



2023/2024 Comcare Licensee Audit

Reserve Bank of Australia

FINAL REPORT

Claims Management System Review/Audit

Audit Date: April 2024

claims

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Table of Contents

Scope of Review/Audit	3
Executive Summary	5
Table of Criteria	7
ELEMENT 1: Commitment and Corporate Governance	9
ELEMENT 2: Planning	14
ELEMENT 3: Implementation.....	23
ELEMENT 4: Measurement and Evaluation	40
ELEMENT 5: Review and Improvement.....	45
Summary of File Findings	46

Scope of Review/Audit

<i>Organisation:</i>	Reserve Bank of Australia ('RBA')
<i>Site/Workplace:</i>	BRM, Melbourne
<i>Scope of Audit:</i>	<p>The review/audit examined RBA's claims management system, processes and outcomes to validate that RBA is meeting its licence conditions and is complying with the <i>Safety, Rehabilitation and Compensation Act 1988</i> (SRC Act).</p> <p>Seven claim files were examined by the auditors. These files contained activity in the previous 12 months.</p> <p>The review/audit encompassed a review of all relevant policies and procedures as they relate to claims management and any other relevant supporting documentation.</p> <p>Overall findings are based on the identification of issues that are considered to be systemic rather than isolated incidents.</p>
<i>Audit Criteria:</i>	<p>This review/audit assessed the claims management system against 31 criteria grouped within five elements:</p> <ol style="list-style-type: none">1. Commitment and Corporate Governance (3 criteria)2. Planning (5 criteria)3. Implementation (17 criteria)4. Measurement and evaluation (5 criteria)5. Review and improvement (1 criterion)
<i>Ratings</i>	<p>The findings in the review/audit report have been classified and marked as follows:</p> <p>Conformance—indicates that the criterion has been met.</p> <p>Non-conformance—indicates that the criterion has not been met.</p> <p>Not able to verify— indicates that the organisation has documented procedures in place, however there are no cases to test that the organisation has followed those procedures. It is expected that this classification will only be used in limited circumstances and where applied, the reasons for the finding will be explained by the auditor.</p> <p>Not Applicable—indicates that the criterion does not apply to the organisation.</p> <p>Where a criterion has been met but the auditor has identified a 'once off' situation or a 'minor' deviation from the documented management system or reference criterion, an Observation may be made. These findings, while representing a non-fulfilment of a requirement, are recognised as being of lower risk to the organisation.</p>

Date(s) of review/audit: April 2024

Auditors: s 47F, BRM Risk Management Pty Ltd ("BRM")

Client Contacts: s 47E(c), RBA
s 47E(c), RBA
s 47E(c), RBA
s 47F, Manager Operations & Licensing, Australia Post

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

Acknowledgment: BRM wishes to acknowledge the cooperation and assistance provided by the management and staff of RBA and thank them for their contribution to the audit process.

Executive Summary

The Reserve Bank of Australia (RBA) has held a self-insurance licence under the Safety, Rehabilitation and Compensation Act 1988 (SRC Act) since 1 May 1996. Their licence is due to expire on 30 June 2031.

The RBA's workers' compensation claims portfolio, within the scope of the nominated audit period, was managed by its third-party claims manager, Australian Postal Corporation (APC), under a contractual arrangement. This arrangement commenced in August 2017 and ceased at the end of June 2024. The RBA appointed Comcare to manage its claims portfolio from July 2024.

The RBA in conjunction with APC has established processes and procedures in place for the management of the claims portfolio. Seven claims were reported as having claim file activity occurring within the scope of this audit.

It is evident through the audit the RBA is committed to supporting their injured employees through their claims services arrangement with APC. It is noticeable a fairly good working relationship exists to ensure the RBA meets the requirements of its self-insurance licence. Since our previous audit last year there has been improvement noted in the timeliness of claim management activities save for incapacity determinations which were identified as late on three claim files.

There were no non-conformances, and three observations were recorded. The conformance rating achieved is 100%.

The audit period reviewed was from 1 April 2023 to 31 March 2024.

This audit has been conducted in line with Comcare's Claims Management System (CMS) Audit Workbook, version 4.0, February 2021.

Non-Conformances

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

Observations

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

Criterion	Observations
1.1	The Workers' Compensation, Rehabilitation and Claims Management Policy is an unsigned document and is due for review in April 2025. It is recommended at the next review that the policy should be signed by the present CEO or other senior executive.
2.2	RBA has not provided a documented procedure to manage payments for dependants of deceased employees.
3.5	RBA does not ensure that all determinations are made quickly and in writing.

In summary, for the 31 criteria within the claims management audit tool, the outcomes are:

	Number of criteria	% of assessed criteria
Conformance (with 3 Observations)	26	100%
Non-conformance	0	0%
Not able to verify	4	
Not applicable	1	

An action plan, which includes completion/review dates and responsibilities, must be developed to address each of the above review/audit findings – and any individual file findings where an error in entitlement was identified.

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

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Date: 19 July 2024

Table of Criteria

Audit element/criterion description	Criterion	Rating
1. Commitment and Corporate Governance		
Documented commitment	1.1	Conformance with Observation
Internal and external accountability	1.2	Conformance
Identify, assess and control risk	1.3	Conformance
2. Planning		
Delegation schedule	2.1	Conformance
Documented procedures	2.2	Conformance with Observation
Planning for legislative compliance	2.3	Conformance
Setting objectives and targets	2.4	Conformance
Plans to achieve objectives and targets	2.5	Conformance
3. Implementation		
Adequate resources	3.1	Conformance
Communication—relevant stakeholders	3.2	Conformance
Employees are aware of rights	3.3	Conformance
Training and competency	3.4	Conformance
Determinations in accordance with the Act	3.5	Conformance with Observation
Powers under the Act	3.6	Conformance
Initial liability	3.7	Conformance
Determining incapacity	3.8	Conformance
Determining benefits	3.9	Conformance
Determining permanent impairment	3.10	Not able to verify
Transitional provisions	3.11	Not Applicable
Reconsiderations	3.12	Not able to verify
Reasonable opportunity	3.13	Not able to verify
Claim reviews	3.14	Conformance
Surveillance	3.15	Not able to verify
Privacy and confidentiality	3.16	Conformance

Audit element/criterion description	Criterion	Rating
Reporting, records, documentation	3.17	Conformance
4. Measurement and Evaluation		
Monitoring planned objectives	4.1	Conformance
Internal audits	4.2	Conformance
Outcomes of audits are actioned, reviewed	4.3	Conformance
Communicating audit results	4.4	Conformance
Providing reports to Comcare and Commission as requested	4.5	Conformance
5. Review and Improvement		
Continuous improvement	5.1	Conformance

ELEMENT 1: Commitment and Corporate Governance

Documented commitment

Criterion 1.1

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

Finding: Conformance with Observation

Evidence:

- D15/13354 Workers' Compensation, Rehabilitation and Claims Management Policy, v5.0, 21/4/23, next review April 2025
- Governor Michele Bullock's statement of commitment (accessible from the intranet)

Corrective Actions:

The last review found one Observation:

The Workers' Compensation, Rehabilitation and Claims Management Policy is due for review in April 2023. It is recommended that the revised policy should be signed by the present CEO or other senior executive.

The Corrective Action Plan states:

Reviewed in December 2023 for inclusion in the Transition to Comcare Policy and Procedure pack.

Comcare contract to come into effect on 1 July 2024. New Policy to come into effect on 1 July 2024.

The Policy was updated in April 2023.

Comment:

The Workers' Compensation, Rehabilitation and Claims Management Policy was updated and approved by the Head of Human Resources in April 2023.

The Policy is reviewed by Human Resources every two years or more frequently if required. All changes to the Policy are approved by the Head of Human Resources.

The policy document is not signed and marked for review in April 2025.

"This policy relates to the Bank's obligations and commitments to providing worker's compensation, rehabilitation and claims management for employees that are injured / ill at work."

In lieu of a signed policy, documented commitment is evidenced in the statement of commitment issued by the new governor, Michel Bullock who commenced as governor in September 2023, which is accessible on the intranet:

"The Executive Committee and I are accountable and responsible for the health, safety, and wellbeing of all staff in the workplace. I commit to providing the necessary resources to maintain our safety standards, but I also remind all staff that it is also your responsibility to take reasonable care for your own health, safety, and wellbeing. You can do this by

following the relevant Bank policies and procedures, identifying, and reporting hazards where appropriate and ensuring your actions do not create any safety risk to any person, including yourself, while at work. This responsibility extends into our hybrid working arrangements.

The Bank has a very good safety record and we have developed a strong safety culture over a long period of time, particularly in our areas of key safety risk. I am determined to maintain that."

Observation:

The Workers' Compensation, Rehabilitation and Claims Management Policy is an unsigned document and is due for review in April 2025. It is recommended at the next review that the policy should be signed by the present CEO or other senior executive.

Corporate governance

Criterion 1.2

The determining authority's claims management system provides for internal and external accountability.

Finding: Conformance

Evidence:

- Governor's statement of commitment (accessible from the intranet)
- Job descriptions:
 - Head of Safety & Wellbeing – 6950, approved 1/12/20
 - Health & Wellbeing Consultant – 8127, approved 25/3/22
 - Mental Health Consultant – 8128, approved 18/11/20
 - Safety Management Consultant – 6692, approved 18/11/20
- Australia Post job descriptions:
 - Head of Workers Compensation, November 2022
 - Claims Manager, November 2022
- Transition Plan to Comcare as Claims Manager, January 2024 – RBA Organisational Chart and Governance Structure
- LCPI report 2023 – Attachment 1 – Organisational charts for the teams responsible for managing compliance (claims, rehabilitation and prevention)
- WHS, CMS, RMS and PR Audit Action Register, August 2023
- Appendix 1 Consultation, January 2024
- Appendix 2 Policies, procedures, standard letters in place, January 2024
- Transition Plan to Comcare as Claims Manager, January 2024

- Amendment agreement dated 27 July 2023 between RBA and Australia Postal Corporation, signed
- 2020 Claims Management Services Agreement, Australian Postal Corporation and Reserve Bank Australia, commencement 1/8/20, expiration 31/7/23, further period 3 years, signed 10/7/20
- Letter of engagement with BRM, 17 January 2024

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- Licensee Compliance and Performance Improvement Annual Report, 2023
- Monthly KPI reports, 2023/2024
- LKPI quarterly comparison reports – March 2023, June 2023
- Claims Management Systems audit report, July 2023, completed by BRM

Comment:

The evidence provided demonstrated several mechanisms of identifying internal and external accountability within the claims management system.

Internal Accountability is demonstrated through the following:

- **Governor's statement of commitment** which is accessible from the intranet. The document outlines the roles and responsibilities of Human Resources and the Work Health & Safety team.
- Job descriptions for RBA and Australia Post
- Organisational structure
- Corrective action plan

External Accountability is demonstrated through the following:

- **Service Level Agreement's with external parties:**

- Amendment agreement dated 27 July 2023 between RBA and Australia Postal Corporation, signed
- 2020 Claims Management Services Agreement, Australian Postal Corporation and Reserve Bank Australia, commencement 1/8/20, expiration 31/7/23, further period 3 years, signed 10/7/20
- Australia Post service level agreements with various parties
- Letter of engagement with BRM, 17 January 2024
- Licensee Compliance and Performance Improvement (LCPI) Annual Report, 2023
- KPI reports for Licensees
- Claims Management Systems audit report, July 2023, completed by BRM

Criterion 1.3

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

Finding: Conformance

Evidence:

- Risk Management Policy, August 2023, v11.0, 28/8/23, review due August 2024
- HR – WHS – WHS Risk Register, last reviewed March 2024
- Work Health and Safety Semi-Annual Report – 2023/24
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/3/24 – 7 Safety & Wellbeing Management Plan
- Quality Assurance – Injury Management Review Process (Compensation Peer to Peer (aka Project Circle) Review Process Flowchart)
- Quality Assurance – Injury Management Review Process (Independent External Audit Preparation Process), November 2022
- IMA Quality Assurance – Injury Management Review Process, v14, February 2024
- Safety and Wellbeing Management Plan – 2023/24, July 2023, v1.0, 4/8/23, next review July 2024
- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2023, v3.1, 6/11/23, review due November 2025
- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2021, v3.0, 18/11/21, review due November 2023
- Claims Management System Audit Workbook, v4.0, February 2021 (Comcare template)
- Project Circle – Spot Check worksheet (sample) March 24

Comment:

The Risk Management Policy incorporates a Risk Appetite profile which guides the RBA on the amount of risk they should be taking. Roles and Responsibilities in relation to the Risk Appetite are explained. The Policy is due for review in August 2024.



The WHS Risk Register identifies risks and has assigned a 'risk owner'. The Register was last reviewed in March 2024.

The key objectives of the Safety and Wellbeing Management Plan are risk based and focus on:

- ensuring the physical safety of our diverse workforce across all our workplace environments
- implementing targeted initiatives that positively impact employees' health and wellbeing
- implementing initiatives to continue to uplift and embed mental health awareness and the capability of people leaders to support their teams.

The LCPI Annual Report demonstrated key challenges and successes to manage the identified risks which are aligned with the Safety and Wellbeing Management Plan with key elements of:

- ensuring the safety of our people during workplace disruptions, works and other situations impacting workplace environments
- implementing initiatives that positively impact employees' health and wellbeing
- implementing initiatives to continue to uplift and embed mental health awareness and the capability of people leaders to support their teams.

The APC has a Quality Assurance Process. The Injury Management Review Process is designed "to ensure a consistent approach is applied to the review of Worker's Compensation, Rehabilitation and Litigation management systems within Australia Post Group's (APG's) Injury Management (IM) team by providing a quality assurance framework."

The APC has an audit program in place to monitor the claims management process.

ELEMENT 2: Planning

Administrative arrangements

Criterion 2.1

The determining authority identifies the administrative and financial limitations for each level of claims manager.

Finding: Conformance

Evidence:

- Workers' Compensation Claims Delegation Schedule, signed 27/3/23 by Governor, Philip Lowe
- Workers' Compensation Claims Delegation, Michele Bullock, March 2024 (draft)
- Workers' Compensation Claims Delegation, signed by the current Governor, Michele Bullock, 26 June 2024
- Email 24/3/24 from RBA General Counsel regarding draft delegation schedules
- Email 14/3/24 from RBA to Sparke Helmore seeking advice on delegation schedules
- Appendix 1 Consultation, January 2024
- Appendix 2 Policies, procedures, standard letters in place, January 2024
- Transition Plan to Comcare as Claims Manager, January 2024
- Amendment agreement dated 27 July 2023 between RBA and Australia Postal Corporation, signed
- 2020 Claims Management Services Agreement, Australian Postal Corporation and Reserve Bank Australia, commencement 1/8/20, expiration 31/7/23, further period 3 years, signed 10/7/20
- File audit

Corrective Actions:

The last review found one Observation:

The sections 8, 14, 16 and 19 determinations issued on the claim files reviewed were signed by a Senior Claims Manager, but this is not a delegated position.

The Workers' Compensation Claims Delegation Schedule requires revision to either add the position of Senior Claims Manager or state 'Claims Manager or above'.

The Corrective Action Plan states:

All Bank delegations are being reviewed by RBA General Counsel as part of the external RBA review.

Delegation review has been sourced to external Workers Comp Lawyers to review and update (Sparke Helmore).

The Claims Delegation Schedule was signed by the current Governor, Michele Bullock, on 26 June 2024. This delegation instrument delegates all functions and powers to their new third party claims manager, Comcare, effective from 1 July 2024.

Comment:

The delegation instrument signed by the previous Governor, Philip Lowe, on 27 March 2023 delegated all functions and powers to the third party claims manager, APC. This delegation instrument remained in place from the last review.

Sections 113, 114, and 119 are delegated to the Head of Department, HR and Deputy Governor, of RBA. Section 116 is delegated to Payroll, Legal and Head of Department, HR of RBA. Financial limitations are also specified for RBA and APC staff.

The services agreement with APC for the delivery of claims management services was amended on 27 July 2023 with an expiry date of 30 June 2024. APC advised the RBA in late 2023 that they will no longer be offering claims management services beyond June 2024 (the RBA subsequently appointed Comcare to assume this role from 1 July 2024).

A draft claims delegation schedule was developed in March 2024 and delegated all functions and powers to APC but was not formalise and signed by the new Governor, Michele Bullock.

The draft claims delegation schedule was referred to an external legal provider, Sparke Helmore Lawyers, in or around March 2024, as part of a review of all Bank delegations. There has been no change in the delegated positions, only a change in the Governor which occurred in September 2023.

The claims delegation schedule was signed by the current Governor, Michele Bullock, on 26 June 2024. This delegation instrument delegated all functions and powers to their new third party claims manager, Comcare, effective from 1 July 2024.

File audit:

The **Workers' Compensation Claims** Delegation Schedule delegated claims management powers and responsibilities for the issuance of sections 8, 14, 16 and 19 determinations to the position of Claims Manager.

File audit confirmed the determinations reviewed continued to be signed by a Senior Claims Manager, and though an observation was recorded in the last review to either add the position of Senior Claims Manager or alternatively state '**Claims Manager or above**' in a revised delegation schedule, the decision in late 2023 to change to a new third party claims manager from 1 July 2024 has now effectively put this issue to rest.

Criterion 2.2

The determining authority has documented procedures for paying compensation to injured employees, dependants of deceased employees, providers of medical treatment and other recipients.

Finding: Conformance with Observation

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2023, v3.1, 6/11/23, review due November 2025
- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2021, v3.0, 18/11/21, review due November 2023
- Email 23/3/24 addressing audit action register finding from the 2023 audit
- IMA, Household and Attendant Care Services – Section 29, v3, Sept 2023
- IMA, Reasonable Medical Costs – Section 16, Reasonable Rehabilitation Costs – Section 37, v5, March 2023
- Work Instruction 01, Diagnostic Request Procedure, v5, September 2023
- Work Instruction 02, Gym/Swim Review, v5, September 2023
- Work Instruction 03, Surgery Request Process, v5, September 2023
- Work Instruction 03a, Surgery Request – QA checklist
- Work Instruction 04, Psychological Services Request Process, v5, September 2023
- Work Instruction 04a, Psychological Initial Treatment Plan, v1
- Work Instruction 04b, Psychological Treatment Review and Revised Treatment Plan
- Work Instruction 05, Unreasonable Refusal of Medical Treatment, v3, March 2023
- Work Instruction 06, Long-Term Medical Costs Management Checklist, v3, September 2023
- Work Instruction 07, Travelling Extended Distances for Medical Treatment, v5, September 2023
- Work Instruction 08, Travel Costs Process (Cabcharge & Other Expenses), v8, May 2023
- Work Instruction 08a, Employee Travel Reimbursement Claim Form
- Work Instruction 08b, Compensation Cabcharge Approval Letter – s16
- Work Instruction 08c, Flights and or Accommodation Approval Letter – s16
- Work Instruction 08d, Flights and or Accommodation Request Form
- Work Instruction 09, Approving and Managing Reasonable Costs under a Rehabilitation Program, April 2023
- Work Instruction 09a, Allied Health Treatment Plan, v1, November 2022
- Work Instruction 09c, Provider Approval Letter template

- Work Instruction 10, Workplace Rehabilitation Provider (WRP) Service Delivery Costs, v2, December 2022
- Work Instruction 10a, Rehabilitation Manual Invoice Entry Instructions, December 2022

Corrective Actions:

The last review found one Observation:

The observation below was recorded in last year's audit and may not have been closed out yet according to the Audit Action Register.

The RBA does not have procedures in place to manage payments for dependants of deceased employees, this includes:

- *Establishment of a trust account*
- *Assigning responsibility for managing and maintaining the trust account*
- *Procedure for payment of weekly benefits to the dependants of deceased employees.*

The Corrective Action Plan states:

Review 1988 SRC Act and trust account, discuss w finance?

D24/93123 - Email from s 47E(c)

We have a process in place to address entitlements (such as unpaid salaries and leave accruals) and payments for employees who pass away while in service, whether due to natural causes or work-related accidents (covered by worker's compensation). If a next of kin or immediate family member is identified, we can make both payments. Otherwise, we await instructions from an appointed legal representative (the deceased estate).

I hope I've been able to answer your question.

Kind regards, s 47E(c) - Payroll

The WHS, CMS & RMS Audit Action Register recorded the above observation as 'Done' in December 2023, however, there was no documented procedure provided in evidence to close out the observation and therefore the observation remains.

Comment:

The audit identified documented procedures in the form of an Injury Management Advice and the Work Instructions, developed by APC, detailing the process for the payment of incapacity and medical and like expense entitlements to injured employees and other relevant stakeholders. A number of these documents are currently under review.

The Audit Action Register indicated an observation was recorded from the previous audit relating to the development of a documented procedure for establishing and administering trust accounts for dependants of deceased employees. An email has been provided in response; however, a documented procedure has not been provided to the auditors.

Observation:

RBA has not provided a documented procedure to manage payments for dependants of deceased employees.

Claims management planning

Criterion 2.3

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

Finding: Conformance

Evidence:

- D15/13354 Workers' Compensation, Rehabilitation and Claims Management Policy, v5.0, 21/4/23, next review April 2025
- Governor's statement of commitment (accessible from the intranet)
- Job descriptions:
 - Head of Safety & Wellbeing – 6950, approved 1/12/20
 - Health & Wellbeing Consultant – 8127, approved 25/3/22
 - Mental Health Consultant – 8128, approved 18/11/20
 - Safety Management Consultant – 6692, approved 18/11/20
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- Appendix 1 Consultation, January 2024
- Appendix 2 Policies, procedures, standard letters in place, January 2024
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- Amendment agreement dated 27 July 2023 between RBA and Australia Postal Corporation, signed
- 2020 Claims Management Services Agreement, Australian Postal Corporation and Reserve Bank Australia, commencement 1/8/20, expiration 31/7/23, further period 3 years, signed 10/7/20
- Safety and Wellbeing Management Plan – 2023/24, July 2023, v1.0, 4/8/23, next review July 2024
- Work Health & Safety Legislation Monitoring Guidelines, v3.2, 28 March 2024, next review March 2026
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/3/24 – 7 Safety & Wellbeing Management Plan

- IMA, Regulatory Register, v3, August 2023
- Work Instruction 14, Natural Justice, v3, February 2023

Corrective Actions:

The last review found one Observation:

The observation below was recorded in last year's audit and may not have been closed out yet according to the Audit Action Register.

No evidence was provided that demonstrated that legislation changes were readily communicated to employees.

The Corrective Action Plan states:

Completed.

The RBA's legislative obligations appears in the Workers' Compensation, Rehabilitation and Claims Management Policy and are communicated via the intranet.

Comment:

Recognition of the RBA's legislative obligations appears in the Workers' Compensation, Rehabilitation and Claims Management Policy and are communicated via the intranet.

The RBA and APC position descriptions outline the key position objectives and an understanding of the legislative and regulatory requirements.

The RBA developed a Workers' Compensation, Rehabilitation and Claims Management Procedure to ensure its practices comply with the SRC Act.

Section 3 of the document covers Roles and Responsibilities for:

- 3.1 Injured/Ill Employee
- 3.2 Managers and People Leaders
- 3.3 Medical Practitioner/Treatment Providers
- 3.4 Claims Manager
- 3.5 Rehabilitation Case Manager
- 3.6 Early Intervention Rehabilitation
- 3.7 Workplace Rehabilitation Providers

The Claims Management Services Agreement with APC requires APC to comply with the RBA's self-insurance licence conditions. Legal advice and support will be provided by a law firm approved by the RBA and appointed by APC.

The Work Health & Safety Legislation Monitoring Guidelines states, "The Bank will track changes to the relevant work health and safety (WHS) legislative instruments and initiate a review of the relevant policies and procedures".

Criterion 2.4

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

Finding: Conformance

Evidence:

- D15/13354 Workers' Compensation, Rehabilitation and Claims Management Policy, v5.0, 21/4/23, next review April 2025
- Governor's statement of commitment (accessible from the intranet)
- Appendix 1 Consultation, January 2024
- Appendix 2 Policies, procedures, standard letters in place, January 2024
- Transition Plan to Comcare as Claims Manager, January 2024
- Amendment agreement dated 27 July 2023 between RBA and Australia Postal Corporation, signed
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- Licensee Compliance and Performance Improvement Annual Report, 2023
- Monthly KPI reports, 2023/2024
- LKPI quarterly comparison reports – March 2023, June 2023
- Safety and Wellbeing Management Plan – 2023/24, July 2023, v1.0, 4/8/23, next review July 2024
- Workers Compensation and Rehabilitation Performance Reports, 2023/2024
- Work Health and Safety Semi-Annual Report – 2023/24
- Monthly report August 2023
- Monthly report December 2023

Comment:

The RBA's Workers' Compensation, Rehabilitation and Claims Management Policy states:

"where employee becomes injured or ill at work, the Bank is committed to maintaining appropriate workers' compensation, rehabilitation and claims management arrangements to ensure that issues are resolved fairly and expeditiously, provide compensation (where appropriate), and provide employees with assistance and resources necessary for recovery and return to work as soon as possible."

The Workers' Compensation, Rehabilitation and Claims Management Policy comments on the RBA's compliance activities to include independent annual audits undertaken by auditors with expert knowledge of the SRC Act and regulations in order to assess the effectiveness of the RBA's claims management and rehabilitation systems.

The LCPI Annual Report identifies the organisational charts for the teams responsible for managing compliance for claims, rehabilitation and prevention, key activities and achievements over the reporting period and objectives and targets for the coming year:

During the report period 1 July 2022 to 30 June 2023 the planned tasks within the Safety and Wellbeing Management Plan of 2022/23 were completed with a high degree of success. The effectiveness of the Bank's prevention and claims management practices was demonstrated through strong audit results. The Prevention, Claims Management System and Rehabilitation Systems audits all received a 100 per cent compliance rating with the auditor noting that the Bank has developed a positive and engaging culture and all managers and employees interviewed (including those with safety critical roles) were knowledgeable about their roles, responsibilities and accountabilities for health and safety. The feedback received from managers, health and safety representatives and workers was exceptional and all are of the belief that the RBA engages with staff on health and safety matters and takes on board feedback provided. Over the next twelve months, the Safety and Wellbeing team will implement initiatives outlined within its 2023/24 Safety and Wellbeing Management Plan, aimed to increase awareness, and understanding of safety management practices, mental health and wellbeing. The next external audit of the Bank's WHS, Claims and Rehabilitation management systems will be in April 2024, and will include a focus at Head Office (including 8 Chifley), Canberra branch, H.C. Coombs Centre and Melbourne Representative Office sites.

