

CORPORATE PLAN 2022–23



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#### **Corporate Strategy**

Comcare

GPO Box 9905 Canberra ACT 2601



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## **CEO's introduction**

As the accountable authority of Comcare, I present the Comcare Corporate Plan for 2022–23, which covers the reporting period 2022–2026 as required under section 35(1)(b) of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act).

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 continuing excellence and leadership as a national workers' compensation authority and work health and safety regulator.

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.

#### **Agron Hughes**

Acting 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 and strategic priorities

Comcare has several important roles. We are a work health and safety regulator, a scheme manager, a claims manager and an insurer. 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 Safety, Rehabilitation and Compensation Act 1988 (SRC Act)
- the Work Health and Safety Act 2011 (WHS Act)
- the Asbestos-related Claims (Management of Commonwealth Liabilities) Act 2005 (ARC Act)
- the Parliamentary Injury Compensation Scheme (PICS) established under the Parliamentary Business Resources Act 2017.

Our roles and responsibilities associated with administering this legislation are described on page 7 of this Corporate Plan. Our purpose and outcome is:

# Promote and enable safe and healthy work

Comcare's purpose brings together our business and engages our clients and stakeholders around physical and psychological injury prevention, early intervention, injury recovery, return to work and workplace health and safety regulation.

Our work is aligned to five strategic priorities that support our purpose. These priorities reflect that there is multi-factorial, multilayered connections between the different functions of Comcare along the prevention—early intervention—injury management-compensation and rehabilitation continuum.

Comcare's values direct the way we approach our priorities.

Figure 1: Comcare's values



Figure 2: Comcare's purpose and strategic priorities

#### Comcare's purpose:

promote and enable safe and healthy work



#### **Excellence in service provision**

As a service delivery agency, we put our stakeholders at the centre of the things we do. We are responsive to the growing community expectations of the public sector to provide seamless, personalised services which we strive to continually improve. Our services are tailored to our stakeholders' needs and in delivering these services we live and model our values, including acting with integrity and respect.



#### **Engagement with our stakeholders**

We strive to uphold a positive reputation as an effective regulator and service delivery agency. We are always open to feedback from our stakeholders and undertake to consult widely on issues that impact them. We aim to engage in authentic, meaningful and genuine interactions with stakeholders at all levels, and to ensure we are courteous and professional in all our dealings.



### Prevention and early intervention across our scheme

As the national workers' compensation authority and work health and safety regulator, we play a leading role in supporting safe and healthy workplaces. We do this by working with employers to adopt risk and evidence-based prevention and early intervention practices, with the ultimate aim of supporting employers and workers to create and maintain physically and mentally healthy workplaces.



#### Insight driven and risk and evidence-based practice

We are working to harness the power of data and analytics to drive our approach to promoting and enabling safe and healthy work. We aim to use all available information to continually improve our services and to identify and address the needs of our scheme. We undertake research and engage with emerging evidence to validate our approach. We regularly evaluate our performance and change course where necessary. We challenge assumptions and do not accept the status quo.



#### Being adaptive and sustainable in the face of change

We are a flexible and adaptive agency, always open to new ideas and new ways of doing things. We consider the broader environment and are proactive in dealing with its impacts. We aim to encourage innovation in the development of sustainable solutions to health and safety issues. We also endeavour to use the latest tools, data and technology to develop new solutions to problems.

# Roles and responsibilities

### Regulator role

We are the national work health and safety regulator which includes regulatory functions and powers for compliance and enforcement under the WHS Act. We also regulate workplace rehabilitation providers and workplace rehabilitation under the SRC Act.

Our compliance and enforcement activities in relation to both work health and safety and workplace rehabilitation combine proactive and reactive components. We group our compliance and enforcement activities into 4 main streams:

- providing information and advice
- · making authorisation and approval decisions
- monitoring the extent of compliance in the jurisdiction
- investigating alleged or potential contraventions.

Our Compliance and Enforcement policy sets out Comcare's approach to its regulatory functions and powers under the WHS Act and SRC Act and guides our decisions on when and how we undertake specific activities.

#### Scheme manager role

We manage the Comcare workers' compensation scheme which covers premium paying employers and self-insured licensees. As the scheme manager we monitor and maintain legislation and develop policy and guidance that:

- sets clear expectations of roles and obligations
- promotes better practice
- creates effective early intervention and return to work practices and outcomes.

As scheme manager we collate, curate and analyse 'whole-of-scheme' data, identifying trends to ensure we achieve sustainable and better practice arrangements. We support the SRCC to manage and monitor self-insured licensees. We provide advice to the Minister on the operation and effectiveness of the SRC Act, along with advice on the administration of the WHS Act. We provide support to the SRCC and the Seacare Authority through expert advice and services. We approve and monitor workplace rehabilitation providers who operate in the scheme.

