

### Rationale

Our client satisfaction results measure if our services are meeting the needs of our clients and identify opportunities to improve service delivery. This performance measure was reframed when Comcare revised its performance framework in 2024–25. The current targets have been set considering baseline results and the next stage of establishment considering deliverables achieved in the first year of reporting. Our Employer Survey has been used to measure employer satisfaction for over 5 years. We are expanding our capability to assess employee satisfaction throughout the claims management process, providing an expanded view of satisfaction from our key clients.

Aligns to regulator performance best practice principle 3.

### Measure type

Target a: Quantitative, effectiveness.

Target b: Qualitative, output.

### Methodology

Target a: Total positive result to an agreed question in Comcare's Employer Survey.

Target b: Assessment of deliverables at the end of the reporting period against deliverables endorsed in planning documentation.

### Data sources

Target a: Annual Comcare Employer Survey.

Target b: Internal planning, governance and reporting documentation.

### Changes since last period

Target a: Methodology changed to be based on a single question in the employer survey instead of a range of inputs..

Target b: Target revised to reflect the next stage in maturity towards being able to measure employee satisfaction, as a result of the mechanism designed in 2024–25.

### 2024–25 Performance Measure

Employee engagement with Comcare's purpose and objectives scores.

### 2024–25 Target

Design a new mechanism for measuring employee satisfaction.

**Performance measure 13**

Client service design and delivery maturity rating.

**2025–26 Target**

Client service design and delivery maturity model adopted.

**Rationale**

Service design and delivery maturity demonstrates our commitment to uplifting our organisational capability to deliver client-centric services. It’s acknowledged that service design and experience is a new concept for Comcare that will be defined, embedded and improved over the years to come.

This is a new performance measure introduced when Comcare revised its performance framework in 2024–25. The current target reflects the next stage of establishment considering the deliverables achieved in the first year of reporting.

**Measure type**

Quantitative, effectiveness.

**Methodology**

Assessment of deliverables at the end of the reporting period against endorsed deliverables in planning documentation.

**Data sources**

Internal planning, governance and reporting documentation.

**Changes since last period**

- Minor revision to performance measure language to align with performance measure 6 which is also based on a maturity rating.
- Target revised to reflect the next stage in maturity towards adopting a maturity model based on the baseline maturity assessment result obtained in 2024–25.

2024–25 Performance Measure	2024–25 Target
Maturity rating against a client service design and delivery maturity model.	Client service design and delivery maturity model identified, and baseline maturity rating obtained to define targets for 2025–26 and beyond.

# Operating context

## Environment

Over the coming decade, our operating environment will present several challenges and opportunities for which Comcare needs to prepare. Our refocused strategy has been developed to address and respond to a range of challenges, risks, commitments, and opportunities which will impact our workforce. The 5 change drivers most likely to impact Comcare's environment in the next 10 years are described in table 4.