Schedule 2 of the Claims Management Services Agreement with APC confirms the performance standards expected.

Active workers compensation claims are reviewed monthly, as outlined in the service agreement between the RBA and APC. Quarterly meetings take place for the following purposes:

- *Claim Management Meetings with relevant RBA stakeholders (to discuss progress of active Workers Compensation Claims)*
- *Performance Meetings with RBA's Head of Employee Relations & Work Health and Safety (to discuss the performance of Australia Post in its delivery of the Services).*

Monthly KPI reports for licensees are provided by Comcare.

Criterion 2.5

The determining authority establishes plans to:

- achieve its objectives and targets
- promote continuous improvement
- provide for effective claims management arrangements.

Finding: Conformance

Evidence:

- D15/13354 Workers' Compensation, Rehabilitation and Claims Management Policy, v5.0, 21/4/23, next review April 2025
- Governor's statement of commitment (accessible from the intranet)
- WHS, CMS, RMS and PR Audit Action Register, August 2023

- Appendix 1 Consultation, January 2024
- Appendix 2 Policies, procedures, standard letters in place, January 2024
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- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2023, v3.1, 6/11/23, review due November 2025
- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2021, v3.0, 18/11/21, review due November 2023
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/3/24
- Injury Management Advices and Work Instructions (APG)

Corrective Actions:

The last review found one Observation:

Actions were not completed in the Audit Action Register.

The Corrective Action Plan states:

Completed.

The WHS, CMS and RMS Audit Action Register confirmed all outstanding actions were completed or closed out in December 2023.

Comment:

The RBA conducts an annual self-audit of its claims management system and identified deficiencies are ordinarily addressed by way of a corrective action plan.

Refer to further comments against criterion 2.4.

ELEMENT 3: Implementation

Resources

Criterion 3.1

The determining authority allocates adequate resources to support its claims management system.

Finding: Conformance

Evidence:

- Transition Plan to Comcare as Claims Manager, January 2024:
 - RBA Organisational Chart and Governance Structure
 - 5. Resourcing Plan
- LCPI report 2023 – Attachment 1 – Organisational charts for the teams responsible for managing compliance (claims, rehabilitation, and prevention)
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/3/24
- Monthly KPI reports, 2023/2024
- LKPI quarterly comparison reports – March 2023, June 2023
- Audit population

Comment:

The LCPI Annual Report 2023 announced:

During the report period 1 July 2022 to 30 June 2023 the planned tasks within the Safety and Wellbeing Management Plan of 2022/23 were completed with a high degree of success. The effectiveness of the Bank's prevention and claims management practices was demonstrated through strong audit results.

The report also included the organisational charts for the teams responsible for managing compliance (claims, rehabilitation, and prevention).

The RBA Safety & Wellbeing Team Procedure, under 4.4 Resources, states:

The Head of Safety and Wellbeing will, in consultation with the team, determine the appropriate resources required to successfully manage Safety and Wellbeing. The review is conducted annually, usually between February and April. In preparing the budget, consideration should be given to the direction from HR senior management, the upcoming work program, previous budgets, training requirements and claims and rehabilitation activity from a staffing and liability perspective.

The APC Workers Compensation Key Contacts references contact details for claims delegates.

The current workload resourcing appears to be adequate given the consistently low claim numbers. There were only seven claim files with relevant activity in the audit period.

Communication and awareness

Criterion 3.2

The determining authority defines and communicates responsibilities to relevant stakeholders.

Finding: Conformance

Evidence:

- Job descriptions:
 - Head of Safety & Wellbeing – 6950, approved 1/12/20
 - Health & Wellbeing Consultant – 8127, approved 25/3/22
 - Mental Health Consultant – 8128, approved 18/11/20
 - Safety Management Consultant – 6692, approved 18/11/20
- Australia Post job descriptions:
 - Head of Workers Compensation, November 2022
 - Claims Manager, November 2022
- Appendix 1 Consultation, January 2024
- Appendix 2 Policies, procedures, standard letters in place, January 2024
- Transition Plan to Comcare as Claims Manager, January 2024
- Amendment agreement dated 27 July 2023 between RBA and Australia Postal Corporation, signed
- 2020 Claims Management Services Agreement, Australian Postal Corporation and Reserve Bank Australia, commencement 1/8/20, expiration 31/7/23, further period 3 years, signed 10/7/20
- Injury Management Advices and Work Instructions (APG)
- WHS Committee
- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2023, v3.1, 6/11/23, review due November 2025 – 3. Roles and Responsibilities
- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2021, v3.0, 18/11/21, review due November 2023 – 3. Roles and Responsibilities
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/3/24 – 8.2 WHS Induction
- Intranet page – Rehabilitation (Injury & Illness)
- Other intranet links include – Workers' Compensation
- APG docs:
 - Information That Matters, October 2023 (APG brochure)
 - The workers' compensation and rehabilitation process explained (APG brochure)

o Workers' Compensation Claim Pack Full (APG)

- File audit

Comment:

Responsibilities and accountabilities are included in the RBA and APC position descriptions.

The service agreement outlines the responsibilities of APC in the claims management process.

The RBA developed a Workers' Compensation, Rehabilitation and Claims Management Procedure to ensure its practices comply with the SRC Act. Section 3 of the Procedures covers Roles and Responsibilities for:

- 3.1 Injured/Ill Employee
- 3.2 Managers and People Leaders
- 3.3 Medical Practitioner/Treatment Providers
- 3.4 Claims Manager
- 3.5 Rehabilitation Case Manager
- 3.6 Early Intervention Rehabilitation
- 3.7 Workplace Rehabilitation Providers

The APC provide information brochures as well as a Claim Pack explaining the workers' compensation and rehabilitation scheme, including processes and entitlements, and roles and responsibilities of relevant stakeholders.

The Claim Pack contains the following quick reference guides:

- *How to Claim Compensation under the Safety, Rehabilitation and Compensation (SRC) Act 1988*
- *Compensation Benefits*
- *Injury Management*
- *Employees' Rights and Responsibilities*
- *Claim for Compensation & Rehabilitation form.*

The intranet contains information on the workers' compensation process. The page in November 2023 notified readers the RBA's current third party claims manager, APC, will not offer claims management services beyond June 2024, and it was anticipated Comcare will assume this role. There are also links to access the Workers' Compensation, Rehabilitation & Claims Management Policy, the Workers' Compensation, Rehabilitation and Claims Management Procedures, and the Claim for Compensation & Rehabilitation form.

File audit:

Of the five files applicable, file audit confirmed compliance with this criterion.

Criterion 3.3

The determining authority communicates relevant information regarding the claims management process including:

- (i) ensuring that employees are aware of their legislative rights and obligations in relation to **workers' compensation**
- (ii) ensuring that employees are informed of the status of their claims
- (iii) ensuring consultation occurs between all parties in regards to the claims management process.

Finding: Conformance

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2023, v3.1, 6/11/23, review due November 2025 – 3. Roles and Responsibilities
- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2021, v3.0, 18/11/21, review due November 2023 – 3. Roles and Responsibilities
- Work Instruction 14, Natural Justice, v3, February 2023
- Intranet page – Rehabilitation (Injury & Illness)
- Other intranet links include – Workers' Compensation
- APG docs:
 - Information That Matters, October 2023 (APG brochure)
 - The workers' compensation and rehabilitation process explained (APG brochure)
 - Workers' Compensation Claim Pack Full (APG)
- File audit

Comment:

The evidence demonstrates that the RBA has provisions for ensuring that employees are aware of their legislative rights and obligations in relation to workers' compensation and ensuring that employees are consistently informed of the status of their claims.

The Workers' Compensation, Rehabilitation and Claims Management Procedure, the Workers' Compensation and Rehabilitation Notice of Rights and the Claim for Compensation & Rehabilitation form outline the employees' rights and obligations and are available to employees on the RBA intranet Workers' Compensation page.

An acknowledgement letter is sent to all employees upon receipt of their claim and is advised they should receive written advice concerning their claim within ten working days.

The initial claim determination undertaken by the Claims Delegate provides for regular communication and consultation with the injured employee on the claims management process. The standard determination letters contain a notice of rights advising the employee of their review rights and the process for requesting a reconsideration of the determination.

File audit:

Of the seven files applicable, file audit confirmed compliance with this criterion.

Training

Criterion 3.4

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

Finding: Conformance

Evidence:

- Job descriptions:
 - Head of Safety & Wellbeing – 6950, approved 1/12/20
 - Health & Wellbeing Consultant – 8127, approved 25/3/22
 - Mental Health Consultant – 8128, approved 18/11/20
 - Safety Management Consultant – 6692, approved 18/11/20
- Australia Post job descriptions:
 - Head of Workers Compensation, November 2022
 - Claims Manager, November 2022
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/3/24 – 8 WHS Training
- 2022 - 2023 National Training Schedule & Register
- 2023 - 2024 National Training Schedule & Register

Comment:

The APC Claims Manager position description stipulate specific position requirements such as *“an understanding of the employee workers' compensation function within a large complex organisational structure under the SRC Act”* and *“has facilitated timely, sustainable, and appropriate claims management outcomes that are cost effective”*.

The Claims Manager reports to the Head of Workers Compensation who is required to have a detailed understanding of the following technical areas:

- SRC Act and related regulatory environment
- Workers' compensation and rehabilitation management systems
- Self-insurance licensing and compliance requirements

The APC National Training Schedule & Register identify the training needs of, and records the training undertaken by, the claims team. The training matrix aligns to the key tasks, accountabilities, and responsibilities of the positions within the claims team. Examples of training recently undertaken include management of Mental Injury claims, Permanent Impairment, Reconsideration Masterclass, legal expert briefings, and attendance at the Comcare Claims Manager Forum.

The RBA's new third party claims manager, Comcare, identifies the importance of providing appropriate training to members of the claims management team by having procedures in place to identify training needs to ensure that competencies are developed and maintained.

To provide assurance to the Commission, Comcare claims managers must complete specific training and professional development to proficiently administer the SRC Act, with refresher training required every two years. Comcare case managers also must complete a suite of Corporate Fundamental modules with mandatory rehabilitation authority training requirements modules as advised by Comcare.

Compliance with the legislation

Criterion 3.5

The determining authority complies with the provisions of the SRC Act when making decisions on claims, including:

- (i) determining claims accurately and quickly
- (ii) determining claims in writing with adequate terms and reasons
- (iii) ensuring there is equity of outcomes resulting from administrative practices used by Comcare.

Finding: Conformance with Observation

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2023, v3.1, 6/11/23, review due November 2025
- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2021, v3.0, 18/11/21, review due November 2023
- IMA, Claim Determinations, v11, September 2023
- APC Work Instruction 03, Workers' Compensation Initial Liability Determinations, v5, June 2023
- APC Work Instruction 22, Reasons for Decision, v3, September 2023
- APC Work Instruction 13, Natural Justice, February 2023
- File audit

Comment:

The IMA – Claim Determinations seek to “*outline procedures involved in making liability determinations (including initial liability) under Section 14(1) of the Safety, Rehabilitation and Compensation Act 1988 (SRC Act), to ensure that processes are nationally consistent and that Comcare compliance is observed*”. The guidelines provide for the claim to be determined accurately and quickly by setting clear timeframes and ensuring all relevant information is in place before the determination is made. It also references a series of Work Instructions to be considered prior to making the determination to achieve equity of outcomes resulting from administrative practices. For example:

- Workers' Compensation Initial Liability Determinations (Work Instruction 3) – outlines the various considerations when determining initial liability.
- Reasons for Decision (Work Instruction 22) – outlines the considerations when preparing the Statement of Reasons to ensure the decision notice contains the necessary recitation of the facts and evidence and be readily understood.
- Natural Justice (Work Instruction 13) – outlines the process to ensure procedural fairness.

File audit:

Of the five files applicable, file audit found four individual findings:

- One finding related to written determinations not provided to an employee where a claim for reimbursement of pharmaceutical costs was made under section 16.
- Three findings related to delays in issuing section 19 incapacity determination letters for the periods of paid weekly compensation.

The file review demonstrated initial liability decision letters issued during the scope of the audit provided clear and adequate terms and reasons and the decisions were made in a timely manner.

Observation:

RBA does not ensure that all determinations are made quickly and in writing.

Criterion 3.6

The determining authority complies with the provisions of the SRC Act when using its powers or meeting statutory obligations under that Act.

Finding: Conformance

Evidence:

- IMA, Independent Medical Examinations - S57 & S36, v6, March 2023
- IMA, Privacy of Injury Management Information, v4, May 2023
- File audit

Comment:

The APC have a comprehensive procedure to guide the Claims Delegate through the section 57 independent medical examination process. This document contains the aim and advice of appointment to failure to attend and its consequences.

There were no other procedures specific to this criterion available for review, however the auditors are aware of, and have previously reviewed, APC procedures for their employees which provides guidance on the use of:

- *Section 58 when requesting information from the employee*
- *Section 59 when receiving a request for certain documents from the employee*
- *Dealing with third party and common law claims*

- *Managing overpayments (s113, s114, s114C, s114D and s11).*

File audit:

Of the three files applicable, file audit confirmed compliance with this criterion.

None of the claims selected for audit included any activity relating to overpayments.

Criterion 3.7

The determining authority complies with the provisions of the SRC Act when determining initial liability.

Finding: Conformance

Evidence:

- IMA, Claim Determinations, v11, September 2023
- Work Instruction 01 – Workers' Compensation New Claim Triage, v6, September 2023
- Work Instruction 02 – Workers' Compensation New Claim Registration, v2, September 2023
- Work Instruction 02a – Workers' Compensation New Claim Registration Checklist
- Work Instruction 03 – Workers' Compensation Initial Liability Determinations, v5, June 2023
- Work Instruction 03a – Workers' Compensation Claim Determination Accepted Checklist
- Work Instruction 03b – Workers' Compensation Claim Determination Denied Checklist
- Work Instruction 04 - Adverse Liability Determinations and Notifying MyHR, v3, March 2023
- Work Instruction 05 - Fixed Term Employees on a Contract, v4, September 2023
- Work Instruction 06 - Hernia Claims, v4, November 2022
- Work Instruction 07 - Skin Cancer Claims, v4, May 2023
- Work Instruction 07a – Heat Cold and Solar UV Radiation Procedure, November 2019, due for review 2023
- Work Instruction 08 - Psychological Injuries, v3, September 2023
- Work Instruction 10 - Medical Evidence to Satisfy Compliance with s54, v2, September 2023
- Work Instruction 10 - Acceptance of Medical Certificates & Evidence, v4, May 2023
- Work Instruction 11 – Guidelines for Management of Non-Compliant Claims, v3, September 2023
- Work Instruction 12 – Abnormal Risk of Injury, v3, April 2023
- Work Instruction 12a - Example Letter - Claim Withdrawal
- Work Instruction 13, Natural Justice, v3, February 2023

- Work Instruction 14 – Under the Influence of Alcohol and Drugs, v3, April 2023
- Work Instruction 15 – Exclusionary Provisions SRC Act (Pre 13 April 2007), v4, September 2023
- Work Instruction 16 – Disease Exclusionary Provisions, v3, April 2023
- Work Instruction 17 – Contracting Out of Liability, v3, September 2023
- Work Instruction 18 – Declaration of Interest, v3, September 2023
- Work Instruction 19 – Management of Disease Events Claimed as Injuries, v3, September 2023
- Work Instruction 19a – Examples
- Work Instruction 20 – Compensation Entitlement and Voluntary Retirement Packages, v3, April 2023
- Work Instruction 21 - Management of Compensation Claims for Injury Management Staff, v3, September 2023
- Work Instruction 22 – Reasons for Decisions, v3, September 2023
- File audit

Comment:

The Compensation Service Expectations requires “a section 14 determination must be issued within 20 calendar days of receipt of a compliant claim for an injury and 60 calendar days of receipt of a compliant claim for a disease.”

In advising of the outcome of an initial liability **determination**, “the Compensation Delegate must phone the Injured Colleague to convey the Initial Determination outcome within 1 working day of making the decision. Initial Liability Advice must be emailed to the Workplace Manager/Team Leader, Managers, Senior Claims Managers, Claims Mangers, Workplace Rehabilitation Provider and the Incidents team within 1 working day of the decision.”

File audit:

File audit confirmed that initial liability determinations were issued in accordance with the provisions of section 14 following receipt of a compliant claim for compensation.

Four files contained relevant activity and were determined to be compliant.

Criterion 3.8

The determining authority complies with the provisions of the SRC Act when determining liability for incapacity.

Finding: Conformance

Evidence:

- IMA, Section 19 – Incapacity Guidelines (including S19(4) Deeming), v6, April 2023
- IMA, Section 8 Normal Weekly Earnings, v7, September 2023
- Example incapacity determination, 2023
- Work Instruction 2, Generic NWE Spreadsheet
- Work Instruction 7, S8 Normal Weekly Earnings Calculation Checklist
- IMA, Sections 117, 118 & 119, v3, April 2021
- IMA, Sections 20, 21, 21A & 22, v4, May 2021
- File audit

Comment:

The IMA - Section 8 Normal Weekly Earnings and Work Instruction – Section 8 Normal Weekly Earnings Calculation checklist provide guidance on the application of the section and articulate the relevant process.

The IMA notes that 12 weeks or 6 fortnightly pays prior to the date of injury are used, where possible, for calculating an employee's NWE, and that in all cases, section 8 provisions of the SRC Act must be applied. A section 8 determination letter is sent to the employee and all relevant parties, and a copy of the calculation sheet is enclosed.

The IMA - Section 19 Incapacity Guidelines provide direction on how to assess and process compensation salary entitlements including specific instructions for section 19(4): deeming an injured employee 'able to earn' salary.

The other relevant sections of the SRC Act when determining liability for incapacity are covered in IMA – Sections 117, 118 & 119, and IMA - Sections 20, 21, 21A & 22.

The section 19 determination template letter contained an incapacity payment table that was easy to follow and included a 'count-down clock' in the table which ran down the weeks/hours for the first 45 weeks each time a determination is issued.

File audit:

Of the four files applicable, file audit confirmed compliance with this criterion.

File review confirmed in each case the employee's NWE was based on their earnings in the 'relevant period' of 12 weeks (6 fortnightly periods immediately before the date of injury) and a copy of the calculation sheet was enclosed with the section 8 determination letter. The calculation sheet provides for fortnightly amounts for allowances and overtime (and overtime hours) to be recorded but does not provide details as to how the base salary and hours were determined.

Criterion 3.9

The determining authority complies with the provisions of the SRC Act when determining liability for benefits, including medical expenses.

Finding: Conformance

Evidence:

- IMA, Household and Attendant Care Services – Section 29, v3, Sept 2023
- IMA, Reasonable Medical Costs – Section 16, v5, March 2023
- File audit

Comment:

The IMA on Reasonable Medical Costs articulate the application of section 16 and relevant processes. *The purpose of the IMA is to "outline procedures involved in making a determination under Section 16 to ensure that processes are nationally consistent and that Comcare compliance is observed"*.

A series of Work Instructions are provided within the IMA document to provide guidance for examples of the type of medical and like services deemed reasonable when applying the Clinical Framework. The examples provided included surgery requests, psychological services, diagnostic requests, and gym / swim review.

The IMA covering section 29 services articulate the application of household and attendant care services and relevant processes.

The section 16 determinations for reimbursement to the employees were revised in the previous year to provide appeal rights when determining liability for benefits.

File audit:

Of the three files applicable, file audit confirmed compliance with this criterion.

Criterion 3.10

The determining authority complies with the provisions of the SRC Act when determining liability for permanent impairment.

Finding: Not able to verify

Evidence:

- Comcare Permanent Impairment Guide Information Sheet (as at 1.04.2023) (Comcare document)
- Guide to the Assessment of the Degree of Permanent Impairment Edition 3.0, 7/3/23
- IMA Permanent Impairment Guide, v7, June 2023
- PI calculation sheet
- Work Instruction, Permanent Impairment & Non-Economic Loss Procedure, Payments and Interest, v8, September 2023

- File audit

Comment:

The Injury Management Advice – Permanent Impairment Guide and the Work Instruction - Permanent Impairment & Non-Economic Loss Procedure, Payments and Interest describes the application and processes for the relevant sections of the SRC Act. It also confirms an election only needs to be made where the injured employee decides to pursue common law.

File audit:

There were no permanent impairment claims made or relevant activity during the scope of this audit, therefore this criterion could not be verified.

Criterion 3.11

The determining authority complies with Part X of the SRC Act, the transitional provisions, particularly in relation to determining permanent impairment and incapacity benefits.

Finding: Not Applicable

Comment:

As transitional provisions relate to the changeover from legislation preceding the SRC Act, Part X of the SRC Act does not apply.

Criterion 3.12

The determining authority complies with the provisions of the SRC Act, and any specific licence conditions (if applicable), when managing reconsiderations.

Finding: Not able to verify

Evidence:

- Amendment agreement dated 27 July 2023 between RBA and Australia Postal Corporation, signed
- 2020 Claims Management Services Agreement, Australian Postal Corporation and Reserve Bank Australia, commencement 1/8/20, expiration 31/7/23, further period 3 years, signed 10/7/20
- Workers' Compensation Claims Delegation Schedule, signed 27/3/23 by Governor, Philip Lowe
- Workers' Compensation Claims Delegation, Michele Bullock, March 2024 (draft)
- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2023, v3.1, 6/11/23, review due November 2025 – 5. Reconsiderations
- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2021, v3.0, 18/11/21, review due November 2023 – 5. Reconsiderations
- File audit

Comment:

APC undertakes reconsiderations on behalf of the RBA, as per the contractual agreement and the IMA - Reconsideration and Review of Determinations.

The Agreement with APC states, *where a Reconsideration is required, Australia Post will undertake the Reconsideration in accordance with Part IV of the SRCA and the Licence.*

Australia Post may request further information regarding a request for Reconsideration. Australia Post shall have discretion to conclude a Reconsideration without receiving further information from RBA.

In the event Australia Post proposes to issue a Reconsideration that either varies or revokes the original Determination, Australia Post will contact RBA to discuss the Reconsideration before it is issued and to permit RBA to provide any further relevant information in its possession (if any).

The IMA - Reconsideration and Review of Determinations with related attachments provide guidance on applying the legislative requirements under section 62 for the reconsideration of determinations. The IMA detailed the procedures for the reconsideration and review of decisions including the expertise of the reviewer who has the responsibility for undertaking the reconsiderations.

The IMA - Reconsideration on Own Motion provides for compliance against the process under section 62(1).

File audit:

File audit found no activity relevant to this criterion.

Claims reviews

Criterion 3.13

The determining authority provides employees with a reasonable opportunity to provide information or comment when claims for on-going liability are being assessed or reviewed.

Finding: Not able to verify

Evidence:

- Work Instruction 14, Natural Justice, v3, February 2023
- File audit

Comment:

The Work Instruction for Natural Justice articulates the importance of procedural fairness when handling claims. The document *“sets out the recommended approach to be taken by Claims Delegates, in making decisions, to give parties the opportunity to provide their point of view, under the Safety, Rehabilitation and Compensation Act 1988 (SRC Act).”*

“In the context of decision making, the natural justice principle establishes two key rules:

- *that decision makers must provide reasonable opportunity to a person whose interest will be adversely affected by any decision to be heard; and*

- *that decision makers must be disinterested or unbiased in any matter that has to be decided."*

File audit:

File audit found no activity relevant to this criterion.

Criterion 3.14

Claim reviews are timely, made accurately and guided by equity, good conscience and the substantial merits of each case without regards to technicalities.

Finding: Conformance

Evidence:

- Quality Assurance – Injury Management Review Process (Compensation Peer to Peer (aka Project Circle) Review Process Flowchart)
- Quality Assurance – Injury Management Review Process (Independent External Audit Preparation Process), November 2022
- IMA Quality Assurance – Injury Management Review Process, v14, February 2024
- Rehabilitation Case – Quality Case Review Form
- Quality Assurance – Injury Management Review Process (Rehabilitation Peer to Peer Review Process Flowchart)
- Email 22/11/23 confirming Australia Post and RBA Claims Management Meeting scheduled 11/12/23
- File audit

Comment:

The APC Compensation Service Expectations outlines timeframes expected to be met for several business needs, including:

1. Review Claim file
2. Requests for information
3. Contact with stakeholders
4. Follow up requests for information
5. S14 determinations
6. Advice determination outcome
7. Claims review and strategy
8. Claims management
9. Claims closure quality checks

The Injury Management Review Process noted *"The IM quality assurance framework involves the following:*

1. *Peer to Peer Reviews conducted by Compensation, Rehabilitation and Litigation teams*
2. *Milestone Reviews conducted between Compensation and Rehabilitation teams*
3. *Quarterly Case Conferences conducted between Compensation and Rehabilitation teams*

4. *Quality Case Reviews conducted within the Rehabilitation team*
5. *Independent External Audits undertaken in respect of Compensation and Rehabilitation claims/cases and relevant management systems*
6. *Independent Internal Audits undertaken by APG Internal Audit team"*

File audit:

Of the five files applicable, file audit confirmed compliance with this criterion.

Surveillance

Criterion 3.15

The determining authority has a policy on the use of covert surveillance and complies with its requirements. The policy must include:

- (i) on whose authority approval may be granted
- (ii) detailed instruction on the manner in which covert surveillance is to be conducted
- (iii) a requirement that any operative undertaking covert surveillance on behalf of the determining authority has been issued with, and has agreed to, written instructions on the policy.

Finding: Not able to verify

Evidence:

- **Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2023, v3.1, 6/11/23, review due November 2025 – 6. Workers Compensation Surveillance**
- **Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2021, v3.0, 18/11/21, review due November 2023 – 6. Workers Compensation Surveillance**
- File audit

Comment:

Approval to conduct surveillance rests with the Head of Safety and Wellbeing who must be satisfied that the surveillance is appropriate in all the circumstances.

Detailed instruction on the way covert surveillance is to be conducted is documented in chapter 6.1 in the **Workers' Compensation, Rehabilitation and Claims Management Procedure**.

The investigator appointed to undertake covert surveillance is to be requested to sign and return a copy of the written instruction acknowledging his/her obligations in terms of the surveillance. Surveillance is not to commence until the signed copy of this instruction is received by the Head of Safety and Wellbeing.

File audit:

File audit found no activity relevant to this criterion.