We recover costs for the functions we and the SRCC perform under the SRC Act. We do this through setting regulatory contributions for Australian Government agencies, supporting the SRCC to set licence fees for self-insured licensees and setting application fees for workplace rehabilitation providers to operate in our scheme. We also recover costs for providing assistance to employers when reconsidering determinations under the *Seafarers Rehabilitation and Compensation Act 1992*.

## Claims manager role

Comcare manages claims across a number of injury compensation schemes. Under the SRC Act we are the workers' compensation claims manager for Australian Government agency employees. In addition, we manage the liabilities for common-law asbestos related conditions under the ARC Act for the Australian Government. We also administer the Parliamentary Injury Compensation Scheme which provides injury compensation coverage for Australian Government parliamentarians and the Prime Minister's spouse.

#### Insurer role

Under the SRC Act, Comcare is also a workers' compensation insurer and we set and collect premiums specific to each Australian Government agency to meet Comcare's claims liability and claims administration costs.

## Our scheme

The Comcare scheme covering work health and safety and workers' compensation elements 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.

As of 30 April 2022, our scheme comprised of 438,205 full-time equivalent (FTE) employees covered under the SRC Act, and 422,256 FTE employees under the WHS Act. It also comprised 213 employers covered under the SRC Act and 212 employers under the WHS Act.

# Key activities and performance

We will be focusing on the following key activities during the life of our Corporate Plan, which are supported by a range of performance measures and targets which we will use to monitor our progress towards delivering our strategic priorities and achieving our purpose.

Although our key activities and performance measures are aligned to one strategic priority, most will cross over multiple priority areas.

Our performance measures are reflected in our Portfolio Budget Statement. Progress and outcomes will be reported through our Annual Performance Statement in our Annual Report.

## Strategic priority one: Excellence in service provision



#### **Excellence in service provision**

As a service delivery agency, we put our stakeholders at the centre of the things we do. We are responsive to the growing community expectations of the public sector to provide seamless, personalised services which we strive to continually improve. Our services are tailored to our stakeholders' needs and in delivering these services we live and model our values, including acting with integrity and respect.

## Table 1: Key activities and performance measures for strategic priority one

#### **Key activities**

Delivering key projects to improve claims management outcomes and performance

Providing work health and safety information and advice through Inspectorate engagement activities

Supporting better practice governance for the SRCC and Seacare Authority

renominance measures				
Performance measure	2022–23 target	2023–24 and beyond		
1.1 We provide quality services to all our stakeholders	1.1.1 Stakeholder satisfaction rating of 85% or more Methodology/Source: Assessment of results of Comcare's Annual Employer Survey, the National Return to Work Survey, Safe Work Month event evaluations and Comcare National Conference event evaluation.	As per 2022–23		
	1.1.2 85% or more evaluated entities report improved work health and safety outcomes as a result of Comcare's regulatory activities  Methodology/source: Assessment of results from Comcare's annual evaluation of its regulatory services.			
	1.1.3 100% of activities are delivered within statutory timeframes, where applicable	-		
	Methodology/source: Actual performance against timeframes specified in the WHS legislation.	_		
	1.1.4 SRCC satisfaction of support provided by Comcare			
	Methodology/source: Actual performance against agreed timeframes in statement of services, meeting protocols and procedures.	_		
	1.1.5 Seacare Authority satisfaction of support provided by Comcare			
	Methodology/source: Actual performance against agreed timeframes in statement of services, meeting protocols and procedures.			
1.2 We consistently manage	1.2.1 95% of resolution payments made within 10 days of receipt of relevant information	As per 2022–23		
Commonwealth asbestos-related	Methodology/source: Actual performance against date documents received post settlement to date of payment.			
disease claims with more equitable and	1.2.2 Asbestos-related disease common law settlements are monitored to ensure consistency and equity			
efficient outcomes	Methodology/source: Annual internal review of asbestos-disease common law settlements against settlement outcomes from previous years.			
1.3 We build and embed better	1.3.1 Our interactions with regulated entities and other stakeholders are open, transparent and consistent	As per 2022–23		
regulatory practice into our work health and safety	Methodology/source: Work health and safety priorities are developed, published and implemented, and forums and webinars are delivered to regulated entities with a focus on their obligations under the WHS legislation.	_		
regulatory activities	1.3.2 We ensure that regulatory activities are conducted in accordance with endorsed policies and procedures			
	Methodology/source: Assessment of results of Comcare's internal assurance program against regulatory activities.			

