



Australian Government

Comcare

Safety, Rehabilitation and
Compensation Commission

Annual Report

2023-24

Publication details

Published by Comcare

© Commonwealth of Australia 2024

PUB 001 – Comcare and SRCC
Annual Reports 2023–24

ISSN 1325-1031 (hard copy)
ISSN 1832-0260 (online)
ABN 41 640 788 304 (Comcare)

All material presented in this publication is provided under a Creative Commons Attribution 4.0 Australia (<https://creativecommons.org/licenses/by/4.0/>) licence.

For the avoidance of doubt, this means this licence only applies to material as set out in this document.



The details of the relevant licence conditions are available on the Creative Commons website (accessible using the links provided) as is the full legal code for the CC BY 4.0 AU licence (<https://creativecommons.org/licenses/by/4.0/legalcode>).

Use of the Coat of Arms

The terms under which the Coat of Arms can be used are detailed on the Department of the Prime Minister and Cabinet [website](https://www.pmc.gov.au/government/commonwealth-coat-arms).
<https://www.pmc.gov.au/government/commonwealth-coat-arms>.

Online access

Online access is available at <https://www.comcare.gov.au/about/governance/annual-report> or alternatively through the Forms and Publications link on the Comcare website.

It is also available on the Australian Government Transparency Portal.

Annual report contact

To obtain further information contact:

cs0@comcare.gov.au

Comcare Strategy Office, Comcare
GPO Box 9905
CANBERRA ACT 2601
Phone 1300 366 979

Acknowledgements

Photography – iStock
Design and typesetting – New Age Graphics
Indexing – Puddingburn
Printing – Trendsetting

Comcare acknowledges and thanks its people, government and business partners for allowing use of images.

Letter of Transmittal



Australian Government

Comcare

Chief Executive Officer

23 September 2024

Senator the Hon Murray Watt
Minister for Employment and Workplace Relations
Parliament House
CANBERRA ACT 2600

Dear Minister

I am pleased to submit Comcare's Annual Report for the year ended 30 June 2024.

The report meets the requirements of federal law including:

- section 46 of the *Public Governance, Performance and Accountability Act 2013*
- schedule 2, sections 3 and 4 of the *Work Health and Safety Act 2011*
- section 85 of the *Safety, Rehabilitation and Compensation Act 1988*.

Following its tabling in Parliament, the report will be available on the Australian Government Transparency Portal and Comcare website.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Greg Vines', with a horizontal line underneath.

Greg Vines

Chief Executive Officer

GPO BOX 9905
CANBERRA ACT 2601
P 1300 366 979

COMCARE.GOV.AU

Contents

Letter of Transmittal	I
Figures and tables	IV
Comcare 2023–24 Snapshot	V
About these reports	VI

Part 1:	
Comcare Annual Report 2023–24	1
Strategic priorities – What we’ve achieved	2
CEO’s year in review 2023–24	3

Chapter 1: About Comcare	10
Purpose and strategic priorities	11
Governing legislation	12
Roles and responsibilities	14
Who we cover	17
Organisational structure	19
Comcare’s Executive team	21
Office locations	26

Chapter 2: Annual performance statements	27
Statement of preparation	28
Performance	29
Strategic priority 1: Excellence in service provision	33
Strategic priority 2: Engagement with our stakeholders	44
Strategic priority 3: Prevention and early intervention across our scheme	50
Strategic priority 4: Insight driven and risk and evidence-based practice	56
Strategic priority 5: Being adaptive and sustainable in the face of change	64

Chapter 3: Management and accountability	73
People	74
Work health and safety management and performance	79
Planning, governance and risk	82
Accountability	93
Financial performance	96
Premium scheme	97
Chapter 4: Financial statements	99
Chapter 5: Scheme and regulatory performance	159
Chapter 6: Appendices	169
Appendix A – Ecologically sustainable development and environmental performance	170
Appendix B – Compliance index	175
Part 2:	
Safety, Rehabilitation and Compensation Commission (SRCC)	
Annual Report 2023–24	181
About this report	182
Letter of Transmittal – SRCC	183
Chairperson’s review	184
About the SRCC	186
Operation of the SRCC	189
Stakeholder engagement	192
Regulatory performance	193
Operation of licensees	199
Operation of the Licence Compliance and Performance Model	202
Glossary and index	209
Glossary	210
Alphabetical index	216

Figures and tables

Figures

Figure 1: Comcare’s purpose and strategic priorities	11
Figure 2: Responsibilities under the Commonwealth legislation	13
Figure 3: Comcare scheme coverage under the SRC Act	17
Figure 4: Comcare scheme coverage under the WHS Act	18
Figure 5: Comcare’s organisational structure as of 30 June 2024	20
Figure 6: Comcare office locations	26
Figure 7: Comcare’s governance structure	85

Tables

Table 1: Acting Executive during 2023–24	25
Table 2: Results against our performance measures and targets	29
Table 3: All ongoing employees current report period (2023–24)	76
Table 4: All non-ongoing employees current report period (2023–24)	76
Table 5: All ongoing employees previous report period (2022–23)	77
Table 6: All non-ongoing employees previous report period (2022–23)	77
Table 7: Information about remuneration for key management personnel	78
Table 8: Comcare’s governance principles	83
Table 9: Comcare’s Audit and Risk Committee	91
Table 10: Comcare financial operating result	96
Table 11: Comcare historical funding ratio	97
Table 12: Comcare historical net premium liabilities	97
Table 13: Comcare scheme workers’ compensation data	160
Table 14: Claim disputation rates	162
Table 15: Notifiable work health and safety incidents – as the national regulator	163
Table 16: Notifiable incidents notified to Comcare under section 38 of the WHS Act	164
Table 17: Telecommunications Asbestos Safety Compliance program activities commenced	164
Table 18: Inspectorate activities commenced	165
Table 19: Notices issued under the WHS Act	165
Table 20: Other statutory reporting requirements under the WHS Act	165
Table 21: Comcare’s environmental performance over the last 5 financial years	172
Table 22: 2023–24 Greenhouse gas emissions inventory – location-based method	173
Table 23: 2023–24 Electricity greenhouse gas emissions	173
Table 24: List of requirements	174
Table 25: SRCC meeting attendance	189
Table 26: SRCC Operational Plan 2023–24	193
Table 27: Licence types, licensees and expiry dates – as at 30 June 2024	199
Table 28: Licensees’ claims activity	204
Table 29: Performance against LKPIs – All licensees	206
Table 30: Recordkeeping requirements under Directions	206

Comcare 2023–24 Snapshot

Purpose

Promote and enable safe and healthy work

Strategic priorities and performance results

Comcare achieved 26 of 27 targets against its 12 performance measures



Values



Data is for the period 1 July 2023 to 30 June 2024.

About these reports

The Comcare and Safety, Rehabilitation and Compensation Commission (SRCC) Annual Reports document the activities of Comcare and the SRCC, and the performance of the Comcare scheme from 1 July 2023 to 30 June 2024. The Comcare and SRCC Annual Reports are published together as the SRCC does not have staff or a budget of its own and is reported through Comcare's financial statements.

These annual reports have been prepared in accordance with the requirements of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) and the *Public Governance, Performance and Accountability Rule 2014* (PGPA Rule). They also comply with the annual reporting requirements of the *Work Health and Safety Act 2011* (Cth) (WHS Act), *Safety, Rehabilitation and Compensation Act 1988* (SRC Act), *Environment Protection and Biodiversity Conservation Act 1999* and the *Commonwealth Electoral Act 1918*.

Part 1 – Comcare Annual Report 2023–24

Chapter 1: About Comcare – Outlines Comcare's purpose, roles and responsibilities, governing legislation and organisational structure.

Chapter 2: Annual performance statements – Analyses Comcare's performance, including results against performance measures and targets in its Portfolio Budget Statements and Corporate Plan.

Chapter 3: Management and accountability – Summarises Comcare's workforce details, work health and safety performance, governance arrangements, and accountability.

Chapter 4: Financial statements – Provides detailed information on Comcare's financial performance for 2023–24.

Chapter 5: Scheme and regulatory performance
Provides data and information relating to Comcare's activities as a claims manager, scheme manager and regulator.

Chapter 6: Appendices – Various appendices that contain further information addressing mandatory reporting requirements and additional organisational performance information.

Part 2 – Safety, Rehabilitation and Compensation Commission Annual Report 2023–24

The SRCC Annual Report 2023–24 report details the objectives, roles, functions, membership and operations of the SRCC. It also provides details about the performance of the SRCC.

Part 1: Comcare Annual Report 2023–24



People

We employed **722** employees across **9** locations around Australia



Scheme coverage

Comcare's scheme comprised of **472,079** full-time equivalent (FTE) employees covered under the SRC Act, and **441,851** FTE under the WHS Act



Stakeholder satisfaction

Results from our employer surveys indicate

81% of employers agree that Comcare is a respected authority

78% agree that Comcare is an effective workplace health and safety regulator

63% of employers agree Comcare is effective in supporting employees to return to work (RTW), up 10 points since 2023

84% of employers are satisfied with Comcare's education and training provision

83% are satisfied with Comcare's webinars, events and forums



Workers' compensation

Claims incidence rates for the Scheme for 2023–24

14.2 incidence of claims received
(per 1000 FTE employees)

10.1 incidence of accepted claims
(per 1000 FTE employees)

6.2 incidence of serious claims
(one week or more of time lost)



Regulatory and prosecutions

1634 notifiable incidents notified to Comcare

1280 compliance and enforcement activities commenced
(252 provide information and advice | 1028 monitoring compliance activities)

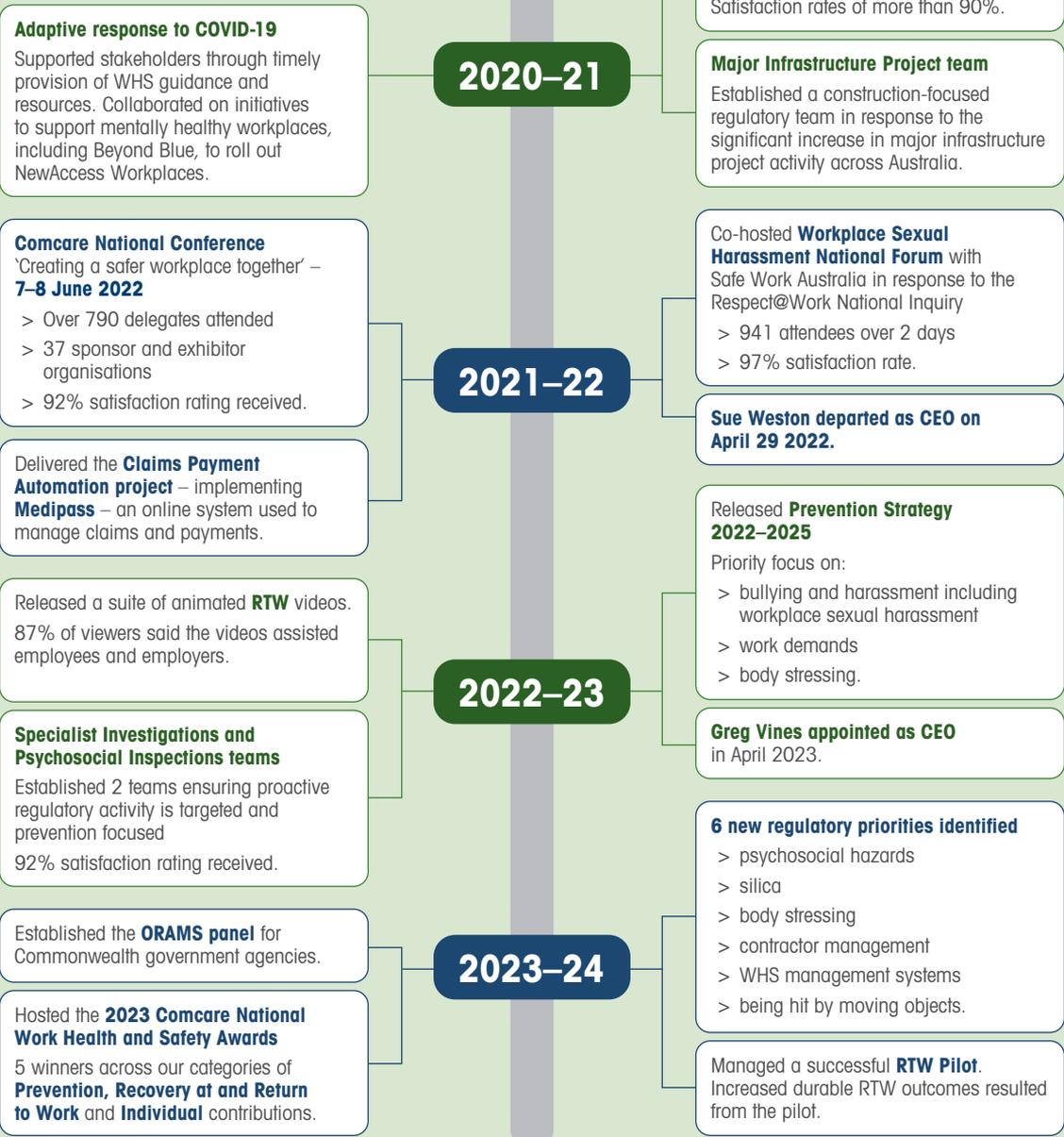
Commenced **4** criminal proceedings under the WHS Act

At 30 June 2024, **10** proceedings are continuing, and one set of proceedings has concluded during this period

Strategic priorities – What we've achieved

From July 1 2020 until June 30 2024, we have worked towards fulfilling the following 5 strategic priorities, under our organisational purpose to 'promote and enable safe and healthy work'.

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



We revisited the strategic priorities at the beginning of 2024 and they have been updated as a result. These priorities will remain in place until 2028.

CEO's year in review 2023–24



Greg Vines

Chief Executive Officer (CEO)

As the CEO and accountable authority of Comcare, I present Comcare's Annual Report to the Minister for Employment and Workplace Relations, Senator the Hon Murray Watt, and the Australian Parliament on the performance of Comcare for the year ended 30 June 2024.

I am pleased this annual report reflects Comcare's critical role and positive work over the last year in delivering on our purpose to promote and enable safe and healthy work.

This was also our final year delivering work against the 5 strategic priorities of excellence in service provision; engagement with our stakeholders; prevention and early intervention across our scheme; insight driven and risk and evidence-based practice; and being adaptive and sustainable in the face of change.

These priorities have served us well and their intent will remain embedded in the way we deliver services to our jurisdiction. Our refreshed priorities are to prevent work-related injuries and deliver better RTW outcomes. These are enabled by making data-driven decisions, uplifting leadership, effectiveness and efficiencies, and delivering client-centric services. This refocus of our efforts will address the key trends that will most likely impact Comcare, the Comcare scheme, and our stakeholders in the next 10 years:

- > change in the nature and volume of injuries and illnesses
- > shifts in patterns of ways of working, amplified by COVID-19
- > rapid advancements in technology including Generative Artificial Intelligence on the rise
- > increasing customer expectations on government and public service
- > increased fiscal and economic pressures.

It is important that we continue to foster a culture of shared responsibility and continuous improvement. To this end, we have added a foundational value to earn and strengthen trust internally and with our stakeholders. When employees, employers and safety professionals work together, they can identify hazards more effectively and develop comprehensive strategies to mitigate risks. It's a cooperative approach that ensures safety measures are practical and tailored to the needs of individual workplaces. Ultimately, collaboration for prevention and change not only protects workers – it fosters a positive organisational culture and improves productivity.

Developments in prevention, early intervention and claims management

Throughout the reporting period, we have continued to build on our focus of psychological safety and injury prevention across our program of work. This reflects recent important changes to work health and safety (WHS) laws and challenging shifts in the compensation landscape. We now have specific regulations in the Commonwealth jurisdiction that prescribe how psychosocial hazards must be identified and managed. The backdrop to this is a compensation environment of increasing numbers of psychological injury claims with poor RTW outcomes. These patterns are not unique to our scheme – every jurisdiction is grappling with these issues.

Comcare’s Pilot Proactive Psychosocial Inspection Program (the Pilot) concluded this year. There is understandably a lot of interest in psychosocial regulation, and we have worked hard to consider and develop our approach collaboratively with our stakeholders. Pleasingly, an independent evaluation of the Pilot found it was perceived as a positive experience by workers, PCBUs and other stakeholders. The Proactive Psychosocial Inspection Program is now an ongoing initiative, with enhancements implemented to maximise the program’s benefits across our jurisdiction.

Amendments to Commonwealth WHS laws that passed Parliament during this period are now in effect across our jurisdiction, containing important enhancements related to enforcement, inspector powers and investigations.

The *Fair Work Legislation Amendment (Closing Loopholes) Act 2023* (Closing Loopholes Act) received Royal Assent on 14 December 2023, adding the offence of industrial manslaughter to the WHS Act from 1 July 2024. The offence, a key recommendation of the 2018 review of the model WHS laws, carries significant penalties to deter and punish the worst offence causing workplace fatalities.

The passing of the Closing Loopholes Act has also brought important developments in compensation and claims management. We have worked throughout 2023–24 to implement presumptive liability provisions for first responders who live with the impact of Post-Traumatic Stress Disorder (PTSD) under the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act). The new provisions simplify access to compensation and cover the Australian Federal Police, ambulance officers, paramedics, emergency services communications operators, firefighters and members of the Australian Border Force and other persons engaged under the *Australian Capital Territory’s Emergencies Act 2004*. The list of employees covered can also be extended by the Minister.

Comcare remains committed to providing high quality, tailored and client-centric claims management services, that enhance health and RTW outcomes and client experience to all those in our scheme. Improving the timeliness of our claims management services continues to be a key area of focus, facilitating early access to appropriate entitlements and required supports. In the last year we reached 92% for initial liability determinations made in the target timeframe (up from 85% last financial year) and 87% for reconsideration decisions (up from 74%).

This year, we also released the Comcare Claims Litigation Strategy 2023–2026 with the aim of resolving disputes promptly and with integrity. We do this by making determinations accurately and quickly, guided by equity, good conscience and the substantial merits of the case without regard to technicalities. The Comcare Claims Litigation Strategy builds on the success of the previous strategy by continuing to improve governance, timeliness, and risk reduction, while acknowledging that Comcare’s litigation environment continues to evolve.

Engaging with our stakeholders

Positioning Comcare as a leading authority in work health and safety is something I consider very important. We remain focused on providing easy to use, reliable services that meet the needs of our clients and stakeholders.

Every year, we engage our scheme and ask them to share their attitudes, experiences and perceptions of us. They inform our Employer Satisfaction Survey, which is a useful tool we use to ensure we are meeting employers’ needs and delivering on our mission to improve workplace health and safety and support injured workers to recover at and return to work.

Overall, employer satisfaction with Comcare is at an all-time high, having increased by 6 points to 80%. Employer satisfaction with Comcare staff has also reached an all-time high of 81%. There were marked improvements in Comcare staff listening, providing clear responses, and keeping employers in the jurisdiction informed. Perceptions of Comcare’s effectiveness in supporting employees’ RTW have increased to 63%, a 10-point increase from 2023. We also achieved a 29% increase in satisfaction with our service ‘conducting proactive inspections by a WHS inspector’.

Employers acknowledged our recent efforts to improve engagement through proactive inspections and better explaining premium calculations and regulatory fees, with both areas up 17 points. Our education and learning offerings are in demand, with employers asking for more workplace health and safety, insurance and self-insurance guidance.

There are also areas for improvement, including providing more consistent, timely and high-quality information, increasing Comcare’s proactivity and facilitating more collaboration and networking opportunities. This feedback has been heard and we’ll be working to improve on these activities moving forward.

Comcare has an excellent team of educators and trainers that offer our jurisdiction training to help them ensure they follow best practice when creating safe work environments. It is pleasing that feedback on our events also highlight the opportunities to share best practice, hear the latest research, be challenged by presentations and build valuable networks. It’s through these events that we can share what works – and what doesn’t – and explore new ways to create safer, healthier and more productive workplaces.

Comcare's biennial Work Health and Safety Awards ceremony took place in November 2023. It recognises and rewards excellence in national workplace health and safety, and recovery at and RTW achievements by employers and individuals across the Comcare scheme. Award categories included prevention in physical and psychological harm, recovery at and return to work and leadership excellence.

Refer to the highlight story '*Comcare host National Work Health and Safety Awards*' later in this report for more details on the award winners and some pictures from the ceremony.

Setting up for success

In 2023, I initiated an Australian Public Service (APS) Capability Review to assess Comcare's current and desired capabilities. Being self-initiated, it was about understanding how to shape Comcare to be the best it can be. We followed a standardised framework from the Australian Public Service Commission (APSC) that looked at leadership and culture, collaboration, delivery, people, resourcing and risk.

I am proud of the strong collaborative relationships our stakeholders spoke of as part of this review. The findings revealed our stakeholders share a desire to see us continue to grow our reach and influence, and their continued support is important to help us get there.

Focusing on what drives excellence in service provision, we produced the new Comcare People Strategy 2028. It is Comcare's commitment to being a great place to work. It is focused on our greatest and most important asset – our people.

The People Strategy builds upon the work undertaken in the Internal Capability Review, the development of our refreshed strategic priorities, and the insights learned from our APS Census results. It details how to best position Comcare in navigating and responding to changes in the wider operating and work environment. We also published the Information Communication Technology (ICT) and Digital Strategy 2028 during this reporting period, which details the key benefits and outcomes that will shape our digital future and enhance our operational efficiency, through 5 key principles: client centric, stable, secure, adaptable and compliant.

This period saw all the APS engage in bargaining for new Enterprise Agreements. The bargaining included 2 parts; one which impacted all of APS and the other which was specific to each agency. I'm pleased that the new Comcare Enterprise Agreement 2024–2027, which was voted for (98% of eligible employees voted yes) in favour by our people, improved conditions for Comcare employees. No conditions or benefits were removed, and in fact the agreement has 19 new conditions and 19 improvements to current conditions.

Looking ahead

As work continues into the next period of 2024–25, Comcare will focus on delivering against its new priorities, ensuring we earn and strengthen trust along the way internally and with our stakeholders.

There is some important work to do in the next year, including advising on and responding to legislative review and change, and working with the APSC to deliver the 'Building safety and integrity capability across the APS' program as part of the Capability Reinvestment Fund. This program consists of 3 complementary projects focused on psychologically safe leadership behaviours and good work design.

My vision is that we continue to understand and build on our opportunities to connect, communicate and demonstrate the value we offer in promoting and enabling safe and healthy work. There is a shared commitment across Comcare to align to this purpose and to our 2 key priorities to prevent work-related injuries and deliver better RTW outcomes. We look forward to the next year working with all our partners and stakeholders to improve prevention of psychological injuries in particular, and increase our influence, appropriately sharing insights to more effectively drive positive change with and for employers and employees across our scheme.

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



Highlight

Comcare host National Work Health and Safety Awards

We hosted the National Work Health and Safety Awards, where every 2 years, we recognise and reward excellence in workplace health and safety.

The winners were announced on Thursday 9 November 2023 at the Boat House in Canberra.

It was a full house, with over 100 people attending including all finalists and some of their colleagues. The event was hosted by John Paul Janke, with presentations from Comcare CEO Greg Vines and APS Commissioner, Dr Gordon de Brouwer.

We received 39 nominations for the awards. The 2023 Judging panel had a high level of expertise and industry knowledge, comprising of Comcare General Managers, Comcare subject matter experts, and independent representatives.



Greg Vines – CEO



MC John Paul Janke



Engaged and socialising audience



*Award winner Jessica Bobbinmarsilio, Konekt
Category 3.B Individual Contribution – Operational Champion*



*Members of the Comcare Executive team surrounded by
award winners*

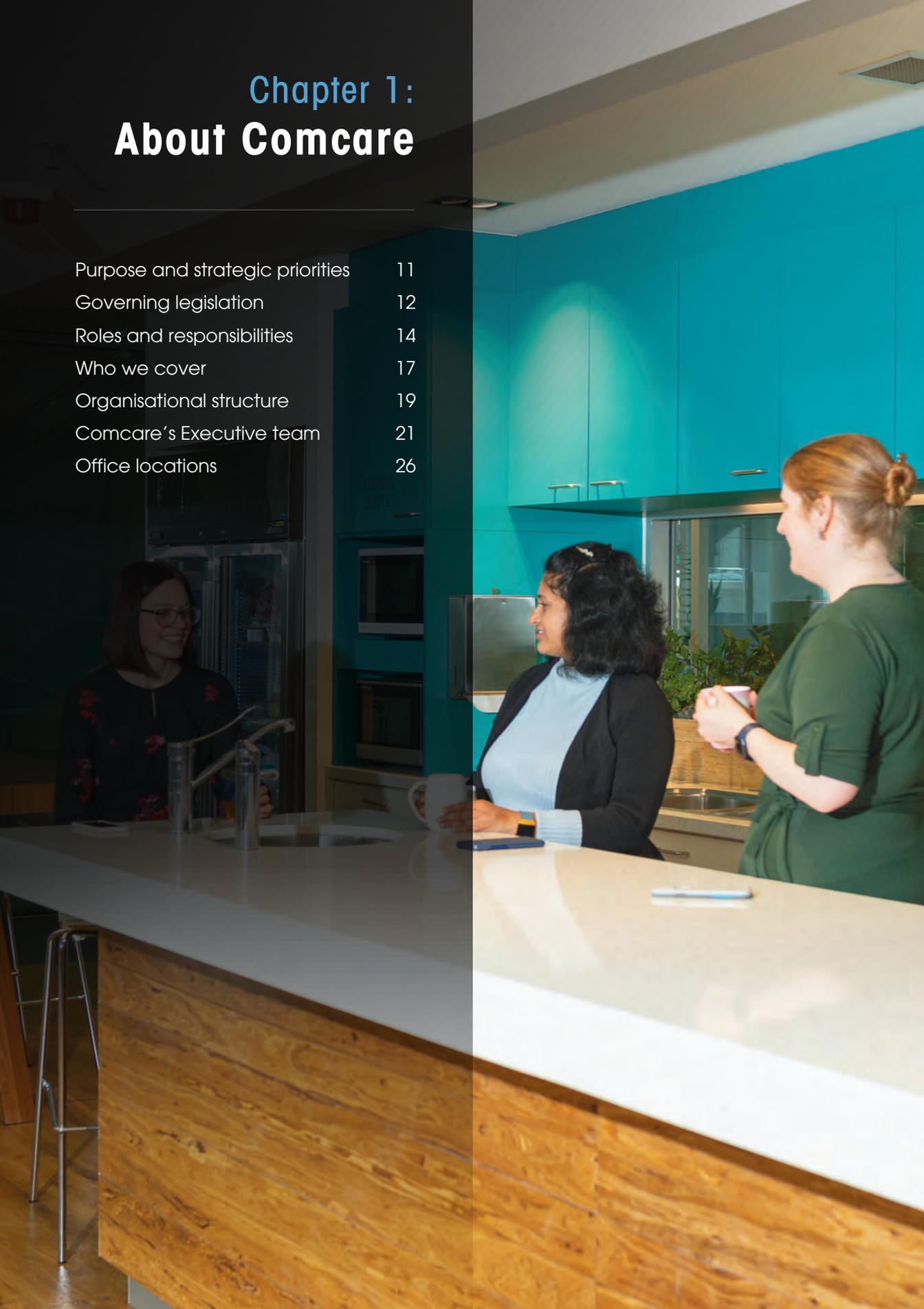
The award categories:

- > Category 1.A Preventing Psychological Harm
- > Category 1.B Preventing Physical Harm
- > Category 2 Recovery at and Return to Work
- > Category 3.A Individual Contribution Award Leadership Excellence
- > Category 3.B Individual Contribution Award Operational Champion

More information about the finalists and winners are on the Comcare [website](https://www.comcare.gov.au/about/news-events/events/whs-awards).
<https://www.comcare.gov.au/about/news-events/events/whs-awards>.