Confidentiality

Criterion 3.16

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

Finding: Conformance

Evidence:

- Amendment agreement dated 27 July 2023 between RBA and Australia Postal Corporation, signed
- 2020 Claims Management Services Agreement, Australian Postal Corporation and Reserve Bank Australia, commencement 1/8/20, expiration 31/7/23, further period 3 years, signed 10/7/20
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/3/24 – 5 Privacy and confidentiality
- IMA, Privacy of Injury Management Information, v4, May 2023
- File audit

Comment:

A clause related to confidentiality and privacy is included in the services agreement between the RBA and APC.

The Safety & Wellbeing Team Procedure states:

The team conducts work in accordance with the Bank's privacy guidelines. Specifically:

- *When not at desk, sensitive material is locked away and computer screens locked*
- *Where paper claim files exist, they are locked in the claims file cupboard when not in use*
- *Appropriate security is applied to TRIM folders*
- *Confidential discussions regarding claims and rehabilitation take place in meeting rooms*
- *Paperwork no longer required is shredded after it is entered in TRIM.*

The Injury Management Advice for Privacy of Injury Management Information provides guidance relating to the responsibilities and requirements for collecting, using, and sharing personal information of injured employees in the context of Injury Management at APG. There are key requirements to follow and actions for delegates.

File audit:

File audit confirmed compliance with this criterion.

Document and file management

Criterion 3.17

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

Finding: Conformance

Evidence:

- Quality Assurance – Injury Management Review Process (Compensation Peer to Peer (aka Project Circle) Review Process Flowchart)
- Quality Assurance – Injury Management Review Process (Independent External Audit Preparation Process), November 2022
- IMA Quality Assurance – Injury Management Review Process, v14, February 2024
- Rehabilitation Case – Quality Case Review Form
- Quality Assurance – Injury Management Review Process (Rehabilitation Peer to Peer Review Process Flowchart)
- Transition Plan to Comcare as Claims Manager, January 2024 – 7.2 IT management/system issues
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/3/24 – 6 WHS Documents and Document Control
- IMA Quality Assurance – Injury Management Review Process, v14, February 2024
- IMA Injury Management Resources Process, v4, March 2023
- File audit

Corrective Actions:

The last review found one Observation:

Several documents require updating or review:

- *The WHS Risk Register identifies risks and has assigned a 'risk owner', however it is noted that the Register was last reviewed December 2021.*
- *The Workers' Compensation, Rehabilitation and Claims Management Policy was due for review in April 2023.*

The following documents contain track changes:

- *D12 403630 WHS Team Procedure*
- *Work Instruction 03 – Workers' Compensation Initial Liability Determinations, v4, November 2022*
- *Work Instruction 08 – Travel Costs Process (Cabcharge & Other Expenses), v8, May 2023*

The Corrective Action Plan states:

Reviewed in December 2023 for inclusion in the Transition to Comcare Policy and Procedure pack.

Comcare contract to come into effect on 1 July 2024. New Policy to come into effect on 1 July 2024.

To be verified at the next CMS audit.

Comment:

Section 6 of the Safety & Wellbeing Team Procedure discusses 'WHS Documents and Document Control':

The Bank uses TRIM for record management and documents are created and stored in accordance with guidelines issued by Information Department.

A list of all WHS policies, procedures and forms contained in TRIM are tracked in the WHS Document Control Register. Documents contained in the register are reviewed on a regular basis (usually annually) or otherwise as often as required to ensure currency. The annual review should take place prior to audits to ensure documents currency. The review is coordinated by the Senior Consultant, WHS. The register contains documents managed by the Safety & Wellbeing team and by FY. FY is responsible for updating their sheet section of the register and the documents within.

To ensure adequate version control, all new WHS documents must include the TRIM reference number, version number, date, and numbered pages.

APC stores all RBA files on their SharePoint.

File audit:

Of the seven files applicable to this criterion, file audit found two individual findings: an audit trail was difficult to establish on file with missing documentation in relation to medical certificates.

ELEMENT 4: Measurement and Evaluation

Monitoring

Criterion 4.1

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

Finding: Conformance

Evidence:

- Licensee Compliance and Performance Improvement Annual Report, 2023
- Monthly KPI reports, 2023/2024
- LKPI quarterly comparison reports – March 2023, June 2023

- Safety and Wellbeing Management Plan – 2023/24, July 2023, v1.0, 4/8/23, next review July 2024
- Workers Compensation and Rehabilitation Performance Reports, 2023/2024
- Work Health and Safety Semi-Annual Report – 2023/24
- Monthly report August 2023
- Monthly report December 2023
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/3/24 – 7 Safety & Wellbeing Management Plan
- Compensation Service Expectations (APG)
- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2023, v3.1, 6/11/23, review due November 2025
- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2021, v3.0, 18/11/21, review due November 2023
- Claims Management System Audit Workbook, v4.0, February 2021 (Comcare template)
- Quality Assurance – Injury Management Review Process (Compensation Peer to Peer (aka Project Circle) Review Process Flowchart)
- Project Circle – Spot Check worksheet (sample) March 24

Comment:

The RBA monitors the claims management system performance against targets set by the Commission LKPI's.

The RBA conducts annual audits of both its claims and rehabilitation management systems to monitor its objective of managing claims in accordance with the legal requirements of the SRC Act.

The services agreement specify the RBA and APC hold quarterly claim management meetings to discuss the progress of active claims, and APC commit to provide the RBA with a monthly active claims progress report. Quarterly performance meetings are also held to discuss the performance of APC in its delivery of the agreed services.

Auditing and reporting

Criterion 4.2

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

Finding: Conformance

Evidence:

- Letter of engagement with BRM, 17 January 2024
- Claims Management Systems audit report, July 2023, completed by BRM

- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2023, v3.1, 6/11/23, review due November 2025
- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2021, v3.0, 18/11/21, review due November 2023
- Claims Management System Audit Workbook, v4.0, February 2021 (Comcare template)
- Quality Assurance – Injury Management Review Process (Independent External Audit Preparation Process)
- Quality Assurance – Injury Management Review Process (Compensation Peer to Peer (aka Project Circle) Review Process Flowchart)
- D12 403630 Safety & Wellbeing Team Procedure, May 2022, v3.1, 7/10/22
- Project Circle – Spot Check worksheet (sample) March 24

Comment:

The conditions of licence require the RBA conduct annual internal audits of their claims management system.

The RBA Safety & Wellbeing Team Procedure, under 4.3 Audits, states:

As part of the Bank's conditions of licence, audits must be undertaken annually on the Bank's WHS, claims and rehabilitation systems. Auditors are sourced by Audit Department and organised by the Senior Consultant – Safety Management in accordance with WHS Audit Guidelines.

The APC has a documented procedure for CMS and RMS audits and an appropriate audit schedule in place. It also has a process that steps through the procedural requirements before, during, and after an external audit.

BRM Risk Management is independent of the RBA and have conducted the annual CMS audit on behalf of the RBA since 2020. BRM auditors are competent and experienced in the auditing of licensees under the SRC Act. The audits are conducted using the approved audit tools in accordance with the requirements of Comcare and the Commission.

Criterion 4.3

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

Finding: Conformance

Evidence:

- WHS, CMS, and RMS Audit Action Register, August 2023
- Claims Management Systems audit report, July 2023, completed by BRM
- Workers Compensation and Rehabilitation Performance Reports, 2023/2024
- Work Health and Safety Semi-Annual Report – 2023/24
- Monthly report August 2023

- Monthly report December 2023
- Licensee Compliance and Performance Improvement Annual Report, 2023
- WHS Committee Meeting minutes – March 2024

Comment:

Evidence reviewed demonstrated that audit outcomes are documented in the WHS, CMS, and RMS Audit Action Register, and a corrective action plan developed and implemented. The register confirmed all actions were completed in December 2023.

It was also established the RBA provided information relating to its claims management system activities and performance to their senior executive.

The BRM 2023 CMS audit results were reported in the LCPI Annual Report, the Work Health and Safety Annual Report, and the WHS Committee Meeting minutes.

Criterion 4.4

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

Finding: Conformance

Evidence:

- Licensee Compliance and Performance Improvement Annual Report, 2023
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/3/24
- WHS Committee Meeting minutes – March 2024

Corrective Actions:

The last review found one Observation:

The results of the previous CMS audit were made available to all employees on the intranet.

it was not evident the employees have been provided an opportunity to comment and provide feedback on the audit results.

The Corrective Action Plan states:

Add audit results to WHS committee meeting agenda.

D24/68100

Standing Agenda item has been added to the WHS Committee agenda.

The WHS, CMS & RMS Audit Action Register recorded the above observation as 'Done' in December 2023. The minutes of the WHS Committee Meeting held in March 2024 reported the CMS 2023 audit results.

Comment:

The Safety & Wellbeing Team Procedure discusses the administrative process undertaken by the Work Health and Safety Committee. Standing agenda items include Safety & Wellbeing Management Plan, WHS Reports (quarterly and annual) and WHS Coordination Committee quarterly updates and includes the reporting of audit results. The Minutes of **these meetings** "*should be completed within two weeks of the meeting. The minutes are distributed to the Committee for feedback prior to being published on the intranet.*"

The Safety & Wellbeing Management Plan outlines the RBA's approach to managing Safety & Wellbeing. The objectives, priorities, and initiatives are devised with consideration to many factors and include outcomes of systems audits and feedback from discussions with employees.

Furthermore, the audit results are tabled in the LCPI Annual Report and after the report is submitted to Comcare it is made available to all employees on the Safety & Wellbeing intranet site.

Criterion 4.5

The determining authority provides the Commission or Comcare with reports or documents as requested. This includes informing Comcare as soon as practicable of any proceedings brought by them, or against them, in relation to a matter arising in respect of a claim managed by them under the SRC Act.

Finding: Conformance

Evidence:

- WHS, CMS, RMS and PR Audit Action Register, August 2023
- Licensee Compliance and Performance Improvement Annual Report, 2023
- Claims Management Systems audit report, July 2023, completed by BRM
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/3/24 – 12.3 Comcare notification

Comment:

The RBA provides the Commission with an LCPI Annual Report that outlined the RBA's activities in the past year and what was planned for the next year.

The RBA notifies Comcare of scheme significant data and provides other information as required.

BRM is unable to assess whether transmission of data to the CDW was successful during the audit period.

ELEMENT 5: Review and Improvement

Continuous improvement

Criterion 5.1

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

Finding: Conformance

Evidence:

- WHS, CMS, RMS and PR Audit Action Register, August 2023
- Claims Management Systems audit report, July 2023, completed by BRM
- Safety and Wellbeing Management Plan – 2023/24, July 2023, v1.0, 4/8/23, next review July 2024
- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2023, v3.1, 6/11/23, review due November 2025
- Workers' Compensation, Rehabilitation and Claims Management Procedure, November 2021, v3.0, 18/11/21, review due November 2023
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/3/24
- Injury Management Advices and Work Instructions (APG)

Comment:

APC conducts an audit program which includes a clear process and tracking. Peer to Peer individual worksheets is **aligned to Comcare's audit** criteria whilst also identifying activities that underpin the requirements.

The RBA and APC address continuous improvement by actioning any items identified in the annual claims management systems audit, and regularly reviewing their documentation.

Continuous improvement strategies for the current year include the Safety and Wellbeing Management Plan to "*identify the Bank's priorities for WHS over the next twelve to eighteen months and the actions that will be taken*", the transition to Comcare as the delegated third party claims manager from 1 July 2024, continued participation in training sessions and legal forums, and ongoing monitoring of LKPI targets and monthly performance results. This is particularly relevant with the recent and upcoming legislative and procedural changes.

Summary of File Findings

Summary of file findings																
File Ref	Audit Criteria															
	2.1	3.2	3.3	3.5	3.6	3.7	3.8	3.9	3.10	3.11	3.12	3.13	3.14	3.15	3.16	3.17
s 47F	NA	NA	C	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	C	C
	NA	C	C	X	NA	NA	NA	C	NA	NA	NA	NA	C	NA	C	X
	NA	C	C	C	NA	C	C	C	NA	NA	NA	NA	C	NA	C	C
	NA	C	C	X	C	C	C	C	NA	NA	NA	NA	C	NA	C	X
	NA	C	C	X	C	C	C	NA	NA	NA	NA	NA	C	NA	C	C
	NA	C	C	C	C	C	C	NA	NA	NA	NA	NA	C	NA	C	C
	NA	NA	C	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	C	C

Individual file findings		
File Reference	Criterion	Finding
s 47F	3.5	Delay in issuing section 19 incapacity determination letters for the periods of paid weekly compensation.
	3.5	Written determinations were not provided to the employee for the following claims for reimbursement of pharmaceutical costs made under section 16: <ul style="list-style-type: none"> • Chemist Connect 20/04/23, \$64.95 • Chemist Connect 05/05/23, \$32.95 • Chemist Connect 12/06/23, \$39.90 • Chemist Connect 13/07/23, \$32.95 • Priceline Pharmacy 03/08/23, \$10.50 • Terry White Chemists 24/08/23, \$36.95
	3.5	Delay in issuing section 19 incapacity determination letters for the periods of paid weekly compensation.
	3.5	Delay in issuing section 19 incapacity determination letters for the periods of paid weekly compensation.
	3.17	An audit trail was difficult to establish on file with missing documentation in relation to medical certificates. Gaps in medical certificates for the period from 19/04/23 to 27/06/23 and for the period after 17/07/23.
	3.17	An audit trail was difficult to establish on file with missing documentation in relation to medical certificates. Gaps in medical certificates for the period after 15/09/23 when the employee resumed on a graded Return to Work plan.

Surveillance file findings		
File Reference	Criterion	Finding
N/A		Nil



2023/2024 Comcare Licensee Audit

Reserve Bank of Australia

FINAL REPORT

Rehabilitation Management System Audit

Audit Date: April 2024

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rehabilitation

Table of Contents

Scope of Review/Audit	3
Executive Summary	5
Table of Criteria	8
ELEMENT 1: Commitment and Corporate Governance	10
ELEMENT 2: Planning	15
ELEMENT 3: Implementation.....	21
ELEMENT 4: Measurement and Evaluation	37
ELEMENT 5: Review and Improvement.....	43
Summary of File Findings	45

Scope of Review/Audit

<i>Organisation:</i>	Reserve Bank of Australia ('RBA')
<i>Site/Workplace:</i>	BRM, Melbourne
<i>Scope of Audit:</i>	<p>The review/audit examined RBA's rehabilitation management system, processes and outcomes to validate that RBA is meeting its licence conditions and is complying with the <i>Safety, Rehabilitation and Compensation Act 1988</i> (SRC Act) and the <i>Guidelines for Rehabilitation Authorities 2019</i> (the Guidelines).</p> <p>Seven rehabilitation case files were examined by the auditors. These files contained activity in the previous 12 months.</p> <p>The review/audit encompassed a review of all relevant policies and procedures as they relate to rehabilitation and return to work management and any other relevant, supporting documentation.</p> <p>Overall findings are based on the identification of issues that are considered to be systemic rather than isolated incidents.</p>
<i>Audit Criteria:</i>	<p>This review/audit assessed the rehabilitation management system against five elements:</p> <ol style="list-style-type: none">1. Commitment and Corporate Governance (3 criteria)2. Planning (4 criteria)3. Implementation (13 criteria)4. Measurement and Evaluation (6 criteria)5. Review and Improvement (1 criterion)
<i>Ratings:</i>	<p>The findings in the review/audit report have been classified and marked as follows:</p> <p>Conformance—indicates that the criterion has been met.</p> <p>Non-conformance—indicates that the criterion has not been met.</p> <p>Not able to verify—indicates that the organisation has documented procedures in place however there are no cases to test that the organisation has followed those procedures. It is expected that this classification will only be used in limited circumstances and where applied, the reasons for the finding will be explained by the auditor.</p> <p>Not Applicable—indicates that the criterion does not apply to the organisation.</p> <p>Where a criterion has been met but the auditor has identified a 'once off' situation or a 'minor' deviation from the documented management system or reference criterion, an Observation may be made. These findings, while representing a non-fulfilment of a requirement, are recognised as being of lower risk to the organisation.</p>

Date(s) of Audit: April 2024

Auditors: s 47F, BRM Risk
Management Pty Ltd ("BRM")

Client Contacts: s 47E(c), RBA
s 47E(c), RBA
s 47E(c), RBA
s 47F, Manager Operations & Licensing, Australia Post

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

Acknowledgment: BRM wishes to acknowledge the cooperation and assistance provided by the management and staff of RBA and thank them for their contribution to the audit process.

Executive Summary

The Reserve Bank of Australia (RBA) has held a self-insurance licence under the Safety, Rehabilitation and Compensation Act 1988 (SRC Act) since 1 May 1996. Their licence is due to expire on 30 June 2031.

The RBA's workers' compensation rehabilitation portfolio, within the initial stages of the nominated audit period, was managed by its third-party claims manager, Australian Postal Corporation (APC), under a contractual arrangement. This arrangement commenced in August 2017 and ceased at the end of June 2024. The RBA has formally brought the rehabilitation functions in-house and appointed Comcare to manage its claims portfolio from July 2024.

The RBA continues to have low rehabilitation file numbers and as such testing against Element 3 – Implementation, was limited. Of the seven files selected for review only four had some level of rehabilitation activity in the audit period. The low file numbers and limited activity made it difficult to verify implementation against all aspects of the RBA's rehabilitation case management.

Overall, at the completion of the review, no non-conformances and nine observations for improvement were recorded. The observations mainly related to procedural documentation requiring review and updating.

The audit period reviewed was from 1 April 2023 to 31 March 2024.

This audit has been conducted in line with Comcare's Rehabilitation Management System (RMS) Audit Workbook, version 3.0, February 2021.

Non-Conformances

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

Observations

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

Criterion	Observation
1.1	The Workers' Compensation, Rehabilitation and Claims Management Policy is an unsigned document and is due for review in April 2025. It is recommended at the next review that the policy should be signed by the present CEO or other senior executive.
3.2	The Safety & Wellbeing Team Procedure and the LCPI Annual Report referenced the following job titles in the Safety and Wellbeing team but current job descriptions to reflect these titles were not provided in the evidence review: <ul style="list-style-type: none"> • Senior Consultant – Safety Management • Senior Consultant – Mental Health • Senior Consultant – Health and Wellbeing

Criterion	Observation
3.2	<p>Review the position description of Senior Consultant – Health and Wellbeing (as the designated Rehabilitation Case Manager) to ensure it defines and communicates the applicable responsibilities to the relevant stakeholders, for example:</p> <ul style="list-style-type: none"> • the rehabilitation and return to work of employees with work related injury and ensuring compliance with all rehabilitation legislative and regulatory obligations under the Safety, Rehabilitation and Compensation Act 1988. • manage the internal and external audit programs relating to rehabilitation including compliance with audit expectations and implementation of corrective action plans to address audit findings where required. • possessing detailed understanding of self-insurance licensing and compliance requirements.
3.3	<p>Review and update documentation accessible to employees to ensure the information reflects the current rights and responsibilities of the RBA as the Rehabilitation Authority responsible for the co-ordination and implementation of rehabilitation case management for its employees.</p>
3.13	<p>The RBA should undertake a full review to ensure it has all relevant documented processes and procedures for rehabilitation in place that recognises the RBA's legislative and regulatory obligations and compliance as the rehabilitation authority.</p>
3.13	<p>A previous Corrective Action remains outstanding: D12 403630 Safety & Wellbeing Team Procedure includes track changes that require updating (Refer 24.1 Endorsements and Grants).</p>
4.2	<p>The amended service agreement between the RBA and APC reflects the change to the RBA having accountability as the Rehabilitation Authority effective from 27/7/23. Therefore, relevant documentation for the RBA requires updating as the rehabilitation delegate monitoring rehabilitation providers' key performance indicators in terms of quality of service delivery, costs, progress reports and outcomes.</p>
4.5	<p>Evidence of the LCPI Annual Report published on the intranet site was not sighted.</p> <p>The Intranet page Life @ The Bank does not contain links to the audit results, LCPI Annual Reports or WHS Committee Meeting Minutes.</p>
4.5	<p>The Safety & Wellbeing Team Procedure contains the following administrative errors:</p> <ul style="list-style-type: none"> • 'Contents' page – the three headings below do not appear in the body of the procedure document: <ul style="list-style-type: none"> o 9. Workers' Compensation and Rehabilitation Management Plan, o 22. Work Health and Safety Coordination Committee (WCC) Administration, and o 26. Head Office Gym Access and Organisation of Fitness Classes.

Criterion	Observation
	<ul style="list-style-type: none"> 'Contents' page – with the omission of the above three headings in the document, the heading numbering and page numbers are not in the correct sequence. <p>References to 'Licensee Improvement Program (LIP) Report' in the 'Contents' page and under subheading 9.4 (page 12) should be corrected to reflect its current title, Licensee Compliance and Performance Improvement (LCPI) Annual Report.</p>

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

	Number of criteria	% of assessed criteria
Conformance (with 9 Observations)	24	100%
Non-conformance	0	Nil
Not able to verify	3	
Not applicable	0	

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

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

s 47F

Signed:

s 47F



Signed:

s 47F



Signed:

s 47F

Date: 30 July 2024

Table of Criteria

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

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

ELEMENT 1: Commitment and Corporate Governance

Documented Commitment

Criterion 1.1

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

Finding: Conformance with Observation

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Policy, v5.0, 21/4/23, next review April 2025
- Governor Michele Bullock's statement of commitment (accessible from the intranet)

Corrective Actions:

The last review found one Observation:

The Workers' Compensation, Rehabilitation and Claims Management Policy was due for review in April 2023. It is recommended that the revised policy should be signed by the present CEO or other senior executive.

The Corrective Action Plan states:

Reviewed in December 2023 for inclusion in the Transition to Comcare Policy and Procedure pack.

Comcare contract to come into effect on 1 July 2024. New Policy to come into effect on 1 July 2024.

The Policy was updated April 2023.

Comment:

The Workers' Compensation, Rehabilitation and Claims Management Policy was updated and approved in April 2023 by the Head of Human Resources.

The Policy is reviewed by Human Resources every two years or more frequently if required. All changes to the Policy are approved by the Head of Human Resources.

The policy document is not signed and marked for review in April 2025.

"This policy relates to the Bank's obligations and commitments to providing worker's compensation, rehabilitation and claims management for employees that are injured / ill at work."

In lieu of a signed policy, documented commitment is evidenced in the statement of commitment issued by the new governor, Michel Bullock, who commenced as governor in September 2023, which is accessible on the intranet:

"The Executive Committee and I are accountable and responsible for the health, safety and wellbeing of all staff in the workplace. I commit to providing the necessary resources to maintain our safety standards, but I also remind all staff that it is also your responsibility to take reasonable care for your own health, safety and wellbeing. You can do this by

following the relevant Bank policies and procedures, identifying and reporting hazards where appropriate and ensuring your actions do not create any safety risk to any person, including yourself, while at work. This responsibility extends into our hybrid working arrangements.

The Bank has a very good safety record and we have developed a strong safety culture over a long period of time, particularly in our areas of key safety risk. I am determined to maintain that."

Observation:

The Workers' Compensation, Rehabilitation and Claims Management Policy is an unsigned document and is due for review in April 2025. It is recommended at the next review that the policy should be signed by the present CEO or other senior executive.

Corporate Governance

Criterion 1.2

The rehabilitation management system provides for internal and external accountability.

Finding: Conformance

Evidence:

- Governor's statement of commitment (accessible from the intranet)
- RBA Job descriptions:
 - Head of Safety & Wellbeing – 6950, approved 1/12/20
 - Health & Wellbeing Consultant – 8127, approved 25/3/22
 - Senior Consultant, Mental Health – 8128, approved 18/11/20
 - Safety Management Consultant – 6692, approved 18/11/20
- Australia Post job descriptions:
 - Head of Rehabilitation, July 2021
 - Regional Rehabilitation Manager, September 2021
- Transition Plan to Comcare as Claims Manager, January 2024 – RBA Organisational Chart and Governance Structure
- LCPI report 2023 – Attachment 1 – Organisational charts for the teams responsible for managing compliance (claims, rehabilitation and prevention)
- Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025
- WHS, CMS, RMS and PR Audit Action Register, August 2023
- Appendix 1 Consultation, January 2024
- Appendix 2 Policies, procedures, standard letters in place, January 2024
- Letter of engagement with BRM, 17 January 2024

- Licensee Compliance and Performance Improvement (LCPI) Annual Report, 2023
- Monthly KPI reports, 2023/2024
- LKPI quarterly comparison reports – March 2023, June 2023
- Rehabilitation Key Performance Indicators (Part 1)
- Rehabilitation Key Performance Indicators (Part 2)
- Rehabilitation Management Systems audit report, July 2023, completed by BRM

Comment:

The evidence provided demonstrated several mechanisms of identifying internal and external accountability within the rehabilitation management system.

Internal Accountability is demonstrated through the following:

- Governor's statement of commitment is accessible from the intranet. The document outlines the roles and responsibilities of Human Resources and the Work Health & Safety team.
- Job descriptions for RBA and Australia Post
- Organisational structure
- Corrective action plan

External Accountability is demonstrated through the following:

- Service Level Agreements with external parties:
 - Amendment agreement dated 27 July 2023 between RBA and Australia Postal Corporation, signed
 - 2020 Claims Management Services Agreement, Australian Postal Corporation and Reserve Bank Australia, commencement 1/8/20, expiration 31/7/23, further period 3 years, signed 10/7/20
 - Australia Post service level agreements with various parties
 - Letter of engagement with BRM, 17 January 2024
- Licensee Compliance and Performance Improvement (LCPI) Annual Report, 2023
- KPI reports for Licensees
- Rehabilitation Management Systems audit report, July 2023, completed by BRM

Criterion 1.3

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

Finding: Conformance

Evidence:

- Risk Management Policy, August 2023, v11.0, 28/8/23, review due August 2024
- HR – WHS – WHS Risk Register, ID 1003012, last reviewed 26/03/24
- Work Health and Safety Semi-Annual Report – 2023/24
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/03/24 – 7 Safety & Wellbeing Management Plan
- Quality Assurance – Injury Management Review Process (Compensation Peer to Peer (aka Project Circle) Review Process Flowchart)
- Quality Assurance – Injury Management Review Process (Independent External Audit Preparation Process), November 2022
- Quality Assurance – Injury Management Review Process (Rehabilitation Peer to Peer Review Process Flowchart)
- IMA Quality Assurance – Injury Management Review Process, v14, February 2024
- Rehabilitation Case – Quality Case Review Form
- Rehabilitation Case – Peer to Peer Review Template
- Safety and Wellbeing Management Plan – 2023/24, July 2023, v1.0, 4/8/23, next review July 2024
- Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025
- Project Circle – Spot Check worksheet (sample) March 24

Comment:

The Risk Management Policy incorporates a Risk Appetite profile which guides the RBA on the amount of risk they should be taking. Roles and Responsibilities in relation to the Risk Appetite are explained. The Policy is due for review in August 2024.