## Strategic priority two: Engagement with our stakeholders



#### **Engagement with our stakeholders**

We strive to uphold a positive reputation as an effective regulator and service delivery agency. We are always open to feedback from our stakeholders and undertake to consult widely on issues that impact them. We aim to engage in authentic, meaningful and genuine interactions with stakeholders at all levels, and to ensure we are courteous and professional in all our dealings.

## Table 2: Key activities and performance measures for strategic priority two

#### **Key activities**

Implementing and evaluating our Engagement Strategy within the Commonwealth WHS jurisdiction on managing and preventing psychosocial hazards in workplaces such as bullying and harassment and sexual harassment

Regularly engaging with employers and other scheme participants using targeted communication channels

Designing and implementing a Comcare Contact Centre

Ongoing engagement with the Administrative Appeals Tribunal (AAT) with a focus on resolving disputes promptly and with integrity in line with our Litigation Strategy

Performance measure	2022–23 target	2023–24 and beyond
2.1 Our AAT litigation program resolves disputes promptly and with integrity	2.1.1 Proportion of Comcare AAT litigation with a successful outcome is 65% or greater Methodology/source: Assessment of outcomes of all AAT matters finalised within the preceding 12 months.	5% increase each financial year
	2.1.2 60% of Comcare AAT litigation matters are progressed to hearing or finalised within 12 months for Comcare managed claims Methodology/source: Actual performance against AAT decision timeframes.	
2.2 We deliver contemporary education and	2.2.1 80% of attendees have their engagement, training and education needs met     Methodology/source: Assessment of feedback from training and webinar surveys.	As per 2022–23
engagement services that promote and enable safe and healthy work	2.2.2 Annual increase in employer and customer reach, engagement and/or change in behaviour with Comcare's education services and communication channels  Methodology/source: Assessment of results associated with communication, training and event statistics and feedback.	

## Strategic priority three: Prevention and early intervention across our scheme



#### Prevention and early intervention across our scheme

As the national workers' compensation authority and work health and safety regulator, we play a leading role in supporting safe and healthy workplaces. We do this by working with employers to adopt risk and evidence-based prevention and early intervention practices, with the ultimate aim of supporting employers and workers to create and maintain physically and mentally healthy workplaces.

## Table 3: Key activities and performance measures for strategic priority three

#### **Key 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

Performance measure	2022–23 target	2023–24 and beyond
3.1 We design and deliver innovative and prevention focused initiatives that promote and enable safe and healthy work	3.1.1 Initiatives are perceived as innovative and/or prevention focused  Methodology/source: Employer perceptions of Comcare initiatives will be measured through the Comcare Employer survey and findings from initiative-specific evaluations.	As per 2022–23
3.2 Our proactive regulatory activity is targeted and prevention focused	3.2.1 Targeted and prevention focused compliance and enforcement activities are delivered on Comcare's Regulatory Priorities  Methodology/source: Assessment of compliance and enforcement activities delivered on regulatory priorities identified through data and intelligence.	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

## Strategic priority four: Insight driven and risk and evidence-based practice



#### Insight driven and risk and evidence-based practice

We are working to harness the power of data and analytics to drive our approach to promoting and enabling safe and healthy work. We aim to use all available information to continually improve our services and to identify and address the needs of our scheme. We undertake research and engage with emerging evidence to validate our approach. We regularly evaluate our performance and change course where necessary. We challenge assumptions and do not accept the status quo.

## Table 4: Key activities and performance measures for strategic priority four

#### **Key activities**

Continuing to mature our data governance, capability and technology in line with our Data Strategy 2019–2022

Using 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

Using improved data, complete the renewal and approval process for workplace rehabilitation providers to operate in the scheme

Performance measure	2022–23 target	2023–24 and beyond
4.1 We drive national work health and safety compliance	4.1.1 100% of incident notifications involving the death of a person result in a monitoring compliance activity  Methodology/source: Assessment of decisions against incident notifications.	As per 2022–23
using a targeted, risk-based approach	4.1.2 100% of incident notifications assessed as extreme or high risk result in a monitoring compliance activity  Methodology/source: Assessment of decisions against incident notifications.	
	4.1.3 Comcare undertakes a follow up verification inspection in 95% of instances where an inspection has identified remedial actions to be undertaken to eliminate or minimise, as far as reasonably practicable, the risk of future incidents occurring  Methodology/source: Assessment of verification inspection data.	
4.2 We undertake strategic and collaborative initiatives to promote and enable safe and healthy work	4.2.1 Strategic and collaborative initiatives deliver evidence-based insights and/or better practice Assessment of activity status reporting and evaluation reports.	As per 2022–23
4.3 Our scheme identifies and adopts better practices which enable and promote safe and healthy work	4.3.1 Through engagement with our stakeholders and utilising an evidence-based approach, better practice initiatives are identified, our advice is adopted and assessed as enabling safe and healthy work  Methodology/source: Total published scheme and e-guidance policy advice and information on the Comcare website, total stakeholder forums delivered and an assessment of evaluations and feedback.	As per 2022–23