Chapter 1: About Comcare

Purpose and strategic priorities	11
Governing legislation	12
Roles and responsibilities	14
Who we cover	17
Organisational structure	19
Comcare's Executive team	21
Office locations	26



Purpose and strategic priorities

Comcare's purpose and outcome statement is to promote and enable safe and healthy work. This purpose unites Comcare's key functional activities and is supported by priorities that reflect our strategic intent across our diverse business.

Our 5 strategic priorities reflect that there are both connections and differences between the functions of Comcare that include prevention, early intervention, injury management, compensation and rehabilitation.

Figure 1: Comcare's purpose and strategic priorities



Governing legislation

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

The SRC Act also establishes the SRCC, which has powers in relation to the management of self-insured licensees operating under the SRC Act, other than those attributed to Comcare.

The *Seafarers Rehabilitation and Compensation Act 1992* (Seafarers Act) establishes the Seafarers Safety, Rehabilitation and Compensation Authority (Seacare Authority), which is responsible for overseeing the Seacare scheme.

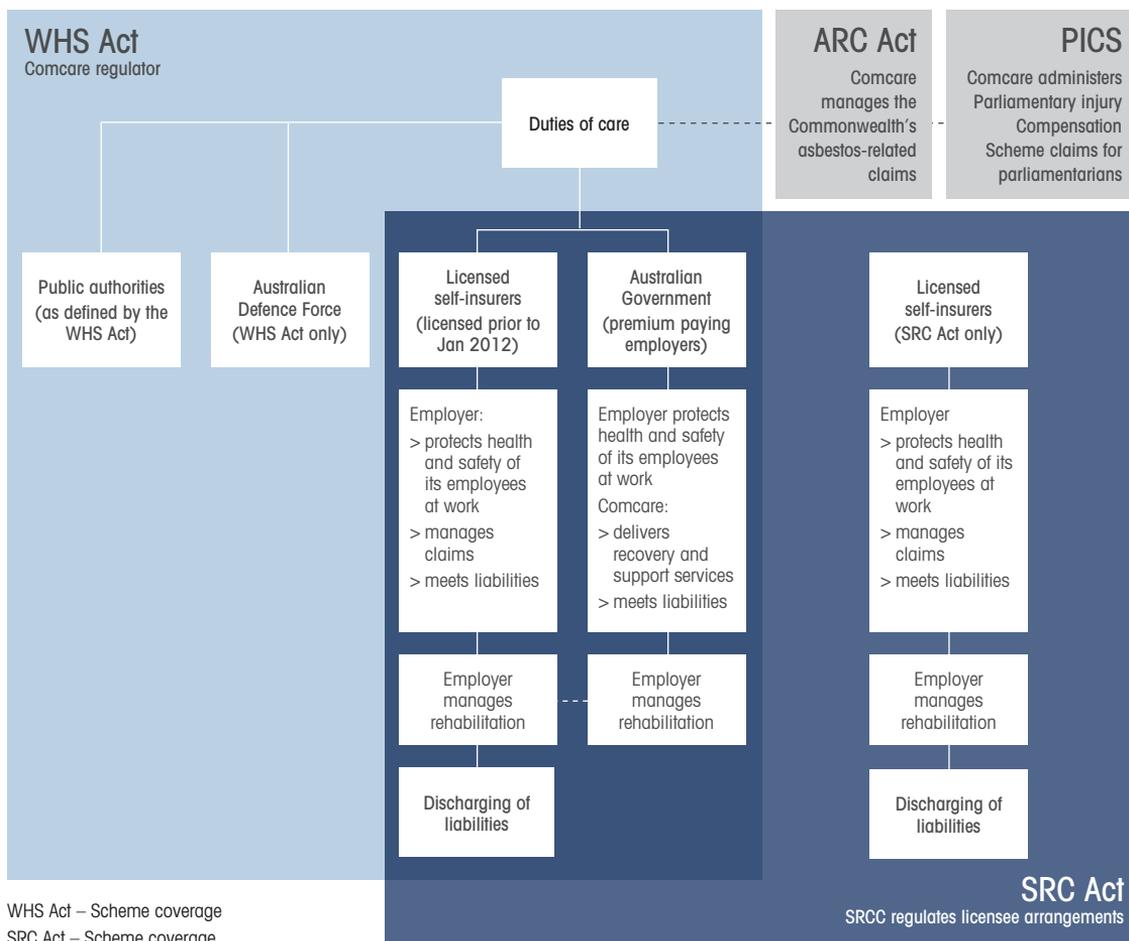
Comcare provides secretariat and other assistance to the SRCC and the Seacare Authority to perform their functions.

Comcare manages the Commonwealth's asbestos-related claims under the *Asbestos-related Claims (Management of Commonwealth Liabilities) Act 2005* (ARC Act). We also administer compensation claims for members of parliament and the Prime Minister's spouse under the Parliamentary Injury Compensation Scheme (PICS), which was established by the *Parliamentary Business Resources Act 2017*.

The *Public Governance, Performance and Accountability Act 2013* (PGPA Act) establishes a system of governance and accountability for public resources. Under the PGPA Act, Comcare is a corporate Commonwealth entity and is:

- > a body corporate
- > governed by an accountable authority
- > a separate legal personality from the Commonwealth
- > subject to the Commonwealth Procurement Rules under section 30 of the PGPA Rule.

Figure 2: Responsibilities under the Commonwealth legislation



at 30 June 2024

Roles and responsibilities

Comcare has several important roles. We are a work health and safety regulator, a scheme manager, a claims manager and an insurer. We also have essential enabling roles, supporting our workforce and driving engagement and better practice approaches to health and safety across our scheme.

Regulator role

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

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

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

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

Scheme manager role

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

- > sets clear expectations of roles and obligations
- > promotes better practice
- > creates effective early intervention and RTW practices and outcomes.

As scheme manager, we collate, curate and analyse 'whole-of-scheme' data, identifying trends to ensure we achieve sustainable and better practice arrangements. We support the SRCC to manage and monitor self-insured licensees.

We provide advice to the Minister on the operation and effectiveness of the SRC Act (along with advice on the administration of the WHS Act). We provide support through expert advice and services to the SRCC and the Seacare Authority. We approve and monitor workplace rehabilitation providers who operate in the scheme.

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

Insurer role

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

Claims manager role

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

The Seafarers Safety, Rehabilitation and Compensation Authority

The Seacare Authority is established under the Seafarers Act and is responsible for overseeing the Seacare scheme. The Seacare scheme is a national scheme of occupational health and safety (OHS)¹, workers' compensation and rehabilitation arrangements which apply to defined seafaring employees and – in the case of OHS – defined third parties.

The Seacare Authority is not a body corporate and does not employ its own staff. To enable it to perform its functions and exercise its powers, Comcare provides the Seacare Authority with secretariat support and other assistance. It also makes available the services of such members of its staff as the Seacare Authority reasonably requires (section 72A of the SRC Act).

On behalf of the Seacare Authority, Comcare:

- > provides secretariat, policy and strategic support to the Seacare Authority, and assistance in implementing its decisions
- > manages the annual appropriation for supporting the Seacare functions
- > monitors and reports on Seacare scheme performance
- > prepares an annual report
- > liaises and communicates with Seacare scheme stakeholders
- > promotes the objectives of the Seacare scheme, particularly the reduction of the human and financial costs of workplace injury in the Australian maritime industry.

The Safety, Rehabilitation and Compensation Commission

The SRCC administers functions under the SRC Act and WHS Act, other than those functions attributed to Comcare. For more information on its role and functions refer to Part 2 of this report – Safety, Rehabilitation and Compensation Commission Annual Report 2023–24.

The SRCC annual report is supplied in accordance with section 89S of the SRC Act.

¹ In accordance with the *Occupational Health and Safety (Maritime Industry) Act 1993*

Who we cover

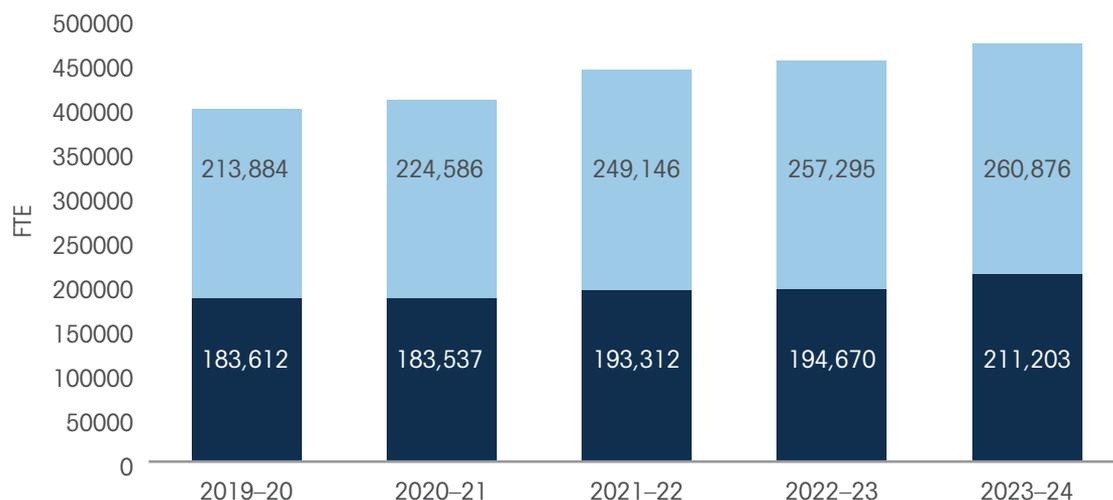
The Comcare scheme is diverse, covering a broad range of occupations and industries including government services, defence, law enforcement, transport, logistics, financial, banking services, manufacturing, construction, telecommunications, health services, higher education and postal services.

During the year, our programs and services were used by:

- > Australian Government agencies, Commonwealth authorities and their employees, and parliamentarians
- > national companies and other organisations licensed by the SRCC and their employees
- > members of the Australian Defence Force including reservists and cadets²
- > individuals making claims against the Commonwealth for asbestos-related conditions.

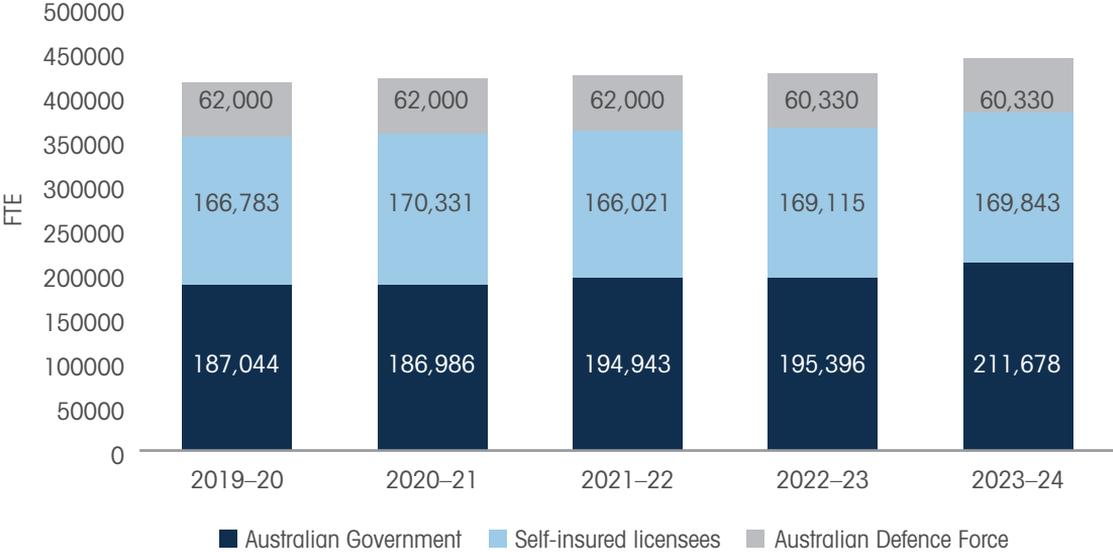
At 30 June 2024, Comcare’s scheme comprised of 472,079 full-time equivalent (FTE) employees covered under the SRC Act, and 441,851 FTE under the WHS Act. Figure 3 and Figure 4 represent the five-year trend of Comcare’s scheme coverage.

Figure 3: Comcare scheme coverage under the SRC Act



² Covered under the WHS Act only

Figure 4: Comcare scheme coverage under the WHS Act



Organisational structure

Comcare is an agency of the Department of Employment and Workplace Relations. In the reporting period, Comcare was part of the Employment and Workplace Relations Portfolio.

From 1 July 2023 to 28 July 2024, Comcare reported to the following Minister:

The Hon Tony Burke MP

Minister for Employment and Workplace Relations

Minister for the Arts

Leader of the House

From 29 July 2024, Comcare reports to the following Minister:

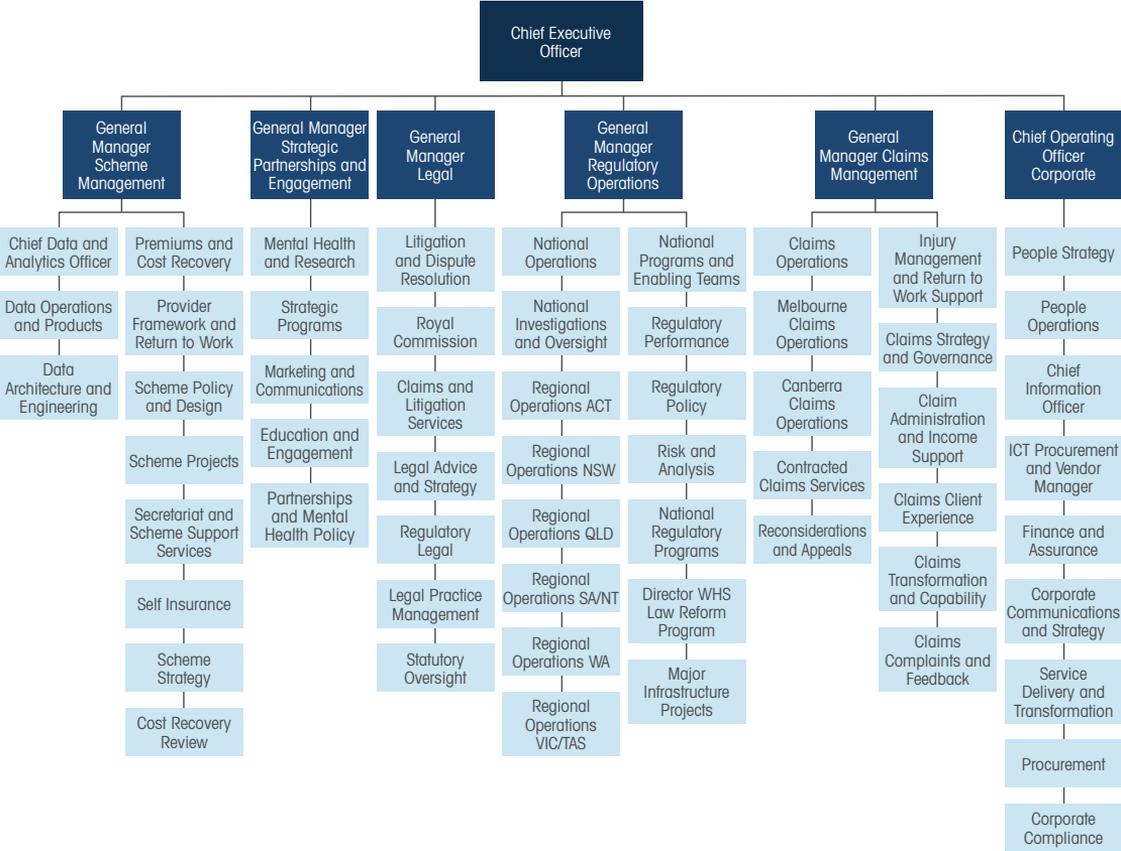
Senator the Hon Murray Watt

Minister for Employment and Workplace Relations

Comcare's CEO is Greg Vines. Comcare is organised into 6 Groups that report to the CEO. Figure 5 represents Comcare's organisational structure.

Comcare has established an Audit and Risk Committee (ARC) to provide independent assurance and assistance to Comcare's CEO on risk, the control and compliance framework, and external accountability responsibilities. The ARC does not have management functions or powers. It is directly responsible and accountable to Comcare's CEO for the exercise of its responsibilities.

Figure 5: Comcare’s organisational structure as of 30 June 2024



Comcare's Executive team



Greg Vines
CEO

Greg has been the Chief Executive Officer of Comcare since April 2023. Comcare serves as the Commonwealth's work health and safety regulator and workers' compensation authority, overseeing the public sector and major national companies. Under Greg's leadership, Comcare focuses on preventing work related injuries, and improving RTW outcomes for injured workers.

Greg is recognised as a respected leader and consensus builder, with extensive experience in labour relations, governance and strategic management in Australia and internationally.

Before joining Comcare, Greg spent 10 years as the Deputy Director-General of the International Labour Organization (ILO), based in Geneva. During this time, he was also a member of the United Nations High Level Committee of Management and spearheaded a transformative reform program that enhanced ILO's governance, laying a strong foundation for the organisation to more effectively collaborate with governments, employers and unions worldwide.

Greg's international experience also includes serving as Minister (Labour) with the Australian Permanent Mission to the United Nations, and as Chair of the Timor-Leste Civil Service Taskforce where he led the reform of public administration and establishment of the Civil Service Commission.

He has a proven track record in public service, having been the Tasmanian State Service Commissioner, Executive Director of Industrial Relations Victoria, and the inaugural Victorian Public Sector Standards Commissioner. Greg's career is also marked by leadership roles within trade union organisations.

He holds a Bachelor of Laws (Hons) from the University of Tasmania, a Bachelor of Business from Monash University, and has completed advanced leadership programs, including in International Labour Relations at Harvard University and the Executive Fellows Program at ANZSOG. He is also a Fellow of Monash University.



Michael Duke
General Manager Scheme Management Group
(Deputy Chief Executive Officer)

Michael joined Comcare in 2016 and was permanently appointed to the role of General Manager Scheme Management Group from 17 September 2020. Michael leads a range of functions covering workers' compensation policy design and guidance, rehabilitation, provider management, self-insurance, premium setting, data analysis and secretariat support for both the SRCC and the Seacare Authority. Michael has a broad range of public sector experience with 20 plus years' experience in the APS.

Michael holds a Graduate Diploma in Employee Relations and Human Resource Management and a Bachelor of Arts both from the University of Melbourne.



Leanne Blackley
Chief Operating Officer Corporate Group

Leanne joined Comcare on 9 May 2022 as Chief Operating Officer. With over 25 years' experience in the public sector, prior to joining Comcare, Leanne was Assistant Secretary in the Department of Foreign Affairs and Trade.

Leanne has held a variety of other senior executive roles across multiple agencies in the Australian government, delivering large transformation initiatives and driving corporate and central agency strategy and processes, including those related to human resources and finance functions. Leanne has also worked in a number of policy agencies and represented Australia in the Philippines and Indonesia with immigration.

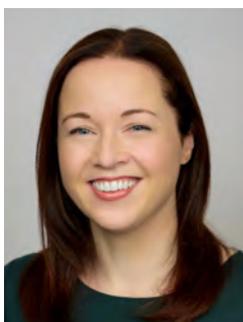
Leanne holds a Bachelor of Arts (First Class Honours) from the University of Wollongong and a Doctorate in History and Sociology from the Australian National University. She is a Certified Level 2 executive coach and a member of the Australian HR Institute, CPA Australia and Australian Institute of Company Directors graduate.



Megan Buick General Manager Strategic Partnerships and Engagement Group

Megan joined Comcare in January 2018 and was permanently appointed to the role of General Manager Strategic Partnerships and Engagement Group from 27 January 2022. Megan has a combined 25 years' experience in the health, aged care and workers' compensation sectors. Prior to working at Comcare, Megan worked in the Victorian health services as a registered nurse in the acute and aged care sectors, in a research capacity in the acute care sector and academia and was the Acting CEO of a Division of General Practice (now the Primary Health Networks) in the primary care sector.

Megan is a passionate leader and manager, investing in and understanding the capabilities and strengths of colleagues to drive organisational outcomes and results. Megan holds post graduate qualifications in Health Services Management and a Bachelor of Applied Science (Nursing).



Louise Close General Manager Legal Group

Louise joined Comcare in 2017 and was permanently appointed to the role of General Manager Legal Group in May 2023. Louise is responsible for the leadership and oversight of Comcare's Legal Group, and for the delivery of all legal services to Comcare and the management of legal, strategic, and operational risk.

Louise has over 15 years' experience as a lawyer specialising in regulatory compliance and enforcement with a focus on work health and safety law, and a broad range of legal experience in administrative law, workers' compensation, statutory compliance, civil and criminal litigation, and the conduct and management of external reviews and inquiries.

Louise holds a Bachelor of Laws (Honours) and a Bachelor of Arts (Honours) from the University of Melbourne and is admitted to practice as an Australian legal practitioner.



Justin Napier General Manager Regulatory Operations Group

Justin joined Comcare in June 2015. He has oversight of Comcare's inspectorate function, regulatory policy, WHS authorisations, WHS helpdesk and regulatory intelligence functions, and the WHS Model Law Reform Program. Prior to joining Comcare, Justin was General Manager Corporate and Operations at the Australian Skills Quality Authority and an Executive member of the Establishment Taskforce responsible for implementation of the Fair Work Act, including the establishment of Fair Work Australia and the Fair Work Ombudsman.

Justin holds a Graduate Diploma in Business Administration, a Bachelor of Arts, is an alumnus of the Kennedy School of Government at Harvard University and is a Member of the Australian Institute of Company Directors.



Lachlan Vivian-Taylor General Manager Claims Management Group

Lachlan Vivian-Taylor commenced at Comcare on 7 December 2023. He is a seasoned, visionary leader with a passion for people and innovation. He has over 20 years of professional experience, spanning across various sectors and domains, such as public administration, health, insurance, and disability. He has also served as a non-executive director, demonstrating his strategic and governance skills.

As the General Manager of the Claims Management Group at Comcare, Lachlan oversees the delivery of high-quality services and outcomes for clients and stakeholders. He leverages his extensive knowledge and expertise in claims management and personal injury to ensure that Comcare fulfils its purpose to enable safe and health work. He also fosters a culture of creativity and collaboration within his team, empowering them to achieve excellence and innovation.

Lachlan holds an Honours degree in Physiotherapy and a Master of Business. He is also a graduate of the Australian Institute of Company Directors.

Acting Executive during 2023–24

Table 1: Acting Executive during 2023–24

Role	Name	Dates
Chief Executive Officer	Michael Duke	17 November 2023 – 26 November 2023
	Michael Duke	24 June 2024 – 28 June 2024
General Manager Claims Management Group	Chloë Eaton	6 February 2023 – 6 December 2023
	Sarah Donohoe	25 September 2023 – 29 September 2023
	Georgina Mckenzie	17 October 2023 – 20 October 2023
	Sarah Donohoe	9 November 2023 – 10 November 2023
Chief Operating Officer Corporate Group	Sarah Donohoe	20 November 2023 – 6 December 2023
	Penelope Schweicker	18 September 2023 – 21 September 2023
	Seyhan Aka	5 October 2023 – 13 October 2023
	Leaha Brown	13 November 2023 – 13 November 2023
	Leaha Brown	1 December 2023 – 1 December 2023
	Leaha Brown	4 December 2023 – 4 December 2023
	Dilpreet Grewal	20 December 2023 – 22 December 2023
Dilpreet Grewal	2 January 2024 – 5 January 2024	
General Manager Legal Group	Yvette Adeney	12 March 2024 – 18 March 2024
	Tilesha Cox	11 September 2023 – 15 September 2023
	Tilesha Cox	2 January 2024 – 12 January 2024
General Manager Regulatory Operations Group	Tilesha Cox	22 April 2024 – 3 May 2024
	Beverley Smith	8 September 2023 – 2 October 2023
	Kellie Heran	15 January 2024 – 26 January 2024
General Manager Scheme Management Group	Gregory Webb	17 November 2023 – 26 November 2023
	Gregory Webb	15 January 2024 – 2 February 2024
	Gregory Webb	24 June 2024 – 28 June 2024
General Manager Strategic Partnerships and Engagement Group	Ngairé Anderson	17 August 2023 – 22 August 2023
	Martin Horrocks	25 January 2024 – 20 February 2024

Office locations

Figure 6: Comcare office locations



Chapter 2: Annual performance statements

Statement of preparation	28
Performance	29
Strategic priority 1: Excellence in service provision	33
Strategic priority 2: Engagement with our stakeholders	44
Strategic priority 3: Prevention and early intervention across our scheme	50
Strategic priority 4: Insight driven and risk and evidence-based practice	56
Strategic priority 5: Being adaptive and sustainable in the face of change	64

Statement of preparation

I, Greg Vines, as the Chief Executive Officer and accountable authority of Comcare, present the 2023–24 annual performance statements of Comcare, as required under paragraph 39(1)(a) of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act).

Our annual performance statements provide an analysis of what has been delivered under each strategic priority based on the key activities in our Corporate Plan and detail the results for our performance measures and targets in our 2023–24 Portfolio Budget Statements and Corporate Plan.

In my opinion, these annual performance statements are based on properly maintained records that accurately reflect the performance of Comcare and comply with subsection 39(2) of the PGPA Act and section 16F of the *Public Governance, Performance and Accountability Rule 2014*.

A handwritten signature in black ink, appearing to be 'G. Vines', with a small dot at the end of the signature.

Greg Vines
Chief Executive Officer
13 September 2024

Performance

Comcare’s efforts are driven by our purpose and outcome statement – to promote and enable safe and healthy work. The performance results in this chapter convey how Comcare measures our success against our 5 strategic priorities based on our key activities and performance measures and targets. We are committed to improving our performance and set ambitious targets to achieve our purpose.

We achieved 26 of the 27 targets against the 12 performance measures that we set for 2023–24. Table 2 provides a summary of results against our performance measures. The remaining chapter provides analysis against our key activities and performance measure targets, including the actions we will take to address those targets that were not achieved.

Table 2: Results against our performance measures and targets

The Performance Measures can be found in both the **Comcare Corporate Plan 2023–24** and the **Comcare, SRCC and Seacare Authority Portfolio Budget Statement 2023–24**.