**Table 4: Summary of change drivers most likely to impact Comcare's environment**

Change driver	What we are seeing	What we are doing
<b>1</b> <b>Legislative reform and shifts in the nature and volume of incidents, notifications, injuries and illnesses</b>	<ul style="list-style-type: none"> <li>Review of our establishing legislation, the SRC Act was initiated in 2024.</li> <li>Changes to the WHS Act as a result of reform to the model work health and safety laws.</li> <li>A rise in work-related psychological injuries and claims.</li> </ul>	<ul style="list-style-type: none"> <li>Proactively engaging with the SRC Act review outcomes and preparing ourselves for further changes to the WHS Act on the horizon.</li> <li>Ensuring our clients and stakeholders are informed and supported through legislative change.</li> <li>Increased focus on prevention activities to achieve better work health and safety outcomes.</li> </ul>
<b>2</b> <b>Shifts in ways of working patterns</b>	<ul style="list-style-type: none"> <li>Competition for talent and higher employee expectations.</li> <li>Changes to the uptake in casualised work, short term roles and contractors.</li> <li>Aging workforce.</li> <li>Remote work and flexible working arrangements.</li> <li>Building a diverse and inclusive workplace environment.</li> </ul>	<ul style="list-style-type: none"> <li>Delivering our roadmap of work towards our People Strategy.</li> <li>Offering a range of flexible working arrangements and employment options for our people through our Enterprise Agreement.</li> </ul>
<b>3</b> <b>Rapid advancements in technology including Generative AI on the rise</b>	<ul style="list-style-type: none"> <li>Data protection and privacy needs, new opportunities for data sharing, and increasing cyber-crime, impacting the efficiency and effectiveness of operations.</li> <li>Rapid advancements in technology including the increased digitisation and use of big data and generative artificial intelligence.</li> <li>Rapid technological innovation raising expectations for transparency and productivity.</li> </ul>	<ul style="list-style-type: none"> <li>Delivering towards our ICT and Digital Strategy 2028.</li> <li>Aligning our cybersecurity posture with whole-of-government and industry best practices, embedding proactive risk controls, improving real-time monitoring, and ensuring rapid response to incidents.</li> <li>Laying the groundwork for greater innovation by investing in secure, modern and scalable ICT infrastructure.</li> </ul>
<b>4</b> <b>Increasing customer expectations on Government and the APS</b>	<ul style="list-style-type: none"> <li>Increase in demand for customer-centric service models.</li> <li>APS Reform: Working towards a vision for a stronger public service.</li> <li>Rise in climate, environmental, and sustainability considerations.</li> </ul>	<ul style="list-style-type: none"> <li>'Delivering client-centric services' is embedded as an enabling priority of the Comcare Strategy with dedicated initiatives and performance measures relating to client satisfaction and client service maturity.</li> <li>Monitoring APS reform initiatives and adopting relevant outcomes.</li> <li>Sustainability is considered under our developing future workplace strategy.</li> </ul>
<b>5</b> <b>Increased fiscal and economic pressures</b>	<ul style="list-style-type: none"> <li>Fiscal and economic pressures such as higher inflation and interest rate changes affect our liabilities.</li> </ul>	<ul style="list-style-type: none"> <li>Demonstrating the economic and productivity benefits of investing in work health and safety to our clients and stakeholders.</li> <li>Using our administrative cost and funding ratio performance measures to assess the financial sustainability of our scheme and efficiency of our claims management and insurance operations.</li> </ul>

## Cooperation

Employees and Employers are our key clients at the centre of our scheme, strategy and operations. We also have other client relationships depending on the interaction.

We engage, collaborate and partner with a wide range of stakeholders at strategic and operational levels to achieve our purpose to promote and enable safe and healthy work.

For some clients and stakeholders, Comcare may have just one role and relationship. For others there can be multiple roles and relationships at various levels. These could range from WHS regulation, workers' compensation, information, guidance and education, through to strategic partnership, influence and support to promote and enable safe and healthy work.

Table 5 provides examples of stakeholders we cooperate, collaborate and partner with when delivering our cores roles and work towards our strategy.

**Table 5: Example of Comcare's cooperative relationships and partnerships**

Stakeholders we engage and collaborate with to		
Provide support for employers and employees	Inform and influence legislation, policy and best practice	Meet government and legislative responsibilities
Medical and rehabilitation service providers	Safe Work Australia	Minister and Portfolio Department – Department of Employment and Workplace Relations
Rehabilitation case managers	Heads of Workplace Safety Authorities (HWSA) and Heads of Workers' Compensation Authorities (HWCA)	Safety Rehabilitation and Compensation Commission (SRCC)
Health and Safety Representatives	State and territory regulators, workers' compensation authorities and insurers	Seafarers Safety, Rehabilitation and Compensation Authority (Seacare)
Unions	Research bodies and universities	Department of Finance
	Industry groups	Commonwealth Department of Prosecutions

# Capability

Our data and analytics, workforce, infrastructure and information and communication technology (ICT) capabilities are essential to our organisation and the focus of work delivered towards our enabling priorities in our strategy.

## People

Our People Strategy 2028 provides a strategic and integrated approach to planning, building, retaining and deploying the workforce our organisation needs to deliver. It is a critical enabler for delivering our purpose and sets out our vision for a capable, engaged and high performing workforce that is trusted and passionate about achieving better work health and safety outcomes for Australians.

Four target outcomes guide the implementation of our initiatives and contribute to meeting our vision of a capable, engaged and high performing workforce that is trusted and passionate about achieving better work health and safety outcomes for Australians:

1. Capability – we attract and grow talented people who value having a positive impact.
2. Agility – we design an adaptable organisation that evolves with change.
3. Wellbeing – we are inclusive and embrace diversity and deliver safe and healthy work.
4. Stewardship – we understand how important stewardship, integrity, and our organisational values are to achieving our purpose.