The WHS Risk Register identifies risks and has assigned a 'risk owner'. The Register was last reviewed in March 2024.

The key objectives of the Safety and Wellbeing Management Plan are risk based and focus on:

- ensuring the physical safety of our diverse workforce across all our workplace environments
- implementing targeted initiatives that positively impact employees' health and wellbeing
- implementing initiatives to continue to uplift and embed mental health awareness and the capability of people leaders to support their teams.

The LCPI Annual Report demonstrated key challenges and successes to manage the identified risks which are aligned with the Safety and Wellbeing Management Plan with key elements of:

- ensuring the safety of our people during workplace disruptions, works and other situations impacting workplace environments
- implementing initiatives that positively impact employees' health and wellbeing
- implementing initiatives to continue to uplift and embed mental health awareness and the capability of people leaders to support their teams.

The APC has a Quality Assurance Process. The Injury Management Review Process is designed "to ensure a consistent approach is applied to the review of Worker's Compensation, Rehabilitation and Litigation management systems within Australia Post Group's (APG's) Injury Management (IM) team by providing a quality assurance framework."

APC has an audit program in place to monitor the rehabilitation management process.

ELEMENT 2: Planning

Administrative arrangements

Criterion 2.1

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

Finding: Conformance

Evidence:

- Safety, Rehabilitation and Compensation Act 1988 – Part 111 – Schedule of Delegations, signed 27/3/23 by Governor, Philip Lowe
- Safety, Rehabilitation and Compensation Act 1988 – Part 111 – Schedule of Delegations, Michele Bullock, Governor, March 2024 (draft)
- **Workers' Compensation Rehabilitation Delegation**, signed by the current Governor, Michele Bullock, 26 June 2024
- Email 24/3/24 from RBA General Counsel regarding draft delegation schedules
- Email 14/3/24 from RBA to Sparke Helmore seeking advice on delegation schedules
- Appendix 1 Consultation, January 2024
- Appendix 2 Policies, procedures, standard letters in place, January 2024
- Transition Plan to Comcare as Claims Manager, January 2024
- Amendment agreement dated 27 July 2023 between RBA and Australia Postal Corporation, signed
- 2020 Claims Management Services Agreement, Australian Postal Corporation and Reserve Bank Australia, commencement 1/8/20, expiration 31/7/23, further period 3 years, signed 10/7/20
- File audit

Comment:

The delegation instrument signed by the previous Governor, Philip Lowe, on 27 March 2023 delegated all functions and powers to the third party claims manager, APC. This delegation instrument remained in place from the last review.

This delegation instrument, delegated all functions and powers as a Rehabilitation Authority, to:

- Senior Health and Wellbeing Consultant
- Senior Mental Health Consultant
- Head of Safety and Wellbeing

The services agreement with APC for the delivery of rehabilitation management services was amended on 27 July 2023 with an expiry date of 30 June 2024 and included the

variation to remove reference to the APC undertaking rehabilitation management services on behalf of the RBA under a dual function model.

The APC advised the RBA in late 2023 that they will no longer be offering rehabilitation management services beyond June 2024 (the RBA subsequently appointed Comcare to assume this role from 1 July 2024).

A draft rehabilitation delegation schedule was developed in March 2024 and delegated all functions and powers to officers of the licensee but was not formalise and signed by the new Governor, Michele Bullock.

The draft rehabilitation delegation schedule was referred to an external legal provider, Sparke Helmore Lawyers, in or around March 2024, as part of a review of all Bank delegations. There has been no change in the delegated positions, only a change in the Governor which occurred in September 2023.

The rehabilitation delegation schedule was signed by the current Governor, Michele Bullock, on 26 June 2024. This delegation instrument delegated specific rehabilitation functions to the following delegated RBA positions, effective from 1 July 2024:

- Head of Safety and Wellbeing
- Senior Consultant, Safety and Wellbeing

File Audit:

File audit found no activity relating to rehabilitation determinations and reconsiderations relevant to this criterion.

Rehabilitation planning

Criterion 2.2

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

Finding: Conformance

Evidence:

- **Workers' Compensation, Rehabilitation and Claims Management Policy, v5.0, 21/4/23, next review April 2025**
- **Governor's statement of commitment (accessible from the intranet)**
- **Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025**
- **Amendment agreement dated 27 July 2023 between RBA and Australia Postal Corporation, signed**
- **RBA Job descriptions:**
 - **Head of Safety & Wellbeing – 6950, approved 1/12/20**
 - **Health & Wellbeing Consultant – 8127, approved 25/3/22**

- Mental Health Consultant – 8128, approved 18/11/20
- Safety Management Consultant – 6692, approved 18/11/20
- Australia Post job descriptions:
 - Head of Rehabilitation, July 2021
 - Regional Rehabilitation Manager, September 2021
- Safety and Wellbeing Management Plan – 2023/24, July 2023, v1.0, 4/8/23, next review July 2024
- Work Health & Safety Legislation Monitoring Guidelines, v3.2, 28 March 2024, next review March 2026
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/03/24 – 7 Safety & Wellbeing Management Plan
- IMA, Regulatory Register, v3, August 2023
- Work Instruction 14, Natural Justice, v3, February 2023

Comment:

The RBA recently updated its **Workers' Compensation, Rehabilitation and Claims Management Procedure** to ensure its practices comply with the SRC Act.

Section 3 of the document covers Roles and Responsibilities for:

- 3.1 Injured/Ill Employee
- 3.2 Managers and People Leaders
- 3.3 Medical Practitioner/Treatment Providers
- 3.4 Claims Manager
- 3.5 Rehabilitation Case Manager
- 3.6 Early Intervention Rehabilitation
- 3.7 Workplace Rehabilitation Providers

Section 4 of the document describes Rehabilitation Case Management in accordance with Comcare's Guidelines for Rehabilitation Authorities 2019.

The **Workers' Compensation, Rehabilitation and Claims Management Policy** recognises RBA's legislative obligations.

The Safety and Wellbeing Management Plan supports provision of a safe and healthy workplace with the goal of ensuring physical and mental health and wellbeing with reduced health related work impairment to support **reduced workplace injury and workers' compensation costs**.

The RBA recognises the requirement for staff with rehabilitation responsibilities to acquire demonstrated knowledge of all rehabilitation legislative and regulatory obligations under the SRC Act.

The RBA position descriptions outline key position objectives and an understanding of legislative and regulatory requirements.

A primary purpose of the Health & Wellbeing Consultant includes *"to provide effective early prevention and rehabilitation for injured/ill employees."* A key position objective is to

"Facilitate co-ordination of rehabilitation and return to work activities", for physical and psychologically injured/ill employees.

The APC position descriptions are no longer relevant due to the amended agreement in July 2023 between the RBA and APC to reflect the RBA as the rehabilitation authority for employees of the RBA. The APC Head of Rehabilitation position description specified responsibility for:

- the rehabilitation and return to work of employees with work related injury and ensuring compliance with all rehabilitation legislative and regulatory obligations under the Safety, Rehabilitation and Compensation Act 1988.
- management of the internal and external audit programs relating to rehabilitation including compliance with audit expectations and implementation of corrective action plans to address audit findings where required.
- possessing detailed understanding of self-insurance licensing and compliance requirements

The Injury Management Advice - Regulatory Register is an APC document that describes the rehabilitation authority requires a "*consistent approach to sharing and storing legislative and regulatory related information across the Australia Post Group (APG) Injury Management Team.*"

Criterion 2.3

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

Finding: Conformance

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Policy, v5.0, 21/4/23, next review April 2025
- Governor's statement of commitment (accessible from the intranet)
- Amendment agreement dated 27 July 2023 between RBA and Australia Postal Corporation, signed
- Licensee Compliance and Performance Improvement (LCPI) Annual Report, 2023
- Monthly KPI reports, 2023/2024
- LKPI quarterly comparison reports – March 2023, June 2023
- Rehabilitation Key Performance Indicators (Part 1)
- Rehabilitation Key Performance Indicators (Part 2)
- Safety and Wellbeing Management Plan – 2023/24, July 2023, v1.0, 4/8/23, next review July 2024
- Workers Compensation and Rehabilitation Performance Reports, 2023/2024
- Work Health and Safety Semi-Annual Report – 2023/24

- Monthly report August 2023
- Monthly report December 2023

Comment:

The Workers' Compensation, Rehabilitation and Claims Management Policy comments on RBA's compliance activities to include independent annual audits are undertaken by auditors with expert knowledge of the SRC Act and regulations in order to assess the effectiveness of the RBA's claims management and rehabilitation systems.

The LCPI Annual Report identifies the organisational charts for the teams responsible for managing compliance for claims, rehabilitation and prevention, key activities and achievements over the reporting period and objectives and targets for the coming year:

During the report period 1 July 2022 to 30 June 2023 the planned tasks within the Safety and Wellbeing Management Plan of 2022/23 were completed with a high degree of success. The effectiveness of the Bank's prevention and claims management practices was demonstrated through strong audit results. The Prevention, Claims Management System and Rehabilitation Systems audits all received a 100 per cent compliance rating with the auditor noting that the Bank has developed a positive and engaging culture and all managers and employees interviewed (including those with safety critical roles) were knowledgeable about their roles, responsibilities and accountabilities for health and safety. The feedback received from managers, health and safety representatives and workers was exceptional and all are of the belief that the RBA engages with staff on health and safety matters and takes on board feedback provided. Over the next twelve months, the Safety and Wellbeing team will implement initiatives outlined within its 2023/24 Safety and Wellbeing Management Plan, aimed to increase awareness and understanding of safety management practices, mental health and wellbeing. The next external audit of the Bank's WHS, Claims and Rehabilitation management systems will be in April 2024, and will include a focus at Head Office (including 8 Chifley), Canberra branch, H.C. Coombs Centre and Melbourne Representative Office sites.

There will be an emphasis on assisting the 65MP project team in delivering organisational change support to staff, ensuring we continue to comply with all legislative WHS duties and obligations and developing a fit for purpose mental health strategy to identify and mitigate psychosocial risks within the Bank. The 65MP project (Head Office refurbishment) will continue to be a key area of focus.

Monthly KPI reports for licensees are provided by Comcare. The monthly KPI report for February 2024 demonstrates the RBA has maintained a 100 percent RTW Rate for the FY 2022/23 to 2023/24 YTD.

The KPI Comparative Report for Licensees – June 2023 report for the 2022-23 period FYTD comparison confirms the RBA's RTW Rate (LKPI 5) at 100% compared with all licensees at 91.9%.

The Workers Compensation Performance Report - February 2024 demonstrates the RBA's positive rehabilitation and return to work performance is significantly higher than the median and average for all licensees for:

- incapacity injury claims
- incapacity disease claims
- incapacity psychological claims

- rehabilitation expenditure
- return to work rate

Notwithstanding the positive results achieved by the RBA it is recognised the RTW rates are based on a low accepted claims count.

Criterion 2.4

The rehabilitation authority establishes plans to:

- achieve its objectives and targets
- promote continuous improvement
- provide for effective rehabilitation arrangements.

Finding: Conformance

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Policy, v5.0, 21/4/23, next review April 2025
- Governor's statement of commitment (accessible from the intranet)
- Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025
- WHS, CMS, RMS and PR Audit Action Register, August 2023
- Licensee Compliance and Performance Improvement (LCPI) Annual Report, 2023
- Safety and Wellbeing Management Plan – 2023/24, July 2023, v1.0, 4/8/23, next review July 2024
- Workers Compensation and Rehabilitation Performance Reports, 2023/2024
- Work Health and Safety Semi-Annual Report – 2023/24
- Monthly report August 2023
- Monthly report December 2023
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/03/24
- Injury Management Advices and Work Instructions (APG)

Comment:

The RBA conducts an annual self-audit of its rehabilitation management system and identified deficiencies are ordinarily addressed by way of a corrective action plan.

Refer to further comments against criterion 2.3.

ELEMENT 3: Implementation

Resources

Criterion 3.1

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

Finding: Conformance

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025
- Transition Plan to Comcare as Claims Manager, January 2024 – RBA Organisational Chart and Governance Structure
- Transition Plan to Comcare as Claims Manager, January 2024 – 5. Resourcing Plan
- LCPI report 2023 – Attachment 1 – Organisational charts for the teams responsible for managing compliance (claims, rehabilitation and prevention)
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/03/24
- Monthly KPI reports, 2023/2024
- LKPI quarterly comparison reports – March 2023, June 2023
- Rehabilitation Key Performance Indicators (Part 1)
- Rehabilitation Key Performance Indicators (Part 2)
- Audit population

Comment:

The current workload resourcing appears to be adequate given the consistently low claim numbers.

The Safety & Wellbeing Team Procedure, under 4.3 Resources, states:

The Head of Safety and Wellbeing will, in consultation with the team, determine the appropriate resources required to successfully manage Safety and Wellbeing. The review is conducted annually, usually between February and April. In preparing the budget, consideration should be given to the direction from HR senior management, the upcoming work program, previous budgets, training requirements and claims and rehabilitation activity from a staffing and liability perspective.

The LCPI Annual Report provides organisational charts for the teams responsible for managing compliance (claims, rehabilitation and prevention). The Safety and Wellbeing team comprise of four positions, one of which is the Senior Consultant – Health and Wellbeing who is the designated Rehabilitation Case Manager responsible for the co-ordination and implementation of rehabilitation case management.

There were only six files with relevant rehabilitation activity in the audit period.

Communication and awareness

Criterion 3.2

The rehabilitation authority defines and communicates responsibilities to relevant stakeholders.

Finding: Conformance with Observations

Evidence:

- RBA Job descriptions:
 - Head of Safety & Wellbeing – 6950, approved 1/12/20
 - Health & Wellbeing Consultant – 8127, approved 25/3/22
 - Mental Health Consultant – 8128, approved 18/11/20
 - Safety Management Consultant – 6692, approved 18/11/20
- Australia Post job descriptions:
 - Head of Rehabilitation, July 2021
 - Regional Rehabilitation Manager, September 2021
- WHS, CMS, RMS and PR Audit Action Register, August 2023
- Letter of engagement with BRM, 17 January 2024

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- Workers' Compensation, Rehabilitation and Claims Management Policy, v5.0, 21/4/23, next review April 2025
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/03/24 – 8.2 WHS Induction
- Injury Management Advices and Work Instructions (APG)
- WHS Committee
- Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025 – 3. Roles and Responsibilities
- LCPI report 2023 – Attachment 1 – Organisational charts for the teams responsible for managing compliance (claims, rehabilitation and prevention)
- Transition Plan to Comcare as Claims Manager, January 2024 – 6.1 Lodging and deciding claims

- Intranet page – Rehabilitation (Injury & Illness)
- Other intranet links include – Workers' Compensation
- Information That Matters, October 2023 (APG brochure)
- The workers' compensation and rehabilitation process explained (APG brochure)
- Workers' Compensation Claim Pack Full (APG)

Comment:

Responsibilities and accountabilities are included in the RBA and APC position descriptions.

The previous 2020 service agreement between the RBA and APC outlined the responsibilities of APC in the rehabilitation management process, however this is now the responsibility of the RBA as the rehabilitation authority. The RBA, since the Amendment Agreement dated 27 July 2023, assumed responsibility for rehabilitation management services, including reconsiderations and administrative matters.

The Workers Compensation, Rehabilitation and Claims Management Procedure outlines Roles and Responsibilities in section 3 and states the Safety and Wellbeing team will *"undertake Rehabilitation Services as required and may refer to an external approved Workplace Rehabilitation Provider in accordance with Comcare."*

Specifically, the Health and Wellbeing Consultant within the Safety and Wellbeing team is the Rehabilitation Case Manager and is responsible for the co-ordination and implementation of the Bank's workplace-based Rehabilitation Programs, and this includes meeting the requirements of the Bank's Self Licencing conditions.

Section 4.4 states *"As the rehabilitation authority, the Bank delegates this authority to make a determination to suspend compensation under the SRC Act to the Head of Safety and Wellbeing."*

The Safety & Wellbeing Team Procedure outline the duties and responsibilities of the Safety and Wellbeing team and the positions covered are:

- Head of Safety and Wellbeing
- Senior Consultant – Safety Management
- Senior Consultant – Mental Health
- Senior Consultant – Health and Wellbeing

The LCPI Annual Report also referenced the above four positions in the organisational chart for the Safety and Wellbeing team. Current job descriptions for the three senior consultant positions were not provided in the evidence review.

The Transition Plan to Comcare as Claims Manager advises employees *"If, as a result of injury, employees are unable to return to their normal hours and/or duties, they will be contacted by the Bank workplace rehabilitation provider who will develop a rehabilitation program in consultation with the employee, their treating doctor and their manager."*

The intranet page – *About rehabilitation*, was recently updated to reflect the change from APC to Comcare as the Bank's third party provider effective from 1 July 2024. The page advises the RBA's Safety and Wellbeing team members *"act as a Rehabilitation Case Manager and arrange all aspects of the rehabilitation process for ill or injured staff who have an accepted workers compensation claim."*

Observation:

The Safety & Wellbeing Team Procedure and the LCPI Annual Report referenced the following job titles in the Safety and Wellbeing team but current job descriptions to reflect these titles were not provided in the evidence review:

- Senior Consultant – Safety Management
- Senior Consultant – Mental Health
- Senior Consultant – Health and Wellbeing

Observation:

Review the position description of Senior Consultant – Health and Wellbeing (as the designated Rehabilitation Case Manager) to ensure it defines and communicates the applicable responsibilities to the relevant stakeholders, for example:

- the rehabilitation and return to work of employees with work related injury and ensuring compliance with all rehabilitation legislative and regulatory obligations under the Safety, Rehabilitation and Compensation Act 1988.
- manage the internal and external audit programs relating to rehabilitation including compliance with audit expectations and implementation of corrective action plans to address audit findings where required.
- possessing detailed understanding of self-insurance licensing and compliance requirements.

Criterion 3.3

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

Finding: Conformance with Observation

Evidence:

- **Workers' Compensation, Rehabilitation and Claims Management Policy, v5.0, 21/4/23, next review April 2025**
- **Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025**
- Work Instruction 14, Natural Justice, v3, February 2023
- Intranet page – Rehabilitation (Injury & Illness)
- Other intranet links include – **Workers' Compensation**
- Information That Matters, October 2023 (APG brochure)
- The workers' compensation and rehabilitation process explained (APG brochure)
- **Workers' Compensation Claim Pack Full (APG)**
- File audit

Comment:

The evidence demonstrates that the RBA has provisions for ensuring that employees are aware of their legislative rights and obligations regarding the rehabilitation process beginning with the **Workers' Compensation, Rehabilitation and Claims Management Policy** which states:

Workplace rehabilitation is an integral component of the Bank's overall strategy of injury prevention and injury management. The Bank will provide, where appropriate, workplace rehabilitation to employees who sustain a work-related injury or illness. The Bank may also provide similar rehabilitation for non-work-related injuries or illness.

The **Workers' Compensation, Rehabilitation and Claims Management Procedure** outlines in section 3 the responsibilities of the injured employee, managers, people leaders, rehabilitation case manager, and workplace rehabilitation providers. The document provides the employee with information about an assessment under section 36 of the SRC Act, recovery and return to work under section 37, and the consequences of failure to undertake a rehabilitation assessment or a rehabilitation program. It also includes an **employee's rights** to request a review of decisions under section 62.

The RBA intranet has a page for Rehabilitation and employees can access information on the process for both work related and non-work related injuries and illness. This page also provides a link to the following:

- Notice of rehabilitation obligation and rights
- Workplace Rehabilitation Policy
- Workplace Rehabilitation Procedure
- Workplace Rehabilitation case management
- Guidelines for Rehabilitation Authorities - 2019

File Audit:

File audit confirmed compliance with this criterion.

Observation

Review and update documentation accessible to employees to ensure the information reflects the current rights and responsibilities of the RBA as the Rehabilitation Authority responsible for the co-ordination and implementation of rehabilitation case management for its employees.

Training

Criterion 3.4

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

Finding: Conformance

Evidence:

- RBA Job descriptions:
 - Head of Safety & Wellbeing – 6950, approved 1/12/20
 - Health & Wellbeing Consultant – 8127, approved 25/3/22
 - Mental Health Consultant – 8128, approved 18/11/20
 - Safety Management Consultant – 6692, approved 18/11/20
- Australia Post job descriptions:
 - Head of Rehabilitation, July 2021
 - Regional Rehabilitation Manager, September 2021
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/03/24 – 8 WHS Training
- 2022 - 2023 National Training Schedule & Register
- 2023 - 2024 National Training Schedule & Register

Comment:

The APC position descriptions for Head of Rehabilitation and Regional Rehabilitation Manager stipulate a detailed understanding of the SRC Act and regulatory environment.

The APC National Training Schedule & Register identify the training needs of, and records the training undertaken by, the rehabilitation team. The training matrix aligns to the key tasks, accountabilities and responsibilities of the positions within the rehabilitation team.

The Safety & Wellbeing Team Procedure states:

4.4 - Resources

The Head of Safety and Wellbeing will, in consultation with the team, determine the appropriate resources required to successfully manage Safety and Wellbeing. The review is conducted annually, usually between February and April. In preparing the budget, consideration should be given to the direction from HR senior management, the upcoming work program, previous budgets, training requirements and claims and rehabilitation activity from a staffing and liability perspective.

Early intervention

Criterion 3.5

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

Finding: Conformance

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025 – 4.1 Early Intervention Rehabilitation
- Workers' Compensation, Rehabilitation and Claims Management Policy, v5.0, 21/4/23, next review April 2025
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/03/24 – 13 Rehabilitation
- Intranet page – Early Intervention
- File audit

Comment:

The RBA has demonstrated the organisation has appropriate processes in place to provide support to assist its employees in the initial stage of having suffered an injury or illness.

The Safety & Wellbeing Team Procedure states:

Section 9.3 - Preparation of WHS Reports

The IMC provides an analysis on any early intervention provided while the costs of early intervention are tracked in the Early Intervention Costs Tracking Spreadsheet. Details of all payments made under the early intervention process are recorded and monitored.

Section 13.2 - Early Intervention Rehabilitation under the SRC Act

The Bank provides early intervention to facilitate timely recovery of employees who suffer a work-related injury or illness that is likely to resolve with a short-term course of treatment. Accessing early intervention does not affect an employee's ability to make a claim for workers' compensation. However, a benefit of early intervention is that injuries are often resolved swiftly, and claims are less likely to be made for simple injuries. Other benefits include assisting injured employees to recover quickly before their condition worsens; improved administrative efficiency; and reduced costs associated with potential deterioration of a condition between the time the Bank is notified and the time a claim is received and determined.

Section 13.3 - Procedure for Early Intervention

Provides guidance on the process in which the RBA will pay up to \$800 for treatment and if approved, additional treatment can be paid, otherwise the employee is encouraged to **submit a claim for workers' compensation** if substantial additional treatment is likely to be required.

The RBA also has a dedicated intranet page that employees can access for information regarding early intervention including the benefits, how early intervention is managed, non-work related injuries or illness and workers' compensation claims.

The **Workers' Compensation, Rehabilitation and Claims Management Procedure** outlines the roles of the RBA Managers and People Leaders, Safety and Wellbeing team including Rehabilitation Case Manager. The procedure documents Early Intervention requirements under the SRC Act and that it allows for a section 36 assessment of capacity to undertake rehabilitation to be arranged, and a section 37 Rehabilitation Program to be implemented. The Bank may also arrange a section 36 assessment where there is insufficient guidance in the original medical certificates or documentation. The procedure also states the RBA's commitment to providing early rehabilitation and return to work assistance for employees suffering an injury or illness whether work-related or not and includes when a claim for compensation is not yet determined.

File Audit:

Of the three files applicable, file audit confirmed compliance with this criterion.

Rehabilitation assessments

Criterion 3.6

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

Finding: Conformance

Evidence:

- **Workers' Compensation, Rehabilitation and Claims Management Procedure**, January 2024, v3.1, 15/01/24, review due November 2025 – 4. Rehabilitation Case Management
- **Workers' Compensation, Rehabilitation and Claims Management Policy**, v5.0, 21/4/23, next review April 2025
- IMA, Independent Medical Examinations - S57 & S36, v6, March 2023
- IMA, Rehabilitation Assessment, v6, May 2023
- Intranet page – Rehabilitation (Injury & Illness)
- File audit

Comment:

The **Workers' Compensation, Rehabilitation and Claims Management Procedure** outlines the role and responsibilities of the Rehabilitation Case Manager to facilitate assessment of injured/ill employees under section 36 of the SRC Act in order to identify their capacity to undertake, or continuing to undertake, a rehabilitation program.

The procedure provides guidance as to when a rehabilitation assessment is required and how a rehabilitation assessment is conducted. The document states that if a rehabilitation assessment is required, the RBA will ensure the employee has completed a consent form to release medical information. Following the assessment by an approved Workplace

Rehabilitation Provider or a qualified medical practitioner, the resultant report will be discussed with all parties, and an appropriate rehabilitation program put in place. The employee will be provided with a copy of the rehabilitation assessment, as well as the employee's medical practitioner/health professional.

File Audit:

File audit found no rehabilitation assessment activity relevant to this criterion.

Rehabilitation programs

Criterion 3.7

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

Finding: Conformance

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025 – 4. Rehabilitation Case Management
- Workers' Compensation, Rehabilitation and Claims Management Policy, v5.0, 21/4/23, next review April 2025
- IMA, Rehabilitation Programs S37(1), v3, January 2023
- Amendment agreement dated 27 July 2023 between RBA and Australia Postal Corporation, signed
- 2020 Claims Management Services Agreement, Australian Postal Corporation and Reserve Bank Australia, commencement 1/8/20, expiration 31/7/23, further period 3 years, signed 10/7/20
- Intranet page – Rehabilitation (Injury & Illness)
- File audit

Comment:

The Workers' Compensation, Rehabilitation and Claims Management Procedure states:

Where the section 36 assessment recommends that the ill/injured employee is capable of undertaking rehabilitation, a Rehabilitation Program may be implemented under section 37 of the SRC Act.

Rehabilitation Programs are managed by the Bank's Health and Wellbeing Consultant within Human Resources. In circumstances where the illness/injury is more complex in nature or rehabilitation may be lengthy, a Workplace Rehabilitation Provider may also be required.