Performance Measure/Target	Status	Result
Strategic Priority 1: Excellence in service provision		
Performance Measure 1.1: We provide quality services to all our stakeholders		
1.1.1 Stakeholder satisfaction rating of 85% or more	Achieved	85%
1.1.2 85% or more evaluated entities report improved WHS outcomes as a result of Comcare’s regulatory activities	Not achieved	73%
1.1.3 100% of activities are delivered within statutory timeframes, where applicable	Achieved	100%
1.1.4 SRCC satisfaction of support provided by Comcare	Achieved	91%
1.1.5 Seacare Authority satisfaction of support provided by Comcare	Achieved	96%
Performance Measure 1.2: We consistently manage Commonwealth asbestos-related disease claims with more equitable and efficient outcomes		
1.2.1 95% of resolution payments made within 10 days of receipt of relevant information	Achieved	98%
1.2.2 Asbestos-related disease common law settlements are monitored to ensure consistency and equity	Achieved	–

Performance Measure/Target		Status	Result
Performance Measure 1.3: We build and embed better regulatory practice into our work health and safety and regulatory activities			
1.3.1	Our interactions with regulated entities and other stakeholders are open, transparent and consistent	Achieved	–
1.3.2	We ensure that regulatory activities are conducted in accordance with endorsed policies and procedures	Achieved	–
Strategic Priority 2: Engagement with our stakeholders			
Performance Measure 2.1: Our Administrative Appeals Tribunal (AAT) litigation program resolves disputes promptly and with integrity			
2.1.1	Proportion of AAT litigation with a successful outcome is 70% or greater	Achieved	75%
2.1.2	65% of Comcare AAT litigation matters are progressed to hearing or finalised within 12 months for Comcare managed claims	Achieved	78%
Performance Measure 2.2: We deliver contemporary education and engagement services that promote and enable safe and healthy work			
2.2.1	80% of attendees have their engagement, training and education needs met	Achieved	92%
2.2.2	Annual increase in employer and customer reach, engagement and change in behaviour with Comcare’s education services and communication channels	Achieved	–
Strategic Priority 3: Prevention and early intervention across our scheme			
Performance Measure 3.1: We design and deliver innovative and prevention focused initiatives that promote and enable safe and healthy work			
3.1.1	Comcare delivers appropriate early intervention programs across the jurisdiction	Achieved	–
Performance Measure 3.2: Our proactive regulatory activity is targeted and prevention focused			
3.2.1	Targeted and prevention focused compliance and enforcement activities are delivered on Comcare’s Regulatory Priorities	Achieved	–

Performance Measure/Target	Status	Result	
Strategic Priority 4: Insight driven and risk and evidence-based practice			
Performance Measure 4.1: We drive national work health and safety compliance using a targeted, risk-based approach			
4.1.1	100% of incident notifications involving the death of a person result in a monitoring compliance activity	Achieved	100%
4.1.2	Comcare undertakes a follow-up verification inspection in 95% of instances where an inspection has identified remedial actions to be undertaken to eliminate or minimise, as far as reasonably practicable, the risk of future incidents occurring	Achieved	100%
Performance Measure 4.2: We undertake strategic and collaborative initiatives to promote and enable safe and healthy work			
4.2.1	Strategic and collaborative initiatives deliver evidence-based insights and/or better practice	Achieved	–
Performance Measure 4.3: Our scheme identifies and adopts better practices which enable and promote safe and healthy work			
4.3.1	Through engagement with our stakeholders and utilising an evidence-based approach, better practice initiatives are identified, our advice is adopted and is assessed as enabling safe and healthy work	Achieved	–
Strategic Priority 5: Being adaptive and sustainable in the face of change			
Performance Measure 5.1: Our scheme is sustainable as evidenced through outcomes achieved by scheme participants (including financial and return to work outcomes)			
5.1.1	Target administrative cost ratio 15 to 25%	Achieved	23.5%
5.1.2	Average Commonwealth premium rate = 1% of payroll or lower	Achieved	0.84%
5.1.3	Minimum funding ratio of 110%	Achieved	112%
5.1.4	Comcare scheme return to work rate of 85 to 95% for accepted claims initially determined within the previous 24 months	Achieved	89%
5.1.5	Comcare scheme notional premium rate = 0.90% or lower	Achieved	0.79%

Performance Measure/Target		Status	Result
Performance Measure 5.2: Our workforce is engaged, capable and supported in their mental health and wellbeing			
5.2.1	Comcare's employee engagement rating at the organisational level exceeds 70%	Achieved	76%
5.2.2	Comcare's wellbeing rating at the organisational level meets or exceeds 75%	Achieved	78%
5.2.3	75% of Executive level employees consider that their workgroup has the appropriate skills, capabilities and knowledge to perform well	Achieved	84%

Strategic priority 1: Excellence in service provision



Analysis of performance against our key activities

Delivering projects to improve claims management outcomes and performance, including trialing new evidence-based approaches for managing claims for complex psychological injury

Claim Management Operating Model

Comcare implemented an updated Operating Model for claim management, focused on improving claim outcomes for those in our scheme. The revised model has delivered improved service quality, capability and client experience. The improvements can be attributed to the alignment of the future state aspiration to Comcare's strategic objectives, as well as defining roles and responsibilities to effectively manage claims, outlining how we best work together as a multi-disciplinary team to achieve outcomes. We continue to focus on improving the timeliness of our claims management services, facilitating early access to appropriate entitlements and supports to improve outcomes for employees with physical and psychological injuries. This year, we achieved 92% for initial liability determinations made in the target timeframe, increasing from the 2022–23 reported total of 85%, and the highest result achieved in the last 5 financial years. Timeliness of reconsideration decisions has also seen strong improvements with 87% decisions made in the target timeframe, compared to the 74% reported in 2022–23.

PTSD changes

On 15 December 2023, legislative changes came into effect introducing presumptive liability provisions that streamline workers' compensation claims process for first responders who suffer from PTSD.

To support the implementation of the changes, Comcare has undertaken several actions, including:

- > publishing scheme guidance on the changes (developed in consultation with key stakeholders) on the Comcare website
- > holding workshops in December 2023 and January 2024 for employers of first responders in the scheme, as well as claims managers, to discuss the intent and application of the changes
- > made modifications to the claims management system requirements to enable capture and reporting of applications that fall under these provisions
- > providing ongoing advice and support to stakeholders via Comcare's Scheme Policy and Design Helpdesk.

Decision making timeframes

On 1 April 2024, amendments to the Safety, Rehabilitation and Compensation Regulations 2019 came into effect and prescribe timeframes for decision making under the SRC Act in relation to initial claims for workers' compensation made under section 14 of the SRC Act and for reconsiderations of determinations following a request made by a claimant under section 38 or 62 of the SRC Act.

To support implementation of these changes, Comcare has undertaken several actions, including:

- > providing updated information on the Comcare website about the amendments
- > informing key stakeholders across the Comcare scheme about the changes
- > providing information and the opportunity to ask questions at Comcare's Claims Manager Forum and the Licensee Liaison Forum
- > following consultation, publishing scheme guidance on the 'Statutory Timeframes for Decision-making under the SRC Act' on the Comcare website
- > providing ongoing advice and support to stakeholders via Comcare's Scheme Policy and Design Helpdesk.

Return to Work Brokerage service

In partnership with Employers Mutual Limited (EML), Comcare offered the Return to Work (RTW) Brokerage service from July 2023 to June 2024 based on the initial success of the RTW pilot. The service was designed to improve RTW outcomes for injured employees with primary or secondary psychological injury and longer-term injured employees, building on the pilot's success. The brokerage service continued whilst the independent evaluation of the pilot was being finalised.

The final evaluation report prepared by Taylor Fry and Monash University outlined strong and statistically significant evidence that this program had a positive effect on RTW outcomes for participants in the Comcare scheme. The proportion of participants who achieved a RTW outcome within 6 months of program commencement, was 247% more than that of non-participants, which indicated program attendance had a strong effect on RTW outcomes.

The RTW Brokerage service continued the focus on job readiness, career coaching, recovery and return to 'good work' or help with career development, for employees in the Comcare scheme. Momentum continued during this time with even more participants returning to meaningful work because of their engagement in a tailored program.

This service is now titled the 'Career Transition Program' and is available for employers in the Comcare scheme to use.

Investing in a new claims management solution that supports high quality, client-centric claims management, improved client experience, and health and RTW outcomes

We have been developing a program called the Service Transformation and Enablement Program (STEP). This program will realise benefits aligned with our refreshed strategic priorities. At a high level, it will provide:

- > improved RTW outcomes
- > improved client experience through service quality and the capacity for self-service
- > access to meaningful insights from data that will support both our strategic decisions and day-to-day operations
- > greater technological assurance and agility.

Undertaking targeted work health and safety regulatory activities to assist duty holders to understand their duties and obligations under the WHS Act

Comcare's proactive framework aims to support PCBUs to meet their duties and obligations under the WHS Act. The key objectives are to:

- > ensure PCBUs have fundamental WHS systems or arrangements in place
- > enable PCBUs and the broader jurisdiction to adapt in an effective and timely manner to significant changes in the WHS environment, including legislative changes
- > reduce harm in the jurisdiction, by targeting significant causes of harm.

A four-year proactive program of work targeting WHS Management Systems commenced in 2023–24 with phase one focused on Incident Management Systems. Over 200 inspections were conducted across the jurisdiction to examine whether PCBUs had implemented compliant incident management systems/arrangements. Throughout these engagements, our inspectors worked with PCBUs to identify gaps in processes and discuss better practice.

We believe a significant factor of the 29% increase in respondents reporting satisfaction with Comcare's service 'conducting proactive inspections by a WHS inspector' was due to the proactive Incident Management Systems inspection program.

Supporting the SRCC and Seacare Authority in the delivery of their respective functions, including supporting the implementation of any Ministerial directions and/or changes proposed by government

Comcare enabled the SRCC to meet its legislative functions by providing high quality secretariat services and supporting it with:

- > analysing its approach to assessing self-insurance licence applications, following amendment to the Safety, Rehabilitation and Compensation Directions 2019 through the Safety, Rehabilitation and Compensation Directions Amendment Instrument 2023. This included communicating the changes and requirements to licence applicants
- > the ongoing review of its regulatory model, including development of guidance advising licensees of the SRCC's reporting expectations where it has a significant change to its risk profile through a corporate restructure or other mechanism.

Comcare enabled the Seacare Authority to meet its legislative function by providing high quality secretariat services and supporting it with:

- > managing the scheme and the Seacare Safety Net Fund through significant changes in the insurance market
- > undertaking a review of the Seacare Authority Exemption Guidelines and providing recommendations to assist it to comply with the Seafarers Rehabilitation and Compensation Directions 2023.

Highlight

2024 Employer Survey

In 2024, Comcare continued to survey employers to examine their satisfaction with Comcare services. The survey was distributed to Chief Operating Officers within Comcare's employers and was open between 4 March and 2 April 2024.

Overall satisfaction with Comcare increased 6 points from 2023, now at 80%. Dissatisfaction also dipped slightly, reducing by 5%. These positive results can most likely be attributed to a stronger focus on clear and timely communication, an emphasis on collaboration and an improved customer service.

Amongst the improvements, some opportunities were also identified. They include:

- > increasing communication with quicker and more tailored information particularly relating to injury and claims management
- > being more proactive with support and communications relating to complex claims, support for new agencies and help with specific challenges
- > Comcare staff continuing to educate themselves on specific industry organisation and challenges to ensure views are balanced, transparent and evidence based.

A general finding was that improving satisfaction with staff and information are key to increasing overall satisfaction and many of the satisfied respondents mentioned positive staff attributes and the quality of the information and guidance they provide.

Strategic priority 1: Excellence in service provision



Performance measure results

Performance Measure 1.1: We provide quality services to all our stakeholders

Target	Result
1.1.1 Stakeholder satisfaction rating of 85% or more Methodology/Source: Assessment of results of Comcare’s Annual Employer Survey, the National Return to Work Survey, Safe Work Month event evaluations and Comcare National Conference event evaluation.	Achieved – 85%

Result analysis

Comcare’s average stakeholder satisfaction rating was 85%. This average is comprised of major scheme employer and employee surveys as well as significant events delivered for broader stakeholders.

- > 2024 Comcare Employer Survey – Overall satisfaction: 80%, response rate: 47%.
- > 2023 Safe Work Month Events – Overall satisfaction: 93%, response rate: 16%.
- > 2022 National Conference – Overall satisfaction: 92%, response rate: 28%*.
- > 2021 National RTW Survey – Overall satisfaction: 74%, response rate: 58%*.

These results highlight where Comcare is performing well for employer stakeholders:

- > 81% of employers agree that Comcare is a respected authority and 78% agree that Comcare is an effective workplace health and safety regulator.
- > 63% of employers agree Comcare is effective in supporting employees return to work, up 10 points since 2023.
- > 84% of employers are satisfied with Comcare’s education and training provision; and 83% are satisfied with Comcare’s webinars, events and forums.

* These measures are carried over from the previous year as per an agreed methodology to reflect the most recent outcome.

Previous results

2022–23: Achieved – 85% stakeholder satisfaction

2021–22: Not achieved – 84% stakeholder satisfaction

2020–21: Not achieved – 74% (employers), employee result not available

2019–20: Not achieved – 76% (employers), employee result not available

Performance Measure 1.1: We provide quality services to all our stakeholders

Target	Result
1.1.2 85% or more evaluated entities report improved work health and safety outcomes as a result of Comcare's regulatory activities Methodology/source: Assessment of results from Comcare's annual evaluation of its regulatory services.	Not achieved – 73%

Result analysis

The Regulatory Operations Group's (ROG) evaluation survey responses showed 73% of evaluated entities (response rate 26%) reported improved work health and safety outcomes as a result of Comcare's regulatory activities. This result was below the target of 85%.

The survey response rates for the last 2 years were lower than expected. As such, the approach for 2024–25 has been revised.

Previous results

2022–23: Not achieved – 73% (target, 85% or more)

2021–22: Achieved – 89% (target, 85% or more)

2020–21: Achieved – 88% (target, 85% or more)

2019–20: Achieved – 85% (target, 85% or more)

Target	Result
1.1.3 100% of activities are delivered within statutory timeframes, where applicable Methodology/source: Actual performance against timeframes specified in the WHS legislation.	Achieved – 100%

Result analysis

100% of authorisations and review activities were delivered within statutory timeframes.

> Comcare received and processed 6095 plant item registrations in 2023–24. 100% were processed within 120 days as per the requirements of the WHS Regulations.

> Comcare received and processed 1703 high risk work licence applications in 2023–24. 100% were processed within 120 days as per the requirements of the WHS Regulations.

> Comcare received one request for internal review in 2023–24, which was conducted in accordance with timeframes specified in the WHS Regulations.

100% of prosecutions were commenced within statutory limitation periods.

Previous results

2022–23: Achieved – 100%

2021–22: Achieved – 100%

2020–21: Achieved – 100%

2019–20: Achieved – 100%

Performance Measure 1.1: We provide quality services to all our stakeholders

Target	Result
1.1.4 SRCC satisfaction with support provided by Comcare Methodology/source: Achievements against activities outlined in the Statement of Services, meeting protocols and procedures, assessed using a stakeholder satisfaction survey or other process.	Achieved – 91%

Result analysis

Service level measures are set through the SRCC meeting protocols and statement of services provided by Comcare and the SRCC. Service levels for the support Comcare provides to the SRCC were achieved 91% of the time.

Previous results

2022–23: Achieved
2021–22: Achieved
2020–21: Achieved
2019–20: Achieved

Target	Result
1.1.5 Seacare Authority satisfaction of support provided by Comcare Methodology/source: Achievements against activities outlined in the Statement of Services, meeting protocols and procedures, assessed using a stakeholder satisfaction survey or other process.	Achieved – 96%

Result analysis

The satisfaction rating is calculated by reference to the service level measures set through the Seacare Authority Meeting Procedures and Protocols. Service levels for the support Comcare provides to the Seacare Authority were achieved 96% of the time.

The improvement over the 2022–23 result reflects the outcomes of a better internal alignment of the Secretariat and Seacare Scheme program functions within Comcare. This has enabled the program function to focus on the significant workload resulting from the high priority scheme viability issues and urgent matters without impacting the Secretariat related services provided to the Seacare Authority.

Previous results

2022–23: Not achieved
2021–22: Achieved
2020–21: Achieved
2019–20: Achieved

Performance Measure 1.2: We consistently manage Commonwealth asbestos-related disease claims with more equitable and efficient outcomes

Target	Result
1.2.1 95% of resolution payments are made within 10 days of receipt of relevant information Methodology/source: Actual performance against date documents received post settlement to date of payment.	Achieved – 98%

Result analysis

98% (40 out of 41) of resolution payments were made within 10 days of receipt of relevant information. One payment was made on day 11.

Previous results

2022–23: Achieved

2021–22: Not achieved – 91% (target 95%)

2020–21: Achieved – 98% (target, 95%)

Not reported prior to 2020–21

Target	Result
1.2.2 Asbestos-related disease common law settlements are monitored to ensure consistency and equity Methodology/source: Annual internal review of asbestos-disease common law settlements against settlement outcomes from previous years.	Achieved

Result analysis

In line with the original purpose of the *Asbestos-related Claims (Management of Commonwealth Liabilities) Act 2005* (ARC Act), Comcare monitors the consistency and equity of settlements.

Comcare resolved 39 Primary ARC Act claims in 2023–24.

Comcare has an obligation under the Legal Services Directions 2017 to act as a model litigant and manage claims and litigation consistently. Asbestos-related disease common law settlements are determined in accordance with legal precedent. The quantum of settlements is guided by reference to decisions of the various Australian courts and tribunals in which asbestos-related disease claims are made. The quantum of each settlement is reviewed internally for consistency with recent decisions, and in most cases is initially recommended by an external legal service provider with special expertise in asbestos-related disease claims and experience in the various Australian court or tribunal in which the claim has been made.

Previous results

2022–23: Achieved

2021–22: Achieved

2020–21: Achieved

Not reported prior to 2020–21

Performance Measure 1.3: We build and embed better regulatory practice into our work health and safety regulatory activities

This measure aligns to the principles of regulator best practice: Continuous improvement and building trust, risk based and data driven and collaboration and engagement.

Target

Result

1.3.1 Our interactions with regulated entities and other stakeholders are open, transparent and consistent

Achieved

Methodology/source: Work health and safety priorities are developed, published and implemented, and forums and webinars are delivered to regulated entities with a focus on their obligations under the WHS legislation.

Result analysis

Comcare continued to interact with regulated entities and other stakeholders in an open, transparent, and consistent manner.

Comcare's Compliance and Enforcement Policy is published on our website and specifies our approach to our regulatory functions and powers under the WHS Act and SRC Act. Specifically, it details our approach on matters such as:

- > the nature of duties and obligations of regulated entities
- > the decision-making process for authorisations and approvals
- > specific compliance tools and how we decide when to use them.

Regulatory decisions are made in accordance with the policy to ensure that our compliance and enforcement activities are consistent, constructive, transparent, accountable, proportionate, responsive, and targeted.

Comcare's ROG has dedicated psychosocial, major infrastructure, asbestos, and investigations teams to focus its regulatory efforts in areas that require a more complex or specialist approach using consistent principles.

Comcare provides a range of guidance and resources to support employers and workers with maintaining healthy and safe workplaces and offers a range of WHS learning courses for PCBUs, managers, supervisors and workers through our learning management system.

Previous results

2022–23: Achieved

2021–22: Achieved

Not reported prior to 2021–22

Performance Measure 1.3: We build and embed better regulatory practice into our work health and safety regulatory activities

Target	Result
<p>1.3.2 We ensure that regulatory activities are conducted in accordance with endorsed policies and procedures</p> <p>Methodology/source: Assessment of results of Comcare’s internal assurance program against regulatory activities.</p>	<p>Achieved</p>

Result analysis

ROG conducted assurance activities in accordance with its 2023–24 Assurance Program. Activities included a review of inspector appointments, a review of inspection timeliness, and an assessment of conformance with business processes. These assurance activities are initiated and conducted internally. Where findings or observations support changes, any endorsed recommendations for improvement are assigned, and implementation is tracked.

Exception reporting on regulatory systems is regularly completed to ensure that activities are conducted and recorded in accordance with endorsed policies and procedures. Exception reporting parameters are updated regularly to align with changes to business processes.

Previous results

2022–23: Achieved

2021–22: Achieved

Not reported prior to 2021–22

Strategic priority 2: Engagement with our stakeholders



Analysis of performance against our key activities

Engaging with employers and other scheme participants about our services and research using targeted communication channels to ensure suitability, uptake, and impact

As part of an ongoing commitment to engage effectively with employers and scheme participants, Comcare's stakeholder engagement strategy and program includes a diverse range of activities, events, webinars and forums. Designed to foster meaningful interactions, increase knowledge and share better practice approaches, this year's engagement program included webinars on topics such as contractor management, prevention of body stressing and musculoskeletal disorders with good work design, understanding premiums and supporting recovery and RTW. Forums and events targeted to support and engage with stakeholders across a range of topics including psychosocial hazards, injury prevention, remote and isolated work, rehabilitation and RTW were included and deployed. These events regularly receive positive feedback and satisfaction ratings between 85% and 100%.

Each year, Comcare surveys employers to learn more about their attitudes, experiences and perceptions. This helps us ensure we're meeting employers' needs and delivering on our purpose to promote and enable safe and healthy work.

You can read more about the Employer Survey in the Highlight story *2024 Employer Survey* on page 37.

As part of an enhanced focus on supporting Health and Safety Representatives (HSRs), Comcare has established a new HSR network, working group and a quarterly newsletter to improve engagement and support capability uplift. HSR engagement within the jurisdiction continues to grow with a HSR Network established with 1254 members in July 2024. A dedicated quarterly HSR newsletter was created and released in September 2023, and revisions have been made to the HSR Handbook.

Engaging and collaborating with our stakeholders to create mentally healthy workplaces and manage psychosocial risks

As part of our commitment to enable mentally healthy workplaces, we sought feedback from external stakeholders on the mental health priorities for the Comcare scheme. We used various forums and channels to engage with employers, unions, rehabilitation providers, regulators and policy makers, such as the Licensee Liaison Forum, the Psychosocial Law Reform Special Interest Group (SIG), and targeted meetings. We aimed to understand the challenges and opportunities in promoting and supporting mental health and wellbeing in the workplace. This engagement continues to inform Comcare's strategic priorities.

Comcare's CEO chaired the inaugural Psychosocial Law Reform SIG meeting in August 2023. The SIG meets biannually and encompasses perspectives of members from across Premium Payers, Self-Insured Licensees, Unions, and the Safety, Rehabilitation Compensation Licensee Association. With a purpose of sharing insights on the implementation of changes to the Commonwealth WHS legislative framework, the SIG has a focus on deepening understanding of psychosocial hazards and risks and how best to work collaboratively on their prevention and management.

Comcare finalised its Pilot Proactive Psychosocial Inspection Program within the jurisdiction in 2023–24. Inspectors conducted 5 in depth proactive psychosocial inspections. The insights from over 200 workers and senior leaders helped inspectors understand psychosocial risk management in our jurisdiction and provide tailored advice to employers. An independent evaluation of the pilot found it met its objectives and was perceived as a positive experience by workers, PCBUs and other stakeholders. It was subsequently approved by Comcare's executive as an ongoing initiative.

Ongoing engagement with the AAT with a focus on resolving disputes promptly and with integrity in line with our Litigation Strategy

Ongoing engagement with the AAT took place in the context of a liaison meeting to discuss operational issues aimed at reducing the time taken for finalising proceedings.

Highlight

Engagement with our events

Event and engagement highlights throughout 2023–24

We held webinars on topics such as:

- > contractor management
- > prevention of body stressing and musculoskeletal disorders with good work design
- > understanding premiums
- > supporting recovery and RTW.

Additionally, further forums and events targeted to support and engage with stakeholders across a range of topics were also undertaken, with much positive feedback received for the varied events.

The image below details successful engagement delivery, displaying information about the webinar program with the Mental Health Professionals' Network.

Comcare and the Mental Health Professionals' Network: Improving health practitioner knowledge of the health benefits of good work

Comcare and the Mental Health Professionals' Network (MHPN) partnered to deliver a series of webinars to provide health practitioners with the skills and knowledge to engage and work with workplaces and other stakeholders to facilitate work participation.

The objectives of the webinars were to:

- > discuss the benefits of participating in good work for people with an injury/illness
- > work through practitioner challenges in facilitating work participation
- > discuss how to leverage the support of employers and other stakeholders
- > recommend ways to manage safe and sustainable work participation.

Webinar topics and dates

Webinar 1	Webinar 2	Webinar 3	Webinar 4
Assessing functional capacity for work for psychological injuries 19 May 2022 The webinar provided participants with the skills and knowledge to assess a client's functional capacity for work, based on their psychological health and wellbeing.	Collaborating with the workplace to enable good work for your patient/client 2 November 2022 The webinar built upon previous principles to discuss how participants can support work participation by enabling good work as part of recovery and RTW.	Supporting clients/patients with PTSD to participate in good work 11 July 2023 The webinar focused specifically on PTSD. It involved discussion on how practitioners could work with employers to facilitate good work for their clients.	Strategies to support work participation for clients/patients living with chronic pain 22 February 2024 The webinar explored the impacts of chronic pain and discussed how practitioners can assist clients/patients participate in work that benefits their health and wellbeing.

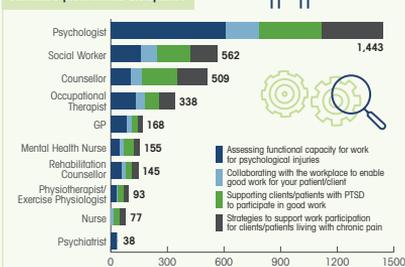
Results from all webinars

Total across the webinars

10,676 Registrations
4,321 Attendees
3,488 Webinar views
7,809 Total reach
40% Average participation rate



Attendee professions/disciplines



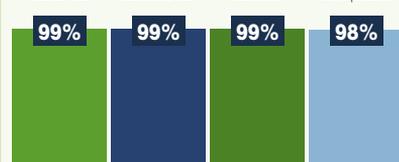
Satisfaction



98% Average satisfaction rating

Average satisfaction rating across the 4 webinars

Aims of the webinar met | Learning outcomes met | Individual needs met | Relevance to work practice



Strategic priority 2: Engagement with our stakeholders



Performance measure results

Performance Measure 2.1: Our AAT litigation program resolves disputes promptly and with integrity

Target	Result
2.1.1 Proportion of Comcare AAT litigation with a successful outcome is 70% or greater Methodology/source: Assessment of outcomes of all AAT matters finalised within the preceding 12 months.	Achieved – 75%

Result analysis

75% of matters resulted in successful outcomes (263 matters out of a total of 349).

A successful outcome is defined as an outcome that is in the best interests of the sustainability of the scheme with a holistic approach to the resolution of matters through the most appropriate disputation process. This provides an alternative metric to affirmation rate, which does not capture matters resolved by consent in favour of the applicant as affirmed, even if a positive outcome is achieved.

Previous results

2022–23: Achieved – 84% (target 65%)

2021–22: Achieved – 84% (target, 60%)

2020–21: Achieved – 81% (target, 55%)

Not reported prior to 2020–21

Target	Result
2.1.2 65% of Comcare AAT litigation matters are progressed to hearing or finalised within 12 months for Comcare managed claims Methodology/source: Actual performance against AAT decision timeframes.	Achieved – 78%

Result analysis

78% of matters progressed to hearing or finalised within 12 months (150 matters out of 192).