**Our Vision – A capable, engaged and high performing workforce that is trusted and passionate about achieving better work health and safety outcomes for Australians.**

### Our Target Outcomes

Capability	Agility	Wellbeing	Stewardship
We attract and grow talented people who value having a positive impact	We are an adaptable organisation that evolves with change	We are inclusive and embrace diversity, and deliver safe and healthy work	We champion stewardship, integrity, the Comcare values, and a connection with our purpose

### Our Employee Experience

 <b>Connection</b> I feel heard, trusted, respected and supported	 <b>Flexibility</b> I have choice and balance	 <b>Purpose</b> My work makes a difference	 <b>Career</b> I learn and grow	 <b>Care</b> I work in a safe and healthy environment
---	---	--	--	---

**Figure 3: Comcare People Strategy vision, Target Outcomes and Employee Experience**

Our People Strategy is aligned to the APS Reform Program, the APS Workforce Strategy, the Commonwealth Aboriginal and Torres Strait Islander Workforce Strategy, the APS Disability Employment Strategy, the APS Gender Equality Strategy, and the APS Culturally and Linguistically Diverse Strategy and Action Plan.

We are committed to the principles of diversity and inclusion, 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, Future Workplace Strategy, and Reconciliation Action Plan, together with the Diversity Inclusion Group and the practices which they inform, will help support and grow a diverse and inclusive workforce.

## APS Strategic Commissioning Framework

The core work of the APS must be done by our core workforce – APS employees. This expectation will wind back excessive outsourcing and its impacts on the skills held and used in APS agencies.

All agencies must move away from outsourcing work that are core roles of the APS or the agency. Agency heads are accountable for rebalancing their workforce to prioritise direct employment, strengthen capability, and ensure any use of external expertise enhances the work and knowledge of the APS. The Strategic Commissioning Framework sets this policy direction for the APS and provides the advice and tools required for agencies to make this change.

This framework sets a clear expectation that most roles and functions will be delivered by APS employees, outlines limited circumstances in which external workforces could be appropriate, and ensures the APS maximises the benefit of any external arrangements.

In 2025–26, Comcare will continue working to bring core work in-house in line with the APS Strategic Commissioning Framework. We expect our targets for 2025–26 to focus on reduced outsourcing of ICT and digital work.

## Workplaces

Our ways of working and how we interact with our stakeholders has changed immensely in recent years. Changing from largely office-based culture to embracing hybrid working, it is now imperative that we manage our property portfolio in a cost-effective way.

Our developing Future Workplace Strategy supports decisions about our workplaces to best support the safety and wellbeing of staff in their ways of working and delivering towards our purpose, now and into the future. Our future workplace vision is 'Contemporary, cost effective, safe and efficient workplaces that connect people, support collaboration, learning and service excellence'.

Our future workplace concepts will be iteratively designed and updated with sharing, flexibility and resilience in mind. The office will be made for working, collaborating and connecting in person whilst still allowing space for focussed and solo work. Safety, accessibility and ergonomics will be key in every setting.

We lease 9 office locations in all capital cities across Australia. Our Future Workplace Strategy will prioritise workplace change based on lease timeframes, growth, team needs and other factors. Our Perth and Newcastle Offices were the first offices to commence a change process in 2023–24 that will be finalised in early 2025–26. Some changes are underway in our Darwin location. Planning the future of our remaining workplaces continues, with changes expected up until 2027–28.



Figure 4: Comcare office locations



## Data and analytics

Our Data and Analytics Strategy 2024–2026 aims to strengthen decision making across Comcare through actionable insights and enhanced data and analytics capability. It will achieve this enterprise-wide uplift through a program of projects and improvement initiatives with a clear focus on making data-driven decisions to deliver better return to work outcomes and prevent work-related injuries.

Key outcomes of the program include:

- Delivery of a prioritised set of ‘proof of value’ business-led data and analytics opportunities to generate tangible business value against agreed success criteria.
- Strengthened data and analytics foundations for greater accessibility and reliability of insights with fit-for-purpose governance.
- Implementation of a target state data operating model for Comcare to enable the above.
- Maturing data and analytics capability.