The procedure explicitly references the programs are individually tailored to the specific circumstances of the injured/ill employee after consultation with, and recommendations received from all relevant parties. The RBA will make determinations having regard to all the elements of section 37(3)(a)-(h) which are documented in the Rehabilitation Program

Form. The determination will be signed by the Rehabilitation Case Manager prior to the commencement of the rehabilitation program.

File Audit:

File review of the two files applicable to this criterion found that section 37 determinations relevant to the audit period were not provided for review, and a finding for each was recorded.

Suitable employment

Criterion 3.8

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

Finding: Conformance

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025 – 4. Rehabilitation Case Management
- Workers' Compensation, Rehabilitation and Claims Management Policy, v5.0, 21/4/23, next review April 2025
- IMA, Rehabilitation & Suitable Employment, v3, October 2022
- Intranet page – Rehabilitation (Injury & Illness)
- File audit

Comment:

The Workers' Compensation, Rehabilitation and Claims Management Procedure outlines:

- Roles and responsibilities for the provision of suitable duties to include Managers and People Leaders and Rehabilitation Case Manager where suitable duties may need to be provided within a Rehabilitation Program.
- Suitable duties are based on the section 36 assessment or the advice of other medical practitioners or health professionals. The procedure states the role includes *"consulting, liaising with and ensuring effective communication between all parties involved in providing rehabilitation and support for the ill/injured employee – that is, the employee, treating doctors and health professionals, workplace rehabilitation providers, supervisors, management and, if requested by the injured employee, a relevant representative."*
- It requires the suitable duties to be *"meaningful, contribute to productivity and wherever possible be modified from the employee's original duties and recognise the existing skills, experience and capabilities of the employee. They will be consistent with the medical/rehabilitation advice and designed so as not to aggravate or cause a recurrence of the employee's condition. The Bank will utilise the Suitable Duties Form to determine what alternative duties are available to the employee, based on available medical evidence."*

The procedure also described the process for identifying alternate return to work options should suitable alternative duties be unavailable or inappropriate. The RBA will commit to off-site rehabilitation or retraining and in exceptional circumstances, may consider retraining or vocational rehabilitation with the aim of assisting the employee to find suitable alternative employment.

File Audit:

File audit noted that, where appropriate, suitable employment was provided.

Determinations, Suspensions and Reconsiderations

Criterion 3.9

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

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

Finding: Not able to verify

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025
- Workers' Compensation, Rehabilitation and Claims Management Policy, v5.0, 21/4/23, next review April 2025
- Rehabilitation forms and templates
- File audit

Comment:

The Workers' Compensation, Rehabilitation and Claims Management Procedure outlined an appropriate level of detail relating to the process for issuing determinations under sections 36, 37, and 62.

The determinations made in accordance with sections 36 and 37 are signed by the Rehabilitation Case Manager. Section 62 requests for reconsideration are reviewed by the Reconsideration Officer.

The rehabilitation forms and templates employed by the RBA captured the relevant sections to be taken into consideration when making determinations.

File Audit:

File audit found no activity relevant to this criterion.

Criterion 3.10

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

Finding: Not able to verify

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025
- Workers' Compensation, Rehabilitation and Claims Management Policy, v5.0, 21/4/23, next review April 2025
- IMA, Non-Compliance and Suspension within the Rehabilitation Process, v3, April 2023
- File audit

Comment:

The Workers' Compensation, Rehabilitation and Claims Management Procedure explains the consequences to an employee for failing to undertake a rehabilitation assessment under section 36 or rehabilitation program under section 37. If a case exists of non-compliance with rehabilitation, the Head of Safety and Wellbeing will determine whether to suspend the employee's rights to compensation, except for payments for medical treatment. It also notes that, *Non-compliance may also be referred as a breach of the code of conduct as a potential failure to follow a lawful and reasonable direction.*

The Workers' Compensation - Notice of Rights states:

If you refuse or fail without reasonable excuse, to undergo an examination in relation to an assessment for rehabilitation or to undertake a Rehabilitation Plan, your rights to compensation under the SRC Act, or to institute or continue any proceedings under the Act, may be suspended. This may occur even if you have refused to sign the Return to Work Plan. If your rights to compensation are suspended, compensation is not payable in respect of the period of suspension; however medical expenses will continue to be paid.

File Audit:

File audit found no activity relevant to this criterion.

Criterion 3.11

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

Finding: Not able to verify

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025 – 5. Reconsiderations
- Workers' Compensation, Rehabilitation and Claims Management Policy, v5.0, 21/4/23, next review April 2025
- File audit

Comment:

The Workers' Compensation, Rehabilitation and Claims Management Procedure states:

Section 5.1 – Reconsideration of own motion

The rehabilitation case manager may make a reconsideration of own motion where the original determination contains an error of fact or law. A reconsideration of own motion is not appropriate for new injuries (including secondary injuries) or for minor administrative corrections.

Section 5.2 – Request for reconsideration

The Safety and Wellbeing team will write to the employee or their legal representative, if applicable, to acknowledge receipt of the request for reconsideration.

The Reconsideration Officer will then review the decision and any further evidence or documentation supplied by the employee. As soon as possible following the review, notice will be provided to the employee outlining:

- *The terms of the decision*
- *The reasons for the decision*
- *An employee's appeal rights to the Administrative Appeals Tribunal (AAT).*

File Audit:

File audit found no activity relevant to this criterion.

Confidentiality

Criterion 3.12

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

Finding: Conformance

Evidence:

- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/03/24 – 5 Privacy and confidentiality
- Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025
- IMA, Privacy of Injury Management Information, v4, May 2023
- File audit

Comment:

The Workers' Compensation, Rehabilitation and Claims Management Procedure states:

Section 4.8 - Rehabilitation Documentation

Files will be securely stored, and confidentiality will be appropriately maintained in compliance with The Privacy Act 1988.

For both workers' compensation claims and non-work related illness/injury Early Intervention or Suitable Duties Plans, records will be securely maintained within the Figtree system.

The Safety & Wellbeing Team Procedure states:

The team conducts work in accordance with the Bank's privacy guidelines. Specifically:

- *When not at desk, sensitive material is locked away and computer screens locked*
- *Where paper claim files exist, they are locked in the claims file cupboard when not in use*
- *Appropriate security is applied to TRIM folders*
- *Confidential discussions regarding claims and rehabilitation take place in meeting rooms*
- *Paperwork no longer required is shredded after it is entered in TRIM.*

The Injury Management Advice for Privacy of Injury Management Information provides guidance relating to the responsibilities and requirements for collecting, using, and sharing personal information of injured employees in the context of Injury Management at APG. There are key requirements to follow and actions for delegates.

File Audit:

File audit confirmed compliance with this criterion.

Document management

Criterion 3.13

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

Finding: Conformance with Observations

Evidence:

- Quality Assurance – Injury Management Review Process (Compensation Peer to Peer (aka Project Circle) Review Process Flowchart)
- Quality Assurance – Injury Management Review Process (Independent External Audit Preparation Process), November 2022
- Quality Assurance – Injury Management Review Process (Rehabilitation Peer to Peer Review Process Flowchart)
- IMA Quality Assurance – Injury Management Review Process, v14, February 2024
- Rehabilitation Case – Quality Case Review Form
- Transition Plan to Comcare as Claims Manager, January 2024 – 7.2 IT management/system issues
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/03/24 – 6 WHS Documents and Document Control
- IMA Injury Management Resources Process, v4, March 2023
- HR – WHS Risk Register, ID 1003012, last updated 26/3/24
- File audit

Corrective Actions:

The last review found one Observation:

Several documents require updating or review:

- The WHS Risk Register identifies risks and has assigned a 'risk owner', however it is noted that the Register was last reviewed in December 2021
- The Workers' Compensation, Rehabilitation and Claims Management Policy was due for review in April 2023
- D12 403630 Safety & Wellbeing Team Procedure includes track changes that require updating

The Corrective Action Plan states:

Reviewed in December 2023 for inclusion in the Transition to Comcare Policy and Procedure pack.

Comcare contract to come into effect on 1 July 2024. New Policy to come into effect on 1 July 2024.

BRM comments:

Completed corrective actions:

- WHS Risk Register was last updated on 26/3/24 with next review on 5/6/24 and identified risk description of "Risk to mental health or wellbeing of staff or contractors"
- The Workers' Compensation, Rehabilitation and Claims Management Policy was reviewed in April 2023

A Corrective Action remains outstanding:

D12 403630 Safety & Wellbeing Team Procedure includes track changes that require updating (Refer 24.1 Endorsements and Grants)

Comment:

The Safety & Wellbeing Team Procedure discusses WHS Documents and Document Control in section 6.1:

The Bank uses TRIM for record management and documents are created and stored in accordance with guidelines issued by Information Department.

A list of all WHS policies, procedures and forms contained in TRIM are tracked in the WHS Document Control Register. Documents contained in the register are reviewed on a regular basis (usually annually) or otherwise as often as required to ensure currency. The annual review should take place prior to audits to ensure documents currency. The review is coordinated by the Senior Consultant, WHS. The register contains documents managed by the Safety & Wellbeing team and also by FY. FY is responsible for updating their sheet section of the register and the documents within.

To ensure adequate version control, all new WHS documents must include the TRIM reference number, version number, date, and numbered pages.

APC stores all RBA files on their SharePoint.

Previously, the RBA had outsourced all aspects of their rehabilitation case management to APC, and the documentation provided throughout the review process to support the Rehabilitation Management System related to APC processes and procedures. These included early intervention, initial needs assessments, rehabilitation programs, identifying suitable duties, reconsiderations and suspensions etc.

This situation has since been rectified where the Principal Officer of the RBA has delegated specific rehabilitation functions and responsibilities to relevant employees of the licensee. The RBA had also begun to develop its own processes and procedures for rehabilitation. It is not clear, however, from the evidence review that the RBA has in place all the relevant documented procedures for rehabilitation. A full review should be undertaken for legislative compliance with input from the new third party claims manager, Comcare, where appropriate.

File Audit:

File audit confirmed compliance with this criterion.

Observation:

The RBA should undertake a full review to ensure it has all relevant documented processes and procedures for rehabilitation in place that recognises the RBA's legislative and regulatory obligations and compliance as the rehabilitation authority.

Observation:

A previous Corrective Action remains outstanding:

D12 403630 Safety & Wellbeing Team Procedure includes track changes that require updating (Refer 24.1 Endorsements and Grants).

ELEMENT 4: Measurement and Evaluation

Monitoring

Criterion 4.1

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

Finding: Conformance

Evidence:

- Licensee Compliance and Performance Improvement (LCPI) Annual Report, 2023
- Safety and Wellbeing Management Plan – 2023/24, July 2023, v1.0, 4/8/23, next review July 2024
- Workers Compensation and Rehabilitation Performance Reports, 2023/2024
- Work Health and Safety Semi-Annual Report – 2023/24
- Monthly report August 2023
- Monthly report December 2023
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/03/24 – 7 Safety & Wellbeing Management Plan
- Compensation Service Expectations (APG)
- Rehabilitation Case – Peer to Peer Review Template

Comment:

The Safety and Wellbeing Management Plan states:

The Plan was developed by HR, in consultation with the WHS Committee and key stakeholders. Progress on the implementation of the Plan will be monitored by the Safety and Wellbeing team. The overall effectiveness of the WHS program is summarised annually in the Bank's Licensee Improvement Program Report and in the WHS Annual Report.

The LCPI Annual Report is certified by the Head of Safety and Wellbeing that it accurately describes the RBA's performance in the reporting period.

The Safety & Wellbeing Team Procedure identifies:

Section 7. Safety & Wellbeing Management Plan

The objectives, priorities, and initiatives identified are devised with consideration to the Bank's operations, WHS indicators, WHS hazards and risks, outcomes of systems audits, feedback from discussions with workers, recent developments in WHS practice, legal requirements, and technological developments. The SAFETY & WELLBEING team has overall responsibility in ensuring that the Plan is appropriately implemented and up-to-date. It is monitored and reviewed at least quarterly by the SAFETY & WELLBEING team. Progress is summarised in the Bank's Licensee Improvement Program Report and WHS Annual Report.

APC undertake Quality Case Reviews at an individual/Workplace Rehabilitation Provider level to provide an additional platform for case management strategy and to monitor WRP Key Performance Indicators (KPI's). The WRP identifies a rehabilitation case suitable for a Quality Case Review during the periodic meeting with their manager. The Quality Case Review Form is completed collaboratively which guides strategising and provides a checklist to review key criteria. The Quality Case Review Forms are signed and recorded appropriately.

Criterion 4.2

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

Finding: Conformance with Observation

Evidence:

- Transition Plan to Comcare as Claims Manager, January 2024
- Service Level Agreement - Amendment agreement dated 27 July 2023 between RBA and Australia Postal Corporation, signed
- 2020 Claims Management Services Agreement, Australian Postal Corporation and Reserve Bank Australia, commencement 1/8/20, expiration 31/7/23, further period 3 years, signed 10/7/20
- Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025
- Rehabilitation key performance guidelines - Approved Workplace Rehabilitation Provider (WRP)
- Rehabilitation Peer to Peer Review Tracking Spreadsheet
- File audit

Comment:

The Workers' Compensation, Rehabilitation and Claims Management Procedure states:

The Bank's Safety and Wellbeing team will:

- *Monitor potential claims via the RBA Workers Compensation inbox.*
- *Undertake Rehabilitation Services as required and may refer to an external approved Workplace Rehabilitation Provider in accordance with Comcare.*

The APC Rehabilitation Key Performance Guidelines outline various activities and the respective timeframes for delivery, applicable to the Workplace Rehabilitation Providers working within the Australia Post Group Injury Management environment.

Transition Plan to Comcare as Claims Manager, includes:

Section 4.5 Workplace Rehabilitation Provider states:

In the event a rehabilitation program is required in accordance with section 37 of the SRC Act, the Bank may choose to manage the rehabilitation program within the Safety and Wellbeing team or refer to a Comcare approved Workplace Rehabilitation Provider.

If your rehabilitation program is managed by the Safety and Wellbeing team, your program will be developed utilising the Rehabilitation Program Form.

If your rehabilitation program is referred to a Workplace Rehabilitation Provider, the Bank has an agreement with Comcare to facilitate rehabilitation programs on the Bank's behalf.

In the event rehabilitation services are required APC operates as an approved workplace rehabilitation provider.

APC Key Performance Indicators are "measurable guidelines that will demonstrate how effectively the team is achieving key objectives and regulatory requirements. These KPI's exist for Compensation, Rehabilitation and Early Intervention processes."

The Rehabilitation Key Performance Guidelines outlines various activities and the respective timeframes for delivery.

File Audit:

File audit confirmed compliance with this criterion.

Observation

The amended service agreement between the RBA and APC reflects the change to the RBA having accountability as the Rehabilitation Authority effective from 27/7/23. Therefore, relevant documentation for the RBA requires updating as the rehabilitation delegate monitoring **rehabilitation providers'** key performance indicators in terms of quality of service delivery, costs, progress reports and outcomes.

Auditing and reporting

Criterion 4.3

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

Finding: Conformance

Evidence:

- Letter of engagement with BRM, 17 January 2024
- Rehabilitation Management Systems audit report, July 2023, completed by BRM

- Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025
- WHS, CMS, RMS Audit Schedule
- Quality Assurance – Injury Management Review Process (Compensation Peer to Peer (aka Project Circle) Review Process Flowchart)
- Project Circle – Spot Check worksheet (sample) March 24
- Rehabilitation Case – Peer to Peer Review Template
- Quality Assurance – Injury Management Review Process (Rehabilitation Peer to Peer Review Process Flowchart)

Comment:

The conditions of licence require the RBA to conduct annual internal audits of their rehabilitation management system.

The RBA Safety & Wellbeing Team Procedure states:

Section 4.3 Audits

As part of the Bank's conditions of licence, audits must be undertaken annually on the Bank's WHS, claims and rehabilitation systems. Auditors are sourced by Audit Department and organised by the Senior Consultant – Safety Management in accordance with WHS Audit Guidelines.

The RBA has an appropriate RMS audit schedule in place and a diagram included in the schedule reflects the standard timeline for a new licence and the different reporting phases against conditions and performance standards throughout.

BRM Risk Management is independent of the RBA and have conducted the annual RMS audits on behalf of the RBA since 2020. BRM auditors are competent and experienced in the auditing of licensees under the SRC Act. The audits are conducted using the approved audit tools in accordance with the requirements of Comcare and the Commission.

Criterion 4.4

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

Finding: Conformance

Evidence:

- WHS, CMS, RMS and PR Audit Action Register, August 2023
- Licensee Compliance and Performance Improvement (LCPI) Annual Report, 2023
- Rehabilitation Management Systems audit report, July 2023, completed by BRM
- Workers Compensation and Rehabilitation Performance Reports, 2023/2024
- Work Health and Safety Semi-Annual Report – 2023/24
- Monthly report August 2023

- Monthly report December 2023

Comment:

Evidence reviewed demonstrated the RBA provided information relating to rehabilitation performance and activities to their executive management. The BRM 2023 audit results were reported in both the LCPI Annual Report and the Work Health and Safety Annual Report as achieving a 100 percent conformance rating.

Criterion 4.5

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

Finding: Conformance with Observations

Evidence:

- Licensee Compliance and Performance Improvement (LCPI) Annual Report, 2023
- WHS committee meeting agenda – March 2024
- Minutes – WHS Quarterly Meeting – 13 March 2024
- D12 403630 Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/3/24
- Intranet: Injury and Illness

Corrective Actions:

The last review found one Observation:

The results of the previous RMS audit were made available to all employees on the intranet. Whilst the audit was an evidence-based review only (as there was no rehabilitation file activity reported within scope of the audit period, and therefore, no specific findings and corrective actions) it was not evident the employees have been provided an opportunity to comment and provide feedback on the audit results.

The Corrective Action Plan states:

Add audit results to WHS committee meeting agenda.

D24/68100

Standing Agenda item has been added to the WHS Committee agenda

The evidence demonstrates the corrective action is closed out.

The RMS audit results were added to the WHS committee meeting agenda and minutes.

Comment:

The Safety & Wellbeing Team Procedure describes the activity and reporting as follows:

Section 4.3 Audits

As part of the Bank's conditions of licence, audits must be undertaken annually on the Bank's WHS, claims and rehabilitation systems. Auditors are sourced by Audit Department and organised by the Senior Consultant – Safety Management in accordance with WHS

audit guidelines. Each audit is to be conducted once in the LIP reporting period (financial year). Every four years the audits are conducted by Comcare.

Section 9.4 Licensee Improvement Program (LIP) Report

After the Report is submitted to Comcare, it is made available to all staff on the Safety & Wellbeing intranet site. The Report is tabled at the WHS Committees meetings to allow for discussion, and staff are alerted to the Report through a notice in Staff Matters for This Week.

Previous reports can be found on the SAFETY & WELLBEING intranet site or in the Document Control Register.

Section 20.5 WHS Meeting Minutes are published on the intranet by the Deputy Chairperson

The Intranet page Life @ The Bank describes information regarding 'Injury and Illness', however, the page does not contain links to the audit results, LCPI Annual Reports or WHS Committee Meeting Minutes.

Observation:

Evidence of the LCPI Annual Report published on the intranet site was not sighted.

The Intranet page Life @ The Bank does not contain links to the audit results, LCPI Annual Reports or WHS Committee Meeting Minutes.

Observation:

The Safety & Wellbeing Team Procedure contains the following administrative errors:

- 'Contents' page – the three headings below do not appear in the body of the procedure document:
 - 9. Workers' Compensation and Rehabilitation Management Plan,
 - 22. Work Health and Safety Coordination Committee (WCC) Administration, and
 - 26. Head Office Gym Access and Organisation of Fitness Classes.
- 'Contents' page – with the omission of the above three headings in the document, the heading numbering and page numbers are not in the correct sequence.
- References to 'Licensee Improvement Program (LIP) Report' in the 'Contents' page and under subheading 9.4 (page 12) should be corrected to reflect its current title, Licensee Compliance and Performance Improvement (LCPI) Annual Report.

Criterion 4.6

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

Finding: Conformance with Observation

Evidence:

- WHS, CMS, RMS and PR Audit Action Register, August 2023
- Licensee Compliance and Performance Improvement (LCPI) Annual Report, 2023
- Rehabilitation Management Systems audit report, July 2023, completed by BRM

- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/03/24 – 12.3 Comcare notification

Comment:

The LCPI Annual Report outlines the RBA's activities in the past year and planned activities for the next year and is provided to the Commission.

The RBA states Comcare is notified of scheme significant data and provides other information as required.

ELEMENT 5: Review and Improvement

Continuous improvement

Criterion 5.1

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

Finding: Conformance

Evidence:

- WHS, CMS, RMS and PR Audit Action Register, August 2023
- Licensee Compliance and Performance Improvement (LCPI) Annual Report, 2023
- Monthly KPI reports, 2023/2024
- LKPI quarterly comparison reports – March 2023, June 2023
- Rehabilitation Key Performance Indicators (Part 1)
- Rehabilitation Key Performance Indicators (Part 2)
- Rehabilitation Management Systems audit report, July 2023, completed by BRM
- Safety and Wellbeing Management Plan – 2023/24, July 2023, v1.0, 4/8/23, next review July 2024
- Workers' Compensation, Rehabilitation and Claims Management Procedure, January 2024, v3.1, 15/01/24, review due November 2025
- Safety & Wellbeing Team Procedure, March 2024, v3.2, 15/03/24
- Injury Management Advices and Work Instructions (APG)

Comment:

The LCPI Annual Report detailed what was achieved in the past year, and what was planned for the year ahead and noted that these goals for the next year had started.

The report noted the *"Bank's 2022/23 Management Plan focused on addressing the key WHS risks faced by the Bank and implementing improvements to the Bank's WHS management systems.*

The key elements of the Plan were:

- *ensuring the safety of our people during workplace disruptions, including the 65MP (Head Office refurbishment) works and other situations impacting workplace environments*
- *implementing initiatives that positively impact employees' health and wellbeing*
- *implementing initiatives to continue to uplift and embed mental health awareness and the capability of people leaders to support their teams.*

Some actions in the Plan span beyond this financial year and are incorporated in the 2023/24 Plan as appropriate."

The purpose of the Safety and Wellbeing Management Plan is to *"identify the Bank's priorities for WHS over the next twelve to eighteen months and the actions that will be taken."* The plan has an emphasis on safety management, mental health and wellbeing. The plan is provided to the executive leaders for dissemination within their departments and is also published on the Intranet.

The RBA also addresses continuous improvement by actioning any items identified in the annual audits, and by regularly reviewing their documentation.

Summary of File Findings

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Summary of files findings												
File Ref	Audit Criteria											
	2.1	3.3	3.5	3.6	3.7	3.8	3.9	3.10	3.11	3.12	3.13	4.2
	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	NA	NA	C	NA	NA	C	NA	NA	NA	C	C	NA
	NA	NA	C	NA	NA	C	NA	NA	NA	C	C	NA
	NA	C	NA	NA	X	C	NA	NA	NA	C	C	C
	NA	C	NA	NA	NA	NA	NA	NA	NA	C	C	NA
	NA	C	C	NA	X	C	NA	NA	NA	C	C	C
	NA	C	NA	NA	NA	C	NA	NA	NA	C	C	NA

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Individual file findings		
File Reference	Criterion	Finding
	3.7	Section 37 determinations relevant to the audit period have not been provided for review.
	3.7	Section 37 determinations relevant to the audit period have not been provided for review.

CLAIMS MANAGEMENT SYSTEM REVIEW REPORT

Reserve Bank of Australia
31 March 2025 – 4 April 2025

Document number	
Version	3.0
Release Date	February 2021
Release Status	Released for use
Approval Status	Approved for use
Prepared by	Secretariat and Scheme Support Services
Confidentiality Category	Unclassified

TABLE OF CONTENTS

TABLE OF CONTENTS	3
SCOPE OF REVIEW/AUDIT	4
EXECUTIVE SUMMARY	6
TABLE OF CRITERIA	8
ELEMENT 2: PLANNING	9
ELEMENT 3: IMPLEMENTATION	11
SUMMARY OF FILE FINDINGS	27

SCOPE OF REVIEW/AUDIT

Organisation	Reserve Bank of Australia (RBA)
Site/Workplace	Review conducted remotely
Scope of review	<p>The review examined the RBA's claims management system, processes and outcomes to validate that RBA is meeting its licence conditions and is complying with the <i>Safety, Rehabilitation and Compensation Act 1988</i> (SRC Act).</p> <p>11 claim files were examined by the auditors. These files were randomly selected from a list of all claim files where some activity had occurred in the previous 12 months.</p> <p>The review encompassed a review of all relevant policies and procedures as they relate to claims management and any other relevant supporting documentation. Overall findings are based on the identification of issues that are considered to be systemic rather than isolated incidents.</p>
Criteria	<p>This review assessed the claims management system against 18 criteria grouped within two elements:</p> <ol style="list-style-type: none">1. Planning (2 criteria)2. Implementation (16 criteria)
Ratings	<p>The findings in the audit report have been classified and marked as follows:</p> <p>Conformance—indicates that the criterion has been met.</p> <p>Non-conformance—indicates that the criterion has not been met.</p> <p>Not able to verify—indicates that the organisation has documented procedures in place however there are no cases to test that the organisation has followed those procedures. It is expected that this classification will only be used in limited circumstances and where applied, the reasons for the finding will be explained by the auditor.</p> <p>Not Applicable—indicates that the criterion does not apply to the organisation.</p> <p>Where a criterion has been met but the auditor has identified a 'once off' situation or a 'minor' deviation from the documented management system or reference criterion, an Observation may be made. These findings, while representing a non-fulfilment of a requirement, are recognised as being of lower risk to the organisation.</p>
Date(s) of review	31 March 2025 – 4 April 2025
Auditors	<p>s 22 , Assistant Director, Comcare</p> <p>s 22 , Senior Assurance Officer, Comcare</p>
Client contacts	<p>s 47E(c)</p> <p>s 47E(c)</p> <p>s 47E(c)</p> <p>s 22 , A/g Assistant Director, Comcare</p>

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

Acknowledgement The auditors wish to acknowledge the cooperation and assistance provided by the management and staff of RBA and thank them for their contribution to the audit process.

EXECUTIVE SUMMARY

Reserve Bank Australia (RBA) has held a self-insurance licence under the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act) since 1 May 1996. From 1 July 2024, RBA has changed its claims management services provider from the Australian Postal Corporation (APC) to Comcare.