## Strategic priority five: Being adaptive and sustainable in the face of change



### Being adaptive and sustainable in the face of change

We are a flexible and adaptive agency, always open to new ideas and new ways of doing things. We consider the broader environment and are proactive in dealing with its impacts. We aim to encourage innovation in the development of sustainable solutions to health and safety issues. We also endeavour to use the latest tools, data and technology to develop new solutions to problems.

## Table 5: Key activities and performance measures for strategic priority five

#### **Key activities**

Delivering an adaptive, secure, digital environment which supports our agency to serve the needs of our stakeholders in an efficient and effective way

Using our portfolio management approach to deliver programs and projects for Comcare

Implementing our *People Strategy 2019–2022* with a focus on culture and engagement, capability, talent and workforce planning

Performance measure	2022–23 target	2023–24 and beyond
5.1 Our scheme is sustainable	5.1.1 Target administrative cost ratio 15 to 25%  Methodology/source: Administration costs/(administration + Claims costs).	As per 2022–23
as evidenced through outcomes achieved by scheme participants	5.1.2 Average Commonwealth premium rate = 1% of payroll or lower  Methodology/Source: Sum of Commonwealth premium amounts/Sum of Commonwealth payrolls obtained from external actuary and agency submissions.	
(including financial and return to work outcomes)	5.1.3 Minimum funding ratio of 110% Methodology/source: Total assets/Net outstanding claims liability calculated by independent actuary.	
	5.1.4 Comcare scheme return to work rate of 85 to 95% for accepted claims initially determined within the previous 24 months  Methodology/source: Percentage and volume of accepted claims that have experienced return to work outcomes.	
	5.1.5 Comcare scheme notional premium rate = 0.90%  Methodology/source: Weighted average of the Australian Government and Licensee annual premium rate outcome. Weighted against each sector as a relative proportion of Comcare scheme FTE.	
5.2 Our workforce is engaged, capable and supported in	5.2.1 Comcare's employee engagement rating at the organisational level exceeds 70%  Methodology/source: Assessment of Comcare's results from the APS census.	As per 2022–23
their mental health and wellbeing	5.2.2 Comcare's wellbeing rating at the organisational level meets or exceeds 75% Methodology/source: Assessment of Comcare's results from the APS census.	
	5.2.3 75% of Executive level employees consider that their workgroup has the appropriate skills, capabilities and knowledge to perform well Methodology/source: Assessment of Comcare's results from the APS census.	

# **Operating context**

#### **Environment**

The pandemic will have ongoing impacts on our operations in 2022–23. We will continue to engage and collaborate with our stakeholders in responding to and recovering from the pandemic. We will monitor the pandemic situation around Australia and support our jurisdiction with timely and relevant advice on related work health and safety issues.

We will continue to evolve our WHS regulatory practices in response to the Respect@Work report with the understanding that the release of the next Safe Work Australia Work Health and Safety Strategy and any potential changes to the WHS model laws will further influence how we improve our approach to regulating health and safety within the jurisdiction.

We are committed to providing safe work environments for Comcare employees that embrace diversity and inclusivity, free from discrimination, harassment (including sexual harassment) and bullying. We are aware of the important and renewed focus on this responsibility and have responded accordingly. We have reviewed and promoted our internal policies to ensure employees are aware of their responsibility to behave in accordance with the APS Code of Conduct and the APS and Comcare Values.

Recruitment for our new office in Launceston has been completed and it is now fully operational, while recruitment continues in our new Darwin office. These two workplaces give us an office presence in each Australian state and territory and the expansion of our footprint to these cities means we can be closer to the stakeholders we serve.

Our workforce has also successfully transitioned to formal flexible working arrangements, which enables us to deliver our services to our jurisdiction uninterrupted. The arrangements have been designed to provide mutual benefit for employees and Comcare by facilitating increased engagement and creativity at the same time as maintaining performance to deliver our strategic priorities.

Comcare has performed very well in the 2021 APS Census, with the results showing that our workforce is highly engaged, motivated and flexible.