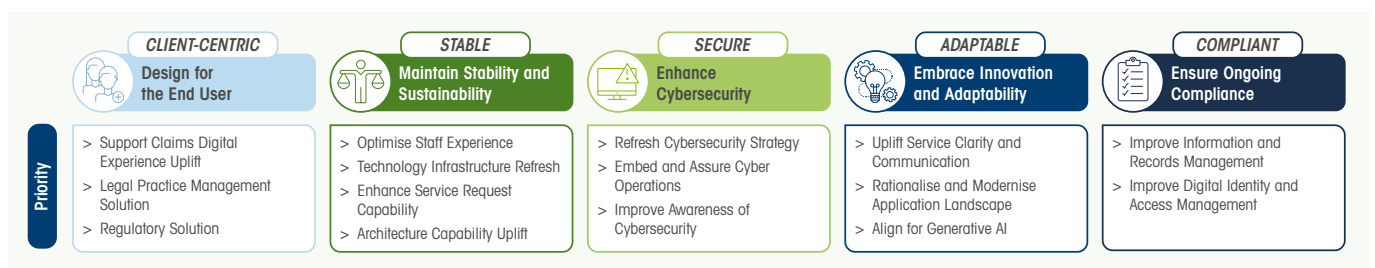
## Information and communications technology (ICT)

Comcare’s [ICT and Digital Strategy 2028](#) provides a clear and future-focused roadmap to strengthen our digital capability, drive innovation, and deliver reliable, secure, and accessible services to our clients, stakeholders and staff. The strategy is grounded in 5 guiding principles: client-centric design, foundational stability, enhanced cybersecurity, innovation with flexibility, and compliance with regulation and legislation.

Our priorities over next 3 years focus on enhancing the user experience, building consistency through standardised digital processes, being future-ready in a rapidly evolving digital landscape, and ensuring cost-effective and scalable technology investments.

At the heart of this strategy is a significant uplift in our cybersecurity capability. We are responding to the escalating threat landscape including scams, phishing attacks, and data breaches by creating a digital environment where clients and staff can feel safe, secure, and confident in their interactions with us. We are aligning our cybersecurity posture with whole-of-government and industry best practices, embedding proactive risk controls, improving real-time monitoring, and ensuring rapid response to incidents. This includes strengthening identity and access management and increasing staff awareness through targeted training and policy reinforcement.

Comcare is also laying the groundwork for greater innovation by investing in secure, modern and scalable ICT infrastructure. These investments ensure our systems are resilient and responsive to both current operational demands and future service delivery needs. This foundation enables us to explore and adopt emerging technologies such as artificial intelligence and machine learning—in a responsible and ethical manner, always guided by Commonwealth frameworks and our commitment to privacy, security, and transparency.



**Figure 5: Comcare ICT and Digital Strategy Guiding Principles and Priorities**

Through strong technology governance, enhanced information and records management, and a disciplined approach to digital transformation, Comcare is building a sustainable and secure digital environment that supports our regulatory functions and enables improved outcomes for our clients and the community.

# Risk oversight and management

## Risk management framework

Effective risk oversight and management is an integral part of all aspects of Comcare's business, driving and supporting our ability to effectively deliver towards our strategy.

Comcare's Risk Oversight and Management Policy and Framework is applied to all our activities and facilitates a positive risk culture where risks are identified early and openly managed in a way that supports the delivery of our priorities. It aligns with the Commonwealth Risk Management Policy and the international risk management standard (ISO 31000:2018).

The framework and a structured, consistent and comprehensive approach to risk management provide a mechanism for proactively identifying and treating risks across the business and for monitoring operating environments. This contributes to strengthening management practices, decision making and innovation.

## Roles and governance

We have specific risk management roles and scheduled reporting of risk at the strategic, group and operational levels. We also monitor emerging risks in our operating environment to ensure these are actively identified and managed.

Our employees have a general responsibility to identify and manage areas of potential risk and demonstrate that their actions and decisions reflect appropriate consideration. All employees are required to complete online fundamentals of risk management training to identify and mitigate risks that will impact their work and their team's outcomes.

Comcare's Chief Operating Officer is the appointed Chief Risk Officer supporting the Chief Executive Officer with oversight of the framework. Risk management oversight and reporting is incorporated into our governance structure through the Executive Committee and Operations Committee. Our Audit and Risk Committee provides independent, external advice on the appropriateness of Comcare's system of risk oversight and management.