Comcare has conducted a review of RBA's claims management system (CMS) against select criteria of Comcare's CMS Audit Tool. This review is in line with the requirements of the Safety, Rehabilitation and Compensation Commission's Licence Compliance and Performance Model (LCPM). Under the LCPM, a change in Claims Manager within the licence cycle triggers a review of the claims management system. RBA is also in the second year of its licence cycle which triggers a year 2 schedule review. This review addresses the requirements for both reviews under the LCPM. For the purposes of this review, only documentation relating to the current claims management arrangements has been assessed to determine if RBA's claims management system is compliant against the requirements of the Claims Management System Audit tool. Comcare verified RBA's claims management performance with Australia Post as its Claims Manager in 2021.

The auditors reviewed the system documentation for RBA's claims management system, along with 11 claim files with activity within the 12 months leading up to the audit, to assess the implementation of claims management processes.

The review has demonstrated that RBA maintains documentation to support its claims management system. The claims management procedures and the implementation of the procedures are detailed and address legislative framework applicable to the claims management system. However, RBA does not have formal procedures with respect to the powers it has retained under the SRC Act. This has resulted in an observation.

The claim file review has identified inconsistencies in reporting claims activity to the Commission Data Warehouse resulting in an auditable trail not being able to be established and a complete record of claims management files is not maintained on the claims management system, Figtree. These identified inconsistencies have resulted in one non-conformance. The claim file review also identified that RBA does not communicate relevant information regarding the claims management process to its employees and does not comply with the provisions of the SRC Act when making decisions on claims which has resulted in two observations.

The review findings are set out in detail against each relevant criterion in the body of the report.

Overall, the RBA has demonstrated that it has a well-established claims management system and should be commended on its commitment to ensuring employees are supported throughout the claims management process.

Non-conformances

One non-conformance was identified during the review:

Criterion	Non-conformance
3.17	RBA does not maintain the relevant level of reporting, records and document management to support its claims management system and legislative compliance.

Observations

A number of observations were identified during the review:

Criterion	Observation
3.3	RBA does not communicate relevant information regarding the claims management process to employees in all instances.
3.5	RBA does not comply with the provisions of the SRC Act when making decisions on claims.
3.6	RBA does not have formal procedures for dealing with third party and common law claims and managing overpayments, including writing off or waiving a debt.

In summary, for the 18 criteria within the claims management audit tool, the outcomes are:

	Number of criteria	% of assessed criteria
Conformance	13	93%
Non-conformance	1	7%
Not able to verify	3	
Not applicable	0	

An action plan, which includes completion/review dates and responsibilities, must be developed to address each of the above review findings – and any individual file findings where an error in entitlement was identified.

The auditors invite RBA to discuss any aspect of this review.

Signed	s 22	Signed	s 22 (/
Auditor name	s 22	Auditor name	s 22
Date	5 May 2025	Date	5 May 2025

TABLE OF CRITERIA

Audit element/criterion description	Criterion	Rating
2. Planning		
Delegation schedule	2.1	Conformance
Planning for legislative compliance	2.3	Conformance
3. Implementation		
Adequate resources	3.1	Conformance
Communication—relevant stakeholders	3.2	Conformance
Employees are aware of rights	3.3	Conformance with observation
Training and competency	3.4	Conformance
Determinations in accordance with the Act	3.5	Conformance with observation
Powers under the Act	3.6	Conformance with observation
Initial liability	3.7	Conformance
Determining incapacity	3.8	Conformance
Determining benefits	3.9	Conformance
Determining permanent impairment	3.10	Not able to verify
Reconsiderations	3.12	Conformance
Reasonable opportunity	3.13	Not able to verify
Claim reviews	3.14	Not able to verify
Surveillance	3.15	Not able to verify
Privacy and confidentiality	3.16	Conformance
Reporting, records, documentation	3.17	Non-conformance

ELEMENT 2: PLANNING

Administrative arrangements

Criterion 2.1

The determining authority identifies the administrative and financial limitations for each level of claims manager.

Finding: Conformance

Evidence:

- Claims Management Services Agreement between Reserve Bank of Australia and Comcare Australia, executed on 1 July 2024
- Reserve Bank of Australia Claims Delegation Schedule under the *Safety, Rehabilitation and Compensation Act 1988*, effective from 1 July 2024
- RBA People Department Organisational Chart, dated 2024
- File review

Comment:

The Claims Management Services Agreement is signed by the Secretary of RBA and the CEO of Comcare. It commenced on 1 July 2024 and provides the terms and conditions for the management of claims.

Prior to this date, APC was the appointed Claims Manager for RBA. The Commission varied RBA's licence to authorise Comcare as its Claims Manager on and from 1 July 2024. For the purposes of this review, only documentation relating to the current claims management arrangements has been assessed to determine if RBA's claims management system is compliant against the requirements of the Claims Management System Audit tool. Comcare verified RBA's claims management performance with APC as its Claims Manager in 2021.

Clause 6.2 of the Agreement sets financial limitations for reasonable claims management costs. Comcare is required to seek approval from the RBA for all reasonable expenses over the amount of \$250. It further states that when an urgent cost is incurred before Comcare can seek approval, Comcare must notify RBA of the expense and the need for incurring the expense without approval within twenty-four hours.

The Claims Delegation Schedule delegates, pursuant to section 108H of the SRC Act, the functions and powers associated to the management of claims to Comcare, specifically a Claims Manager, and RBA positions, specifically Head of Safety and Wellbeing, Senior Consultant Safety and Wellbeing, Chief People Officer and Deputy Governor. These positions are reflected in the current organisational chart.

Most functions and powers have been given to all positions outlined, however, the RBA has retained the power to assess whether to take Common Law action (section 50), recover amounts due to RBA (section 113) recover overpayments, write off or waive a debt (sections 114(A-D)), investigate whether an employee is in receipt of double benefits (section 118) and investigate and recover compensation where state compensation is payable (section 119).

Out of the 11 files selected for the review, five were relevant to this criterion. It was demonstrated across all relevant determinations that they were signed appropriately by a Comcare delegate.

Claims management planning

Criterion 2.3

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

Finding: Conformance

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Policy, Version 5.1, dated 3 March 2025
- Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4.0, dated 3 March 2025
- Senior Consultant Safety & Wellbeing, Comcare Training history summary, dated 10 March 2025
- 2024 Draft WHS Training Needs Analysis – SSR update, Version 3, undated
- WHS Training Needs Analysis, Version 1.0, dated 3 March 2025
- WHS Committee Meeting Minutes, no version control, dated 10 December 2024
- Claims Management Services Agreement between Reserve Bank of Australia and Comcare Australia, executed on 1 July 2024
- Comcare Claims Manual – Independent medical examination pages, no version control, published 19 December 2024,
- Comcare Claims Manual – Decision Making under the SRC Act pages, no version control, published 3 March 2025,
- Comcare Claims Manual – Legislative tests and initial liability pages, no version control, undated
- Email from ^{s 47E(c)} dated 24 October 2024
- Comcare LMS Training History Summary for ^{s 22}, dated 3 April 2025
- Comcare LMS Training History Summary for ^{s 22}, dated 3 April 2025
- Comcare Legislative Changes to s57 Medical Examination Procedures News Updates (screen shot)
- Comcare Legislative Changes to s36 Rehab Assessments and s57 Medical Examination News Updates (screen shot)

Comment:

The Workers' Compensation, Rehabilitation, and Claims Management Policy reflects RBA's commitment to compliance with the SRC Act. The policy outlines RBA's Rehabilitation and Compensation Framework, emphasising regulatory compliance and ensuring adherence by all RBA employees. Specifically, it states, at chapter 2:

'The Bank and Claims Manager will ensure compliance with the requirements set out in the SRC Act and regulations, as well as regulatory compliance issued by the Safety, Rehabilitation & Compensation Commission or Comcare for the effective management of workers' compensation and rehabilitation. Existing policies and procedures will be reviewed regularly in light of any changes made to the regulatory framework.'

The SRC Act underwent significant amendments in 2024, while the *Safety, Rehabilitation, and Compensation Regulations 2019* were amended in 2023. The Claims Manager, Comcare has developed and implemented work instructions and letter templates to reflect these legislative changes and ensure compliance in claims management.

- Statutory timeframes for decision-making and 'Stop Clock' provisions came into effect on 1 April 2024. Comcare has detailed processes covering all scenarios

where stop clock provisions apply, including examples and instructions for decision makers to implement the provisions accurately and consistently. These are outlined mainly in the 'Decision Making under the SRC Act' claims manual pages.

- Amendments to section 57 of the SRC Act came into effect on 14 June 2024, introducing section 57A, which outlines the legislative requirements for arranging an independent medical examination. Decisions under section 57 are now classified as determinations under section 60 of the SRC Act. Comcare's independent medical examinations procedure demonstrates the effective implementation and directives for the application of the section 57 amendments and the *Guide for Arranging Rehabilitation Assessments and Requiring Examination* (the Guide).

The WHS Training Needs Analysis outlines the training requirements for RBA Staff, categorising them as either mandatory or recommended, and tracks training compliance. The evidence provided by RBA demonstrates that the Senior Consultant Safety & Wellbeing has completed various Comcare training modules and attended workers' compensation workshops in 2023 and 2024.

RBA staff receive relevant legislative updates from Comcare which are delivered to the wider WHS Team in WHS Committee and weekly team meetings which ensure that all staff are kept updated on legislative requirements. In addition, RBA provides for ongoing education through its delivery of resources and learning modules.

Comcare provided evidence demonstrating compliance with training requirements and ensuring staff remain up to date with legislative and regulatory information. Comcare's Claims Strategy and Governance team is responsible for managing legislative updates to the Claims Manual and notifying all staff of legislative changes and updates.

Comcare has agreed to, in the Claims Management Services Agreement, in part, to implement appropriate structures and mechanisms to ensure the consistent application of claims management policy and procedures and to comply with the *Privacy Act 1988* (Cth) (Privacy Act) and all other applicable laws and regulations.

ELEMENT 3: IMPLEMENTATION

Resources

Criterion 3.1

The determining authority allocates adequate resources to support its claims management system.

Finding: Conformance

Evidence:

- Claims Management Services Agreement between Reserve Bank of Australia and Comcare Australia, executed on 1 July 2024
- Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4.0, dated 3 March 2025
- Workers' Compensation, Rehabilitation and Claims Management Policy, Version 5.1, dated 3 March 2025
- RBA People Department Organisational Chart, dated 2024

Comment:

The claims management function is provided by Comcare, as the third-party Claims Manager to RBA.

The Workers' Compensation, Rehabilitation and Claims Management Policy outlines RBA's commitment to providing necessary resources to support the management of claims and to support injured employees' recovery and return to work.

The Workers Compensation, Rehabilitation and Claims Management Procedure details compensation service expectations that require claims delegates to make decisions on claims accurately and in a timely manner.

The RBA Claims Management Service Agreement between RBA and Comcare outlines that, RBA receives approximately seven to eight workers compensation claims per annum and one request for reconsideration.

The Service Agreement outlines the service expectations and that all personnel are to be qualified and suitable for the tasks allocated to them.

The Service Agreement sets out the resource matrix staffing requirements which outlines the position title and scope of work, which includes:

Claims Manager – 2

Assistant Director – 1

Income Assessment Officer -1

Income Support Officer – 1

Assistant Director, Contracted Claims – 1

Director, Contracted Claims – 1.

It is evident that the allocated staffing requirements in the Service Agreement is adequate to support RBA's CMS.

Communication and awareness

Criterion 3.2

The determining authority defines and communicates responsibilities to relevant stakeholders.

Finding: Conformance

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4.0, dated 3 March 2025
- Claims Management Services Agreement between Reserve Bank of Australia and Comcare Australia, executed on 1 July 2024
- Workers' Compensation – Life @ The Bank Intranet page (screen shot)
- Rehabilitation – Life @ The Bank Intranet page (screen shot)
- 2402 - Executed - Engagement letter - Clyde & Co - RBA - Claims Management Ad Hoc Advice - 28 February 2024
- 2402 - Executed - Reserve Bank of Australia - Sparke Helmore - Terms of Engagement - Claims Management Ad Hoc Advice - Feb 2024
- Variation Agreement between Reserve Bank of Australia and Figtree Systems Pty Ltd, executed 9 October 2024
- File review

Comment:

RBA has developed a range of documents that defines and communicates responsibilities to key stakeholders involved in the claims management process.

The Workers' Compensation, Rehabilitation and Claims Management Procedure outlines the roles and responsibilities of the injured employee, managers, claims manager and medical treatment providers.

RBA's intranet page Life @ The Bank, provides relevant information on the roles and responsibilities of the Safety & Wellbeing team, Employee and Supervisor. In addition, it includes information on early intervention, the claims process and workers compensation information, including incident reporting and how to lodge a claim.

The Claims Management Services Agreement with Comcare outlines the responsibilities of the claims manager in undertaking claims management services.

The agreements with Figtree and legal providers outline responsibilities for these service providers.

Out of the four claims relevant to this criterion, there was one non-compliant claim. The individual file finding is detailed in the table at the end of the report.

Criterion 3.3

The determining authority communicates relevant information regarding the claims management process including:

- (i) ensuring that employees are aware of their legislative rights and obligations in relation to workers' compensation
- (ii) ensuring that employees are informed of the status of their claims
- (iii) ensuring consultation occurs between all parties in regard to the claims management process.

Finding: Conformance with observation

Evidence:

- RBA Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4.0, dated 3 March 2025
- RBA Workers' Compensation, Rehabilitation and Claims Management Policy, Version 5.1, dated 3 March 2025
- RBA Workers' Compensation and Rehabilitation Notice of Rights, Version 4.0, dated 12 April 2024
- Comcare Claims Manual, Incapacity for Work pages, no version control, undated
- Comcare Claims Manual, Determining Liability for Medical Treatment pages, no version control, Published 3 March 2025
- RBA Claim for Compensation and Rehabilitation Form, no version control, undated
- RBA Contact with Absent Employees - Life @ The Bank Intranet page (screen shot)
- RBA Rehabilitation Flow Chart - Life @ The Bank Intranet page (screen shot)
- Workers' Compensation – Life @ The Bank Intranet page (screen shot)
- Rehabilitation – Life @ The Bank Intranet page (screen shot)
- Comcare Claims Communication Principles pages, no version control, undated
- Various Determination Letter Templates
- File review

Comment:

RBA communicates relevant information regarding the claims management process to its employees including their legislative rights and obligations through a range of resources.

The Workers' Compensation, Rehabilitation and Claims Management Policy states RBA's commitment to providing employees with information about their rights, obligations and entitlements under the SRC Act.

The Workers' Compensation, Rehabilitation and Claims Management Procedure outlines employees' rights and obligations.

Comcare's Claims Manual, Incapacity for Work pages outline the responsibilities of the Claims Manager in engaging with injured employees with open and effective communication channels to ensure they understand their relevant entitlements, obligations and the status of their claim.

Comcare's Claims Manual Determining Liability for Medical Treatment pages sets out the steps in communicating medical treatment determinations. The Manual provides guidance on communicating decisions to employees in line with Comcare's overarching communication principles and approach of:

- o to be transparent and set expectations
- o communicate simply
- o consider the context
- o be curious and listen
- o adjust to your medium and audience.

The Claim for Compensation and Rehabilitation Form encompasses a privacy statement and detailed collection statement. The Workers Compensation and Rehabilitation Notice of Rights to accompany determinations provides further information to employees' regarding their rights and responsibilities.

RBA's Contact with Absent Employees and the Rehabilitation Flowchart outline the importance of regular communication with injured employees, the workers' compensation process and employees' rights and responsibilities.

RBA's intranet page Life @ The Bank, provides relevant information on the roles and responsibilities of the Safety & Wellbeing team, Employee and Supervisor. In addition, it includes information on early intervention, the claims process and workers compensation information, including incident reporting and how to lodge a claim.

The file review identified three claims, out of the nine claims relevant to this criterion, that did not satisfy the requirements for this criterion. In all instances there is no documentation on file to verify that the employee is aware of their rights and obligations and the status of their claim. Individual file findings are detailed in the table at the end of the report.

Observation:

RBA does not communicate relevant information regarding the claims management process to employees in all instances.

Training

Criterion 3.4

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

Finding: Conformance

Evidence:

- Claims Management Services Agreement between Reserve Bank of Australia and Comcare Australia, executed on 1 July 2024
- Comcare LMS Training History Summary for ^{s 47E(c)}, dated 10 March 2025 (excel spreadsheet)
- 2024 Draft WHS Training Needs Analysis – SSR update, Version 3, undated
- WHS Training Needs Analysis, Version 1.0, dated 3 March 2025
- Job Profile – Safety & Wellbeing, Senior Consultant, Safety and Wellbeing, no version control, undated
- Comcare LMS Training History Summary for ^{s 22}, dated 3 April 2025
- Comcare LMS Training History Summary for ^{s 22}, dated 3 April 2025

Comment:

RBA identifies training requirements and ensures team members have the required skills and capabilities to perform their roles.

The WHS Training Needs Analysis outlines the training requirements and ongoing development for RBA staff, categorising them as either mandatory or recommended, and tracks training compliance. The evidence provided by RBA demonstrates that the Senior Consultant Safety & Wellbeing has completed various Comcare training modules and attended workers' compensation workshops in 2023 and 2024.

In discussion with the Claims Manager, Comcare confirmed that the Claims Management Group (CMG) are required to complete eight mandatory LMS E-Learning training courses and five facilitated workshops yearly. The E-Learning courses consist of SRC legislative material. The Claims Manager and Assistant Director training history summary was provided as evidence and demonstrates completion of the yearly mandatory LMS training.

The Service Agreement outlines RBA's commitment to ensuring Claims Manager staff have the necessary skills and capabilities to undertake their roles.

Compliance with the legislation

Criterion 3.5

The determining authority complies with the provisions of the SRC Act when making decisions on claims, including:

- determining claims accurately and quickly
- determining claims in writing with adequate terms and reasons
- ensuring there is equity of outcomes resulting from administrative practices used by Comcare.

Finding: Conformance with observation

Evidence:

- Comcare Claims Manual – Decision Making under the SRC Act pages, no version control, published 3 March 2025
- File review

Comment:

Comcare's decision making under the SRC Act process details the legislative requirements when issuing determinations. This includes the requirements pursuant to

section 61 of the SRC Act, that all determinations are in writing, that they set out the terms, reasons for the determination and the right to seek a reconsideration of the decision. It further details that decisions are to be made accurately and quickly (section 69 of the SRC Act) and be guided by equity, good conscience and the substantial merits of the case, without regard to technicalities (section 72 of the SRC Act).

Information for requesting a reconsideration is outlined, via a link, in all determination letters issued by Comcare. It provides a link to Comcare’s website and details the reconsideration process and what is required by the injured employee if requesting a review of the determination. This was verified by the auditors through the file review.

The file review identified that RBA did not comply with the provisions of the SRC Act when making decisions on claims. Three files, out of the eight files applicable to this criterion, did not issue determinations in writing when required. These findings are detailed in the individual file findings summary at the end of this report.

Observation:

RBA does not comply with the provisions of the SRC Act when making decisions on claims.

Criterion 3.6

The determining authority complies with the provisions of the SRC Act when using its powers or meeting statutory obligations under that Act.

Finding: Conformance with observation

Evidence:

- Comcare Claims Manual – Independent medical examination pages, no version control, published 19 December 2024
- Comcare Claims Manual – Requesting information from employees pages, no version control, undated
- Comcare Claims Manual – Request for claim file pages, no version control, undated
- Comcare Claims Manual – Overpayments pages, no version control, undated
- Claims Management Services Agreement between Reserve Bank of Australia and Comcare Australia, executed on 1 July 2024
- Email from ^{s 47E(c)} RBA - CMS further evidence request - Day Three, dated 2 April 2025

Comment:

As discussed at criterion 2.3, Comcare has a detailed process outlining the requirements of section 57 of the SRC Act and the Guide when arranging independent medical examinations.

The provisions of section 58 are detailed in Comcare’s requesting information from employees process.

Comcare has detailed guidance for decision makers when an employee requests information on their claims file under section 59 of the SRC Act. Comcare’s Statutory Oversight team manages all information requests to ensure only appropriate information is released to the employee or the persons acting on behalf of the employee. The process also guides decision makers to Comcare’s website when assisting employees with their information requests. Comcare has a page on its website to assist and advise employees what information can be requested and how to request a copy of their claim file.

As discussed at criterion 2.1, RBA has retained the delegation to assess whether common law action will be taken under section 50 of the SRC Act. In the event of a common law claim RBA will retain its own lawyers to manage such claims.

RBA has also retained the delegation to waive or write off overpayments under section 114 of the SRC Act. In line with the Claims Management Services Agreement, Comcare is required to advise RBA as soon as practicable after Comcare becomes aware that it has done or omitted to do something which has the effect that the RBA is or is likely to be in breach of a terms or condition of licence. If an overpayment has occurred because of an error in determining entitlements Comcare needs to advise the RBA. Comcare's overpayment processes outline the provisions and requirements of the SRC Act when managing overpayments.

In a scenario where overpayment, writing off a debt or recovering debt was identified, RBA's relevant delegate would authorise RBA's payroll team to rectify the issue as per the delegation schedule.

In discussion with RBA, they confirmed that in scenarios where an employee may be in receipt of double benefits, Comcare is the relevant delegate who will make the determination.

The processes detailed above are not documented in RBA's procedural documentation.

There was one claim relevant to this criterion in the scope of the review and it was found compliant.

Observation:

RBA does not have formal procedures for dealing with third party and common law claims and managing overpayments, including writing off or waiving a debt.

Criterion 3.7

The determining authority complies with the provisions of the SRC Act when determining initial liability.

Finding: Conformance

Evidence:

- Comcare Claims Manual – Decision Making under the SRC Act pages, no version control, published 3 March 2025
- Comcare Claims Manual – Legislative tests and initial liability pages, no version control, undated
- Comcare Claims Manual – Specific conditions and circumstances pages, no version control, undated
- Comcare Claims Manual – Assessing a work related death claim pages, no version control, published 6 January 2025
- Comcare Claims Manual – Double Benefits (section 118) pages, no version control, undated
- Comcare Claims Manual – State Compensation payable (section 119) pages, no version control, undated
- File review

Comment:

Comcare's decision making under the SRC Act process details the legislative requirements when issuing determinations. This includes the requirements pursuant to section 61 of the SRC Act, that all determinations are in writing, that they set out the terms, reasons for the determination and the right to seek a reconsideration of the

decision. It further details that decisions are to be made accurately and quickly (section 69 of the SRC Act) and be guided by equity, good conscience and the substantial merits of the case, without regard to technicalities (section 72 of the SRC Act).

Prescribed timeframes, including stop clock provisions for initial liability decisions are also outlined in the decision making under the SRC Act process and it guides decisions makers on what is required to make an initial liability determination.

The legislative tests and initial liability pages outline all legislative requirements that the decision maker is required to consider from establishing that the injured employee is an employee for the purposes of the Act to assessing and/or obtaining information to determine if the claim is an injury or disease claim right through to a quality assurance process to ensure the determination is correct.

The requirements when assessing liability for the loss of damage or property pursuant to section 15 of the SRC Act and the requirements relating to locally engaged staff are outlined in the Claims Manual 'specific conditions and circumstances' pages.

The process for assessing and determining a death claim pursuant to section 17 of the SRC Act is detailed in the Claims Manual at assessing a work-related death pages. It outlines the full provisions of the SRC Act relating to a compensable death, including what documentation is required before a decision can be made.

Provisions for the management of double benefits and state compensation are detailed in the Claims Manual. As outlined at criterion 2.1, the delegation to assess and manage state-based claim matters remains with RBA.

The file review identified three claims relevant to this criterion. All three claims were found to be compliant.

Criterion 3.8

The determining authority complies with the provisions of the SRC Act when determining liability for incapacity.

Finding: Conformance

Evidence:

- Comcare Claims Manual -Calculating Incapacity Payments Pages, no version control, published 2 December 2024
- Comcare Claims Manual – Assessment of ability to earn pages, no version control, published 9 August 2024
- Comcare Claims Manual – Incapacity for work pages, no version control, undated
- Comcare Claims Manual – Leave and incapacity, no version control, published 2 December 2024
- Comcare Claims Manual – Redemptions (lump sum payments), no version control, undated
- Comcare Claims Manual – Nursing Homes, no version control, undated
- Comcare Claims Manual – Double Benefits (section 118) pages, no version control, undated
- Comcare Claims Manual – State Compensation payable (section 119) pages, no version control, undated
- Incapacity Determination Letter Templates
- File review

Comment:

The Calculating Incapacity Payments page outlines an overview of incapacity provisions and the role of the Claims Manager. Comcare has a dedicated team, the Income Support Team, that manages all incapacity payments.

The Manual outlines all incapacity provisions within the SRC Act. This includes the legislative requirement, timeframes, the Claims Managers' role and examples to guide decision makers.

The Claims Manual pages provided include the process for calculation of NWE, section 19 payments including minimum wage, AWOTEFA, and when the employee is in receipt of superannuation, lump sum or pension. The leave and incapacity page details the process and requirements for decision makers to adhere to when injured employees are on other non-compensable leave, including section 116 of the SRC Act. Further it outlines the provisions of section 23, when an employee is maintained in hospital, and when it may be appropriate to reduce incapacity payments. The full process and considerations are outlined in Comcare's Nursing Homes claims manual page.

The process and legislative requirements for the payment of redemptions to current or ex-employees in accordance with sections 30 and 31 of the SRC Act are outlined in the Comcare Claims Manual redemption pages.

Provisions for the management of double benefits and state compensation are detailed in the Claims Manual. As outlined at criterion 2.1, the delegation to assess and manage state-based claim matters remains with RBA.

The claim file review identified two claims that were relevant to this criterion. There was one instance where section 19 provisions had not been applied as there is no determinations in writing for the incapacity periods determined. The full detail of this individual finding is provided in the individual file summaries at the end of this report. The overall finding for lack of required information is raised against criterion 3.17.

Criterion 3.9

The determining authority complies with the provisions of the SRC Act when determining liability for benefits, including medical expenses.