Table 6 summarises the environmental trends and challenges, potential implications and the opportunities that may influence our approach.

## Table 6: Environmental trends influencing our approach

Trends and challenges	Implications	Opportunities
The evolving industry landscape	<ul> <li>Changes in the working environment including:</li> <li>employee expectations and perceptions of work</li> <li>mental health trends</li> <li>the ageing workforce</li> <li>increases in occupational violence, particularly for emergency responders, health professionals and teachers</li> <li>the gig economy characterised by short-term roles and contractors</li> <li>flexible work.</li> </ul>	<ul> <li>We are agile in response to the evolving landscape by committing to be a learning organisation.</li> <li>Using our strategic partnerships to drive outcomes and contribute to national conversations in response to workplace risks and challenges.</li> <li>Using data analytics and research capabilities to inform evidence-based responses.</li> <li>Using data analytics and risk-based regulation to respond to changes in the work environment.</li> </ul>
Technology	<ul> <li>Increasing digitisation and use of big data and artificial intelligence is changing workforce capability requirements.</li> <li>Increased availability of telehealth services.</li> <li>New opportunities for data sharing and an increasing cyber security risk that impact the efficiency and effectiveness of our operations.</li> </ul>	<ul> <li>Monitoring occupational risks and any changes brought about by the changing nature of work.</li> <li>Investing in technology to maintain a flexible and agile workforce and information and communications technology capability.</li> <li>Continuing to enhance our cyber security vigilance and resilience.</li> </ul>
Stakeholder expectations	<ul> <li>Our reputation and value proposition to our stakeholders and the demand for our service offerings.</li> <li>Changing scheme demographics and service delivery models.</li> </ul>	<ul> <li>Being a leader within the insurance industry and regulatory environment through informed best practice, research and innovation.</li> <li>Understanding our stakeholders' needs and sharing our knowledge and experience with them and potential new stakeholders.</li> <li>Recognising the increase in demand for customer-centric service models.</li> <li>Reviewing our capability, efficient and effective service offerings and outcome focused practices.</li> </ul>
Economic situation and reforms	<ul> <li>Impacts on interest rates and the cost of inflation directly affect Comcare's liabilities and other economic parameters.</li> <li>Dynamics of policy and national reforms, and their cross-sectoral impacts.</li> <li>Judicial rulings which impact the Government, our stakeholders and Comcare.</li> <li>The Australian Public Service Review and modernisation.</li> <li>Review of the WHS model laws.</li> </ul>	<ul> <li>Investing in research.</li> <li>Being a leader in workers' compensation reform.</li> <li>Contributing to the national conversation in addressing emerging health issues within the workplace.</li> <li>Remaining organisationally agile to deliver reforms, to meet stakeholder needs and to effectively implement Government decisions, using better practice principles.</li> </ul>

## Cooperation

Comcare engages and collaborates with a wide range of stakeholders at strategic and operational levels to achieve our purpose to promote and enable safe and healthy work. We consider both external and internal stakeholders for activities and projects.

Our Engagement Strategy and supporting Stakeholder Engagement Framework aims to achieve our purpose through a stakeholder centric approach to engagement that is increasingly well coordinated, collaborative and effective.

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
- a trusted institution and industry leader.

Our approaches to engagement include:

- informing or educating through a range of communication channels
- listening to and involving our stakeholders throughout the process to ensure issues, concerns and insights are understood
- working together with our stakeholders to find solutions and implement plans for action
- supporting and contributing to the aligned efforts of external stakeholder forums, groups, committees and individuals.

Our external engagement map provides some broader examples of Comcare's stakeholder engagement activity across strategic, tactical and operational levels, all of which contribute to achieving our purpose.