## Strategic risks

Our strategic risks are aligned to our strategic and enabling priorities and intended performance results under the Comcare Strategy. Our strategic risks and mitigation activities for 2025–26 are represented in table 6.

Strategic risks are confirmed annually, with quarterly monitoring and reporting to the Executive Committee and Audit and Risk Committee. General Managers are appointed as leads for managing each risk.



**Table 6: Comcare's strategic risks and mitigation activities**

Priority and values	Strategic risk statement	Mitigation activities
<b>Prevent work-related injuries</b>	1. Our activities are not designed or targeted appropriately to prevent work related injuries, especially psychosocial prevention is not driving positive change with employers and employees.	<ul style="list-style-type: none"> <li>Designing and implementing an evaluation framework to measure positive change in employers and employees.</li> <li>Delivering a range of proactive and reactive work health and safety compliance and enforcement activities in line with our Compliance and Enforcement Policy.</li> </ul>
<b>Deliver better return to work outcomes</b>	2. Complicated processing and delayed decision making of claims impedes better return to work outcomes.	<ul style="list-style-type: none"> <li>Improving the claims experience and operations.</li> <li>Improving our ability to make timely decisions on claims for compensation.</li> </ul>
	3. Our inability to deliver support and interventions for the recovery needs of injured employees, focusing on psychological injuries, impedes their returning to work.	<ul style="list-style-type: none"> <li>Enabling employers to improve return to work outcomes.</li> <li>Improving return to work outcomes through insights, innovation and influence.</li> </ul>
<b>Making data-driven decisions</b>	4. Our data capability is not sufficiently mature to support meaningful, transparent and consistent decision making.	<ul style="list-style-type: none"> <li>Improving our data capability maturity.</li> <li>Enabling transparent and consistent engagement with our data and reporting products.</li> </ul>
<b>Uplifting leadership, effectiveness and efficiency</b>	5. The lack of empowered, quality leadership and direction is deteriorating Comcare's purpose, performance, effectiveness and efficiency.	<ul style="list-style-type: none"> <li>Improving the effectiveness of our leadership and governance.</li> <li>Enhancing our employee engagement.</li> <li>Uplifting foundational ICT.</li> </ul>
	6. Our scheme is not financially sustainable.	<ul style="list-style-type: none"> <li>Strengthening our funding and cost-recovery arrangements.</li> <li>Undertaking analysis of effectiveness of Premium Process.</li> <li>Uplifting strategic financing and budgeting capability.</li> </ul>
<b>Delivering client-centric services</b>	7. Our services are not appropriately designed and delivered to meet the changing needs of our clients leading to client dissatisfaction and immaturity of our service delivery capability.	<ul style="list-style-type: none"> <li>Improving our client satisfaction through service design and delivery capability and client insights.</li> <li>Delivering platforms for the future.</li> </ul>
<b>Organisational values</b>	8. Weaknesses in our culture, collaboration and innovation cause our stakeholders to lose trust in Comcare's advice and decisions.	<ul style="list-style-type: none"> <li>Enhancing our governance processes and culture.</li> <li>Improving oversight and enforcement of positive behaviours and integrity.</li> <li>Encouragement of teamwork, collaboration and innovation.</li> <li>Enhancing stakeholder engagement, communication and education.</li> </ul>

# Appendix A – Corporate plan content requirements

We considered the requirements of the PGPA Act and *Public Governance, Performance and Accountability Rule 2014* (PGPA Rule) and guidance in the [Department of Finance Resource Management Guide 132 – Corporate Plans for Commonwealth Entities](#) when preparing this Corporate Plan.

Table 7 provides a compliance index, summarising the location of the required information across the Corporate Plan.

**Table 7: Corporate Plan compliance index**

Requirement	Location in Corporate Plan
<a href="#">Introduction</a>	Page 1
<a href="#">Purpose</a>	Page 3
<a href="#">Key activities</a>	Page 7 – 8
<a href="#">Performance</a>	Pages 12 – 25
Operating context	
<a href="#">Environment</a>	Page 26
<a href="#">Cooperation</a>	Page 27
<a href="#">Capability</a> (workforce capability planning, infrastructure requirements, ICT requirements)	Pages 28 – 30
<a href="#">Risk oversight and management</a>	Pages 31 – 32
Subsidiaries	Not applicable – Comcare do not have subsidiaries.

1300 366 979 • [comcare.gov.au](https://comcare.gov.au)