Comcare has embedded a program to improve management of Comcare’s Claims litigation activities. The program includes enhanced litigation governance and oversight, reviews of long-standing AAT proceedings, Legal Service Provider reporting on prospects and lead indicators of delay and a continued emphasis on lessons learned processes in AAT and Federal Court litigation.

Previous results

2022–23: Achieved – 87% (target, 60%)

2021–22: Achieved – 93% (target, 55%)

2020–21: Achieved – 92% (target, 50%)

Not reported prior to 2020–21

Performance Measure 2.2: We deliver contemporary education and engagement services that promote and enable safe and healthy work

Target	Result
2.2.1 80% of attendees have their engagement, training and education needs met Methodology/source: Assessment of feedback and evaluations from training and education activities.	Achieved – 92%

Result analysis

Evaluation of Comcare’s 2023–24 training and webinar programs indicate that, on average, 92% of attendees had their engagement, training and education needs met.

- > Comcare training program (live learning and online) – Overall satisfaction: 89%, response rate: 4%
- > 2023–24 Regulatory Priorities and Incident Management (31 July 2023) – Overall satisfaction: 91%, response rate: 17%
- > Why recovery and RTW matters and what makes a difference (28 November 2023) - Overall satisfaction: 93%, response rate: 18%
- > Contractor Management and Regulatory Process Enhancements (28 February 2024) - Overall satisfaction: 85%, response rate: 16%
- > Licence Fee and Cost Recovery Webinar (27 March 2024) - Overall satisfaction: 100%, response rate: 29%
- > Psychosocial Health and Safety Forum (15 May 2024) - Overall satisfaction: 87%, response rate: 12%
- > Understanding your Comcare 2024–2025 Premium (23 May 2024) – Overall satisfaction: 85%, response rate: 12%
- > Transport Network Forum (26 June 2024) - Overall satisfaction: 93%, response rate: 13%
- > Mental Health Community of Practice People at Work in-person workshops (June 2024) – Overall satisfaction: 95%, response rate: 43%.

Previous results

- 2022–23: Achieved – 94% (target, 80%)
- 2021–22: Achieved – 96% (target, 80%)
- 2020–21: Achieved – 87.6% (target, 80%)
- Not reported prior to 2020–21

Performance Measure 2.2: We deliver contemporary education and engagement services that promote and enable safe and healthy work

Target	Result
<p>2.2.2 Annual increase in employer and customer reach, engagement and/or change in behavior with Comcare’s education services and communication channels</p> <p>Methodology/source: Assessment of results associated with communication, training and event statistics and feedback.</p>	Achieved

Result analysis

Evaluation of Comcare’s Learning Management System (LMS), webinar program data and social media engagement indicate an increase in employer and customer reach and engagement. This year:

- > Comcare’s LMS saw a 43% increase in the number of accounts (now 28,244), a 79% increase in eLearning course completions (14,405 completed), a 25% increase in annual live learning attendance (2066 attendees) and 250 organisations accessing content, 12% more than during 2022–23.
- > Webinars delivered had a total of 7,833 registrations from 77% of the organisations in Comcare’s jurisdiction, 35 more organisations than in 2022–23.
- > Comcare’s eNews subscribers increased by 15%, with a total of 7,278 subscribers.
- > Comcare’s LinkedIn followers rose by 16%, total Twitter followers was stable before being decommissioned in late 2023. A Comcare Instagram account was established in early 2024. The average engagement rate for Comcare’s LinkedIn posts rose from 5% to 6.5% in the year.
- > Over 2023–24, the Comcare website received approximately 2 million total page views. While organic search (for example, Google search) is the main driver of traffic to the website (over 400,000 visits), referrals from social media and other websites drove over 60,000 visits, which indicates a strong engagement program. [Note that changes since the previous year are not available for website given a change in methodology and configuration.]

Previous results

2022–23: Achieved

2021–22: Achieved

2020–21: Achieved

Not reported prior to 2020–21

Strategic priority 3: Prevention and early intervention across our scheme



Analysis of performance against key activities

Delivering our core services including claims management and work health and safety regulation and implementing proactive programs that highlight legislative changes and seek to improve outcomes

Comcare delivered a range of activities and resources across the scheme including publishing scheme guidance to assist claims managers with implementation of new legislative requirements. We conducted interactive workshops and provided policy helpdesk support, to help stakeholders understand and apply the changes introduced by the *Fair Work Legislation Amendment (Closing Loopholes) Act 2023* and the Safety, Rehabilitation and Compensation Amendment (Period for Decision-making) Regulations 2023.

Within Comcare's Claims Management Group, we piloted a new Claims Review Process, developed to implement a systematic review of claims at regular intervals and support a proactive, bio-psychosocial approach to claims management, improved health and RTW outcomes and improved service delivery. It enables a holistic claims management approach between relevant stakeholders, including employee, employer and treating health practitioners. The process involves regular review and monitoring of treatment, recovery and RTW aspects of the claim and setting of claim-specific goals and identifying the supports needed to achieve them. Identifying barriers and risk factors to achieving the goals and devising proactive strategies to address them are included. Following a successful pilot, the process has now been incorporated into operations.

Comcare's proactive regulatory program supports this priority by seeking to ensure PCBUs have systems in place to meet their obligations under the WHS Act. A four-year proactive program of work targeting WHS Management Systems commenced in 2023–24 and was delivered as a component of ROG's Regional Engagement Program. Inspectors also conducted 147 Information and Advice activities as part of the Regional Engagement Program. The first phase focused on Incident Management Systems. Over 200 inspections were conducted across the jurisdiction to examine whether a PCBU had implemented compliant incident management systems/arrangements.

Providing national leadership in prevention and early intervention through delivery of and engagement in:

- > relevant forums, cross jurisdictional activities, research, and better practice initiatives
- > proactive and reactive regulatory activities.

Comcare has demonstrated its national leadership in prevention and early intervention through its engagement with forums; presenting, participating in, contributing to and exhibiting at the following:

- > 2023 Workplace Mental Health Symposium on good work design and evaluation of workplace initiatives to improve mental health and wellbeing
- > 2024 Centre for Transformative Work Design Conference and sharing its experience in integrating good work design in government systems, culture and management practice
- > APS Academy MasterCraft Series and the Institute of Public Administration Australia Future Leaders Program on the topic of psychologically safe and healthy work
- > Mental Health Professionals' Network
- > It Pays to Care, Influencing Employers Symposium
- > The 23rd World Congress on Safety and Health at Work.

Hosted by Comcare, the biannual Transport Network Forum took place in October 2023 and June 2024. The October forum included an update on health and safety research projects in the industry, and a panel session with representatives across the industry sharing their lived experiences of the 'Respect@work' themes. The forum received an average satisfaction rating of 91%, with 167 people attending the event. The June 2024 forum had a focus on fatigue and sleeping disorders, with insights from the National Heavy Vehicle Regulator among others. The forum received an average satisfaction rating of 93%, with 151 people attending the event.

The WHS Law Reform program has led the jurisdiction through advising of amendments to the WHS Act and SRC Act. This includes changes relating to industrial manslaughter, presumptive PTSD provisions for first responders, increased penalties for offences under the Commonwealth WHS Act, and other important recommendations from the review of the model WHS laws.

Delivering prevention and early intervention strategies and initiatives including New Access workplaces and the Comcare Prevention Strategy 2022–2025

Prevention strategy

Comcare achieved the deliverables for its second year. Notable achievements included the psychosocial inspectorate pilot, the comprehensive Good Work Design resources (viewed over 9000 times), the bullying prevention project, and Safe Work Month's focus on body stressing with a webinar and new resources. To align with the updated Comcare priorities and extend our prevention focus beyond 2025, we will develop a refreshed prevention approach for the Comcare scheme; meanwhile, the Prevention Committee continues to support whole-of-Comcare prevention initiatives that reduce the risk of harm and injury to workers and others.

NewAccess workplaces

In partnership with Beyond Blue, Comcare commenced the NewAccess workplaces mental health coaching program in 2020. The program, now with 18 participating APS agencies, supports participants with mild to moderate anxiety and/or depression through a structured approach. The independent evaluation demonstrated that NewAccess workplaces contributes to the promotion of mental health prevention and/or early intervention, with a positive return on investment. This successful program will be opened up to all APS agencies through an ongoing standing offer arrangement commencing in late 2024.

Highlight

Success of the Return to Work pilot

Comcare piloted an evidence-based program titled 'Your Future' – also known as the RTW pilot which aimed to change the employment outlook for long-term injured employees by providing customised and individualised support for participants. In collaboration with Employers Mutual Limited (EML), Comcare liaised with employment specialists (career coaches) who worked with injured employees to provide tailored in-depth job canvassing, matching and support, complemented by career coaching and planning and for those with more complex needs, a supporting case management function.

The pilot ran between November 2021 and October 2022, targeting injured employees who had been unsuccessful in returning to work with their pre-injury employer using the traditional rehabilitation framework. It achieved several positive results:

- > 37 registrations from 126 invitations, with 34 employees completing a program.
- > 27 employees completed the full program, 6 employees completed the fast-track program, and one employee who joined in July 2022, undertook a bespoke mid-length program for 18 weeks.
- > 29 participants and 60 non-participants were included in the pilot evaluation process, after excluding employees who were either partially or fully at work on commencement. 11 participants, and 7 non-participants achieved RTW outcomes within 6 months of program commencement.
- > Of those who achieved a RTW outcome, 10 participants and 6 non-participants achieved durable RTW outcomes. This means 37.9% of participants achieved a RTW outcome within 6 months compared to 11.7% for non-participants.

Based on the positive early findings outlined in the interim evaluation report, the service offering resumed in July 2023. This was titled the RTW Brokerage service and ran until 30 June 2024.

The momentum built during the pilot continued into the brokerage, with a further 36 employee registrations achieved from 95 invitations sent. Additionally, 31 employees completed a program, with 7 achieving a RTW outcome as at the end of June. More RTW outcomes are expected.

Comcare hopes to see this service offering continuing to be utilised, with referrals to EML now at the discretion of the Commonwealth agencies in our scheme under section 37 of the SRC Act.

Strategic priority 3: Prevention and early intervention across our scheme



Performance measure results

Performance Measure 3.1: We design and deliver innovative and prevention focused initiatives that promote and enable safe and healthy work

Target	Result
<p>3.1.1 Comcare delivers appropriate early intervention programs across the jurisdiction</p> <p>Methodology/source: Summary of formal program evaluations which assess metrics to determine whether programs are appropriate and effective.</p>	Achieved

Result analysis

Throughout 2023–24, Comcare delivered 2 early intervention programs across the jurisdiction. NewAccess workplaces was focused on early intervention for workers with mild to moderate anxiety and/or depression, while the Good Work Design program focused on addressing psychosocial risks arising from the design of work.

NewAccess workplaces, a low-intensity cognitive behavioural therapy mental health coaching program, was delivered to 18 APS agencies. The program received over 500 enquiries in 2023–24 and supported 215 individual participants to better manage their symptoms. The main reasons for accessing the program include work demands, family, parental or carer issues, and relationship issues. Performance monitoring data indicates that almost 8 out of 10 participants (79%) recovered as a result of the program.

Comcare’s Good Work Design resources, including videos, guidance, micro-learns and team talks, were well received by users. Formal evaluation results indicate that the resources are relevant and effective and are being used to inform team and organisational activities and decisions about good work design in agencies that participated in the evaluation. However, there were some limitations to these findings due to small sample sizes, for example. Comcare presentations on good work design have been well attended, reaching at least 86 scheme organisations. These have generated ongoing engagement with several APS agencies expressing an interest in embedding good work design within their systems, culture and management practices.

Previous results

Not reported prior to 2023–24

Performance Measure 3.2: Our proactive regulatory activity is targeted and prevention focused

This measure aligns to the principles of regulator best practice: Continuous improvement and building trust, risk based and data driven and collaboration and engagement.

Target	Result
<p>3.2.1 Targeted and prevention focused compliance and enforcement activities are delivered on Comcare’s Regulatory Priorities</p> <p>Methodology/source: Assessment of compliance and enforcement activities delivered on regulatory priorities identified through data and intelligence.</p>	Achieved

Result analysis

Comcare’s 6 regulatory priorities informed targeted and prevention focused compliance and enforcement. The priorities targeted in 2023–24 were psychosocial hazards, silica, body stressing, contractor management, WHS management systems, and being hit by moving objects.

Comcare addressed these priorities through a program of work which included proactive engagements with organisations and industries, compliance inspections, and provision of targeted education and engagement via webinars or published guidance and tools.

To read more about how these priorities were addressed, see the Highlight story – *Risk-based and evidence-led approach to identifying 2023–24 Regulatory priorities* on page 59.

Previous results

2022–23: Achieved

Not reported prior to 2022–23

Strategic priority 4: Insight driven and risk and evidence-based practice



Analysis of performance against our key activities

Continuing to mature our data governance, capability and technology with the commencement of activities under our new Data Strategy

Comcare developed a Data and Analytics Strategy for 2024–2026, which builds upon foundations established across data governance, capability and technology. Several strategically aligned initiatives were identified and prioritised to deliver value to Comcare and its stakeholders through data and analytics, including a reporting uplift project which commenced in April 2024. Comcare continues to strengthen its data and analytics functions through further embedding of data governance practices, future proofing our data architecture and making enhancements to our internal data operating model to adapt to business needs as they evolve.

Advancing intelligence and risk analysis to inform and prioritise prevention and regulatory activities, including a renewed focus on proactive regulation

Comcare's dedicated Intelligence and Data Analysis section within the Regulatory Operations Group continues to scan available intelligence sources to overlay data when analysing risks within the jurisdiction. Comcare's Regulatory Risk Model has evolved, and enhancements made throughout the year have improved its value as a risk profiling tool and a critical resource for identifying regulatory priorities.

In 2023–24, we refined our triaging approach for WHS Concerns and Incident Notifications. An updated triaging model was developed to further ensure that Comcare strategically allocates resources to areas of the greatest risk of non-compliance in the jurisdiction.

Driving translation and better practice in line with our *Comcare Research Plan: Towards 2026* and the related themes including, enabling safe and healthy work, fostering work participation, facilitating mentally healthy workplaces, and adapting to the future of work

Our applied research projects under the *Comcare Research Plan: Towards 2026* are designed to promote and enable safe and healthy work. We use a partnership approach to conduct and disseminate our research, collaborating with academic institutions, industry experts, and other government agencies to drive better practice and innovation in work health and safety. Highlights from 2023–24 include:

Beyond the Office: Considerations and practical approaches for working safely at home literature review

Working from home has become a common practice for many workers, however, this brings significant challenges for work health and safety, as well as opportunities for enhancing worker wellbeing and productivity. Comcare reviewed this literature to explore the best practices for managing hybrid work arrangements and provided evidence-based recommendations for employers and workers to ensure that hybrid work is safe and healthy.

New approaches to preventing workplace bullying

We worked with the University of South Australia's International Centre for Allied Health Evidence to complete a literature review on the risk and protective factors for workplace bullying, interventions to reduce bullying, and bullying during home-based work. We then partnered with Edith Cowan University to develop tools and conduct a pilot for preventing workplace bullying.

Investing in improved data to monitor the performance of approved workplace rehabilitation providers operating in the scheme

In 2023–24, Comcare continued to improve the Workplace Rehabilitation Provider portal to support the collection of data to monitor Workplace Rehabilitation Provider performance. The portal allows Comcare to capture individual and scheme level RTW performance and compliance data.

This data capture, coupled with improved reporting processes, has enhanced Comcare's ability to monitor, analyse and manage approved workplace rehabilitation provider RTW performance.

Enhancing claims management operational and strategic reporting to help drive improved operational outcomes and prioritise strategic initiatives

Comcare identified an opportunity to collaborate with a key client using the data Comcare holds about claims, to support the organisation in 2 ways:

1. Understand the relative success of current early intervention services
2. Discover new ways to deliver better early intervention support service to their staff

This organisation was seeking an understanding of incidents, trends and costs of workplace injury, including the impact on their operational productivity. Comcare needed a deeper level of understanding of return to health and work barriers specific to that organisation, to enable initiatives and projects to improve outcomes. We applied human centred design techniques to understanding a data problem and created 'The Data Placemat'. Each quarter, Comcare produces a placemat in 2 parts.

- > Part A is a standardised visual representation of key claim facts using the latest data about the number and type of workers compensation claims received.
- > Part B of the placemat, 'The back page' changes each quarter. In each edition, Comcare highlights a new data story, delving deeper into specific, tailored data, enabling the organisation to understand the impact on employees in a particular cohort.

The visualisation provides a meaningful and accessible analysis of the key drivers of the financial and human cost of workplace incidents and feedback from the organisation has been extremely positive, including indications the insights gained from the data presentation are being actively utilised in management decisions and driving change.

Highlight

Risk-based and evidence-led approach to identifying 2023–24 regulatory priorities

We identified 6 regulatory priorities to deliver on, through proactive programs of work in 2023–2024. They are:

1. Psychosocial hazards
2. Being hit by moving objects
3. Body stressing
4. WHS Management systems
5. Contractor management
6. Silica

These priorities were determined using a risk-based and evidence-led approach, including the review and analysis of our regulatory data, and a focus on the priorities in [Comcare's Prevention Strategy 2022–2025 \[PDF\]](https://www.comcare.gov.au/about/forms-pubs/docs/pubs/corporate-publications/Comcare-Prevention-Strategy-2022-2025) <https://www.comcare.gov.au/about/forms-pubs/docs/pubs/corporate-publications/Comcare-Prevention-Strategy-2022-2025.pdf> and Safe Work Australia's [Australian Work Health and Safety Strategy 2023–2033](https://www.safeworkaustralia.gov.au/awhs-strategy_23-33) https://www.safeworkaustralia.gov.au/awhs-strategy_23-33.

The identification of priorities ensures additional focus is placed on specific WHS risks with a prevention focus to incorporate into the planning and delivery of national and regional engagement activities.

In 2023, Comcare began delivering on these priorities through proactive programs of work, including a series of webinars and the provision of information and resources on our website.

Highlights include:

- > A program of proactive inspections with organisations to assess incident management systems and arrangements. Well implemented, effective WHS management systems are key to providing a framework to deliver improved WHS performance in an organisation and are an ongoing priority for Comcare. A webinar was delivered in July 2023 with an overview of our regulatory approach to incident management systems and outlining key considerations for persons conducting a business or undertaking.
- > Psychosocial hazard harm prevention, which is a key focus and priority for all WHS regulators. Throughout 2023, our Psychosocial Regulation team provided a specialist focus on proactive regulation and harm prevention within Comcare's jurisdiction through targeted intelligence-driven stakeholder engagement, education, and inspection programs. Comcare's first Psychosocial Health and Safety Forum was delivered in October 2023 during National Safe Work Month, providing an update on the regulatory landscape and approaches to address psychosocial hazards.

Risk-based and evidence-led approach to identifying 2023–24 regulatory priorities

WHS Management Systems were targeted in a four-year proactive program of work. In 2023–24, the program focused on Incident Management Systems. Over 200 inspections were conducted across the jurisdiction to examine whether a PCBU had implemented compliant incident management systems/arrangements. Throughout these engagements, our inspectors worked with PCBUs to identify gaps in processes and discuss better practice.

Where gaps were identified in systems, inspectors worked with PCBUs to identify actions to work towards better practice, with the end goal of all PCBUs having systems or arrangements in place to achieve legislative compliance in managing WHS incidents. Comcare's Employer Survey saw a 29% increase in satisfaction with our service 'conducting proactive inspections by a WHS inspector'.

In February 2024, Comcare held a webinar on Contractor Management – shared duties and control. Contractor Management risks are also addressed through Comcare's dedicated program regulating the rollout of the National Broadband Network (NBN). The Telecommunications Asbestos Safety Compliance (TASC) program is prevention focused and involves conducting targeted risk-based compliance activities for the removal of asbestos containing materials and civil construction works. The TASC program aims to ensure the highest levels of WHS are applied to the rollout of the NBN through a cooperative and proactive approach. The team of TASC inspectors provides the rollout's delivery partners and contractors with guidance and information to improve understanding of the WHS requirements related to the work.

In 2023–24, the TASC team conducted:

- > 472 site visits and assessments
- > 259 contractor assessments (55 were new contractors).

The Major Infrastructure Project team who covers the Silica risk expanded in 2023–24 to ensure it can undertake proportionate and responsive regulatory activities in this space.

Initial work to address the regulatory priorities of body stressing and being hit by moving objects was undertaken this year. This work will continue in 2024–25.

Strategic priority 4: Insight driven and risk and evidence-based practice



Performance measure results

Performance Measure 4.1: We drive national work health and safety compliance using a targeted, risk-based approach

This measure aligns to the principles of regulator best practice

Target	Result
4.1.1 100% of incident notifications involving the death of a person result in a monitoring compliance activity Methodology/source: Assessment of decisions against incident notifications.	Achieved – 100%

Result analysis

Comcare commenced a monitoring compliance activity for 100% of incident notifications involving the death of a person.

Refer to Table 16 'Notifiable incidents notified to Comcare under section 38 of the WHS Act' in Chapter 5 for more information about this item.

Previous results

2022–23: Achieved

2021–22: Achieved

2020–21: Achieved

Not reported prior to 2020–21

Target	Result
4.1.2 Comcare undertakes a follow up verification inspection in 95% of instances where an inspection has identified remedial actions to be undertaken to eliminate or minimise, as far as reasonably practicable, the risk of future incidents occurring Methodology/source: Assessment of verification inspection data.	Achieved – 98%

Result analysis

Comcare undertook a follow up verification inspection for 98% of inspections that identified remedial actions to be undertaken.

Previous results

2022–23: Achieved 100% (target, 95%)

2021–22: Achieved 100% (target, 95%)

2020–21: Achieved 98% (target, 95%)

Not reported prior to 2020–21

Performance Measure 4.2: We undertake strategic and collaborative initiatives to promote and enable safe and healthy work

Target	Result
4.2.1 Strategic and collaborative initiatives deliver evidence-based insights and/or better practice Methodology/source: Assessment of activity status reporting and evaluation reports.	Achieved

Result analysis

Comcare has effectively collaborated with a broad range of stakeholders to deliver evidence-based insights and better practice. Highlights are summarised below.

Mental Health Community of Practice: People at Work workshops

These were held in Canberra and Melbourne in June 2024 involving 44 representatives from 27 Comcare scheme organisations. In a follow up survey of participants, almost all (94%) reported that it increased their understanding of People at Work, an evidence-based psychosocial risk assessment tool, and most (69%) were likely to implement it in their workplace.

Learning Management System: Sharing project

Following a successful twelve-month trial, on 3 June 2024 Comcare transitioned to 2 new sharing functionalities. The new offering can service the full jurisdiction and offers improved reporting and updates to content. There are currently 55 agencies transitioned and accessing 16 eLearning products.

Evidence synthesis products

Comcare's Workplace Research Monthly alert is delivered in collaboration with the University of South Australia's Centre for Allied Health Evidence. It outlines the latest peer-reviewed articles on a range of workplace health and safety, prevention, recovery at work and RTW topics. The alert is one of Comcare's most wide-reaching products with over 5,200 subscribers at the end of 2023–24, which is a 20% increase on the previous year. Additionally, this partnership also delivers emerging evidence summaries which provide a six-monthly snapshot of issues gaining traction in the areas of work health and safety and workers' compensation.

Previous results

2022–23: Achieved

Performance Measure 4.3: Our scheme identifies and adopts better practices which enable and promote safe and healthy work

Target	Result
<p>4.2.1 Through engagement with our stakeholders and utilising an evidence-based approach, better practice initiatives are identified, our advice is adopted and assessed as enabling safe and healthy work</p> <p>Methodology/source: Total published scheme and e-guidance policy advice and information on the Comcare website, total stakeholder forums delivered and an assessment of evaluations and feedback.</p>	Achieved

Result analysis

We have developed, updated and published scheme guidance on our website to support and assist claims and rehabilitation managers in the scheme. Scheme guidance outlines Comcare's understanding of, and approach to, implementing the provisions of the SRC Act and aims to encourage a proper and consistent approach to decision making on workers' compensation claims and rehabilitation matters across the scheme. The published scheme guidance has been regularly accessed by scheme participants.

In 2023–24, Comcare developed a further 4 scheme guidance publications on claims management topics. To support understanding and implementation of scheme guidance, Comcare also holds quarterly Claims Manager forums with scheme participants to discuss claims management practices with a view to achieving consistency in approach.

Comcare invited all scheme participants who attended Comcare's virtual December 2023 Claims Manager Forum to evaluate the scheme guidance and recorded 59 responses. The evaluation found that 93% of survey respondents indicated that the guidance was relevant to their claims management role, while 69% said it assists them in managing claims. 92% of survey respondents who attended the Claims Manager Forums rated those forums as excellent or good.

Comcare delivers 3 Rehabilitation Case Manager forums annually to highlight better practice recovery and RTW through presentations from industry experts, academics and the perspective of people with lived experience. In March 2024, Comcare received 61 responses from invited registrants of Comcare's Rehabilitation Case Manager Forum to evaluate the forums and other RTW guidance. The survey results detailed:

- > 95% of respondents found the forum presentations were engaging and well delivered.
- > 92% of respondents indicated that Comcare's RTW guidance was relevant to their role as a rehabilitation case manager.
- > 84% said it assisted them in managing rehabilitation.

Through this evidenced engagement with our stakeholders and utilising an evidence-based approach, we have identified better practice initiatives, choosing pertinent topics to present on and produce guidance about. Our advice is adopted and assessed as enabling safe and healthy work.

Previous results

2022–23: Achieved

2021–22: Achieved

2020–21: Achieved

Not reported prior to 2020–21

Strategic priority 5: Being adaptive and sustainable in the face of change



Analysis of performance against our key activities

Delivering our ICT and Digital Strategy 2028 to ensure an adaptive, secure, digital environment which supports our agency to serve the needs of our stakeholders in an efficient and effective way

The ICT and Digital Strategy 2028 was released in May this year and is a comprehensive plan aimed at aligning technology with our business goals and driving innovation across Comcare.

You can read more about this strategy in the Highlight story *Finalisation of Comcare's ICT and Digital Strategy 2028, People Strategy 2028 and Data and Analytics Strategy 2024–2026* on page 65.

Investing in our portfolio management approach to assure effective delivery of programs and projects for Comcare including benefits realisation

Recommendations from an independent assessment of Comcare's Portfolio, Program and Project Management Maturity in 2022 have been implemented and embedded by the Enterprise Portfolio Management Office (EPMO). The Portfolio Management Board is presented with a revised Portfolio Report each month, providing insights into the status and performance of current programs and projects to inform decision making. In addition, routine compliance assessments are carried out by the EPMO, driving improved consistency and providing greater assurance across the portfolio.

Implementing our People Strategy 2028 with a focus on capability, agility, wellbeing, and stewardship

The People Strategy 2028 was released early in 2024. It is Comcare's commitment to being a great place to work and our people!

Read more about this strategy in the Highlight story *Finalisation of Comcare's ICT and Digital Strategy 2028, People Strategy 2028 and Data and Analytics Strategy 2024–2026* on page 65.

Highlight

Finalisation of Comcare's ICT and Digital Strategy 2028, People Strategy 2028 and Data and Analytics Strategy 2024–2026

We released 3 major strategies in the early part of 2024. The People Strategy 2028, the ICT and Digital Strategy 2028, and the Data and Analytics Strategy 2024–2026.