Figure 3: Comcare's external engagement activity map

HEADS OF WORKPLACE SAFETY AUTHORITIES (HWSA)	MINISTERIAL LIAISON AND BRIEFINGS	DEWR SECRETARY AND PORTFOLIO	CEO & AGENCY HEAD MEETINGS/ BRIEFINGS	DEPUTY SECRETARIES' SAFETY AND COMPENSATION FORUM (DSSC)	INTERDEPARTMENTAL FORUM ON MENTAL HEALTH (IFMH)	SAFE WORK AUSTRALIA (SWA)
APS COO COMMITTEE	SAFETY REHABILITATION COMPENSATION COMMISSION (SRCC)	HEADS OF WORKERS COMPENSATION AUTHORITIES (HWCA)	MENTALLY HEALTHY WORKPLACE ALLIANCE (MHWA)	COLLABORATIVE PARTNERSHIP TO IMPROVE WORK PARTICIPATION	ACTU, INDUSTRY AND UNION AFFILIATE ENGAGEMENT	OTHER EXTERNAL EVENTS/FORUMS COMCARE PARTICIPATES IN
WEBINARS	CLAIMS MANAGEMENT FORUMS (CMF)	LICENSEE LIAISON FORUM (LLF)	DEFENCE LIAISON FORUM (DLF)	WHS FORUMS	MENTAL HEALTH COMMUNITY OF PRACTICE (MHCOP)	COMMONWEALTH SAFETY MANAGEMENT FORUM (CSMF)
SMALL AGENCY FORUM (SAF)	PREMIUM SESSIONS	SAFE WORK MONTH (SWM)	BLENDED EDUCATION AND LEARNING PRODUCTS AND SERVICES	APS HR NETWORK	COMCARE NATIONAL CONFERENCE AND AWARDS	COMMUNICATIONS AND MARKETING; SOCIAL, WEBSITE MEDIA AND PRODUCTS
RESEARCH AND PILOTS	ACCOUNT MANAGEMENT	CLAIMS, SCHEME, WHS HELPDESKS	OUTREACH ACTIVITIES	PROVIDE INFORMATION AND ADVICE (PIA)	MONITORING COMPLIANCE ACTIVITIES (MC)	TEAMS WITH EXTERNAL SERVICE DELIVERY

LEGEND

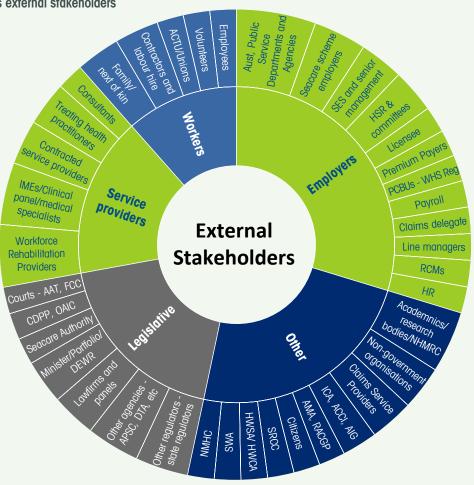
**STRATEGIC** 

TACTICAL

OPERATIONAL AND BAU ACTIVITIES

For some 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 strategic influence, relationship management, service delivery and decision making on individual matters.

Figure 4: 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
ACTU	Australian Council of Trade Unions	IME	Independent Medical Examiners
AIG	Australian Industry Group	NMHC	National Mental Health Commission
AMA	Australian Medical Association	NHMRC	National Health and Medical Research Council
APSC	Australian Public Service Commission	OAIC	Office of the Australian Information Commissioner
CDPP	Commonwealth Director of Public Prosecutions	PCBU	Person Conducting Business or Undertaking
DEWR	Department of Employment and Workplace Relations	RACGP	Royal Australian College of General Practitioners
DTA	Digital Transformation Agency	RCM	Rehabilitation Case Managers
FCC	Federal Circuit Court	SES	Senior Executive Service, Australian Public Service
HR	Human Resources	SRCC	Safety, Rehabilitation and Compensation Commission
HSR	Health and Safety Representatives	SWA	Safe Work Australia
HWCA	Heads of Workers' Compensation Authorities	WHS	Work Health and Safety

The following list represents stakeholders who do not receive services from Comcare, but make a significant contribution to achieving our purpose:

Stakeholder	Contribution
The Australian Council of Trade Unions (ACTU)	As representatives of many employees within our scheme, we engage with the ACTU on the legislation we administer and our policies and procedures to assist us in meeting our purpose of promoting and enabling safe and healthy work.
The Administrative Appeals Tribunal (the AAT)	Comcare commits to improve litigation performance and drive excellence in service provision and engagement by resolving disputes promptly and with integrity, recognising that the AAT is a significant stakeholder in this process.
Beyond Blue	Comcare is partnering with Beyond Blue to deliver a two-year national mental health initiative known as NewAccess workplaces to address our key priorities of prevention and driving innovation and better practice across the scheme.
Commonwealth Department of Public Prosecutions (CDPP)	In managing the integrity of our scheme and ensuring healthy and safe workplaces, we work with the CDPP to support the prosecution of offences under the WHS Act and the SRC Act.
Department of Employment and Workplace Relations	Comcare is an agency of the Department of Employment and Workplace Relations and works closely with it on legislative and policy matters that contribute to our ability to promote and enable safe and healthy work.
Heads of Workers Compensation Authorities (HWCA)	Comcare is a member of HWCA, which is made up of representatives from workers' compensation authorities across Australia and New Zealand. We work together to promote and implement best practice in our workers' compensation arrangements in policy and legislative matters, regulator and scheme administration.
Heads of Workplace Safety Authorities (HWSA)	Comcare is a member of HWSA, which is made up of representatives from work health and safety regulators across Australia and New Zealand. We work together to promote and implement best practice in work health and safety in the areas of policy and legislative matters, education and enforcement.
Safe Work Australia (SWA)	We collaborate with SWA, an Australian government agency, to develop and implement national policy to improve work health and safety and workers' compensation arrangements across Australia.