Finding: Conformance

Evidence:

- Comcare Claims Manual – Allied health treatment pages, no version control, undated
- Comcare Claims Manual – Consideration for aids, appliances, alterations and modifications under sections 16 and 39 pages, no version control, undated
- Comcare Claims Manual – Dental treatment pages, no version control, undated
- Comcare Claims Manual – Determining liability for medical treatment pages, no version control, published 3 March 2025
- Comcare Claims Manual – Exercise, weight loss and gym pages, no version control, undated
- Comcare Claims Manual – Hearing loss treatment pages, no version control, undated
- Comcare Claims Manual – Home help and attendant care pages, no version control, published 3 March 2025
- Comcare Claims Manual – Medical aids and appliances under section 16 pages, no version control, published 3 March 2025

- Comcare Claims Manual – Medications pages, no version control, published 3 March 2025
- Comcare Claims Manual – Nursing Homes, no version control, undated
- Comcare Claims Manual – Pain Therapy pages, no version control, undated
- Comcare Claims Manual – Psychology pages, no version control, undated
- Comcare Claims Manual – Receiving and actioning travel requests pages, no version control, published 3 March 2025
- Comcare Claims Manual – Rehabilitation aids, appliances, alterations and modifications under section 39 pages, no version control, undated
- Comcare Claims Manual – Surgery pages, no version control, undated
- Comcare Claims Manual – Transcranial Magnetic Stimulation (TMS) and Repetitive Transcranial Magnetic Stimulation pages, no version control, undated
- Comcare Claims Manual – What are appropriate costs pages, no version control, undated
- Comcare Claims Manual – What is medical treatment pages, no version control, published 3 March 2025,
- Comcare Claims Manual – What is reasonable medical treatment pages, no version control, undated
- Comcare Claims Manual -Calculating Incapacity Payments pages, no version control, published 2 December 2024
- Comcare Claims Manual – Paying for funeral and memorial services pages, no version control, undated
- Various Determination Letter Templates

Comment:

Comcare has detailed processes to assess and determine reasonable medical costs pursuant to section 16 of the SRC Act. The processes include assessment tools, links to statutory rates, relevant considerations –including case law, and links to determination templates.

Weekly benefits payable to prescribed children is outlined in Comcare’s Calculating Incapacity Payments pages and work-related death processes. These processes detail the requirements and considerations applicable to sections 17 and 18 of the SRC Act.

The Home Help and Attendant Care processes detail the requirements and considerations applicable to section 29 of the SRC Act.

Comcare’s claims manual details the considerations for aids, appliances, alterations and modifications in accordance with sections 16 and 39 of the SRC Act and provides guidance for decision makers to accurately determine if an item is considered a rehabilitation or medical aid.

All processes intertwine and include links to accept or deny liability for the requested treatment to ensure that decisions are accurate and determined in a timely manner.

Out of the six claims relevant to this criterion, there was one claim which did not comply with the requirement of this criterion. The individual file finding is detailed in the table at the end of the report.

There were no claims in the scope of this review with activity relating to death claim provisions, home help and attendant care, or rehabilitation aids and appliances.

Criterion 3.10

The determining authority complies with the provisions of the SRC Act when determining liability for permanent impairment.

Finding: Not able to verify

Evidence:

- Comcare Claims Manual – Assessing and determining a permanent impairment claim pages, no version control, published 3 February 2025
- Comcare Claims Manual – Assessing hearing loss claims for permanent impairment pages, no version control, undated
- Comcare Claims Manual - Calculating permanent impairment payment amounts pages, no version control, published 3 March 2025
- Comcare Claims Manual – Claiming permanent impairment pages, no version control, undated
- Comcare Claims Manual – Electing to sue the Commonwealth pages, no version control, undated
- Comcare Claims Manual – Registering a claim for permanent impairment pages, no version control, undated
- Comcare Claims Manual – Rejecting a claim for permanent impairment pages, no version control, undated
- Compensation Claim for Permanent Impairment and Non-economic Loss – Form and Checklist, no version control, undated
- Comcare Claims Manual – Forms, Letters and Templates

Comment:

The evidence provided demonstrates that there are detailed processes in place covering the full provisions of the SRC Act when assessing and determining liability for permanent impairment.

There were no permanent impairment claims in the scope of this review, therefore, the auditors were not able to verify the implementation of the procedures.

Criterion 3.12

The determining authority complies with the provisions of the SRC Act, and any specific licence conditions (if applicable), when managing reconsiderations.

Finding: Conformance

Evidence:

- Claims Management Services Agreement between Reserve Bank of Australia and Comcare Australia, executed on 1 July 2024
- Reserve Bank of Australia Claims Delegation Schedule under the *Safety, Rehabilitation and Compensation Act 1988*, effective from 1 July 2024
- Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4.0, dated 3 March 2025
- Comcare Claims Manual – Reconsiderations on request and reconsiderations of own motion, no version control, undated
- Various Reconsideration Templates
- File review

Comment:

The Workers' Compensation, Rehabilitation and Claims Management Procedure, provides a general overview on the reconsideration process and it is stated that Comcare will provide, on RBA's behalf, reconsiderations for claim-related decisions.

Information for requesting a reconsideration is outlined, via a link, in all determination letters issued by Comcare. It provides a link to Comcare's website and details the

reconsideration process and what is required by the injured employee if requesting a review of the determination. This was verified by the auditors through the file review.

Comcare's Claim Manual outlines the process and legislative provisions applicable when assessing and issuing a reviewable decision.

The file review demonstrated 100% compliance against this criterion against the two relevant claims.

Claims reviews

Criterion 3.13

The determining authority provides employees with a reasonable opportunity to provide information or comment when claims for on-going liability are being assessed or reviewed.

Finding: Not able to verify

Evidence:

- Comcare Claims Manual- Decision Making Under the SRC Act (Natural Justice), no version control, undated
- Various Determination Letter Templates
- File review

Comment:

Comcare's Claims Manual outlines the key principles of natural justice and fair decision-making requirements as a fundamental element of its claims management processes.

The Manual details the decision-making process in accordance with legislative provisions of section 61 of the SRC Act, that all determinations are in writing, that they set out the terms, reasons for the determination and the right to seek a reconsideration of the decision. It further details that decisions are to be made accurately and quickly (section 69 of the SRC Act) and be guided by equity, good conscience and the substantial merits of the case, without regard to technicalities (section 72 of the SRC Act).

The Manual provides guidance on how to issue a fair opportunity notice to injured employees which informs them of the intended adverse decision. This process aligns with the natural justice principles and the importance of ensuring procedural fairness by requiring delegates to provide employees with an opportunity to respond to decisions that may adversely affect them.

There were no claims being assessed or reviewed for on-going liability in the scope of this review, therefore, the auditors were unable to verify the implementation of the evidence provided.

Criterion 3.14

Claim reviews are timely, made accurately and guided by equity, good conscience and the substantial merits of each case without regards to technicalities.

Finding: Not able to verify

Evidence:

- Comcare Claims Manual- Claim Review Process, no version control, undated
- Comcare Claims Management Plan, Version 5.3, dated July 2024
- File review

Comment:

Comcare's Claims Manual outlines a systematic approach to ensuring regular monitoring and progression towards outcomes.

The Manual sets out the principles of claims management and incorporates the requirement to review claims in an accurate and timely manner guided by good conscience and the substantial merits of each case without regards to technicalities.

Claim reviews are monitored and are conducted on a regular basis at the critical stages in the life of a claim. A report is provided to Claims Managers on a weekly basis and provides a breakdown on claims activity of each claim, and the status of the claim to assist with prioritising and managing workloads. The report also flags when claims are coming up for review in the approaching 12 weeks.

Different modes of claim reviews have been documented including an internal claims review meeting or external case conferences to ensure appropriate claims and rehabilitation management. Claim review outcomes are documented in the Claims Management Plan.

The Claims Management Plan supports the commitment to timely claim reviews and outlines the key criteria in reviewing claims in detail including liability status, treatment, RTW status, goals, any identified barriers and planned next actions.

There were no claims applicable to this criterion in the scope of this review, therefore, the auditors were unable to verify the implementation of the evidence provided.

Surveillance

Criterion 3.15

The determining authority has a policy on the use of covert surveillance and complies with its requirements. The policy must include:

- (i) on whose authority approval may be granted
- (ii) detailed instruction on the manner in which covert surveillance is to be conducted
- (iii) a requirement that any operative undertaking covert surveillance on behalf of the determining authority has been issued with; and has agreed to; written instructions on the policy.

Finding: Not able to verify

Evidence:

- RBA – Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4, dated March 2025
- RBA – Workers' Compensation, Rehabilitation and Claims Management Policy, Version 5.1, dated 3 March 2025

Comment:

The Workers' Compensation, Rehabilitation and Claims Management Policy includes RBA's Surveillance Policy and outlines the required information on approval, how surveillance is to be conducted and links to the Workers' Compensation, Rehabilitation and Claims Management Procedure.

The procedure details the conditions which must be met before surveillance can be undertaken. The application for surveillance form is required to be completed by the Claims Manager for approval by the RBA delegate. It outlines the conditions and instructions for surveillance conduct, use, destruction and storage of surveillance material. The procedure also states that the operative engaged is required to sign and

return a copy of the instruction acknowledging his/her obligations in terms of the surveillance and that surveillance is not to commence until the signed copy is received by the RBA delegate.

The auditors were not able to verify conformance with this criterion as there had been no covert surveillance activity on the claim files in the last 12 months.

Confidentiality

Criterion 3.16

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

Finding: Conformance

Evidence:

- Claims Management Services Agreement between Reserve Bank of Australia and Comcare Australia, executed on 1 July 2024
- RBA Safety & Wellbeing Team Procedure, Version 3.2, dated 18 March 2025
- RBA Privacy Guidelines, Version 6.0, dated December 2022
- RBA Privacy Policy at www.rba.gov.au/privacy (link in the claim form)
- Comcare Claims Process Manual Figtree Systems, Version 1.0 dated September 2022
- Variation Agreement between Reserve Bank of Australia and Figtree Systems Pty Ltd, executed 9 October 2024
- Comcare Claims Manual – Privacy, no version control, undated
- RBA Claim for Compensation and Rehabilitation Form, no version control, undated
- File Review

Comment:

The RBA Privacy Policy outlines the requirements of the Privacy and the *Privacy (Australian Government Agencies – Governance) APP Code 2017* which is registered under the Privacy Act. This Policy sets out some key information about the RBA's approach to privacy including information relating to its employees. The policy outlines how RBA collects, stores, uses and discloses personal information.

The Collection Statement in the Claim for Compensation and Rehabilitation Form specifies how RBA collects, stores, uses and discloses personal information with respect to claims and rehabilitation management.

The Claims Management Services Agreement requires the claims manager to comply with the applicable privacy legislation.

Comcare's Claims Manual sets out Comcare's privacy obligations in respect to collecting, storing, using and disclosing personal information in the management of claims.

The Safety & Wellbeing Team Procedure in accordance with RBA's Privacy Guidelines outlines the privacy requirements including that appropriate security is applied to TRIM folders, sensitive material is locked away, confidential discussions regarding claims and rehabilitation take place in meeting rooms, and where paper claim files exist, they are locked in the claims file cupboard when not in use.

All electronic claim files are securely maintained in TRIM and Figtree. Access to Figtree is managed by the RBA IT team. Authorised personnel have individual Figtree accounts which includes multifactor authentication protection.

The claim file review demonstrated 100% compliance with the requirements of this criterion.

Document and file management

Criterion 3.17

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

Finding: Non-conformance

Evidence:

- RBA Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4, dated March 2025
- Workers' Compensation, Rehabilitation and Claims Management Policy, Version 5.1, dated 3 March 2025
- RBA Safety & Wellbeing Team Procedure, Version 3.2, dated 18 March 2025
- PD Policy Register, no version control, undated
- Comcare Claims Process Manual Figtree Systems, Version 1.0 dated September 2022

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records from TRIM
records from TRIM
records from TRIM
records from TRIM
records from TRIM
records from TRIM
records from TRIM
records from TRIM

- File Review

Comment:

The Workers' Compensation, Rehabilitation and Claims Management Policy and the Workers' Compensation, Rehabilitation and Claims Management Procedure briefly address secure record-keeping, legislative compliance, and protection of sensitive data.

The Policy Register lists RBA's workers compensation procedural documentation, including document type, owner, and review dates.

The RBA Safety & Wellbeing Team Procedure, chapter 6, details how RBA manages its system documentation including review and version control requirements.

RBA and its claims manager use Figtree, an electronic claims management system, for the management of individual claims and reporting to the Commission Data Warehouse.

The Comcare Claims Process Manual is an overarching document which outlines the file creation and management requirements including how all file notes are created and recording to ensure consistency across all files.

The RBA Safety & Wellbeing Team Procedure, chapter 23, details how RBA manages claim records in TRIM. The procedure outlines that the Senior Health & Wellbeing Consultant is responsible for monitoring the Workers' Compensation inbox to identify new claims, with admin access provided by the IT Service Desk. Workers' Compensation documents are securely stored in TRIM for accurate record-keeping and confidentiality. A claim number is generated in Figtree for each claim and used by the

Claims Manager in the management of individual claims. Entries made into Figtree are reviewed for accuracy by the Senior Consultant, WHS.

The RBA Safety & Wellbeing Team Procedure further details that the Health & Wellbeing Consultant is responsible for submitting the Data Warehouse report to Comcare via its online portal within five business days of each month, in line with Comcare's reporting requirements.

All relevant documentation, including emails and other correspondence is stored in TRIM, following a structured labelling convention to ensure both confidentiality and accessibility. Regular annual file reviews are undertaken to maintain integrity and confidentiality of workers compensation records. RBA demonstrated that TRIM contains a full record of each claim through a presentation during the review.

However, the file review demonstrated that a complete record of the file is not maintained on the claims management system, Figtree. The Claims Manager, Comcare, does not have access to RBA's TRIM records and for the effective management of a claim, all information and data should be on the Figtree record. The auditors reviewed the TRIM claim records as well as the record on Figtree for each claim and it was identified that pertinent information like determinations and invoices were missing from Figtree. The file review also identified instances where the claims activity did not reflect what was reported to the Commission Data Warehouse and/or incorrect data as well as instances where determinations were not issued in writing for the reimbursement of medical treatment to the employee.

Findings were identified against five claims, out of the 11 relevant to this criterion, demonstrating that RBA has not maintained the relevant level of reporting, records and document management to support its claims management system and legislative compliance. All file findings are detailed at the individual file findings table at the end of this report.

Non-conformances:

RBA does not maintain the relevant level of reporting, records and document management to support its claims management system and legislative compliance.

SUMMARY OF FILE FINDINGS

Summary of file findings															
File Ref	Audit Criteria														
	2.1	3.2	3.3	3.5	3.6	3.7	3.8	3.9	3.10	3.11	3.12	3.13	3.14	3.16	3.17
N/A	N/A	✓	N/A	N/A	N/A	N/A	N/A	✓	N/A	N/A	N/A	N/A	N/A	✓	✗
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✗	N/A	N/A	N/A	N/A	N/A	✓	✓
N/A	N/A	✗	✗	N/A	N/A	N/A	N/A	✓	N/A	N/A	N/A	N/A	N/A	✓	✗
✓	✓	✓	✓	N/A	N/A	✓	✓	✓	N/A	N/A	N/A	N/A	N/A	✓	✓
N/A	N/A	✗	✗	N/A	N/A	N/A	✓	✓	N/A	N/A	N/A	N/A	N/A	✓	✓
✓	✓	✗	✗	N/A	N/A	✗	✓	✓	N/A	N/A	N/A	N/A	N/A	✓	✓
✓	N/A	✓	✓	N/A	N/A	N/A	✓	✓	N/A	N/A	N/A	N/A	N/A	✓	✗
✓	✓	✓	✓	N/A	✓	N/A	N/A	N/A	N/A	N/A	✓	N/A	N/A	✓	✗
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓	✗
✓	N/A	✓	✓	N/A	✓	N/A	N/A	N/A	N/A	N/A	✓	N/A	N/A	✓	✓
N/A	✗	✓	✓	✓	✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓	✓

s 47F

Individual file findings		
File Reference	Criterion	Finding
s 47F	3.17	The claim information on the claims management system Figtree, is not a complete record. There is no documentation, no determinations and no case notes to verify an audit trail. The only activity in scope for this claim is a medical payment dated 15 May 2024, however, the claims record is required to be a complete record.
	3.9	The medical imaging invoice dated 8 December 2023 was not paid until 7 July 2024.
	3.3	The employee is not aware of their rights and responsibilities as no section 16 determination have been issued with respect to the pharmaceutical costs reimbursement to the employee on 28 August 2024.
	3.5	Pharmaceutical costs for the amount of \$122.24 was reimbursed to the employee on 28 August 2024, but no section 16 determination issued. The reimbursement was made to the employee, therefore, a section 16 determination was required.
	3.17	The claim information on the claims management system Figtree, is not a complete record. There is no documentation, no determinations and no case notes to verify an audit trail. The only activity in scope for this claim is a medical payment dated 28 August 2024, however, the claims record is required to be a complete record.
	3.3	The employee is not aware of their rights and responsibilities as no section 16 determinations have been issued with respect to multiple physiotherapy treatment sessions post 13 June 2024 and up to February 2025.
	3.5	No section 16 determinations were issued in writing with respect to multiple physiotherapy treatment sessions post 13 June 2024. The claim record shows multiple invoices issued to the employee and payments for physiotherapy treatment sessions up to 10 February 2025. The reimbursements were made to the employee, therefore, section 16 determinations were required.

s 47F

3.3	The employee is not aware of their rights and responsibilities as no incapacity determinations have been issued past 20 June 2024.
3.5	The employee is currently in receipt of incapacity payments and has been certified unfit until 11 April 2025. There are no determinations in writing past 20 June 2024.
3.8	Determinations for periods of incapacity past 20 June 2024 have not been determined in accordance with the requirements of section 19 of the SRC Act
3.17	<p>Unable to establish auditable trail on the claim record in Figtree due to the following:</p> <p>The section 16 determination dated 3 October 2024 has a wrong date of injury, 24 October 2023. The correct date of injury is 10 October 2023.</p> <p>The section 16 determination dated 16 October 2024 has a wrong date of injury, 24 October 2023, and references a claim number for a different employee, ^{s 47F}. The correct date of injury is 10 October 2023.</p> <p>Section 19 determination dated 3 October 2024 was reported to the Commission Data Warehouse and the transactions under the finance tab show a weekly compensation payment on 3 October 2024, but no such determination is available on the claim record in Figtree.</p>
3.17	The reconsideration dated 24 June 2024 has not been reported to the Commission Data Warehouse.
3.17	The claim information on the claims management system Figtree, is not a complete record. There is no documentation or case notes to verify an audit trail. The claim is reported as 'withdrawn' however, there is nothing on file demonstrating why it was withdrawn.
3.2	There is no evidence on file to demonstrate that the employee was aware of the roles and responsibilities of the stakeholders in the claims management process.

REHABILITATION MANAGEMENT SYSTEM AUDIT REPORT

Reserve Bank of Australia
31 March 2025 – 4 April 2025

Document number	DOC5629306
Version	3.0
Release Date	February 2021
Release Status	Released for use
Approval Status	Approved for use
Prepared by	Secretariat and Scheme Support Services
Confidentiality Category	Unclassified

TABLE OF CONTENTS

TABLE OF CONTENTS	3
SCOPE OF REVIEW/AUDIT	4
EXECUTIVE SUMMARY	6
TABLE OF CRITERIA	8
ELEMENT 2: PLANNING	9
ELEMENT 3: IMPLEMENTATION.....	12

SCOPE OF REVIEW/AUDIT

Organisation	Reserve Bank of Australia (RBA)
Site/Workplace	Review conducted remotely
Scope of review	<p>The review examined RBA's rehabilitation management system, processes and outcomes to validate that RBA is meeting its licence conditions and is complying with the <i>Safety, Rehabilitation and Compensation Act 1988</i> (SRC Act) and the <i>Guidelines for Rehabilitation Authorities Instrument 2019</i> (the Guidelines) and the <i>Guide for Arranging Rehabilitation Assessments and Requiring Examinations 2024</i> (the Guide).</p> <p>No rehabilitation case files were examined by the auditors as there were no rehabilitation case files where activity had occurred in the previous 12 months.</p> <p>The review encompassed all relevant policies and procedures as they relate to rehabilitation and return to work management and any other relevant, supporting documentation. An interview was also conducted with rehabilitation staff.</p> <p>Overall findings are based on the identification of issues that are considered to be systemic rather than isolated incidents.</p>
Criteria	<p>This review assessed the rehabilitation management system against two elements:</p> <ol style="list-style-type: none">1. Planning (2 criteria)2. Implementation (10 criteria)
Ratings	<p>The findings in the review/audit report have been classified and marked as follows:</p> <p>Conformance—indicates that the criterion has been met.</p> <p>Non-conformance—indicates that the criterion has not been met.</p> <p>Not able to verify—indicates that the organisation has documented procedures in place however there are no cases to test that the organisation has followed those procedures. It is expected that this classification will only be used in limited circumstances and where applied, the reasons for the finding will be explained by the auditor.</p> <p>Not Applicable—indicates that the criterion does not apply to the organisation.</p> <p>Where a criterion has been met but the auditor has identified a 'once off' situation or a 'minor' deviation from the documented management system or reference criterion, an Observation may be made. These findings, while representing a non-fulfilment of a requirement, are recognised as being of lower risk to the organisation.</p>
Dates of review	31 March 2025 – 4 April 2025
Auditors	<p>^{s 22} , Assistant Director, Comcare</p> <p>^{s 22} , Senior Assurance Officer, Comcare</p>

Client contacts

s 47E(c)

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RBA

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Record of review

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

Acknowledgement

The auditor's wish to acknowledge the cooperation and assistance provided by the management and staff of RBA and thank them for their contribution to the review process.

EXECUTIVE SUMMARY

The Reserve Bank of Australia (RBA) has held a self-insurance licence under the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act) since 1 May 1996.

Comcare conducted a review of RBA's rehabilitation management system (RMS), assessing it against 12 criteria from the Rehabilitation Management System Audit Tool. This review forms part of the Year 2 scheduled assessment, aligned with the Safety, Rehabilitation, and Compensation Commission's Licence Compliance Performance Model.

The auditors reviewed system documentation for RBA's rehabilitation management processes. However, files were not reviewed as no rehabilitation activity had occurred in the 12 months leading up to the audit. The review confirmed that RBA maintains documentation regarding its rehabilitation management processes. RBA has developed consistent, systematic procedures that align with the Rehabilitation Management System Audit Tool criteria and relevant legislation.

Seven of the 12 applicable criteria could not be verified due to the absence of rehabilitation activity, preventing the auditors from assessing the implementation of procedural documentation. However, the documented procedures demonstrate RBA's preparedness, with processes and templates available for delegates should a rehabilitation claim arise in the future.

Overall, the review highlighted RBA's established RMS, demonstrating its commitment to injury management and return-to-work outcomes for employees. One observation was noted regarding the inadequate inclusion of delegation for rehabilitation reconsiderations, which is discussed in detail at criterion 2.1.

In conclusion, RBA has achieved 100% compliance against the requirements of the assessed criteria.

Observations

One observation was identified during the audit:

Criterion	Observation
2.1	The Reserve Bank of Australia (RBA) – Rehabilitation Delegation Schedule under the <i>Safety, Rehabilitation and Compensation Act 1988</i> , dated 26 June 2024 does not include the delegation to undertake rehabilitation reconsiderations pursuant to section 62 of the SRC Act

In summary, for the 12 criteria within the rehabilitation management system review/audit tool, the outcomes are:

	Number of criteria	% of assessed criteria
Conformance	5	100%
Non-conformance	0	
Not able to verify	7	
Not applicable	0	

An action plan, which includes completion/review dates and responsibilities, must be developed to address the observation raised.

The auditors invite RBA to discuss any aspect of this review.

Signed	s 22	Signed	s 22
Auditor name	s 22	Auditor name	s 22
Date	5 May 2025	Date	5 May 2025

TABLE OF CRITERIA

Audit element/criterion description	Criterion	Rating
2. Planning		
Delegation schedule	2.1	Conformance with observation
Planning for legislative compliance	2.2	Conformance
3. Implementation		
Employees are aware of rights	3.3	Not able to verify
Early intervention	3.5	Conformance
Rehabilitation assessments	3.6	Not able to verify
Rehabilitation programs	3.7	Not able to verify
Suitable employment	3.8	Not able to verify
Determinations in accordance with the SRC Act	3.9	Not able to verify
Employee non-compliance	3.10	Not able to verify
Reconsiderations	3.11	Not able to verify
Privacy and confidentiality	3.12	Conformance
Reporting, records, documentation	3.13	Conformance

ELEMENT 2: PLANNING

Administrative arrangements

Criterion 2.1

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

Finding: Conformance with observation

Evidence:

- Reserve Bank of Australia (RBA) – Rehabilitation Delegation Schedule under the *Safety, Rehabilitation and Compensation Act 1988*, dated 26 June 2024
- Position Description, Workday Safety & Wellbeing Senior Consultant – screenshot, dated 10 December 2024
- Reserve Bank of Australia People Department Organisational Chart, dated 2024

Comment:

The delegation, issued pursuant to section 41A of the SRC Act, is signed by Michele Bullock, the Principal Officer of the RBA, on 26 June 2024, with an effective date of 1 July 2024.

The delegation outlines that the Governor, as the Principal Officer and rehabilitation authority for RBA employees, has revoked all previous instruments of delegation and appointed certain positions within the RBA to exercise the specified powers and functions under the SRC Act. These delegated authorities must comply with relevant RBA policies and procedures, as well as any limits, restrictions, exclusions, and directions set by the Governor or their successor. Importantly, the delegation does not authorise sub-delegation.

The positions listed in Schedule 1 of the delegation are:

- Category 1:
 - Head of Safety and Wellbeing
 - Senior Consultant, Safety and Wellbeing.
- Category 2:
 - Head of Safety and Wellbeing

The aforementioned positions are authorised to excise the functions and powers as described in Schedule 2 of the delegation schedule. These functions include, but are not limited to, the authority to decide on rehabilitation assessments, suspension of rights to compensation, and the provision of rehabilitation programs for employees suffering from work-related injuries. It is noted that the delegation to suspend under sections 36(4) and 37(7) of the SRC Act has been categorised as 'Category 2' and can only be undertaken by the Head of Safety and Wellbeing.

The organisational chart reflects the appropriate staff members assigned to the rehabilitation team, in line with the delegation schedule and current staffing.

The delegation schedule does not include the delegation to undertake rehabilitation reconsideration, including reconsiderations on own motion.

No rehabilitation activity has occurred in the past 12 months, preventing the auditors from verifying the implementation of this criterion against rehabilitation decisions. However, the Delegation Schedule is compliant with legislative requirements.