ICT and Digital Strategy 2028

Our ICT and Digital Strategy 2028 aims to facilitate seamless digital transitions for all clients and stakeholders, fostering adaptability and innovation to meet emerging needs and technological advancements.

The ICT and Digital Strategy is underpinned by 5 guiding principles to steer our journey: client-centric design, foundational stability, enhanced cybersecurity, innovation with flexibility, and adherence to regulation and legislation. There are 15 key priorities for the next 4 years focused on enhancing the user experience, establishing consistent and standardised processes, being future ready, and achieving cost efficiency.

We will be investing in stable, secure, and scalable infrastructure that forms the backbone of all our digital initiatives. A strong and resilient foundation will not only support current operational needs but also provide the flexibility to adapt to future demand.

We will elevate our cybersecurity posture to proactively safeguard against evolving threats and vulnerabilities. This includes aligning with the whole of government and industry direction to ensure protection against threats, embedding controls to reduce risk and improve proactive protection, continuous monitoring to detect control failures and ensure we are adequately prepared to respond to cyber incidents, and actively communicating policies and ensuring there is adequate training for our people.

We will be adaptable to change with a dedicated focus on innovation to ensure Comcare is proactive and in the best position to take advantage of new and emerging technologies, sooner rather than later. Emerging technologies, such as AI, will be adopted in accordance with government guidelines to provide improved client experience while maintaining a secure environment.

Ensuring ongoing compliance with whole of government frameworks and internal policies to reduce Comcare's risk profile and protect our clients and staff is a priority, considering information and records management and improving digital identity and access management.



Finalisation of Comcare's ICT and Digital Strategy 2028, People Strategy 2028 and Data and Analytics Strategy 2024–2026

People Strategy 2028

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

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

The People Strategy is aligned to the APS Reform Program, the APS Workforce Strategy, the Commonwealth Aboriginal and Torres Strait Islander Workforce Strategy, APS Disability Employment Strategy, and the APS Gender Equality Strategy.

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

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

We are committed to the principles of diversity and inclusion, ensuring that all employees have access to our services and programs, and that our workforce is representative of the broader Australian community. Our People Strategy, Workplace Strategy, and Reconciliation Action Plan, together with the Diversity Inclusion Group and the practices which they inform, will help support and grow a diverse and inclusive workforce.

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

Our Target Outcomes

Capability
We attract and grow talented people who value having a positive impact

Agility
We are an adaptable organisation that evolves with change

Wellbeing
We are inclusive and embrace diversity, and deliver safe and healthy work

Stewardship
We champion stewardship, integrity, the Comcare values, and a connection with our purpose

Our Employee Experience



Connection
I feel heard, trusted, respected and supported



Flexibility
I have choice and balance



Purpose
My work makes a difference



Career
I learn and grow



Care
I work in a safe and healthy environment

Comcare People Strategy Vision, Target Outcomes and Employee Experience

Data and Analytics Strategy 2024–2026

The Data and Analytics Strategy 2024–2026 (D&A Strategy), developed in consultation with representatives from all Groups within Comcare, outlines a target state for data and analytics in Comcare by 2026 and a three-year roadmap of initiatives to deliver and enable business value.

Through focused effort on these initiatives, Comcare is expanding its proactive use of data to promote and enable safe and healthy work, while also strengthening foundations through robust data platforms, architecture and data governance practices.

The D&A Strategy also outlines a Data Operating Model concept to facilitate the execution of the D&A Strategy and support co-ordinated maturity uplift. This strategy aligns with the broader Comcare purpose and strategic objectives, by supporting data-driven decision making.

Strategic priority 5: Being adaptive and sustainable in the face of change



Performance measure results

Performance Measure 5.1: Our scheme is sustainable as evidenced through outcomes achieved by scheme participants (including financial and return to work outcomes)

Target	Result
5.1.1 Target administrative cost ratio within 15 to 25% Methodology/source: Administration costs/(administration + claims costs).	Achieved – 23.5%

Result analysis

The target administrative cost ratio result at the end of 2023–24 is 23.5%, meeting the target.

Previous results

2022–23: Achieved – 22.6% (target, 15 to 25%)

2021–22: Achieved – 21.7% (target 15 to 25%)

2020–21: Achieved – 20.6% (target 15 to 25%)

2019–20: Not achieved – 19.7% (target 17% or lower)

Target	Result
5.1.2 Average Commonwealth premium rate = 1% of payroll or lower Methodology/Source: Sum of Commonwealth premium amounts/sum of Commonwealth payrolls obtained from external actuary and agency submissions.	Achieved – 0.84%

Result analysis

The average Commonwealth premium rate is 0.84% for 2023–24.

There is minimal overall increase from prior year resulting from the removal of 10% discount provided last year, along with the impact of change in economic conditions.

Previous results

2022–23: Achieved – 0.83% (target 1% of payroll or lower)

2021–22: Achieved – 0.79% (target 1% of payroll or lower)

2020–21: Achieved – 0.85% (target 1% of payroll)

2019–20: Achieved – 0.85% (target 1% of payroll)

Performance Measure 5.1: Our scheme is sustainable as evidenced through outcomes achieved by scheme participants (including financial and return to work outcomes)

Target	Result
5.1.3 Minimum funding ratio of 110% Methodology/source: Comcare's premium-related assets divided by premium-related workers' compensation claims liability, valued by independent actuary.	Achieved – 112%

Result analysis

The funding ratio for 2023–24 is 112%. The result demonstrates the financial sustainability of Comcare's premium scheme.

The funding ratio decreased from 117% for 2022–23 to 112% for 2023–24. In 2023–24 assets increased by \$25.5m but the outstanding claims liability increased by \$104.3m. The largest contributor to the increase in liabilities is claim experience and forecast assumptions, mostly related to claims for psychological disease.

If the funding ratio falls below the minimum target of 110%, Comcare will apply strategies to strengthen the financial viability of the premium scheme.

Previous results

2022–23: Achieved – 117% (target, 110%)

2021–22: Achieved – 124% (target, 110%)

2020–21: Achieved – 129% (target, 110%)

Not reported prior to 2020–21

Target	Result
5.1.4 Comcare scheme return to work rate of 85 to 95% for accepted claims initially determined within the previous 24 months Methodology/source: Percentage and volume of accepted claims that have experienced return to work outcomes.	Achieved – 89%

Result analysis

Comcare achieved a RTW rate of 89% for 2023–24.

Previous results

2022–23: Achieved – 89% (target 85 to 95%)

2021–22: Achieved – 88% (target 85 to 95%)

2020–21: Achieved – 87% (target 85 to 95%)

Not reported prior to 2020–21

Performance Measure 5.1: Our scheme is sustainable as evidenced through outcomes achieved by scheme participants (including financial and return to work outcomes)

Target	Result
5.1.5 Comcare scheme notional premium rate = 0.90% or lower Methodology/source: Weighted average of the Australian Government and Licensee annual premium rate outcome. Weighted against each sector as a relative proportion of Comcare scheme FTE.	Achieved – 0.79%

Result analysis

For 2023–24, the notional premium rate target has been achieved and is 0.79%. This result is an increase on last year (0.72% in 2022–23) and is attributed to an increase in the self-insured licensee notional premium rate.

Previous results

- 2022–23: Achieved – 0.72% (target, 0.90%)
- 2021–22: Achieved – 0.78% (target, 0.94%)
- 2020–21: Achieved – 0.80% (target, 0.94%)
- 2019–20: Achieved – 0.86% (target, 0.94%)

Performance Measure 5.2: Our workforce is engaged, capable and supported in their mental health and wellbeing

Target	Result
5.2.1 Comcare’s employee engagement rating at the organisational level exceeds 70% Methodology/source: Assessment of Comcare’s results from the APS census.	Achieved – 76%

Result analysis

Comcare’s employee engagement index rating from the 2024 APS Employee Census is 76%, remaining consistent with the 76% rating from 2023. Comcare’s rating is 3% above the APS engagement index of 73% in 2024, from an 88% participation rate. These results demonstrate that we have an engaged workforce.

Previous results

- 2022–23: Achieved – 76% (target, meets or exceeds that from the previous year)
- 2021–22: Achieved – 75% (target, meets or exceeds that from the previous year)
- 2020–21: Not Achieved – 74% (target, meets or exceeds that from the previous year)
- Not reported prior to 2020–21

Performance Measure 5.2: Our workforce is engaged, capable and supported in their mental health and wellbeing

Target	Result
--------	--------

5.2.2 Comcare's wellbeing rating at the organisational level meets or exceeds 75% **Achieved – 78%**

Methodology/source: Assessment of Comcare's results from the APS census.

Result analysis

Comcare's wellbeing policies and support index rating from the 2024 APS Employee Census is 78%, remaining consistent with the 2023 figure. Results indicate that we have a sustainable and healthy work environment, with Comcare's wellbeing score 8% above the 2024 APS wellbeing index of 70%.

Previous results

2022–23: Achieved – 78% (target, meets or exceeds 75%)

2021–22: Achieved – 80% (target, meets or exceeds that from the previous year)

2020–21: Not achieved – 78% (target, meets or exceeds that from the previous year)

Not reported prior to 2020–21

Target	Result
--------	--------

5.2.3 75% of Executive level employees consider that their workgroup has the appropriate skills, capabilities and knowledge to perform well **Achieved – 84%**

Methodology/source: Assessment of Comcare's results from the APS census.

Result analysis

84% of Executive level employees agree that their workgroup has the appropriate skills, capabilities and knowledge to perform well based on the results of the 2024 APS Employee Census. This is a minor decrease of 2% for the same question in 2023 (86%). It is noted that a further 11% of Executive level employees neither agreed nor disagreed with this question in the Census, as compared to 8% in 2023.

Previous results

2022–23: Achieved – 86% (target, meets or exceeds that from the previous year)

2021–22: Achieved – 81% (target, meets or exceeds that from the previous year)

2020–21: Achieved – 84% (target, the majority of managers consider that their work group has appropriate skills, capabilities and knowledge to perform well)

Not reported prior to 2020–21





Chapter 3: Management and accountability

People	74
Work health and safety management and performance	79
Planning, governance and risk	82
Accountability	93
Financial performance	96
Premium scheme	97

People

Overview

Comcare is committed to being a great place to work. We value our greatest asset – our people – and provide our employees with the tools, skills and culture needed to continue our sector leading work and deliver on our current and future priorities.

Our employees possess high levels of engagement with our work, its purpose, their team, their managers and their roles. High levels of engagement are strongly associated with positive benefits such as increased performance and productivity, and demonstrate that our employees are motivated, inspired and enabled to improve our organisation's outcomes. We aspire to maintain these levels of engagement and ensure our people feel connected to Comcare and each other, and our success in this is demonstrated by our strong 2024 APS Employee Census results with 88% of eligible employees participating. The results included:

- > 91% 'I am satisfied with my non-monetary employment conditions' (including flexible working arrangements).
- > 84% 'I would recommend my agency as a good place to work'.
- > 88% 'I believe strongly in the purpose and objective of my agency'.
- > 87% 'My agency supports and actively promotes an inclusive workplace culture'.
- > 89% 'I believe my immediate supervisor cares about my health and wellbeing'.

In 2024, Comcare released our People Strategy 2028. Refer to the Highlight story *Finalisation of Comcare's ICT and Digital Strategy 2028, People Strategy 2028 and Data and Analytics Strategy 2024–2026* on page 65 for more information about the strategy.

It sets out Comcare's vision for a capable, engaged and high performing workforce, underpinned by the importance to employees of an experience of work that has:

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

The strategy's target outcomes are:

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

Comcare is committed to delivering on the targets set by the Australian Government relating to the employment of First Nations peoples and people with disability, reduce the gender pay gap, and aspire for a workforce that reflects the Australian community. Comcare is proud of its active support for diversity and inclusion, and the participation of employees across the organisation in contributing to a culture that at its heart embodies wellbeing and respect.

Comcare is dedicated to fostering an inclusive and engaged workforce, where employees feel supported to work at their best and encourages a workplace culture where everyone maximises and maintains high performance through the Comcare Performance Development Framework. The Performance Development Framework is designed not only to address an employee's technical capabilities but recognises the importance of behaviours including Comcare's 4 cultural priorities and the APS Values, Employment Principles and Code of Conduct. We provide a safe work environment, that embraces diversity and inclusivity, free from discrimination, harassment and bullying. Comcare promotes workplaces that are appropriate, reasonable, fair, respectful and in which courteous behaviours are always present.

As of 30 June 2024, we employed 679 ongoing employees and 43 non-ongoing employees, based in 9 locations around Australia.

Table 3: All ongoing employees current report period (2023–24)

	Man/Male			Woman/Female			Non-binary			Prefers not to answer			Uses a different term			Total
	Full-time	Part-time	Total	Full-time	Part-time	Total	Full-time	Part-time	Total	Full-time	Part-time	Total	Full-time	Part-time	Total	
NSW	24	0	24	21	3	24	0	0	0	0	0	0	0	0	0	48
Qld	10	1	11	15	2	17	0	0	0	0	0	0	0	0	0	28
SA	5	0	5	6	2	8	0	0	0	0	0	0	0	0	0	13
Tas	6	1	7	9	1	10	0	0	0	0	0	0	0	0	0	17
VIC	87	2	89	118	19	137	0	0	0	0	0	0	0	0	0	226
WA	7	1	8	4	1	5	0	0	0	0	0	0	0	0	0	13
ACT	109	5	114	167	44	211	1	0	1	0	0	0	0	0	0	326
NT	2	0	2	5	1	6	0	0	0	0	0	0	0	0	0	8
External Territories	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overseas	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	250	10	260	345	73	418	1	0	1	0	0	0	0	0	0	679

Table 4: All non-ongoing employees current report period (2023–24)

	Man/Male			Woman/Female			Non-binary			Prefers not to answer			Uses a different term			Total
	Full-time	Part-time	Total	Full-time	Part-time	Total	Full-time	Part-time	Total	Full-time	Part-time	Total	Full-time	Part-time	Total	
NSW	1	0	1	1	0	1	0	0	0	0	0	0	0	0	0	2
Qld	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
SA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Tas	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
VIC	7	0	7	4	2	6	0	0	0	0	0	0	0	0	0	13
WA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
ACT	5	1	6	13	6	19	1	0	1	0	0	0	0	0	0	26
NT	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	1
External Territories	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overseas	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	14	1	15	19	8	27	1	0	1	0	0	0	0	0	0	43

Table 5: All ongoing employees previous report period (2022–23)

	Man/Male			Woman/Female			Non-binary			Prefers not to answer			Uses a different term			Total
	Full-time	Part-time	Total	Full-time	Part-time	Total	Full-time	Part-time	Total	Full-time	Part-time	Total	Full-time	Part-time	Total	
NSW	19	0	19	16	3	19	0	0	0	0	0	0	0	0	0	38
Qld	10	0	10	11	5	16	0	0	0	0	0	0	0	0	0	26
SA	3	0	3	4	1	5	0	0	0	0	0	0	0	0	0	8
Tas	7	0	7	7	0	7	0	0	0	0	0	0	0	0	0	14
VIC	69	1	70	100	17	117	0	0	0	0	0	0	0	0	0	187
WA	7	0	7	3	1	4	0	0	0	0	0	0	0	0	0	11
ACT	100	6	106	169	50	219	0	0	0	0	0	0	0	0	0	325
NT	3	0	3	4	1	5	0	0	0	0	0	0	0	0	0	8
External Territories	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overseas	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	218	7	225	314	78	392	0	0	0	0	0	0	0	0	0	617

Table 6: All non-ongoing employees previous report period (2022–23)

	Man/Male			Woman/Female			Non-binary			Prefers not to answer			Uses a different term			Total
	Full-time	Part-time	Total	Full-time	Part-time	Total	Full-time	Part-time	Total	Full-time	Part-time	Total	Full-time	Part-time	Total	
NSW	2	0	2	1	0	1	0	0	0	0	0	0	0	0	0	3
Qld	2	0	2	0	0	0	0	0	0	0	0	0	0	0	0	2
SA	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
Tas	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	1
VIC	9	0	9	9	1	10	0	0	0	0	0	0	0	0	0	19
WA	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	1
ACT	9	1	10	14	3	17	0	0	0	0	0	0	0	0	0	27
NT	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	1
External Territories	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Overseas	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	23	1	24	26	5	31	0	0	0	0	0	0	0	0	0	55

Executive remuneration

Information about remuneration for key management personnel and senior executives is provided below:

Table 7: Information about remuneration for key management personnel

Name	Position title	Short-term benefits			Post-employment benefits	Other long-term benefits		Termination benefits	Total remuneration
		Base salary (\$)	Bonuses (\$)	Other benefits and allowances (\$)	Superannuation contributions (\$)	Long service leave (\$)	Other long-term benefits (\$)	(\$)	(\$)
Gregory Vines	CEO	427,026	0	5,605	42,064	4,514	0	0	479,209
Leanne Blackley	Chief Operating Officer	231,564	0	2,497	43,981	19,411	0	0	297,453
Megan Buick	General Manager	216,019	0	3,128	33,450	11,372	0	0	263,969
Louise Close	General Manager	216,338	0	3,428	33,461	8,884	0	0	262,111
Michael Duke	General Manager	222,860	0	28,348	41,332	18,408	0	0	310,948
Chloe Eaton	Acting General Manager	149,245	0	1,385	21,803	5,706	0	0	178,139
Justin Napier	General Manager	229,670	0	28,348	35,659	14,991	0	0	308,668
Lachlan Vivian-Taylor	General Manager	140,171	0	300	21,012	1,121	0	0	162,604
Total		1,832,893	0	73,039	272,762	84,407	0	0	2,263,101

Note:

¹ The amounts above reconcile to Note 4.2 Key management personnel remuneration in the financial statements

² During the reporting period there were no other senior executives or other highly paid staff not already included as key management personnel in the table above.

Work health and safety management and performance

We are committed to providing and maintaining a workplace focused on physical and mental health and safety and supporting our employees in accordance with the *Work Health and Safety Act 2011* (Cth) (WHS Act) and the *Safety, Rehabilitation and Compensation Act 1988*.

We strive to minimise and mitigate risks to health and safety through consultation, communication, and systematic hazard identification, risk assessment and implementation of control measures.

Comcare's People Strategy 2028 highlights our commitment to provide a safe and healthy work environment, where we manage psychosocial hazards effectively, support employees experiencing illness or injury and instil trust in our workforce.

A national network of elected employee support officers guides the agency's safety culture. These officers cover the workplace responsibility roles including Health and Safety Representatives, First Aid Officers, Mental Health First Aid Officers, Harassment Contact Officers, and Fire and Floor Wardens.

Health and safety initiatives

In 2023–24, Comcare undertook a range of initiatives to ensure it provides a healthy and safe workplace. These included:

- > Comcare funded annual influenza vaccination program: A total of 215 employees received the vaccination through this initiative.
- > Health and Wellbeing allowance: Offering up to \$300 reimbursement for eligible employees for participation in activities that benefit health and wellbeing. 635 employees claimed the reimbursement in 2023–24. The new approved Enterprise Agreement contained an allowance increase to \$376, effective on 1 July 2024.
- > Ergonomic workstations: Comcare offices provide sit-to-stand workstations for all employees. Additionally, in 2023–24, 52 workstation assessments were delivered by suitably qualified providers with employees provided with self-help guidance to ensure maintenance of personal ergonomic settings.
- > Wellbeing portal: Access to Wellbeing@Comcare, a health and wellbeing online platform that covers a new health and wellbeing topic each month with a range of resources presented to suit individuals' needs.
- > Early intervention: This program provides timely and tailored support for employees, and access to workplace rehabilitation providers. During the period, 20 employees received support and assistance for early intervention and 19 for non-work-related injuries and illness.
- > NewAccess Workplaces Program: This program uses an early intervention model to provide confidential mental health coaching by Beyond Blue that can be accessed without a general practitioner referral or mental health treatment plan.

- > Employee Assistance Program (EAP): We onboarded a new provider and this program continues to provide telephone and face-to-face access to confidential, individual counselling that supports the psychological wellbeing of employees and their families. It provides a specialist helpline for our First Nations employees.
- > Delivered wellbeing check-in program, facilitated by the EAP, as a proactive support service to employees in high-risk roles to build personal capability and resilience, to respond to the psychosocial hazards of their work.
- > Delivered training on Managing Aggressive and Distressed Customers to support 64 employees prepare for and respond to difficult and aggressive customers including suicide awareness and self-care.
- > National Safe Work Month activities: Weekly communication activities raised awareness of work health and safety across Comcare (employer). Comcare (the employer) participated in the activities run externally by Comcare including a psychosocial health and safety forum and webinars on body stressing, musculoskeletal disorders and good work design.

We reviewed and adjusted our response to risk of infectious diseases in the workplace to incorporate COVID-19 and align with public health advice.

Psychosocial capability and management

Comcare (the PCBU) continued engagement to embed psychosocial risk management into business-as-usual activity to support the agency as a mentally healthy workplace. We also ensured psychosocial and mental health initiatives are evidence-based, effective and fit for purpose.

In April 2024, Comcare conducted 2 all staff surveys; the Psychosocial Safety Climate and People at Work, to establish baseline measures of psychosocial risk. The survey results rated Comcare's psychosocial risk as low overall against established benchmarks. Key areas of strength and opportunities for improvement were identified, as well as the need to focus on some roles and business areas. Results from the surveys form the basis for implementation of initiatives to be the focus in 2024–25 through our Psychosocial Capability Uplift program, to mature the internal WHS Psychosocial Risk Management System.

The Psychosocial Capability Uplift program supports the People Strategy 2028. The surveys form a reliable foundation and opportunity for ongoing measurement to assess targeting interventions and assessment of effectiveness of initiatives and changing needs over time.

Comcare (as the employer), participated in the Comcare Prevention of Workplace Bullying Pilot co-sponsored by the Edith Cowan University.

Notifiable incidents

Under section 38 of the WHS Act, we are required to notify the regulator of any deaths, serious injury or illness, or dangerous incidents arising out of our work. In 2023–24, there was one notifiable incident relating to a serious injury. Comcare (regulator) assessed the matter and determined that the circumstances did not indicate any non-compliance of the WHS Act regarding this incident.

No investigations were undertaken, and no statutory enforcement notices were received from the regulator.

Workers' compensation claims

Nine new workers' compensation claims were accepted. The average weeks lost increased from zero weeks in 2022–23 to 11.9 weeks in 2023–24. These employees were supported to recover at and return to work through the assistance of workplace rehabilitation providers, with many also receiving early intervention support prior to the submission of a claim. Comcare's initiatives and commitment to early intervention, rehabilitation, return to work principles and ongoing education continue to provide a safe and rewarding workplace for our employees.

Planning, governance and risk

Strategic planning and reporting

Comcare's planning and reporting cycle is made up of various activities to confirm the organisation's strategic direction, priorities and performance measures for the year ahead. Activities include:

- > Strategic direction assessment by Comcare's Executive to confirm if our purpose, strategic priorities, performance measures and strategic risks are suitable for the year ahead, based on an environmental scan activity.
- > Review of performance measures to confirm if existing measures are effectively measuring performance against our purpose and priorities, and to identify opportunities for improvement as our work matures and progresses.
- > Organisational wide planning activities to confirm the portfolio programs and projects and initiatives in line with budget, risk, workforce, capability, technology and business continuity needs.

Our planning activities support the development of our Portfolio Budget Statements, annual Corporate Plan, internal business plans and individual performance development plans.

Performance against targets set out in these documents are monitored through Comcare's authoritative committees and the Audit and Risk Committee (ARC), with final results reported in our annual report.

We have used the 2024–25 planning cycle to refocus our strategic priorities and develop the new Comcare Strategy 2024–2028 (the Comcare Strategy) that details our strategic and enabling priorities, key activities, aspirations, performance measures and strategic risk statements. It will be delivered through the work planned and prioritised on our internal Strategic Roadmap.

The new Comcare Strategy has informed our Portfolio Budget Statement and Corporate Plan for 2024–25 and will be the focus of our next annual report.

Comcare is continuing to mature its planning and reporting cycle for 2025–26 with a greater focus on integrating risk, budget and workforce planning to ensure our efforts and investments align to our strategic priorities and enabling priorities so Comcare can manage its strategic risks and achieve its strategic aspirations.

Governance framework

Comcare aims for excellence in its governance to promote public trust and confidence. Good governance for Comcare focuses on 2 key requirements:

- > Performance – governance procedures and practices are designed to shape our results, and demonstrate results to the Executive, the government and stakeholders.
- > Conformance – the practices designed to conform with applicable legislative and policy requirements, in addition to the public expectations of transparency and integrity.

Comcare’s leadership plays an important role in ensuring good governance practices are embedded throughout the organisation and how we work. On a day-to-day basis, governance is about the way officials make decisions and implement policies in practice.

Comcare’s governance framework is based on 6 key principles. It has supported effective governance and underpinned the design of our governance structures and systems. The principles-based approach promotes greater flexibility and responsiveness to Government and customer needs.

Table 8: Comcare’s governance principles

	Principles in action	Alignment with our values
Consistent Consistent rules, practices and behaviours	We have meaningful mechanisms in place to ensure we adhere to all applicable standards and requirements. We continuously monitor, review and evaluate performance and compliance, and adjust strategies, processes and systems to improve performance and ensure compliance.	Act with integrity and respect
Transparent A risk and evidence-based approach to decision making	We act with integrity and accountability, continually assessing risks to the achievement of objectives or compliance. We have clear roles and responsibilities, and procedures for making decisions and exercising authority.	
Collaborative Commitment to work across boundaries	We collaborate in everything we do. We share key information across groups and get the right people involved.	Collaborate and innovate
Flexible Ability to adapt to meet tomorrow’s challenges	We look for new ideas and think about what is happening across the broader environment. We use flexible and evolving, principles-based systems.	
Stewardship Delegated authority and ownership of outcomes	We take every opportunity to enhance our performance, and ensure our services are responsive and provided in accordance with our values. We are insight driven and committed to risk and evidence-based practices to ensure the best use of resources.	Strive to have a positive impact
Aligned Aligned to purpose, priorities and risk	We continually realign to meet our short and long-term goals. We work in alignment with our risk appetite.	

Executive Committee and senior management committees

Under the PGPA Act, Comcare is a corporate Commonwealth entity with a CEO as the accountable authority. The CEO is assisted in the corporate governance functions by internal governance committees.

There are 2 levels of governance committees in Comcare's governance structure: Executive Committee and Authoritative Committees. Supporting structures to facilitate consultation and inform Comcare's governance committees sit underneath these levels.