## Capability

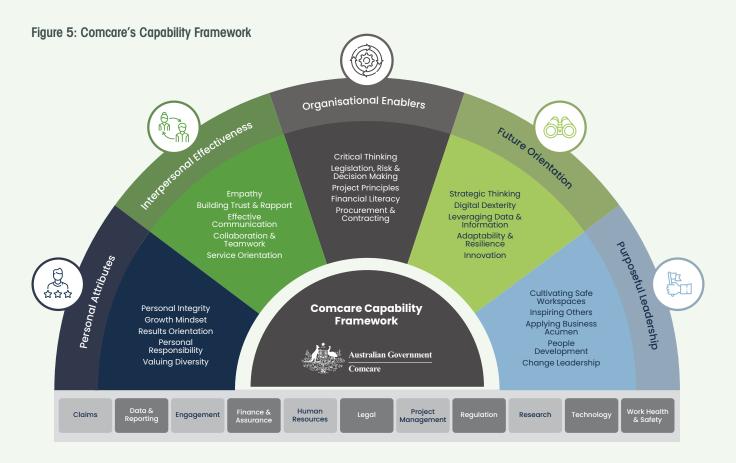
To achieve our purpose and priorities, our success is contingent on anticipating and adapting to changing workforce requirements and the environment within which we operate. Our Workforce Planning Framework supports the identification of both our operational and strategic requirements and the capabilities needed to deliver on current and future initiatives.

Comcare recognises the importance of a capable workforce and fostering an environment that empowers our people to enhance their skills for career success.

Comcare's Capability Framework has been developed to provide a common and consistent basis to reflect the capabilities (knowledge, skills and abilities) which underpin the work we do, with a view to establishing a future-focused plan for capability within the organisation and one that supports and aligns with the attraction, performance and retention of our employees.

We are seeking to be responsive and proactive to changing workforce needs, with a particular focus on:

- Improving data literacy through the continued implementation of our Data Strategy and establishing an approach to supporting data capability within Comcare.
- Building leadership capability, through targeted support, development opportunities and resources, designed to improve manager confidence and support our leaders to lead and manage change in a dynamic environment.
- Stakeholder engagement and service delivery, ensuring that we promote and enable safe and healthy work through a stakeholder centric approach to engagement, that is coordinated, collaborative and effective.
- Maturing our project management capability, supported by our Enterprise Portfolio Management Office, to ensure that our work is aligned to our strategic priorities and purpose.
- Identifying, nurturing and supporting talent within the organisation to ensure that we have the right people, with the right skills to deliver our work.



#### Our people

Our People Strategy 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.

To successfully deliver on our purpose and priorities, we must ensure that we embed a culture of learning, encouraging ongoing development and career pathways, enabling a high performing workplace and retention of talent. The following factors are critical to our success.

- Future proofing our workforce ensuring that we have the right people, with the right skills, at the right time to deliver on Comcare's agenda.
- A flexible and agile workforce in the way we deliver our services, how we adapt and respond to our dynamic environment, and how we manage our workforce.
- 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.
- Driving a positive culture ensuring that Comcare is considered an employer of choice, attracting and retaining talented employees to deliver on our wide variety of priorities and outcomes.
- 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 aim is to embed these values in our business through the leadership behaviours of every individual.

We are 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, we will further develop and strengthen our:

- Data management, analysis and interpretation This critical area underpins our evidence-based approach to delivery of work. Our Data Strategy provides a vision for Comcare's data future and outlines a pathway for transformational change.
- Stakeholder engagement This is critical to the success
  of Comcare and our primary purpose of promoting and
  enabling safe and healthy work. Comcare's Engagement
  Strategy identifies how we will achieve this aim through
  delivery of a stakeholder centric approach to engagement
  that is increasingly well coordinated, collaborative
  and effective.
- Leadership capability This will empower our current and future leaders to set expectations and model behaviours that enhance our culture.
- Culture focus By articulating our approach to work and the values expected of all employees across Comcare's business Groups, we will continue to build an inclusive, open culture that encourages a collaborative, innovative and risk-based approach to work, particularly through times of change.
- Change management Continuously improving our approach to change and ensuring we have the capability to adapt and effectively manage change contributes to a flexible and agile workforce that embraces innovation and drives transformation.