Observation:

The Reserve Bank of Australia (RBA) – Rehabilitation Delegation Schedule under the *Safety, Rehabilitation and Compensation Act 1988*, dated 26 June 2024 does not

include the delegation to undertake rehabilitation reconsiderations pursuant to section 62 of the SRC Act

Rehabilitation planning

Criterion 2.2

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

Finding: Conformance

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Policy, Version 5.1, dated 3 March 2025
- Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4.0, dated 3 March 2025
- Senior Consultant Safety & Wellbeing, Comcare Training history summary, dated 10 March 2025
- WHS Training Needs Analysis, version 1.0, dated 3 March 2025
- Reserve Bank of Australia WHS Committee meeting minutes, 10 December 2024
- Email from Senior Consultant Safety and Wellbeing, 1 April 2024

Comment:

The 'Workers' Compensation, Rehabilitation, and Claims Management' policy reflects RBA's commitment to compliance with the *Safety, Rehabilitation, and Compensation Act 1988* (SRC Act). The policy outlines RBA's Rehabilitation and Compensation Framework, emphasising regulatory compliance and ensuring adherence by all RBA employees. Specifically, it states, at chapter 2:

"The Bank and Claims Manager will ensure compliance with the requirements set out in the SRC Act and regulations, as well as regulatory compliance issued by the Safety, Rehabilitation & Compensation Commission or Comcare for the effective management of workers' compensation and rehabilitation. Existing policies and procedures will be reviewed regularly in light of any changes made to the regulatory framework."

The 'Workers' Compensation, Rehabilitation, and Claims Management' procedure confirms that changes to the legislation in 2024 and the introduction of *the Guide* have been incorporated into the relevant processes. This includes the requirements of RBA when considering or arranging a section 36 assessment and statutory timeframes when undertaking a reconsideration.

The WHS Training Needs Analysis outlines the training requirements for RBA Staff, categorising them as either mandatory or recommended, and tracks training compliance. The evidence provided by RBA demonstrates that the Senior Consultant Safety & Wellbeing has completed various Comcare training modules and attended rehabilitation workshops in 2023 and 2024.

In addition, RBA confirmed via email on 1 April 2024 that the team monitors legislative changes through various channels, including:

- Comcare's self-insurance fortnightly updates
- Comcare's Claims Manager Forum
- Comcare's licensee liaison Forum
- Comcare's Annual Conference
- SRCLA Monthly Meeting
- OHS Alerts daily updates
- Comcare courses.

RBA rehabilitation team is currently a team of three and hold weekly Thursday team meetings to discuss relevant issues, including legislative changes. An example of a

post- meeting team email has been provided to the auditors. The Senior Consultant Safety & Wellbeing presents legislative changes to HSR representatives, when required, at RBA WHS Committee meetings, as evidenced by the 10 December 2024 meeting minutes which included updates on legislative changes to the SRC Act that occurred in 2024.

The information provided indicates that RBA uses several communication channels and a team approach to stay informed and ensure that personnel are up to date on legislative changes.

ELEMENT 3: IMPLEMENTATION

Criterion 3.3

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

Finding

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Policy, Version 5.1, dated 3 March 2025
- Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4.0, dated 3 March 2025
- Workers' Compensation and Rehabilitation Notice of Rights, Version 4.0, dated 31 March 2025
- Workers' Compensation' – Life @ The Bank Intranet page (screen shot)
- 'Rehabilitation' – Life @ The Bank Intranet page (screen shot)
- Incident reporting –Life @ The Bank Intranet page (screen shot)

Comment:

RBA ensures that relevant information regarding the rehabilitation process, including employees' rights and obligations, is clearly communicated to employees. All information relating to the rehabilitation process, incident reporting, relevant stakeholder's rights and obligations is available to all employees on RBA's intranet site.

The 'Workers' Compensation, Rehabilitation, and Claims Management' policy demonstrates RBA's commitment to providing effective compensation, rehabilitation, and support for employees injured or ill due to work-related incidents, while ensuring compliance with the SRC Act and the broader regulatory framework.

Chapter 3 of the 'Workers' Compensation, Rehabilitation, and Claims Management' procedure outlines the responsibilities of both employees and management in the rehabilitation and return-to-work process, including the requirement to provide employees with a notice of rights when determinations under sections 36 and 37 are issued, as well as the right to request a review of decisions under section 62 of the SRC Act as outlined in its notice of rights.

RBA's rehabilitation process is outlined in a structured flow chart, detailing the responsibilities of employees, supervisors, and the Safety & Wellbeing team. The flow chart emphasises the need for supervisors to assess the situation, maintain regular contact with the employee, and notify the Safety & Wellbeing team if return-to-work support is required. The Safety & Wellbeing team collaborates with the relevant stakeholders to develop tailored rehabilitation plans, assess the need for early intervention, and manage return-to-work arrangements. The page also provides direct links to relevant forms and resources regarding the rehabilitation process.

No rehabilitation activity has occurred in the past 12 months; therefore, this criterion is unable to be verified.

Early intervention

Criterion 3.5

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

Finding: Conformance

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Policy, Version 5.1, dated 3 March 2025
- Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4.0, dated 3 March 2025
- Early Intervention Procedure, version 3.0, dated 3 March 2025
- Early Intervention, Injury & Illness –Life @ The Bank, Intranet page (screen shot)
- Incident form – Life @ The Bank Intranet page (screen shot)

Comment:

The RBA's 'Early Intervention' Procedure outlines its commitment to providing timely support and rehabilitation for employees experiencing early signs of work-related or, in some cases, non-work-related injuries or illnesses. The procedure focuses on identifying and responding to early warning signs, offering assistance to help employees remain healthy and safe in the workplace. It includes the roles and responsibilities of employees, people leaders, and the Safety & Wellbeing team in accessing and managing early intervention support, aiming to reduce the impact and duration of injuries and promote return to work.

The procedure emphasises the benefits of early intervention, such as reducing absenteeism, preventing chronic illness, and improving morale. It defines minor work-related injuries or illnesses and provides a list of early warning signs to help identify employees at risk. The roles of employees, people leaders, and the Safety and Wellbeing team are clearly outlined, ensuring effective rehabilitation management. The procedure is regularly reviewed, and resources are available for further reference.

The 'Early Intervention, Injury & Illness' section from RBA's internal intranet page provides detailed information on RBA's early intervention program. The page outlines the steps employees need to take when reporting work-related injuries or illnesses and how the Safety & Wellbeing team offers ongoing support throughout the process as well as the parameters for obtaining treatment through early intervention.

Various chapters within the 'Workers' Compensation, Rehabilitation and Claims Management' procedure also outline the stages and variations of the early intervention process in detail.

No rehabilitation activity under the SRC Act has occurred in the past 12 months; however, the auditors reviewing files for the claims management system review sighted early intervention processes implemented on several claims.

Rehabilitation assessments

Criterion 3.6

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

Finding: Not able to verify

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4.0, dated 3 March 2025
- Workers' Compensation and Rehabilitation Notice of Rights, Version 4.0, dated 12 April 2024
- Reserve Bank of Australia Rehabilitation Assessment Examination Template, no version control, undated

Comment:

The RBA's Section 36 rehabilitation assessment process, as outlined in the 'Workers' Compensation, Rehabilitation and Claims Management' procedure, outlines the legislative requirements when assessing if an employee has the capacity to undertake a rehabilitation program. It outlines the requirements of the Guide, detailing the statutory limitations of assessments, obtaining information from the employee's treatment practitioner and when a formal rehabilitation assessment is required under section 36, seeking the employees views and retaining a record of those discussions/correspondence with the employee.

The required legislative framework is outlined in the procedure, and it is a high-level overview of the requirements when undertaking an assessment for rehabilitation in line with the Guide.

The Section 36 Assessment Examination Template includes relevant legislative factors that the delegate must consider when arranging an examination.

There have been no rehabilitation assessments undertaken in the scope of this review; therefore, the auditors are unable to verify the implementation of rehabilitation assessments against this criterion.

Rehabilitation programs

Criterion 3.7

The rehabilitation authority provides rehabilitation programs in accordance with section 37 of the SRC Act and the Guidelines, and ensures consultation occurs between all parties in regards to the rehabilitation process.

Finding: Not able to verify

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Procedure, version 4.0, dated 3 March 2025
- Reserve Bank of Australia Rehabilitation Program Template, no version control, undated

Comment:

The evidence supplied demonstrates that RBA has arrangements in place to ensure it provides rehabilitation programs in accordance with the provisions of section 37 of the SRC Act and section 9 of the Guidelines.

The required legislative framework is outlined in the procedure, and it is a high-level overview of the requirements when determining a rehabilitation program in line with the requirement of section 37 of the SRC Act.

The section 37 rehabilitation program template guides delegates to ensure that the program is developed in line with the requirements of the Guidelines and legislation.

No rehabilitation programs have been implemented under section 37 of the SRC Act in the scope of this review. Therefore, the auditors were unable to verify the implementation of rehabilitation programs against this criterion.

Suitable employment

Criterion 3.8

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

Finding: Not able to verify

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4.0, dated 3 March 2025
- Reserve Bank of Australia Suitable Duties form, undated, no version control

Comment:

The evidence demonstrates that RBA has arrangements in place to ensure it takes all reasonable steps to provide employees with suitable employment or to assist them in finding such employment.

Chapters 4.6 and 4.7 of the 'Workers' Compensation, Rehabilitation, and Claims Management' procedure outline processes for identifying and providing suitable employment. These chapters cover the following:

- legislative requirements applicable to the provision of suitable duties
- the process of identifying suitable duties and employment to ensure safe return to work
- return-to-work process and hierarchy
- graduated return to work options and external redeployment

The 'Suitable Duties' form is the process for ensuring duties are suitable and in line with the requirements of section 40 of the SRC Act. The information gathered and identification of suitable duties is done in consultation with the employee, supervisor, case manager, and workplace rehabilitation provider (WRP) when required. The pre-injury duties are outlined and agreed by all stakeholders before identifying potential suitable duties available, also agreed by all stakeholders. This is then provided to the treating practitioner to assess work capacity, again highlighting agreed outcomes by all stakeholders.

No rehabilitation activity has occurred in the past 12 months; therefore, this criterion is unable to be verified.

Determinations, Suspensions and reconsiderations

Criterion 3.9

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

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

Finding: Not able to verify

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4.0, dated 3 March 2025
- Reserve Bank of Australia Rehabilitation Program Template, no version control, undated
- Reserve Bank of Australia Rehabilitation Assessment Examination Template, no version control, undated
- Reserve Bank of Australia Suitable Duties form, undated, no version control
- Section 37(7) suspension template, no version control, undated
- Section 36(4) suspension template, no version control, undated

Comment:

As discussed in criterion 3.6 and 3.7, the Workers' Compensation and Claims Management Procedure outlines the requirements for determinations to be issued in writing and specifies that the Case Manager must sign a section 37 program prior to its commencement.

Whilst no rehabilitation activity has occurred in the scope of this review, RBA has demonstrated the ability to comply with these provisions with standardised forms and templates to ensure legislative compliance when issuing determinations.

As there has been no rehabilitation determinations issued within scope the review, the auditors are unable to verify this criterion.

Criterion 3.10

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

Finding: Not able to verify

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4.0, dated 3 March 2025
- Workers' Compensation and Rehabilitation Notice of Rights, Version 4.0, dated 12 April 2024
- Section 37(7) suspension template, no version control, undated
- Section 36(4) suspension template, no version control, undated

Comment:

The 'Workers' Compensation and Rehabilitation Notice of Rights' explains the consequences to an employee for failing to undertake a rehabilitation assessment under section 36 or return to work plan under section 37. It outlines that if it is considered that an employee's rights to compensation should be suspended, a formal determination will be issued under section 61 of the SRC Act, which is reviewable under section 62. Additionally, the notice confirms that any reconsideration is carried out by the head of Health, Safety & Wellbeing, who is a delegate not involved in the

original determination.

The 'Workers' Compensation, Rehabilitation and Claims Management' procedure, outlines the process for addressing non-compliance. It defines what constitutes a reasonable excuse, addresses the suspension process and specifies that the Head of Safety & Wellbeing holds the delegation to make determinations regarding the suspension of benefits. It further provides natural justice principles that outline that all reasonable steps have been taken to resolve the issues causing non-compliance before any formal determination is issued.

It is evident that a high-level procedure is in place, including a suite of templates for implementing suspension provisions under sections 36(4) and 37(7) to guide delegates and ensure compliance and consistency when determining suspensions.

No rehabilitation activity has occurred in the past 12 months; therefore, this criterion is unable to be verified.

Criterion 3.11

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

Finding: Not able to verify

Evidence:

- Workers' Compensation, Rehabilitation and Claims Management Policy, Version 5.1, dated 3 March 2025
- Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4.0, dated 3 March 2025
- Workers' Compensation and Rehabilitation Notice of Rights, Version 4.0, dated 12 April 2024

Comment:

The 'Workers' Compensation, Rehabilitation and Claims Management' procedure outlines the process for reconsiderations and reconsiderations of own motion, briefly describing the procedure and arrangements for managing these reconsiderations in accordance with sections 62 and 63 of the SRC Act.

The procedure, in chapter 3.4.1, outlines the statutory timeframes for decision making in relation to reconsiderations (30 calendar days to decide a request by a claimant to reconsider a determination). It provides an overview, including the process and considerations for delegates to follow in line with the stop clock provisions, which came into effect on 1 April 2024. Additionally, the procedure correctly reflects the recent introduction of the Administrative Review Tribunal (ART), which replaced the AAT as of 14 October 2024. The 'Workers' Compensation and Rehabilitation Notice of Rights' specifies that a reconsideration cannot be undertaken by the original decision-maker.

As outlined at criterion 2.1, the delegation schedule does not include the delegation for RBA employees to undertake rehabilitation reviewable decisions. This is required to be rectified against the finding raised against criterion 2.1

No rehabilitation activity has occurred in the past 12 months; therefore, this criterion is unable to be verified.

Confidentiality

Criterion 3.12

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

Finding: Conformance**Evidence:**

- Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4.0, dated 3 March 2025
- RBA Claim for Compensation and Rehabilitation Form, no version control, undated
- Reserve Bank of Australia, Safety & Wellbeing Team Procedure, Version 3.2, dated 18 March 2025
- Reserve Bank of Australia, Execution of Agreement with NTT Data Figtree Systems Pty Ltd for Figtree software hosting and licenses, dated 3 September 2019

Comment:

RBA's privacy policy, available on their website, outlines their commitment to safeguarding the personal information of individuals who interact with RBA or whose information is collected indirectly. The policy ensures the protection of this information in compliance with the *Privacy Act 1988* (Privacy Act) and the *Privacy (Australian Government Agencies – Governance) APP Code 2017*, which is registered under the Privacy Act. It provides a framework for how RBA collects, stores, uses, and discloses personal information while ensuring confidentiality is maintained. Additionally, employees can request copies of documents related to their claim and access their personal information, supporting transparency and ensuring compliance with privacy and confidentiality obligations as required by law.

The Collection Statement in the 'Claim for Compensation and Rehabilitation Form' further details how RBA collects, stores, and uses personal information for compensation and rehabilitation under the SRC Act and *Work Health and Safety Act 2011* (WHS Act). It details the types of information collected, such as medical assessments and rehabilitation plans, and how it may be shared with authorised parties, including medical providers, legal representatives, and government agencies like the ATO and Centrelink. This process ensures that personal information is used appropriately for assessing compensation eligibility and rehabilitation needs, while also protecting privacy.

Chapter 5 of the RBA Safety & Wellbeing Team Procedure mandates that when staff are not at their desks, sensitive materials are locked away, and computer screens are secured. Any paper claim files that exist are stored in locked claim file cupboards when not in use. Confidential discussions regarding claims and rehabilitation take place in designated meeting rooms to further safeguard privacy.

RBA uses TRIM and Figtree for the secure handling of rehabilitation records. Both systems have controlled access that supports compliance with privacy legislative requirements. Furthermore, any paperwork no longer required is shredded after being entered into TRIM, ensuring that sensitive information is destroyed securely.

Document management**Criterion 3.13**

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

Finding: Conformance**Evidence:**

- Workers' Compensation, Rehabilitation and Claims Management Policy, Version 5.1, dated 3 March 2025
- Workers' Compensation, Rehabilitation and Claims Management Procedure, Version 4.0, dated 3 March 2025

- PD Policy Register, no version control, undated
- Reserve Bank of Australia, Safety & Wellbeing Team Procedure, Version 3.2, dated 18 March 2025
- Reserve Bank of Australia, Execution of Agreement with NTT Data Figtree Systems Pty Ltd for Figtree software hosting and licenses, dated 3 September 2019

Comment:

The 'Workers' Compensation, Rehabilitation and Claims Management' policy and the 'Workers' Compensation, Rehabilitation and Claims Management' procedure briefly address secure record-keeping, legislative compliance, and protection of sensitive data.

The 'Policy Register' lists RBA's workers compensation and rehabilitation procedural documentation, including document type, owner, and review dates.

The RBA Safety & Wellbeing Team Procedure further clarifies that the Senior Health & Wellbeing Consultant is responsible for monitoring the Workers' Compensation inbox to identify new claims, with admin access provided by the IT Service Desk. Workers' compensation documents are securely stored in TRIM for accurate record-keeping and confidentiality. A claim number is generated in Figtree for each claim and used to document all actions and decisions. Entries made into Figtree are reviewed for accuracy by the Senior Consultant, WHS. All relevant documentation, including emails and other correspondence is stored in TRIM, following a structured labelling convention to ensure both confidentiality and accessibility. Regular annual file reviews are undertaken to maintain integrity and confidentiality of workers' compensation records. Furthermore, chapter 6 of the team procedure addresses version control.

Additionally, the Health & Wellbeing Consultant is responsible for submitting the Data Warehouse report to Comcare via its online portal within five business days of each month, in line with Comcare's reporting requirements.

RBA has the appropriate procedural information to ensure that it maintains the relevant level of reporting and records. As there was no rehabilitation activity in the scope for this review, the auditors could not verify if appropriate records were held in the system against rehabilitation files.

Claims

Results are based on the financial year in which claims were received and claims were accepted (which will differ from financial year of injury in some cases). Tracking changes in the volume, rate and composition of claims received and accepted provides insight into the performance of your agency's injury prevention and claims management strategies.

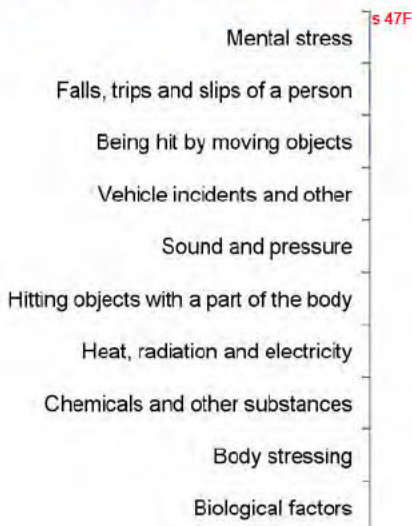
Number of claims received and accepted s 22

s 22

	2024-25	2025-26
Claims received	s 47F	0
Claims determined		0
Claims accepted		0
Claim acceptance rate*	100%	0%

*The claim acceptance rate details the number of claims currently accepted as a proportion of all claims initially determined in the reporting period.

Claims accepted by Mechanism of Injury, 2022-23 to 2025-26

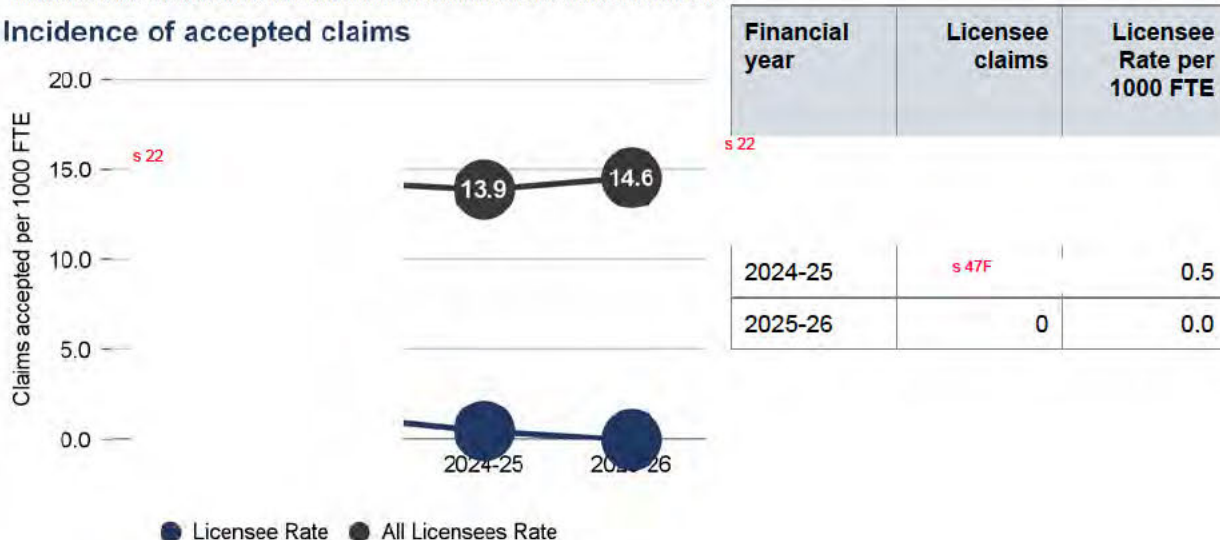


Claims Initially Accepted

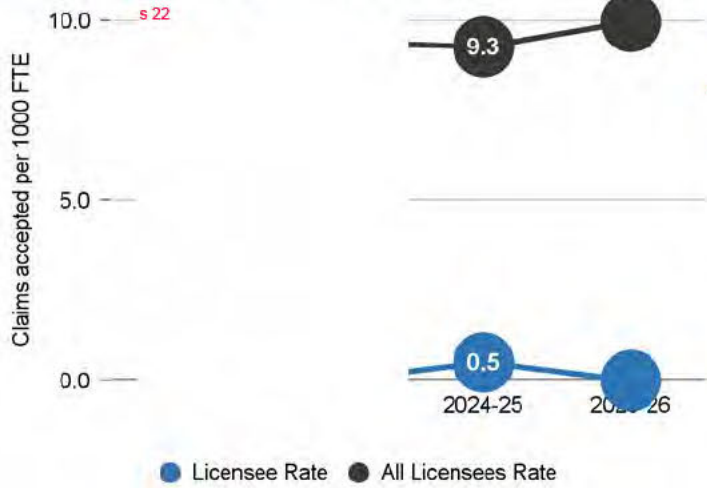
*The incidence of claims accepted is the number of claims initially determined and initially accepted in the reporting period. Includes take-over claims. This measure is calculated the same as LKPI 4.

s 22

Incidence of accepted claims



Incidence of accepted injury claims



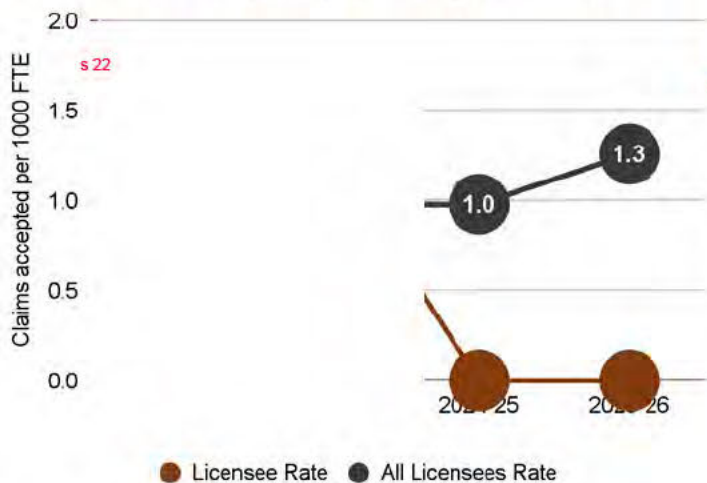
Financial year	Licensee claims	Licensee Rate per 1000 FTE
2024-25	s 47F	0.5
2025-26	0	0.0

Incidence of accepted disease claims



Financial year	Licensee claims	Licensee Rate per 1000 FTE
2024-25	0	0.0
2025-26	0	0.0

Incidence of accepted psychological claims



Financial year	Licensee claims	Licensee Rate per 1000 FTE
2024-25	0	0.0
2025-26	0	0.0

A work-related injury is the result of a single traumatic event where harm or hurt is immediately apparent, for example a muscle strain as a result of a fall, or burns from contact with a hot surface.

A work-related disease usually results from repeated or long-term exposure to an agent or event, for example, loss of hearing as a result of long-term exposure to noise, or an illness arising from exposure to an infectious agent. Work related diseases can be classified as psychological in nature when they relate to the psychological system of the individual.

The classification of a claim is derived from the Type of Occurrence Classification System (TOOCS) nature of injury/disease code present on the claim.

s 22

s 22



Disputation

Number of requests for reconsideration received

s 22

		2024-25	2025-26
Licensee	Reconsiderations received	0	0

Affirmation rate - reconsiderations

s 22

		2024-25	2025-26
Licensee	Reconsiderations affirmed	0	0
	Reconsiderations decided	0	0
	Affirmation rate*	0%	0%

*The percentage of reviewable decisions that affirmed the original determination with a decision date in the reporting period. Excludes initiated by own motion and withdrawn.

Number of AAT applications received

s 22

s 22

		2024-25	2025-26
Licensee	Appeals received	0	0

Affirmation rate - appeals

s 22

		2024-25	2025-26
Licensee	Appeals affirmed	0	0
	Appeals decided	0	0
	Affirmation rate*	0%	0%

*The percentage of AAT decisions that affirmed the reviewable decision. Note that applications withdrawn by the applicant or that have been dismissed are considered to have been affirmed. Excludes initiated by own motion.

Internal Use Only

Number of claims received
 Reserve Bank of Australia

Mechanism	Number of Claims
BEING HIT BY MOVING OBJECTS	s 47F
MENTAL STRESS	
TOTAL	

2024-25

Claim ID	External Claim ID	Determination Status	Injury Date	First Compliance Date	Received Date	Date Received
s 47F						
Number of claims	s 47F				Average:	
					Median:	

Internal Use Only

Number of claims received
Reserve Bank of Australia

Days between DOI and received Date	Customer	NOI Grouping	Nature of Injury	Mechanism of Incident
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s.47F

Internal Use Only

Number of claims received
Reserve Bank of Australia

nt	Mechanism	Latest NDS RTW Sta
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s 47F

Internal Use Only

Number of claims received
Reserve Bank of Australia

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s 47F