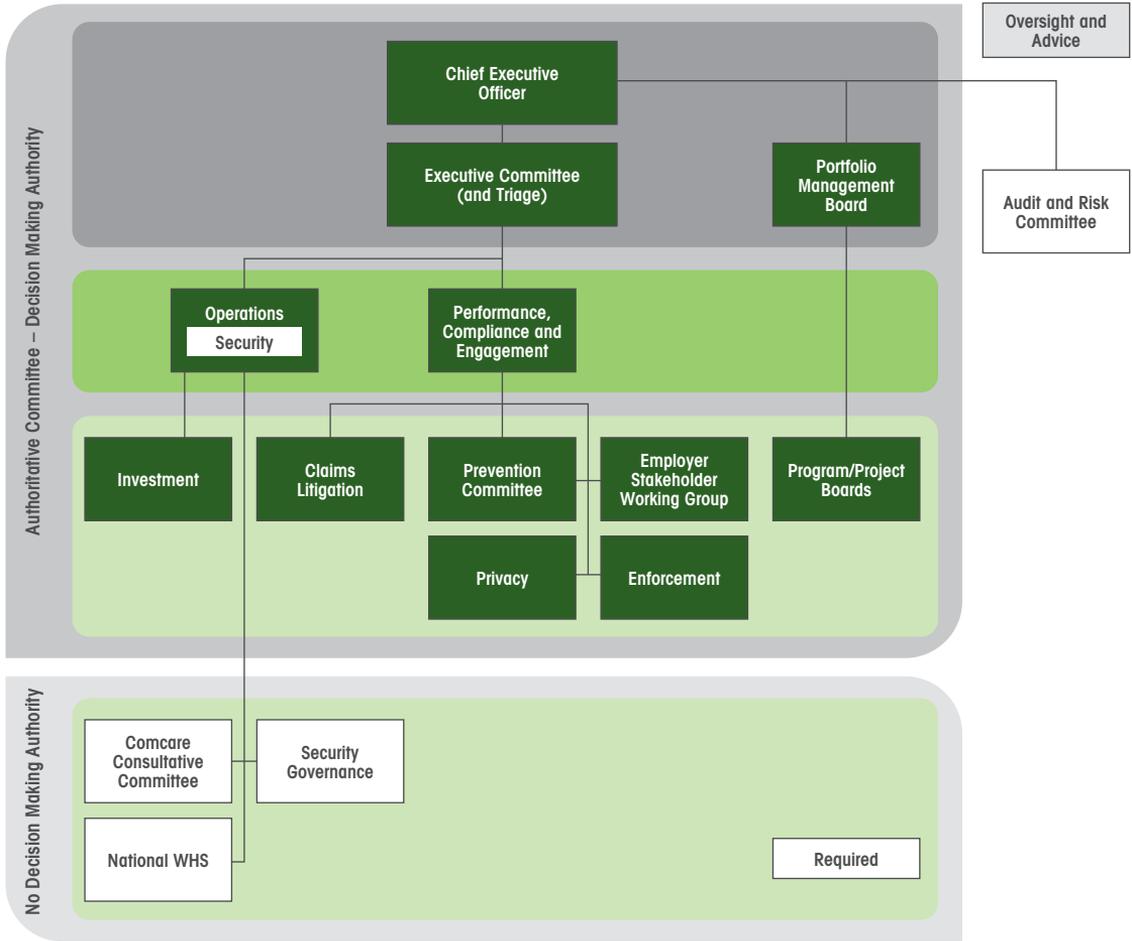
The Executive Committee provides strategic oversight and guidance of Comcare's overall performance and accountability requirements. This committee is the highest level in Comcare's governance committee structure. Its responsibilities include:

- > prioritisation of investments, programs and initiatives based on strategy and legislative requirements
- > steering of change impacts across Comcare
- > major scope and content decisions that have strategic implications or cross-group impacts of significance
- > benefits and achievement of Comcare's priorities and performance measures
- > ensuring effective and robust governance and assurance arrangements, including setting risk appetite and prioritisation.

Authoritative committees provide strategic oversight and guidance of core cross-organisation business priorities, strategies or functions considered complex or high risk. Authoritative committees are accountable to the Executive Committee. Responsibilities include, but are not limited to:

- > monitoring delivery of immediate priorities and performance outcomes
- > management of risk and cross-business impacts
- > recommendations to the appropriate delegate for statutory decisions relating to compliance activities
- > assessing and realising longer-term improvement opportunities
- > escalating matters of significant cross-group impact, outside the group's remit to the Executive Committee.

Figure 7: Comcare’s governance structure



Fraud

Comcare is committed to complying with the Commonwealth Fraud and Corruption Control Framework 2024 (Fraud Control Framework) (in particular, section 10 of the *Public Governance, Performance and Accountability Rule 2014*) to minimise fraud.

Comcare maintains enterprise and group fraud risk assessments, which are reviewed biannually. The risk assessments ensure there are appropriate mechanisms in place to prevent, detect and respond to fraud and inform Comcare’s Fraud Control Policy, Plan and supporting procedures.

Comcare undertakes investigations of criminal fraud and corruption against Comcare. All criminal fraud investigations are conducted in compliance with the Fraud Control Framework and the Australian Government Investigations Standards 2022.

In 2023–24:

- > Comcare completed a review of its approach to fraud and corruption in preparation for the new *PGPA Fraud and Corruption Rule*
- > Updated our reporting, referral and public interest disclosure processes to align with the commencement of the National Anti-Corruption Commission
- > Delivered a Fraud Awareness week program from 13 – 17 November 2023. Activities included:

Internal:

- Internal communications from the CEO and Chief Operating Officer
- Daily intranet articles as well as internal network screen messaging
- 2 internal information sessions

External:

- Hosted 2 guest speaker presentations. Both presentations were well attended with 223 officials attending the session presented by Chris McDermott, Director from the Commonwealth Fraud Prevention Centre and 209 attending the session presented by John Ford, Acting Commissioner from the Australian Taxation Office.

Internal audit

The internal audit program is a key element of the Comcare corporate governance framework.

The program provides assurance to the Comcare and Seacare Authority ARC, the CEO, the Chair of the Seacare Authority and senior management. It adds value to what Comcare does by highlighting opportunities for improvement in statutory compliance, internal control, and efficiency and effectiveness of business processes.

Internal audit topics are identified through consultation with senior management and the ARC. In deciding the final program of internal audit work for the year, the ARC considers the strategic and operational risk profile of Comcare and relevant audit reports published by the Australian National Audit Office (ANAO).

A new Comcare internal auditor was onboarded in 2023–24. Four internal audits were presented to the ARC in 2023–24, an increase from 3 audits in 2022–23. The audits included:

- > an assessment of our Complaints Management system
- > a review of our Regulatory Operations Assurance Program
- > assessments of both our Cloud Governance Framework
- > a health check of the New Claims Management Solution project.

Internal audit recommendations are tracked and reported to the ARC to ensure identified risks are addressed. During 2023–24, there were 47 recommendations made through internal audit reports (compared with 14 in the previous year). At the end of 2023–24, 32 recommendations arising from completed audits were closed and 28 recommendations remained open (compared with 13 in the previous year).

Risk management

Comcare has embedded systematic risk management as part of its governance and planning processes and organisational culture. Comcare's particular focus is on:

- > establishing a high-quality, agency-wide risk management framework
- > providing comprehensive training and awareness of risk management
- > evaluating and improving risk performance
- > strengthening engagement with stakeholders on risk issues.

Comcare's strategic risks are based on focus areas aligned to our strategic priorities, where risk may arise in our operating environment. Comcare's risk focus areas are detailed in the Comcare Corporate Plan 2023–24.

Comcare's Executive Committee is responsible for monitoring and maintaining our Strategic Risk Register (SRR). In 2023–24, the SRR was reported quarterly to the Executive Committee and the ARC for external assurance.

This year, Comcare has:

- > finalised the action items for our internal audit program review of risk culture, focussing on: encouraging appropriate risk taking and empowering employee decision making, increasing the consistency of communication and collaboration on risk management and highlighting the value of risk management activities and sharing lessons learnt.

- > delivered risk awareness week from 17 to 21 June 2024 including:

Internal:

- Internal communications from the CEO and Chief Operating Officer
- Daily intranet articles as well as internal network screen messaging
- A presentation spotlighting our CEO with 242 staff attending
- An internal information session on strategic risk, with 157 attendees

External:

- Hosted a guest speaker presentation on risk management from Ms Kate Hughes, Chair of our Audit and Risk Committee with 188 people attending this session.

- > developed and implemented a new process and register for emerging risk.

Audit and Risk Committee

The CEO has established the ARC in accordance with section 45 of the PGPA Act. The objective of the committee is to provide independent assurance and assistance to Comcare’s CEO and the Seacare Authority Chairperson on risk, the control and compliance framework, and external accountability responsibilities in line with the functions set out in the Committee’s charter on the [Comcare website](https://www.comcare.gov.au/about/forms-pubs/docs/pubs/corporate-publications/comcare-audit-risk-committee-charter-2024.pdf). <https://www.comcare.gov.au/about/forms-pubs/docs/pubs/corporate-publications/comcare-audit-risk-committee-charter-2024.pdf>.

For 2023–24, the ARC consisted of 5 independent members, including the Chairperson appointed by the CEO. Comcare’s senior executive, the Chief Financial Officer, internal audit officers and the ANAO regularly attend as observers.

Kate Hughes (ARC Chairperson)

Ms Kate Hughes is a risk management, compliance, internal audit and governance professional who also holds non-executive roles with the Australian Prudential Regulation Authority, Victorian Department of Health, Lower Murray Water, SuniTAFE and SkyCity Entertainment Group.

Ms Hughes' most recent executive role was as Chief Audit and Risk Officer at RMIT University, with responsibility for the University's internal audit, risk management, compliance and regulatory affairs functions. Prior to this Ms Hughes was the Chief Risk Officer at Telstra, with global responsibility for the enterprise-wide risk management, resilience, investigations, privacy, compliance and health and safety functions.

Ms Hughes has led international teams for 15 years and she has broad risk management, compliance, safety and governance experience in many sectors, including financial services, agribusiness, retail, manufacturing, public administration and telecommunications. Ms Hughes has also provided risk management and compliance consulting services on trade practices, employment and environmental issues.

Kevin Noonan (ARC Member)

Mr Kevin Noonan is an Emeritus Chief Analyst at Omdia, the global technology research company, with more than 400 analysts covering 150 markets in the technology, media, and telecommunications industries.

Mr Noonan has more than 40 years' experience in technology-based governance, strategy and direction. This includes 28 years in the government sector as a Chief Information Officer, senior executive and manager, and a further 12 years as an international senior industry analyst.

Prior to joining the Comcare and Seacare Authority ARC in 2019, Mr Noonan held the dual positions of Chief Analyst and Practice Leader for Ovum's worldwide government practice. In this role he worked with government and industry executives in various locations around the world.

Mr Noonan also worked as a Head of Consulting at Intermedium, where he specialised in government sector industry development, and provided advice to executives from more than half the top 100 IT companies.

Peter Hughes (ARC Member)

Mr Peter Hughes has over 35 years' experience as a consulting actuary. Mr Hughes retired in 2016 as a Mercer Partner when he was the Leader of the Insurance Investment Consulting practice for the Pacific region. He continues as an independent actuary and insurance investment consultant as well as holding a number of audit, risk, finance and investment governance roles.

Mr Hughes provided specialist strategic investment consulting and asset/liability risk management advice to insurance companies to help them meet their business goals. Mr Hughes' clients during his career with Mercer included general insurers, life offices, worker's compensation, compulsory third party, professional indemnity, lender's mortgage and health insurance funds.

David Turvey (ARC member)

Mr David Turvey is Executive Director of Jobs and Skills Australia. He is responsible for overseeing the operations of the organisation, including providing strategic advice on the work program, technical advice on analytical products, building relationships with partners and stakeholders and managing operational aspects such as budgeting, recruitment, technology and culture and people management.

Prior to his current role, Mr Turvey was First Assistant Secretary, National Skills Commission. He has held executive roles at the Department of Education, Skills and Employment, Department of the Prime Minister and Cabinet, Department of Industry, Innovation and Science, Australian Treasury, and the Department of Finance and Administration. Mr Turvey also worked as an economist at the Organisation for Economic Cooperation and Development. Mr Turvey has worked in a range of policy areas including labour market policy, vocational education and training policy, industry policy, fiscal policy and public debt management.

Mr Turvey's governance experience covers several Australian Government entity audit committee roles and as Treasurer of a not-for-profit community organisation in the ACT. Mr Turvey holds a Master of Economics from the Australian National University and is a Graduate of the Australian Institute of Company Directors.

Stephen Sheehan (ARC member)

Mr Stephen Sheehan is a financial management consultant. He has over 40 years' experience working in financial management and accounting roles that spanned both the public and private sector. Mr Sheehan has considerable financial management and reporting, accounting, risk and assurance, performance reporting, organisational management and governance experience.

Mr Sheehan's APS senior executive career included roles as the Chief Financial Officer of the Department of Immigration and Citizenship, the Department of Health and Ageing and CRS Australia.

Mr Sheehan provides audit committee services and financial management advice to a range of Commonwealth agencies.

Table 9: Comcare’s Audit and Risk Committee

Member name	Qualifications, knowledge, skills or experience (include formal and informal as relevant)	Number of meetings attended	Total number of meetings held	Total annual remuneration (GST inc.)	Additional Information (Including role on committee)
Kate Hughes (Chairperson)	<p>Qualifications:</p> <ul style="list-style-type: none"> > Bachelor of Commerce from Western Sydney University > Graduate Diploma in Applied Finance from FINSIA > Graduate Diploma in OH&S from RMIT > Graduate of the Australian Institute of Company Directors <p>Knowledge, skills and experience</p> <ul style="list-style-type: none"> > Accounting and Finance Audit > Assurance and Risk Management > Security and Compliance > Governance and Public Administration > Strategic Advice and Business Development 	5	5	\$18,743.40	Chairperson
Kevin Noonan	<p>Qualifications:</p> <ul style="list-style-type: none"> > Australian Government computing programmer accreditation in 1975 > Senior Member of Australian Computer Society (certified practitioner) > Member of the Australian Information Industry Association <p>Knowledge, skills and experience</p> <ul style="list-style-type: none"> > Security and Compliance > Governance and Public Administration > Strategic Advice and Business Development > Information Technology 	4	4	\$12,810.00	Member

Member name	Qualifications, knowledge, skills or experience (include formal and informal as relevant)	Number of meetings attended	Total number of meetings held	Total annual remuneration (GST inc.)	Additional Information (Including role on committee)
Peter Hughes	<p>Qualifications:</p> <ul style="list-style-type: none"> > Fellow of the Institute of Actuaries of Australia > Graduate of the Australian Institute of Company Directors <p>Knowledge, skills and experience:</p> <ul style="list-style-type: none"> > Accounting and Finance > Audit, Assurance and Risk Management > Industry-specific Knowledge – Insurance > Strategic Advice and Business Development > Actuarial and Investment 	5	5	\$18,029.90	Member
David Turvey	<p>Qualifications:</p> <ul style="list-style-type: none"> > Master of Economics from Australian National University > Graduate of the Australian Institute of Company Directors <p>Knowledge, skills and experience:</p> <ul style="list-style-type: none"> > Accounting and Finance > Governance and Public Administration > Strategic Advice and Business Development > Data Mining and Analytics > Performance and Economics 	5	5	N/A	Member
Stephen Sheehan	<p>Qualifications:</p> <ul style="list-style-type: none"> > Bachelor of Commerce (Accounting) <p>Knowledge, skills and experience:</p> <ul style="list-style-type: none"> > Accounting and Finance > Risk management > Strategic Advice and Business development 	5	5	\$17,080.80	Member

Accountability

Comcare's self-initiated capability review

Comcare undertook a self-initiated capability review between September and December 2023, that included both staff and external stakeholders. There were 5 domains of focus: collaboration, leadership and culture, delivery, workforce, and enabling functions.

The resulting identified development areas (in the context of what we might anticipate our future operating environment to be) will be included in our ongoing work and strategies moving forward.

Significant activities and changes that affected Comcare

No significant activities or changes occurred that affected the operations or structure of the entity in 2023–24.

Ministerial Directions

Comcare received no Ministerial Directions in 2023–24.

Government general policy orders

Comcare complied with the General Policy Order Public Governance, Performance and Accountability (Charging for Regulatory Activities) issued by the Minister for Finance on 24 August 2017.

Significant non-compliance with finance law

There were no instances of significant non-compliance with finance law reported to the Minister by Comcare under paragraph 19(1)(e) of the PGPA Act in 2023–24.

Judicial decisions and reviews by outside bodies

External audit

The Auditor General tabled a performance audit of Comcare's administration of workers' compensation claims on 25 June 2023. The objective of the audit was to assess the effectiveness of Comcare's administration of claims for Australian Government entities under its workers' compensation scheme.

The audit found Comcare’s administration of claims made under the workers’ compensation scheme is effective, however Comcare has not benchmarked the target for its efficiency measure which means the efficiency of the claims management process is not clear. There were 2 recommendations in the report. In 2023–24, Comcare addressed the first recommendations related to reviewing our delegated claims arrangements to identify lessons for claims management. For the second recommendation, Comcare completed its review of our corporate performance measures and is considering different approaches to benchmark its administrative cost ratio.

Freedom of information

Comcare is required to publish information to the public as part of the *Freedom of Information Act 1982* (FOI Act) Information Publication Scheme (IPS).

In accordance with rule 17AH of the PGPA Rule 2014: Comcare’s Agency Plan and other categories of information specified by the IPS are available on the [Comcare website](#).

<https://www.comcare.gov.au/about/governance/comcare-information-publication-scheme>.

Office of the Australian Information Commissioner

Freedom of information requests for review

During 2023–24, the Office of the Australian Information Commissioner (OAIC) notified Comcare that it had received 23 requests for Information Commissioner reviews of freedom of information decisions made by Comcare.

Comcare provided submissions in relation to 12 Information Commissioner reviews. Submissions for the other 11 reviews are in progress.

Privacy complaints

During 2023–24, OAIC notified Comcare that it had received 2 privacy complaints about Comcare’s actions. One complaint is ongoing.

Commonwealth Ombudsman

During 2023–24, Comcare received 4 formal investigation notices and 2 preliminary inquiries notices from the Commonwealth Ombudsman.

A total of 4 matters comprising both investigations and preliminary inquiries were finalised, with the Commonwealth Ombudsman deciding that no further review of the matters was warranted.

One Commonwealth Ombudsman preliminary inquiry and 2 investigations received in the period remained ongoing as of 30 June 2024.

Procurement (related entity transactions)

Comcare procurement was undertaken in accordance with the PGPA Act and the Commonwealth Procurement Rules. Comcare actively supports the Indigenous Procurement Policy, meeting the targets set to ensure indigenous business opportunities continue to grow.

Comcare has published its second annual *Modern Slavery Act 2018* (Cth) (the Act) Statement, covering Comcare's procurement and investment activities, after assessing and addressing any identified modern slavery risks in its operations and supply chains.

Details of contracts for consultancy services

Comcare entered into 22 consultancy contracts with an individual contract value of \$10,000 or more (GST inclusive) with a total consultancy value of \$1,583,893 (GST inclusive). Two of these are multi-year contracts.

Services provided under the contracts include the provision of advisory services, strategy support, independent audit and reviews.

Senate Order on entity contracts

As a corporate Commonwealth entity, we comply with the Senate Order on entity contracts and publish a list of contracts valued at \$100,000 or more (GST inclusive) on our [website](#). Refer to our [website](#) to read the report – <https://www.comcare.gov.au/about/governance/comcare-contracts-list>.

More information on the value of contracts above the relevant threshold of \$400,000 (GST inclusive) is available on the [AusTender website](#) – <https://www.tenders.gov.au/>.

Pay on-time reporting

Comcare recognises the importance of ensuring that small businesses are paid on time.

The results of the Survey of Australian Government Payments to Small Business are available on the [Treasury's website](#).

Indemnities and insurance

Professional indemnity insurance, purchased from Comcover indemnifies Comcare, the CEO, and all employees for damages, and defence costs awarded for breach of duty.

In 2023–24, Comcare paid \$66,607 (GST inclusive) (\$65,952 in 2022–23) for directors' and officers' insurance.

Advertising and market research

During 2023–24, Comcare spent \$57,613 (GST inclusive) on advertising and nil on market research.

Financial performance

At the end of 2023–24, Comcare remains in a strong financial position.

Comcare’s premium scheme continues to operate within targets in terms of both efficiency and ongoing viability.

Comcare continues to efficiently deliver upon its outcome to promote and enable safe and healthy work.

In 2023–24, Comcare had an operating deficit of \$5.5 million as shown in the table below.

Table 10: Comcare financial operating result

	2019–20	2020–21	2021–22	2022–23	2023–24
	\$m	\$m	\$m	\$m	\$m
Workers’ compensation premiums	163.3	167.4	161.6	175.5	213.1
Other cost-recovery revenue	36.4	37.0	45.0	39.1	40.0
Interest and other revenue	24.0	13.9	9.2	20.9	30.0
Revenue from government	61.2	51.2	44.0	51.2	55.9
Claim payments	(216.9)	(207.9)	(196.2)	(206.3)	(219.7)
Administration costs (business-as-usual)	(101.1)	(106.8)	(107.7)	(113.8)	(126.1)
Administration expenses (projects)	(4.2)	(6.9)	(9.0)	(11.6)	(15.6)
Administration costs (finance costs)	(3.2)	(7.2)	(0.9)	(0.2)	(0.2)
Surplus of revenue over expenses	(40.5)	(59.3)	(54.0)	(45.3)	(22.6)
Movement in claims provisions and appropriations receivable					
Movement in provisions for outstanding claims liabilities	124.3	88.9	150.3	21.0	(64.0)
Available funding from movement in claims provisions	(92.9)	(37.6)	(88.8)	26.2	81.0
Surplus/(deficit) on continuing operations	(9.1)	(8.0)	7.5	1.8	(5.5)
Net equity	17.2	9.1	22.7	24.5	19.0
Cash and cash equivalents	986.6	943.8	497.3	435.3	404.9

Premium scheme

Comcare's funding ratio at 30 June 2024 was 112%. This represents a decrease compared to last year's result of 117%. However, it remains above Comcare's target minimum funding ratio of 110% for the seventh consecutive year. The result demonstrates that Comcare's premium scheme remains financially viable and capable of funding outstanding premium-related claims liabilities.

The positive funding ratio represents a surplus of premium funds of \$211.0 million (\$289.8 million in 2022–23) available to settle future claims liabilities.

Table 11: Comcare historical funding ratio

	2019–20	2020–21	2021–22	2022–23	2023–24
Funding ratio	128%	129%	124%	117%	112%

The decrease in the funding ratio compared to last year's result was due to the net impact of:

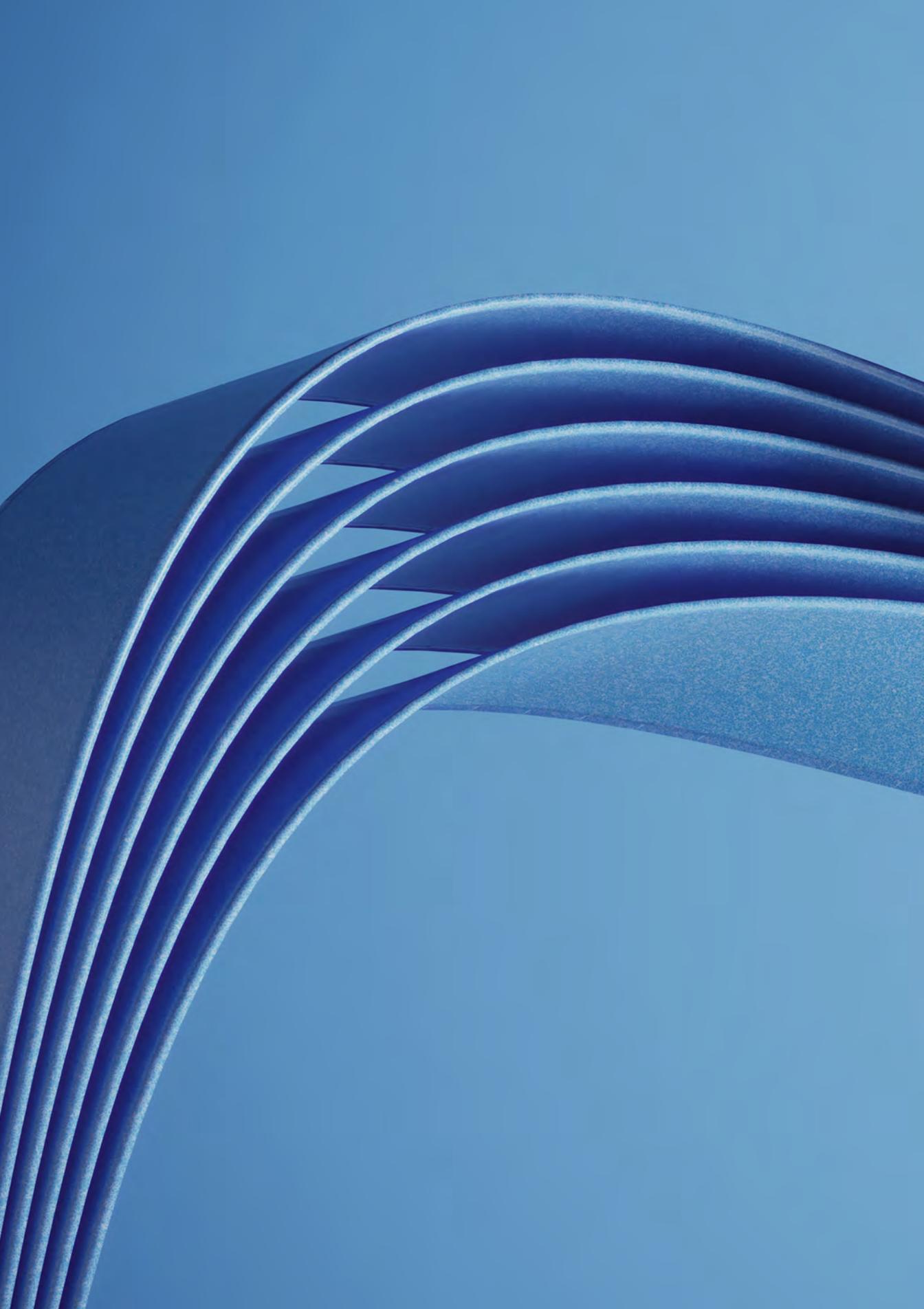
an increase in premium scheme liabilities of \$104.3 million, offset by an increase in premium scheme assets of \$25.5 million.

Comcare will closely monitor the funding ratio in 2023–24 and if it falls below the minimum target of 110%, Comcare will apply strategies to strengthen the financial viability of the premium scheme.

Comcare's net premium scheme liabilities at 30 June 2024 were \$1.802 billion (\$1.698 billion in 2022–23). The increase was mainly due to higher incapacity activations for psychological disease claims.

Table 12: Comcare historical net premium liabilities

	2019–20	2020–21	2021–22	2022–23	2023–24
	\$m	\$m	\$m	\$m	\$m
Net premium liabilities	1,708	1,646	1,664	1,698	1,802



Chapter 4:
**Financial
statements**





INDEPENDENT AUDITOR'S REPORT

To the Minister for Employment and Workplace Relations

Opinion

In my opinion, the financial statements of Comcare (the Entity) for the year ended 30 June 2024:

- (a) comply with Australian Accounting Standards and the *Public Governance, Performance and Accountability (Financial Reporting) Rule 2015*; and
- (b) present fairly the financial position of the Entity as at 30 June 2024 and its financial performance and cash flows for the year then ended.

The financial statements of the Entity, which I have audited, comprise the following as at 30 June 2024 and for the year then ended:

- Statement by the Accountable Authority and Chief Financial Officer;
- Statement of comprehensive income;
- Statement of financial position;
- Statement of changes in equity;
- Cash flow statement; and
- Notes to the financial statements, comprising material accounting policy information and other explanatory information.