- Project and program management We are continuing to mature our project and program management approach, with a focus on:
  - » strengthening our ability to embrace emergent change
  - » enhancing our decision making by aligning and balancing project investments
  - » maximising our business value
  - » ensuring our efforts are aligned with our strategic priorities
  - » effectively managing our resources to realise benefits.

We are committed to providing an environment where our employees can enhance their capability and excel in their roles, supporting our agency to deliver on its strategic priorities and ensuring that we have the right workforce now and into the future.

Comcare's Executive team has renewed its commitment to the Comcare values and is ensuring they are considered in the work we deliver and in the culture fostered across all business Groups (see Comcare's values at page 5).

## **Our technology**

Our ICT Strategy 2019–2023 aims to deliver modern ICT capability that will enable continuous improvement across the organisation while retaining the flexibility to adapt to new priorities and support changing business requirements. Our ICT Strategy aligns with the Australian Government's digital transformation agenda and Digital Continuity 2020 Policy.

Delivery of the ICT Strategy will establish key ICT platforms and capabilities that promote innovation, deliver insight and underpin comprehensive customer-centric services. It 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.

Figure 7: ICT Strategy workstreams



During 2022–23, several key ICT platforms and projects will allow for digital engagement and transacting in more efficient ways including:

- implementing a central contact centre to manage communication between Comcare and our stakeholders
- providing services to external clients in a digital format to simplify and streamline transactions and meet client needs and expectations
- enhancing cyber safety of employees and information with advanced end-point protection and a stronger cyber security culture
- promoting and expanding provider use of the Medipass invoicing solution which automates the payment of workers' compensation related medical and allied health services
- 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 to its stakeholders.

## 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 facilitates a positive risk culture where risks are identified early and openly and managed in a way that supports the delivery of our business 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.

We have specific risk management roles and reporting of risk at the strategic, group and operational levels. 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 delegated Risk Champion supporting the Chief Executive Officer with oversight of the framework. Risk management oversight and reporting is also incorporated into our governance structure through the Executive Committee and Operations Committee. Our Audit and Risk Committee (ARC) provides independent, external advice on the appropriateness of Comcare's system of risk oversight and management.

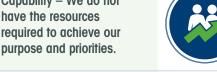
## Table 7: Comcare's key risks and mitigation strategies

#### **Risk description**

## Capability – We do not have the resources required to achieve our



**Risk mitigation strategies** 



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 auide the implementation of new capabilities.



Culture – The values and the behaviours of our employees do not meet required levels of service and compliance with APS standards.



Comcare's Executive Committee supports the implementation of our 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.



Governance – The approaches we use for making decisions, assigning accountability. setting standards and monitoring outcomes do not align with our service delivery.



Comcare has reviewed 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 has been strengthened through the implementation of revised performance measures. We are also actively monitoring emerging issues in our operating environment to ensure risks are actively identified and managed.



Stakeholders - Our interaction with parties we engage with, work with and deliver services to is inadequate.



Comcare has a 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 and communications capability, forums and events to engage with our stakeholders and enhance understanding of our scheme and jurisdiction.

# Subsidiaries and supporting entities

Comcare does not have any subsidiary bodies.

Comcare provides support through expert advice and services to the SRCC and the Seacare Authority.

Comcare's budget includes funding for the SRCC and Seacare Authority as these entities are not bodies corporate and do not employ their own staff. Comcare provides these entities with secretariat support and other assistance.

The Seacare Authority's performance measures are referenced in Comcare's Portfolio Budget Statement. The Seacare Authority prepares its own Corporate Plans and Annual Reports. Refer to the Seacare Authority website for further information.

The SRCC is not required to prepare a Corporate Plan under the PGPA Act. The SRCC does prepare an Annual Report to report on specific requirements under the SRC Act and the Safety, Rehabilitation and Compensation Directions 2019 (Directions). Refer to the SRCC website for further information.

# **Appendix**

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

- Subsection 35(1) of the PGPA Act 2013
- The PGPA Rule 2014.

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

Table 8: Comcare compliance table	
Requirement	Page(s)
Introduction	4
Statement of preparation	
The reporting period for which the plan is prepared	
The reporting periods covered by the plan	
Purposes	5
Key activities and performance	9–13
Operating context	
Environment	15–16
Capability	20–23
Risk oversight and management	24–25
<ul> <li>Cooperation</li> </ul>	17–19
<ul> <li>Subsidiaries</li> </ul>	25

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