Basis for opinion

I conducted my audit in accordance with the Australian National Audit Office Auditing Standards, which incorporate the Australian Auditing Standards. My responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of my report. I am independent of the Entity in accordance with the relevant ethical requirements for financial statement audits conducted by the Auditor-General and their delegates. These include the relevant independence requirements of the Accounting Professional and Ethical Standards Board's APES 110 *Code of Ethics for Professional Accountants (including Independence Standards)* (the Code) to the extent that they are not in conflict with the *Auditor-General Act 1997*. I have also fulfilled my other responsibilities in accordance with the Code. I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

Accountable Authority's responsibility for the financial statements

As the Accountable Authority of the Entity, the Chief Executive Officer is responsible under the *Public Governance, Performance and Accountability Act 2013* (the Act) for the preparation and fair presentation of annual financial statements that comply with Australian Accounting Standards and the rules made under the Act. The Chief Executive Officer is also responsible for such internal control as the Chief Executive Officer determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Chief Executive Officer is responsible for assessing the ability of the Entity to continue as a going concern, taking into account whether the Entity's operations will cease as a result of an administrative restructure or for any other reason. The Chief Executive Officer is also responsible for disclosing, as applicable, matters related to going concern and using the going concern basis of accounting, unless the assessment indicates that it is not appropriate.

GPO Box 707, Canberra ACT 2601
38 Sydney Avenue, Forrest ACT 2603
Phone (02) 6203 7300

Other information

The Accountable Authority is responsible for the other information. The other information comprises the information included in the annual report for the year ended 30 June 2024 but does not include the financial statements and my auditor's report thereon.

My opinion on the financial statements does not cover the other information, and accordingly I do not express any form of assurance conclusion thereon.

In connection with my audit of the financial statements, my responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or my knowledge obtained in the audit, or otherwise appears to be materially misstated.

If, based on the work I have performed, I conclude that there is a material misstatement of this other information, I am required to report that fact. I have nothing to report in this regard.

Auditor's responsibilities for the audit of the financial statements

My objective is to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes my opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with the Australian National Audit Office Auditing Standards will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

As part of an audit in accordance with the Australian National Audit Office Auditing Standards, I exercise professional judgement and maintain professional scepticism throughout the audit. I also:

- identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for my opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Entity's internal control;
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Accountable Authority;
- conclude on the appropriateness of the Accountable Authority's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Entity's ability to continue as a going concern. If I conclude that a material uncertainty exists, I am required to draw attention in my auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify my opinion. My conclusions are based on the audit evidence obtained up to the date of my auditor's report. However, future events or conditions may cause the Entity to cease to continue as a going concern; and
- evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

I communicate with the Accountable Authority regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that I identify during my audit.

Australian National Audit Office



Fiona Sheppard
Executive Director

Delegate of the Auditor-General

Canberra
17 September 2024

COMCARE FINANCIAL STATEMENTS

for the year ended 30 June 2024

Contents

Certification

Primary Financial Statements

- Statement of comprehensive income
- Statement of financial position
- Statement of changes in equity
- Cash flow statement

Overview

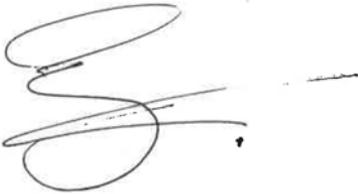
Notes to the Financial Statements

1. Departmental financial performance
 - 1.1 Expenses
 - 1.2 Own-source revenue and gains
2. Departmental financial position
 - 2.1 Financial assets
 - 2.2 Non-financial assets
 - 2.3 Payables
 - 2.4 Interest bearing liabilities
 - 2.5 Provisions
3. Funding
 - 3.1 Cash flow reconciliation
 - 3.2 Regulatory charging summary
4. People and relationships
 - 4.1 Employee provisions
 - 4.2 Key management personnel remuneration
 - 4.3 Related party disclosures
5. Managing uncertainties
 - 5.1 Contingent assets and liabilities
 - 5.2 Remuneration of auditors
 - 5.3 Financial instruments
 - 5.4 Fair value measurement
6. Other information
 - 6.1 Current/Non-current distinction for assets and liabilities
 - 6.2 Assets held in trust
 - 6.3 Reporting of outcomes
 - 6.4 Budget variances commentary

Statement by the Accountable Authority and Chief Financial Officer

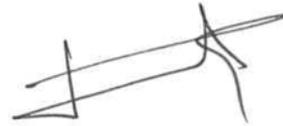
In our opinion, the attached financial statements for the year ended 30 June 2024 comply with subsection 42(2) of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act), and are based on properly maintained financial records as per subsection 41(2) of the PGPA Act.

In our opinion, at the date of this statement, there are reasonable grounds to believe that Comcare will be able to pay its debts as and when they fall due.



Greg Vines
Accountable Authority and Chief Executive Officer

16 September 2024



Seyhan Aka
Chief Financial Officer

16 September 2024

Comcare

Statement of comprehensive income

for the period ended 30 June 2024

		2024	2023	2024 Original Budget
	Notes	\$'000	\$'000	\$'000
Net cost of services				
Expenses				
Employee benefits	1.1A	89,547	74,851	85,121
Suppliers	1.1B	41,209	38,649	34,433
Depreciation and amortisation	2.2A	10,980	11,232	11,387
Finance costs	1.1C	169	177	125
Write-downs and impairment of assets	1.1D	5	745	-
Workers' compensation claims expense	1.1E	195,168	186,828	190,901
Common law asbestos-related disease claims expense		24,491	19,485	25,497
Total expenses		361,569	331,967	347,464
Own-source income				
Own-source revenue				
Revenue from contracts with customers	1.2A	255,803	216,890	233,444
Interest	1.2B	25,448	16,720	19,777
Rental income	1.2C	1,478	1,356	1,630
Other revenue		453	399	250
Total own-source revenue		283,182	235,365	255,101
Gains				
Gains/(Losses) from movement in workers' compensation claims provision	1.2D	(92,315)	(31,008)	(6,143)
Gains from movement in common law asbestos-related disease claims provision	1.2E	28,301	51,967	19,880
Total gains/(losses)		(64,014)	20,959	13,737
Total own-source income		219,168	256,324	268,838
Net (cost of)/contribution by services		(142,401)	(75,643)	(78,626)

	Notes	2024 \$'000	2023 \$'000	2024 Original Budget \$'000
Revenue from Government	1.2F	55,869	51,218	56,315
Available funding from movement in claims provision		81,047	26,209	22,311
Surplus on continuing operations		(5,485)	1,784	-

Other comprehensive income

Items not subject to subsequent reclassification to net cost of services

Changes in asset revaluation reserve (net)	2.5B	26	(36)	-
Total other comprehensive income/(loss)		26	(36)	-
Total comprehensive income/(loss)		(5,459)	1,748	-

The above statement should be read in conjunction with the accompanying notes.

Budget variances commentary is provided in Note 6.4.

Comcare Statement of financial position

as at 30 June 2024

	Notes	2024 \$'000	2023 \$'000	2024 Original Budget \$'000
Assets				
Financial assets				
Cash and cash equivalents	2.1A	404,922	435,278	402,326
Trade and other receivables	2.1B	2,208,719	2,130,643	2,186,706
Other financial assets	2.1C	23,971	12,000	9,656
Total financial assets		2,637,612	2,577,921	2,598,688
Non-financial assets¹				
Buildings	2.2A	22,816	30,152	23,360
Plant and equipment	2.2A	4,453	2,472	4,400
Computer software	2.2A	9,411	10,587	10,143
Other non-financial assets	2.2B	2,339	1,238	1,531
Total non-financial assets		39,019	44,449	39,434
Total assets		2,676,631	2,622,370	2,638,122
Liabilities				
Payables				
Suppliers	2.3A	2,744	2,865	2,696
Workers' compensation claims payable		4,092	2,897	5,050
Other payables	2.3B	3,586	3,220	1,843
Total payables		10,422	8,982	9,589
Interest bearing liabilities				
Leases	2.4A	19,785	25,631	19,760
Total interest bearing liabilities		19,785	25,631	19,760

		2024	2023	2024 Original Budget
	Notes	\$'000	\$'000	\$'000
Provisions				
Employee provisions	4.1	20,644	15,221	19,259
Workers' compensation claims	2.5A, C, D, E	2,044,688	1,952,440	1,900,073
Common law asbestos-related disease claims	2.5F	561,426	594,973	666,120
Other provisions	2.5B	664	662	607
Total provisions		2,627,422	2,563,296	2,586,059
Total liabilities		2,657,629	2,597,909	2,615,408
Net assets		19,002	24,461	22,714
Equity				
Contributed equity		7,717	7,717	7,717
Reserves		9,301	9,275	9,312
Retained surplus		1,984	7,469	5,685
Total equity		19,002	24,461	22,714

¹ Right-of-use assets are included in the line items Buildings, and Plant and Equipment.

The above statement should be read in conjunction with the accompanying notes.

Budget variances commentary is provided in Note 6.4.

Comcare Cash flow statement

for the period ended 30 June 2024

	Notes	2024 \$'000	2023 \$'000	2024 Original Budget \$'000
Operating activities				
Cash received				
Sales of goods and rendering of services		47,423	43,775	48,719
Receipts from Government		59,646	56,502	56,315
Interest		16,054	11,494	19,777
Workers' compensation premiums		205,774	175,510	186,604
GST received from customers		20,941	17,858	16,133
Net GST received		-	-	-
Other		1,957	1,810	-
Total cash received		351,795	306,949	327,548
Cash used				
Employees		83,908	77,535	85,121
GST paid to suppliers		7,401	6,942	6,716
Net GST paid		13,416	10,949	9,417
Suppliers		42,431	38,187	34,436
Interest payments on lease liabilities		141	159	125
Workers' compensation claims		194,753	188,927	190,900
Common law asbestos-related disease claims		24,491	19,485	25,496
Payments to the Official Public Account		5,284	15,510	-
Total cash used		371,825	357,694	352,211
Net cash from/(used by) operating activities	3.1	(20,030)	(50,745)	(24,663)

	Notes	2024 \$'000	2023 \$'000	2024 Original Budget \$'000
Investing activities				
Cash used				
Purchase of property, plant and equipment		4,480	5,448	2,782
Total cash used		4,480	5,448	2,782
Net cash from/(used by) investing activities		(4,480)	(5,448)	(2,782)
Financing activities				
Cash used				
Principal payments of lease liabilities		5,846	5,817	6,127
Total cash used		5,846	5,817	6,127
Net cash from/(used by) financing activities		(5,846)	(5,817)	(6,127)
Net increase/(decrease) in cash held		(30,356)	(62,010)	(33,572)
Cash and cash equivalents at the beginning of the reporting period		435,278	497,288	435,898
Cash and cash equivalents at the end of the reporting period	2.1A	404,922	435,278	402,326

The above statement should be read in conjunction with the accompanying notes.

Budget variance commentary is provided in Note 6.4.

Overview

Objectives of Comcare

Comcare is an Australian Government controlled entity. It is a not-for-profit entity. Comcare is a work health and safety regulator, a scheme administrator and an insurer and claims manager. Comcare also has enabling roles, focused on the capability and capacity of its own workforce and on supporting engagement and better practice approaches to health and safety across its scheme.

Comcare also provides support through expert advice and services to the Seafarers Safety, Rehabilitation and Compensation Authority (Seacare Authority). The cost of services is published in the Seacare Authority financial statements under the statement of comprehensive income with further detail in Note 1.1.

Comcare is structured to meet the following outcome:

Outcome 1: Promote and enable safe and healthy work.

The basis of preparation

The financial statements are general purpose financial statements and are required by section 42 of the *Public Governance, Performance and Accountability Act 2013*.

The financial statements have been prepared in accordance with:

- a) *Public Governance, Performance and Accountability (Financial Reporting) Rule 2015*
- b) Australian Accounting Standards and Interpretations issued by the Australian Accounting Standards Board (AASB) that apply for the reporting period.

The financial statements have been prepared on an accrual basis and in accordance with the historical cost convention, except for certain assets and liabilities reported at fair value. Except where stated, no allowance is made for the effect of changing prices on the results or the financial position. The financial statements are presented in Australian dollars.

New Accounting Standards

Adoption of new Australian accounting standard requirements

No accounting standard has been adopted earlier than the application date as stated in the standard.

The following new, revised, amending standards and/or interpretations were issued by the Australian Accounting Standards Board prior to the signing of the Statements by the Accountable Authority and Chief Financial Officer, which are not expected to have a material impact on Comcare's financial statements for future reporting periods.

Standard/Interpretation	Application date for Comcare ¹	Nature of impending change/s in accounting policy and likely impact on initial application
AASB 2020-1 Amendments to Australian Accounting Standards – Classification of Liabilities as Current or Non-current	1 July 2024	Amends AASB 101 Presentation of Financial Statements to clarify the classification of liabilities as either current or non-current. For example, a liability is classified as non-current if an entity has the right at the end of the reporting period to defer settlement of the liability for at least 12 months after the reporting period. AASB 2020-1 is applicable to annual reporting periods beginning on or after 1 January 2024.
AASB 2022-10 Amendments to Australian Accounting Standards – Fair Value Measurement of Non-Financial Assets of Not-For-Profit Public Sector Entities (AASB 2022-10)	1 July 2024	AASB 2022-10 applies to annual periods beginning on or after 1 January 2024. This standard amends AASB 13 Fair Value Measurement for fair value measurements of non-financial assets of not-for-profit public sector entities not held primarily for their ability to generate net cash inflows. This standard also adds implementation advice and relevant illustrative examples for fair value measurements of non-financial assets of not-for-profit public sector entities not held primarily for their ability to generate net cash inflows.

¹ Comcare’s expected initial application date is when the accounting standard becomes operative at the beginning of Comcare’s reporting period.

All other new, revised or amending standards, or interpretations that were issued prior to the sign-off date and are applicable to future reporting periods are not expected to have a future material impact on Comcare’s financial statements.

Taxation

Comcare is exempt from all forms of taxation except Fringe Benefits Tax and the Goods and Services Tax.

Significant accounting judgements and estimates

Comcare's compensation schemes exhibit many of the characteristics of an insurance business. Comcare's statutory relationship with its customers and the Commonwealth is not of the nature of an insurance contract as defined under AASB 1023 General Insurance Contracts. Comcare regards the application of AASB 137 Provisions, Contingent Liabilities and Contingent Assets in the valuation of its claims provisions as being more appropriate. The valuation of workers' compensation claims liabilities and common law asbestos-related disease claims liabilities was undertaken as at 30 June 2024 by independent consulting actuaries, Taylor Fry Pty Ltd (Taylor Fry). The provisions represent an estimate of the present value of future payments in respect of claims for events occurring before 30 June 2024 with a 75% probability of sufficiency. The estimated cost of claims includes direct expenses to be incurred in settling claims. The expected value of recoveries from third parties is included in Trade and Other Receivables.

Comcare takes all reasonable steps to ensure it has appropriate information regarding its claims exposures. However, given the uncertainty in establishing the claims provisions, it is likely the final outcome will prove to be different from the original liability established.

Many sources of uncertainty exist when estimating a "long tail" provision. There are some general sources of uncertainty and these arise from:

- > the actuarial models and methods which may not exactly match the underlying claims process
- > past claim fluctuations which may create uncertainty in selecting model parameters
- > unavailable data or undetected errors in data which may result in inappropriate parameters being selected
- > future economic and environmental conditions which may be different to those assumed
- > future claim fluctuations, resulting in uncertainty of the projected liability.

Principles of accounting for workers' compensation claims

Comcare manages workers' compensation claims for Commonwealth employees under the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act). Workers' compensation claims for work related injuries and illness sustained on or after 1 July 1989 are referred to as 'premium claims' or 'premium business'. Workers' compensation claims for work related injuries sustained by Commonwealth employees prior to that date are referred to as 'pre-premium claims' or 'pre-premium business'.

For premium claims, premiums are received from employers covered under the SRC Act. These amounts are calculated using a system and methodology developed by an independent actuary and are intended to fully cover all liabilities incurred over the life of these claims.

All premiums are charged in advance for the full financial year. There are no unearned premiums or deferred acquisition costs at the end of the financial year. Changes to premiums arising from wage and salary adjustments are recognised in the year amounts become payable or receivable.

Pre-premium claims are funded by parliamentary special appropriations on an emerging cost basis.

In accordance with section 128A of the SRC Act, Comcare's liability under the SRC Act in respect of any injury, loss or damage suffered before 1 July 1989 by an employee of a Commonwealth authority listed in section 128A(4) must be discharged by the authority.

Claims provisions

The valuation of workers' compensation claims liabilities and common law asbestos-related disease claims liabilities was undertaken as at 30 June 2024 by independent consulting actuaries, Taylor Fry.

The liability for workers' compensation claims (both premium and pre-premium) and common law asbestos-related disease claims are determined in accordance with the requirements of AASB 137 *Provisions, Contingent Liabilities and Contingent Assets*. Provisions for claims are recognised when:

- > Comcare has a present legal or constructive obligation as a result of past events
- > it is probable that an outflow of resources will be required to settle the obligation
- > the amount has been reliably estimated.

Where there are a number of similar obligations for each claim type, the likelihood that an outflow will be required in settlement is determined by considering the class of obligations as a whole. A provision is recognised even if the likelihood of an outflow with respect to any one item included in the same claim type may be small.

The expected future payments are discounted to present value using a risk free rate. The expected future payments include claims reported but not yet paid, claims incurred but not reported and anticipated claims handling costs. Claims handling costs can either be associated directly with individual claims, such as legal and other professional fees, or associated indirectly with individual claims, such as claims administration costs.

Workers' compensation claims provisions

There are specific sources of uncertainty arising from the nature of the schemes and the data. Allowance is made, however, for changes or uncertainties which may create distortions in the underlying statistics or which might cause the future cost of claims to increase or decrease when compared with the past cost of claims, including:

- > trends in long-term weekly income replacement benefit and medical cost continuance rates
- > the longer lag times between injury and claim relative to other workers' compensation schemes
- > movements in industry benchmarks
- > changes in service delivery which might accelerate or slow down the development and/or recording of paid or incurred claims, compared with the statistics from previous periods
- > changes in the legal environment
- > medical and technological developments.

The injury profile within the schemes creates dynamic expenditure patterns. Typically injuries can be of an immediate and short-term duration as well as those which are more permanent resulting in long-term entitlements. Historically, the expenditure trend does concentrate earlier (the discounted mean term of the liabilities is approximately eight years). However, the provisions have a long tail element where payments are expected to be made for the next 50 or more years.

For the purpose of estimating the workers' compensation provisions, Taylor Fry considers the varying types of benefits. These include the following:

- > incapacity payments, split between short-term and long-term payments
- > medical and rehabilitation expenses
- > legal expenses

- > other costs, including permanent impairment, non-economic loss payments, death, common law and other payments.

In calculating the estimated cost of future workers' compensation claims, Taylor Fry uses a variety of estimation techniques, generally based on statistical analysis of historical experience, which assumes that the development pattern of the current and future claims will be consistent with past experience.

The sensitivity analysis shown below quantifies some of the significant uncertainty around the valuation estimates. It is not intended to be comprehensive and uncertainty remains in other areas. It shows that, notwithstanding the substantial downward adjustment in the liability as a result of changes in the assumptions for valuations, the risk of over or under estimating the liability remains. At the same time, these results show there is room for a further decline in expenditure under assumptions that would not be unreasonable given recent experience.

Details of the specific assumptions used in deriving the claims liabilities at 30 June are detailed in Notes 2.5D-G.

Premium business

The value of the provision for premium claims liability has increased by \$104 million in 2023–24 (\$32 million increase in 2022–23).

Changes to premium claims liability	\$' million
Opening balance of gross liability as at 1 July 2023	1,705
Roll forward to 30 June 2024 valuation date	36
Projected gross liability as at 30 June 2024	1,741
Alignment of inflation bases	-
Changes in economic assumptions	(14)
Number of active incapacity and/or medical claims	51
Number of new claimants receiving incapacity and/or medical payments	40
Shorter-term continuance rates	1
Longer-term continuance rates, including effect of retirement	(13)
Changes in claims administration expenses	21
Assumed average quarterly payments	(18)
Asbestos experience and model changes	-
Closing balance of gross liability as at 30 June 2024	1,809

Commonwealth latent mental disease claims

Comcare carried out analysis of data in relation to latent mental disease claims and has recognised a separate provision for liability arising from constructive obligations existing before the date of injury, but after the date of exposure to the cause of injury. This accounting practice recognises the liability before Comcare's legal obligation to provide compensation under the SRC Act. The additional liability cannot be funded from premiums until the year in which the resulting injuries occur.

Premium business sensitivity analysis

As the workers' compensation provisions are subject to a variety of assumptions, it is considered prudent to disclose what could be the sensitivities of the significant assumptions. In its report, Taylor Fry has provided the following information regarding areas of uncertainty and key risks.

1. Longer-term continuance rates

The valuation estimate is extremely sensitive to the assumed longer-term continuance rates (for claims of 15 or more years since injury). Past longer-term continuance rates have shown considerable variability from year to year and estimates of future longer-term continuance rates are highly uncertain. If continuance rates for incapacity and medical payments were to reach levels 0.5% higher than those assumed for this valuation the central estimate of the liability would increase by around \$96 million. However, if experience were to move in the opposite direction by the same amount, then the liability would decrease by around \$77 million.

2. Shorter-term continuance rates

The liability estimate is highly sensitive to forecast short term continuance rates (for claims of less than 15 years since injury). In the past there has been considerable quarterly variation in short term continuance rates, increasing the uncertainty of estimates. If short term continuance rates on both incapacity and medical payments were to reach levels 0.5% higher than forecast, then the central estimate of liability would increase by around \$104 million. However, if experience was 0.5% lower than forecast, the central estimate of liability would decrease by \$90 million. Both these scenarios can be considered moderate variations in continuance rate assumptions given the historical variability in continuance rates.

3. Unit administration expenses increasing slightly

Administration expenses per service unit have increased during 2023–24 due to fewer open claims and fewer claims reports. A future cost per weighted service unit equal to the historical average has been assumed. If the cost per weighted service unit were to continue increasing, the liability estimate would increase by \$3.5 million.

Estimation uncertainty

The illustrative alternative valuation assumptions considered in the analysis are intended to provide some indication as to the relative sensitivity of the provision estimate to changes in some of the assumptions used. The range of the values considered in this analysis should not be considered as necessarily presenting a "reasonable" range of possible outcomes.

It should also be noted that the analysis considers the impact of changes in each factor in isolation. In reality, several factors might vary at the same time. Hence, the combined effect of several variations from the assumptions could be significantly greater than the variation indicated for each factor in isolation. No reliance should be placed on this analysis in regard to the level of uncertainty in the estimates. This has been modelled and quantified separately by Taylor Fry in arriving at a provision for premium and pre-premium claims liabilities. A 13% risk margin (13% in 2022–23) has been applied to the central estimate for premium claims liabilities and 17% (17% in 2022–23) for pre-premium claims liabilities, which gives an intended 75% probability of sufficiency. The probability of sufficiency remain unchanged from 2022–23.

Economic assumptions

This provision is sensitive to interest rate and inflation assumption changes as Taylor Fry calculates the future cash flows and then discounts these future values to the present value using the discount rate. The level of the discount rate, while not affecting the projected future cash flows themselves, will alter the present value assigned to those cash flows, and hence the estimate of the liability.

Common law asbestos-related disease claims

The estimated cost of asbestos-related disease claims is by its nature highly uncertain. In projecting future events which may not occur for 40 to 50 years the actuary is extrapolating disease incidence numbers many years beyond the data from which the projection models have been calibrated. Further, in projecting the future cost of compensation in a common law system the actuary needs to consider the potential for the claims and litigation environment to change.

The outlook for future compensation costs for asbestos litigation in general and for Comcare's liabilities in particular contains a great number of uncertainties in relation to factors such as:

- > the number of diagnosed incidences of asbestos-related diseases
- > the proportion of cases being compensated
- > medical diagnostic and treatment improvements
- > the litigation environment, including legal precedents and court procedures
- > the cost per claim and the contribution from co-defendants.

Sensitivity analysis performed by Taylor Fry indicates that the net central estimate liability, including expenses, may vary by approximately -\$80 million to +\$33 million (i.e. -22% to +9%) as a result of some plausible changes in the valuation basis.

This analysis illustrates the uncertainty inherent in the projections. It is possible a number of these changes could occur simultaneously, resulting in even larger changes. Each of the scenarios in the sensitivity analysis lies within the selected risk margin, which is 34% of the central estimate (2023: 34%).

Disclosure of funding for Comcare

Premium Business

Premium business refers to workers' compensation claims resulting from injuries occurring on or after 1 July 1989.

In accordance with section 97A of the SRC Act, Comcare calculates premiums to be charged for each financial year based on the expected costs for claims when the date of injury, as defined in the SRC Act, is in that year. The calculation of the Comcare premium pool takes into account actual and notional interest expected to be earned on the premium funds collected.

Prior to being repealed (effective 1 July 2002), subsection 90A of the SRC Act required that premiums collected by Comcare be paid to the Australian Government. These funds will be returned to Comcare through parliamentary appropriations as required for payment of claims relating to incidents occurring after 1 July 1989. As at 30 June 2024 the notional balance of these funds was \$1,615.0 million (2023: \$1,572.5 million). This appropriation is only payable to Comcare after it has exhausted all of its retained funds. Premiums received from 1 July 2002 are retained by Comcare.

The funds held with the Australian Government earn notional interest at a rate set by a determination made by the Minister for Finance under section 90C(3) of the SRC Act. A new determination was made in March 2022 and first applied to the 2022-23 financial year which changes the rate used to earn notional interest on the balance from 1 November 2018. The notional interest earned in 2023-24 is \$42.5 million (2023: \$6.1 million). This notional interest is calculated and added to or subtracted from the balance of the notional reserve. The Safety, Rehabilitation and Compensation (Notional Interest) Determination 2022 is published at the Federal Register of Legislation.

Independent actuarial assessment has established the estimated liability for the premium business claims as at 30 June 2024 is \$1,809.7 million (2023: \$1,705.5 million).

The following table summarises the sources of funds available to Comcare to settle the outstanding claims for the premium business.

	Note	2024 \$'000	2023 \$'000
Net premiums held in the Commonwealth Consolidated Revenue Fund ¹		1,615,014	1,572,513
Cash and cash equivalents		397,931	414,965
Actuary assessed third party recoveries		7,802	7,869
Actuary assessed gross outstanding liability for payment of premium related claims ²	2.5C	(1,809,738)	(1,705,526)
Surplus funds in excess of claims liabilities		211,009	289,821

¹ \$1,415.3 million has been recognised as a receivable from the Commonwealth Consolidated Revenue Fund as at 30 June 2024 (2023: \$1,294.0 million).

² Excludes \$11.3 million for additional latent mental disease claims where the date of injury as defined in the SRC Act is after balance date. Refer to Note 2.5E for Commonwealth latent mental disease claims provision.

Pre-premium business

Workers' compensation claims resulting from injuries that occurred prior to 1 July 1989 are referred to as 'pre-premium' claims. Expenses associated with these claims are funded from Australian Government special appropriations. Independent actuarial assessment has established the outstanding liability estimate for these claims as at 30 June 2024 is \$223.6 million (2023: \$235.6 million).

The following table summarises the sources of funds available to Comcare to settle the outstanding claims for the pre-premium business.

	Note	2024 \$'000	2023 \$'000
Special appropriation receivable		222,640	236,886
Cash and cash equivalents		1,010	(1,272)
Actuary assessed gross outstanding liability for payment of pre-premium related claims	2.5E	(223,650)	(235,614)
Surplus funds in excess of claims liabilities		-	-

Asbestos-related disease business

Comcare is also responsible for the management of asbestos-related personal injury common law disease claims against the Commonwealth. Expenses associated with these claims are funded from Australian Government special appropriations. Independent actuarial assessment has established the outstanding liability estimate for these claims as at 30 June 2024 is \$561.4 million (2023: \$594.9 million).

The following table summarises the sources of funds available to Comcare to settle the outstanding claims for the asbestos-related disease business.

	Note	2024 \$'000	2023 \$'000
Special appropriation receivable		476,736	501,248
Cash and cash equivalents		2,767	6,556
Actuary assessed third party recoveries		81,923	87,169
Actuary assessed gross outstanding liability for payment of asbestos-related claims	2.5F	(561,426)	(594,973)
Surplus funds in excess of claims liabilities		-	-

Events after the reporting period

There was no subsequent event that has the potential to significantly affect the ongoing structure and financial activities of Comcare.

Departmental financial performance

This section analyses the financial performance of Comcare for the year ended 30 June 2024

2024	2023
\$'000	\$'000

Note 1.1: Expenses

1.1A	Employee benefits		
	Wages and salaries	65,851	58,888
	Superannuation		
	Defined contribution plans	9,609	7,840
	Defined benefit plans	2,117	2,096
	Leave and other entitlements	10,981	4,566
	Separation and redundancies	-	160
	Other	989	1,301
	Total employee benefits	89,547	74,851

Accounting policy

Accounting policies for employee related expenses are contained in the 'People and relationships' section.

1.1B	Suppliers		
	Goods and services supplied or rendered		
	Consultants	887	517
	Legal expenses	3,470	2,841
	Contractors	8,232	6,868
	Fees for professional services	7,616	8,198
	External claims services	3,022	3,487
	Education and conference delivery	397	258
	Information communication technology	10,868	9,734
	Property services	1,542	1,822
	Travel	1,635	1,447
	Other	2,983	2,772
	Total goods and services supplied or rendered	40,652	37,944

	2024 \$'000	2023 \$'000
Goods supplied	520	288
Services rendered	40,132	37,656
Total goods and services supplied or rendered	40,652	37,944
Other suppliers		
Workers' compensation expenses	557	705
Total other suppliers	557	705
Total suppliers	41,209	38,649

Comcare has no short-term lease commitments as at 30 June 2023.

Accounting policy

Short-term leases and leases of low-value assets

Comcare has elected not to recognise right-of-use assets and lease liabilities for short-term leases of assets that have a lease term of 12 months or less and leases of low-value assets (less than \$10,000). Comcare recognises the lease payments associated with these leases as an expense on a straight-line basis over the lease term.

1.1C Finance costs

Interest on lease liabilities	141	159
Unwinding of discount	28	18
Total finance costs	169	177

The above lease disclosures should be read in conjunction with the accompanying notes 1.1B, 2.2A and 2.4A.

Accounting policy

All borrowing costs are expensed as incurred.

1.1D Write-downs and impairment of assets

Write-down of trade receivables	-	36
Write-down of property, plant and equipment	5	20
Impairment of intangible assets	-	689
Total write-downs and impairment of assets	5	745

	2024 \$'000	2023 \$'000
1.1E Workers' compensation claims expense		
Workers' compensation claims expenses paid and payable (net)	195,168	186,828
Total workers' compensation claims expense	195,168	186,828
Premium claims expense		
Incapacity	120,380	112,021
Legal including common law	14,325	12,724
Medical, travel and other	45,701	45,209
	180,406	169,954
(Less): Recoveries from third parties	(136)	(263)
Total premium claims expense	180,270	169,691
Pre-premium claims expense		
Incapacity	3,436	4,056
Legal, including common law	564	598
Medical, travel and other	10,898	12,483
	14,898	17,137
(Less): Recoveries from third parties	-	-
Total pre-premium claims expense	14,898	17,137

Note 1.2: Own-source revenue and gains

Own-source revenue

1.2A Revenue from contracts with customers		
Rendering of services	255,803	216,890
Total revenue from contracts with customers	255,803	216,890

	2024 \$'000	2023 \$'000
Disaggregation of revenue from contracts with customers		
Major service:		
Premium		
Australian Government entities (related parties)	210,082	172,537
External entities	3,043	2,920
Regulatory contribution	20,417	20,059
Licence fees	19,597	18,995
Other	2,664	2,379
	255,803	216,890

Accounting policy

Comcare recognises revenue at an amount that reflects the consideration entitled in exchange for transferring goods or services to a customer. Where a contract is assessed to have specific, enforceable performance obligations, Comcare recognises income if those obligations are satisfied, either: at a point in time where the ownership or control of the goods or services is passed to the customer at the specific time; or progressively over the period covered. The following is a description of principal activities from which Comcare generates its revenue:

- > The main source of Comcare's revenue is the premiums to cover workers' compensation claims under the SRC Act. Premiums are charged in advance for the full financial year and revenue is recognised progressively over the period covered. Changes to premiums arising from wage and salary adjustments are recognised in the year these amounts become payable or receivable.
- > Comcare also collects regulatory contributions and self-insurance licence fees on an estimated cost recovery basis. Revenue is recognised at the point that invoices are raised. In addition, licence application fees are also payable by entities that apply for a licence to be granted by the SRCC. The application fees are recognised once the application has been assessed and processed by Comcare.

The transaction price is the total amount of consideration to which Comcare expects to be entitled in exchange for transferring promised goods or services to a customer. The consideration promised in a contract with a customer may include fixed amounts, variable amounts, or both.

Receivables for goods and services, which have 30 day terms, are recognised at the nominal amounts due less any impairment allowance account. Collectability of debts is reviewed at the end of the reporting period. Allowances are made when collectability of the debt is no longer probable.

1.2B Interest

Cash on deposit	25,448	16,720
Total interest	25,448	16,720

Accounting policy

Interest revenue is recognised using the effective interest method.

	2024	2023
	\$'000	\$'000

1.2C Rental Income

Operating Lease

Subleasing right-of-use assets

1,478	1,356
-------	-------

Total Rental Income

1,478	1,356
-------	-------

Operating Leases

The sub-lease with the National Emergency Management Agency (NEMA) is for the period 30 June 2023 to 29 June 2024. NEMA has the intention to extend the lease until the end of November 2024.

Maturity analysis of operating lease income receivables:

Within 1 year

534	1,304
-----	-------

534	1,304
-----	-------

The above lease disclosures should be read in conjunction with the accompanying notes 1.1B, 2.2A and 2.4A.

1.2D Gains from the movement in workers' compensation claims provision

Gains /(Losses) from the movement in workers' compensation claims provision

(92,315)	(31,008)
----------	----------

Total gains /(Losses) from the movement in workers' compensation claims provision

(92,315)	(31,008)
----------	----------

Gains/(Losses) from the movement in premium claims provision

Movements during reporting period:

Premium claims provision

(104,212)	(31,557)
-----------	----------

Recoveries receivable

(67)	(2,455)
------	---------

Total gains/(losses) from the movement in premium claims provision

(104,279)	(34,012)
-----------	----------

Gains from the movement in pre-premium claims provision

Movements during reporting period:

Pre-premium claims provision

11,964	3,004
--------	-------

Total gains from the movement in pre-premium claims provision

11,964	3,004
--------	-------

	2024 \$'000	2023 \$'000
1.2E	Gains/(losses) from the movement in common law asbestos-related disease claims provision	
	Movements during reporting period:	
	Asbestos claims provision	33,547 100,620
	Recoveries receivable	(5,246) (48,653)
	Total gains/(losses) from the movement in common law asbestos-related disease claims provision	28,301 51,967
1.2F	Revenue from Government	
	Department of Employment and Workplace Relations	
	Corporate Commonwealth entity payment item	6,029 5,897
	Grants from portfolio department	49,840 45,321
	Total revenue from Government	55,869 51,218

Accounting policy

Revenue from Government

Amounts appropriated for departmental appropriations for the financial year (adjusted for any formal additions and reductions) are recognised as Revenue from Government when the entity gains control of the appropriation, except for certain amounts which relate to activities that are reciprocal in nature, in which case revenue is recognised only when it has been earned. Appropriations receivable are recognised at their nominal amounts.

Funding received or receivable from non-corporate Commonwealth entities (appropriated to the non-corporate Commonwealth entity as a corporate Commonwealth entity payment item for payment to this entity) is recognised as Revenue from Government by the corporate Commonwealth entity unless the funding is in the nature of an equity injection or a loan.

Departmental financial position

This section analyses Comcare's assets used to conduct its operations and the operating liabilities incurred as a result. Employee related information is disclosed in the 'People and relationships' section.

2024	2023
\$'000	\$'000

Note 2.1: Financial assets

2.1A Cash and cash equivalents

Cash at bank and on hand	1,141	1,134
Deposits at call	14,781	11,144
Term deposits	389,000	423,000
Total cash and cash equivalents	404,922	435,278

For further information on Cash and cash equivalents see note 5.3D Credit risk. The closing balance of Cash and cash equivalents does not include amounts held in trust: \$1.9 million in 2024 and \$1.8 million in 2023. See note 6.2 Assets held in trust for more information.

Accounting policy

Cash is recognised at its nominal amount. Cash and cash equivalents includes cash on hand and demand deposits in bank accounts with an original maturity of three months or less that are readily convertible to known amounts of cash and subject to insignificant risk of changes in value.

2.1B Trade and other receivables

Goods and services receivable

Goods and services	862	635
Total goods and services receivable	862	635

Appropriations receivable

For existing programs*	2,114,681	2,032,127
Total appropriations receivable	2,114,681	2,032,127

	2024 \$'000	2023 \$'000
Other receivables		
Third party claims recoveries receivable - workers' compensation claims	7,802	7,869
Third party claims recoveries receivable - common law asbestos-related claims	81,923	87,169
Claims recoveries	5,118	4,805
GST receivable from the Australian Taxation Office	605	728
Other	1	50
Total other receivables	95,449	100,621
Total trade and other receivables (gross)	2,210,992	2,133,383
(Less) impairment loss allowance		
Goods and services	(36)	(36)
Claims recoveries	(2,237)	(2,704)
Total impairment loss allowance	(2,273)	(2,740)
Total trade and other receivables (net)	2,208,719	2,130,643

* The value disclosed is the combined value of the pre-premium special appropriation receivable, asbestos-related disease special appropriation receivable and part of the net premiums held in the Commonwealth Consolidated Revenue Fund as identified in the Overview.

Credit terms for goods and services were within 30 days (2022: 30 days).

Accounting policy

Financial assets

Trade receivables, loans and other receivables that are held for the purpose of collecting the contractual cash flows where the cash flows are solely payments of principal and interest, which are not provided at below-market interest rates, are subsequently measured at amortised cost using the effective interest method adjusted for any loss allowance.

Reconciliation of impairment loss allowance

Movements in relation to 2024

	Goods and services \$'000	Other receivables \$'000	Total \$'000
As at 1 July 2023	-	2,704	2,704
Amounts written off	-	(1,163)	(1,163)
Amounts recovered and reversed	-	96	96
Increase/(Decrease) recognised in net cost of services	-	600	600
Total as at 30 June 2024	-	2,237	2,237

Movements in relation to 2023

	Goods and services \$'000	Other receivables \$'000	Total \$'000
As at 1 July 2022	-	2,574	2,574
Amounts written off	-	(1,302)	(1,302)
Amounts recovered and reversed	-	419	419
Increase/(Decrease) recognised in net cost of services	-	1,013	1,013
Total as at 30 June 2023	-	2,704	2,704

Accounting policy

AASB 9 uses an 'expected credit loss' (ECL) impairment model which applies to financial assets measured at amortised cost, contract assets and debt instruments measured at fair value through other comprehensive income.

Trade and other receivable assets and contract assets at amortised cost are assessed for impairment at the end of each reporting period. The simplified approach has been adopted in measuring the impairment loss allowance at an amount equal to lifetime ECL.

2.1C Other financial assets

Interest accrued	16,000	6,606
Revenue accrued	7,971	5,394
Total other financial assets	23,971	12,000

Note 2.2: Non-financial assets

2.2A

Reconciliation of the opening and closing balances of property, plant and equipment and intangibles (2024)

	Buildings \$'000	ROUA Buildings \$'000	Buildings subtotal \$'000	Plant and equipment \$'000	ROUA Plant and equipment \$'000	ROUA Plant and equipment subtotal \$'000	Computer software \$'000	Total \$'000
As at 1 July 2023								
Gross book value	25,651	38,594	64,245	9,468	318	9,786	27,112	101,143
Accumulated depreciation/amortisation	(20,324)	(13,769)	(34,093)	(7,033)	(281)	(7,314)	(16,525)	(57,932)
Total as at 1 July 2023	5,327	24,825	30,152	2,435	37	2,472	10,587	43,211
Additions:								
By purchase	79	391	470	3,231	34	3,265	-	3,735
By internally developed	-	-	-	-	-	-	719	719
Depreciation and amortisation expense	(1,548)	(6,258)	(7,806)	(1,228)	(51)	(1,279)	(1,895)	(10,980)
Impairment recognised in net cost of services	-	-	-	-	-	-	-	-
Disposals:								
Cost of assets disposed	-	(322)	(322)	(1,735)	-	(1,735)	(196)	(2,253)
Add write back of depreciation on disposals	-	322	322	1,730	-	1,730	196	2,248
Net asset disposals	-	-	-	(5)	-	(5)	-	(5)
Net book value 30 June 2024	3,858	18,958	22,816	4,433	20	4,453	9,411	36,680
Net book value 30 June 2024 represented by:								
Gross book value	25,730	38,663	64,393	10,964	352	11,316	27,635	103,344
Accumulated depreciation/amortisation	(21,872)	(19,705)	(41,577)	(6,531)	(332)	(6,863)	(18,224)	(66,664)
Net book value 30 June 2024	3,858	18,958	22,816	4,433	20	4,453	9,411	36,680

All revaluations were conducted in accordance with the revaluation policy stated below. On 30 June 2022, an independent valuer, Pickles Valuations Pty Ltd, conducted the revaluations.

Reconciliation of the opening and closing balances of property, plant and equipment and intangibles (2023)

	Buildings \$'000	ROUA Buildings \$'000	Buildings subtotal \$'000	Plant and equipment \$'000	ROUA Plant and equipment \$'000	ROUA Plant and equipment subtotal \$'000	Computer software \$'000	Total \$'000
As at 1 July 2022								
Gross book value	25,621	38,403	64,024	8,432	304	8,736	24,154	96,914
Accumulated depreciation/amortisation	(18,678)	(7,605)	(26,283)	(5,899)	(220)	(6,119)	(15,038)	(47,440)
Total as at 1 July 2022	6,943	30,798	37,741	2,533	84	2,617	9,116	49,474
Additions:								
By purchase	115	278	393	1,625	14	1,639	-	2,032
By internally developed	-	-	-	-	-	-	3,647	3,647
Depreciation and amortisation expense	(1,731)	(6,251)	(7,982)	(1,703)	(61)	(1,764)	(1,487)	(11,233)
Impairment recognised in net cost of services	-	-	-	-	-	-	(689)	(689)
Disposals:								
Cost of assets disposed	(85)	(87)	(172)	(589)	-	(589)	-	(761)
Add write back of depreciation on disposals	85	87	172	569	-	569	-	741
Net asset disposals	-	-	-	(20)	-	(20)	-	(20)
Net book value 30 June 2023	5,327	24,825	30,152	2,435	37	2,472	10,587	43,211
Net book value 30 June 2023 represented by:								
Gross book value	25,651	38,594	64,245	9,468	318	9,786	27,112	101,143
Accumulated depreciation/amortisation	(20,324)	(13,769)	(34,093)	(7,033)	(281)	(7,314)	(16,525)	(57,932)
Net book value 30 June 2023	5,327	24,825	30,152	2,435	37	2,472	10,587	43,211

Accounting policy

Acquisition of assets

Assets are recorded at cost on acquisition except as stated below. The cost of acquisition includes the fair value of assets transferred in exchange and liabilities undertaken. Financial assets are initially measured at their fair value plus transaction costs where appropriate.

Assets acquired at no cost, or for nominal consideration, are initially recognised as assets and income at their fair value at the date of acquisition, unless acquired as a consequence of restructuring of administrative arrangements. In the latter case, assets are initially recognised as contributions by owners at the amounts at which they are recognised in the transferor's accounts, immediately prior to the restructuring.

Asset recognition threshold

Purchases of property, plant and equipment are recognised initially at cost in the statement of financial position, except for purchases costing less than \$5,000, which are expensed in the year of acquisition (other than where these items form part of a group of similar items which are significant in total).

The initial cost of an asset includes an estimate of the cost of dismantling and removing the item and restoring the site on which it is located. This is particularly relevant to 'make good' provisions in property leases taken up by Comcare where there exists an obligation to restore the property to its original condition. These costs are included in the value of Comcare's leasehold improvements with a corresponding provision for the 'make good' recognised.

Leased right-of-use (ROU) assets

Leased ROU assets are capitalised at the commencement date of the lease and comprise of the initial lease liability amount, initial direct costs incurred when entering into the lease less any lease incentives received. These assets are accounted for by Commonwealth lessees as separate asset classes to corresponding assets owned outright, but included in the same column as where the corresponding underlying assets would be presented if they were owned.

On initial adoption of AASB 16 Comcare has adjusted the ROU assets at the date of initial application by the amount of any provision for onerous leases recognised immediately before the date of initial application. Following initial application, an impairment review is undertaken for any right of use lease asset that shows indicators of impairment and an impairment loss is recognised against any right of use lease asset that is impaired. Lease ROU assets continue to be measured at cost after initial recognition in Commonwealth agency, GGS and Whole of Government financial statements.

Revaluations

Following initial recognition at cost, property, plant and equipment (excluding ROU assets) are carried at fair value (or an amount not materially different from fair value) less subsequent accumulated depreciation and accumulated impairment losses. Valuations are conducted with sufficient frequency to ensure that the carrying amounts of assets did not differ materially from the assets' fair values as at the reporting date. The regularity of independent valuations depends upon the volatility of movements in market values for the relevant assets. Comcare initiates a revaluation of assets every three years due to the immaterial movements in fair value of the assets.

Revaluation adjustments are made on a class by class basis. Any revaluation increment is credited to equity under the heading of asset revaluation reserve except to the extent that it reversed a previous revaluation decrement of the same asset class that was previously recognised in the surplus/(deficit). Revaluation decrements for a class of assets are recognised directly in the surplus/(deficit) except to the extent that these amounts reverse a previous revaluation increment for that class.

Any accumulated depreciation as at the revaluation date is restated proportionately with the change in the gross carrying amount of the asset so that the carrying amount of the asset after revaluation equals its revalued amount.

Depreciation

Depreciable property, plant and equipment assets are written off to their estimated residual values over their estimated useful lives to Comcare using, in all cases, the straight-line method of depreciation.

Depreciation rates (useful lives), residual value and methods are reviewed at each reporting date and necessary adjustments are recognised in the current, or current and future, reporting periods, as appropriate.

Depreciation rates applying to each class of depreciable asset are based on the following useful lives:

	2024	2023
Office machines and equipment	2 to 10 years	2 to 10 years
Leasehold improvements	Lease term	Lease term

The depreciation rates for ROU assets are based on the commencement date to the earlier of the end of the useful life of the ROU asset or the end of the lease term.

Impairment

All assets were assessed for impairment at 30 June 2024 by qualified Comcare officers. Where indications of impairment exist, the asset's recoverable amount is estimated and an impairment adjustment made if the asset's recoverable amount is less than its carrying amount.

The recoverable amount of an asset is the higher of its fair value less costs of disposal and its value in use. Value in use is the present value of the future cash flows expected to be derived from the asset. Where the future economic benefit of an asset is not primarily dependent on the asset's ability to generate future cash flows, and the asset would be replaced if Comcare was deprived of the asset, its value in use is taken to be its depreciated replacement cost.

Derecognition

An item of property, plant and equipment is derecognised upon disposal or when no further future economic benefits are expected from its use or disposal.

Intangibles

Comcare's intangibles comprise purchased software and internally developed software with an initial cost of \$30,000 or more. These assets are carried at cost less accumulated amortisation and accumulated impairment losses.

Software is amortised on a straight-line basis over its anticipated useful life of between 3 to 15 years (2023: 3 to 15 years).

All software assets were assessed by qualified Comcare officers for indications of impairment as at 30 June 2024.

	2024 \$'000	2023 \$'000
2.2B Other non-financial assets		
Prepayments	2,339	1,238
Total other non-financial assets	2,339	1,238

No indicators of impairment were found for other non-financial assets.

2024	2023
\$'000	\$'000

Note 2.3: Payables

2.3A Suppliers

Trade creditors and accruals	2,744	2,865
Total supplier payables	2,744	2,865

Settlement is usually made within 30 days (2022: 30 days).

2.3B Other payables

Income in advance	358	160
Salaries and wages	2,025	1,782
Superannuation	321	288
Other	882	990
Total other payables	3,586	3,220

Note 2.4: Interest bearing liabilities

2.4A Leases

Lease liabilities	19,785	25,631
Total leases	19,785	25,631

Total cash outflow for leases for the year ended 30 June 2024 was \$6,435,359. (2023: \$5,975,669).

Maturity analysis - contractual undiscounted cash flows

Within 1 year	6,332	6,258
Between 1 to 5 years	14,136	20,055
Total leases	20,468	26,313

Office accommodation

Comcare in its capacity as lessee has ten leases for office accommodation. The remaining non-cancellable term of the lease ranges from less than one year and up to five years and the annual rental increases range from 3% to 3.75%. Some leases contain an option to extend the lease for a further term. This is not included in the right-of-use asset and lease liability as Comcare is not reasonably certain of exercising the option.

Lease of vehicles

Comcare in its capacity as lessee has eleven vehicle leases. The non-cancellable term of these leases are less than one year.

The above lease disclosures should be read in conjunction with the accompanying notes 1.1B, 1.1C and 2.2A.

Accounting policy

Leases

For all new contracts entered into, Comcare considers whether the contract is, or contains a lease. A lease is defined as 'a contract, or part of a contract, that conveys the right to use an asset (the underlying asset) for a period of time in exchange for consideration'.

Once it has been determined that a contract is, or contains a lease, the lease liability is initially measured at the present value of the lease payments unpaid at the commencement date, discounted using the interest rate implicit in the lease, if that rate is readily determinable, or otherwise the department's incremental borrowing rate is used.

Subsequent to initial measurement, the liability will be reduced for payments made and increased for interest. It is remeasured to reflect any reassessment or modification to the lease. When the lease liability is remeasured, the corresponding adjustment is reflected in the right-of-use asset or profit and loss depending on the nature of the reassessment or modification.

	Notes	2024 \$'000	2023 \$'000
--	-------	----------------	----------------

Note 2.5: Provisions

2.5A Workers' compensation claims

Premium claims	2.5C	1,809,738	1,705,526
Commonwealth latent mental disease claims	2.5D	11,300	11,300
Pre-premium claims	2.5E	223,650	235,614
Total workers' compensation claims		2,044,688	1,952,440

2.5B Other provisions

Provision for restoration obligations		664	662
Total other provisions		664	662

	Notes	2024 \$'000	2023 \$'000
Provision for restoration obligations reconciliation			
Carrying amount 1 July		662	607
Adjustment in provision as a result of revaluation		(26)	37
Unwinding of discount		28	18
Closing balance as at 30 June		664	662

Comcare currently has three (2023: three) agreements for the leasing of premises which have provisions requiring Comcare to restore the premises to their original condition at the conclusion of the lease. Comcare has made a provision to reflect the present value of this obligation.

2.5C Provision for premium claims

Carrying amount at 1 July		1,705,526	1,673,969
Increase/(Decrease) in provisions made during the year		228,548	166,294
Claims payments made during the year		(180,270)	(169,691)
Unwinding of discount		69,551	41,473
Change in discount rate		(29,506)	(34,048)
Change in inflation rate		15,889	27,529
Closing balance at 30 June*		1,809,738	1,705,526

* Refer to the Overview for disclosure of the funding available to Comcare to meet this liability.

The valuation of premium claims liabilities was undertaken as at 30 June 2024 by an independent firm of consulting actuaries, Taylor Fry. Taylor Fry has stated that its valuation complies with actuarial Professional Standard PS302 *Valuations of General Insurance Claims*.

The provision for premium claims represents an actuarial assessment of the expected payments to be made in the future by Comcare in relation to workers' compensation claims incurred on or after 1 July 1989. The provision is recognised on a gross basis with an intended 75% probability of sufficiency. The estimate for third party recoveries is included in trade and other receivables. Refer to Note 2.1B.

The following assumptions have been made in determining the provision amount.

Economic assumptions	2024 %	2023 %
Medical payments inflation	4.81 to 5.17	4.75 to 5.35
Other payments inflation	3.54 to 3.87	3.31 to 4.45
Discount rate	3.89 to 5.04	3.76 to 4.73

Premium business liability assumptions	2024	2023
Claim frequency	0.50%	0.45%
Third party recoveries	0.7%	0.7%
Claims administration expenses	21.8%	21.4%
Average claim size	\$179,064	\$170,626

	2024	2023
	\$'000	\$'000
2.5D Provision for Commonwealth latent mental disease claims		
Carrying amount at 1 July	11,300	11,300
Increase/(Decrease) in provisions made during the year	(395)	(251)
Unwinding of discount	486	295
Change in discount rate	(195)	(230)
Change in inflation rate	104	186
Closing balance at 30 June*	11,300	11,300

* Refer to the Overview for disclosure of the funding available to Comcare to meet this liability.

The valuation of Commonwealth latent mental disease claims liabilities was undertaken as at 30 June 2024 by an independent firm of consulting actuaries, Taylor Fry. Taylor Fry has stated that its valuation complies with actuarial Professional Standard PS302 *Valuations of General Insurance Claims*.

The provision represents an actuarial assessment of the expected payments to be made in future by Comcare in relation to latent mental disease claims for which the date of injury as defined in the SRC Act is after balance date.

The provision is recognised on a gross basis with an intended 75% probability of sufficiency.

2.5E Provision for pre-premium claims		
Carrying amount at 1 July	235,614	238,618
Increase/(Decrease) in provisions made during the year	(6,831)	11,419
Claims payments made during the year	(14,898)	(17,137)
Unwinding of discount	9,881	5,611
Change in discount rate	(4,450)	(5,064)
Change in inflation rate	4,334	2,167
Closing balance at 30 June*	223,650	235,614

* Refer to the Overview for disclosure of the funding available to Comcare to meet this liability.

The valuation of pre-premium claims liabilities was undertaken as at 30 June 2024 by an independent firm of consulting actuaries, Taylor Fry. Taylor Fry has stated that its valuation complies with actuarial Professional Standard PS302 *Valuations of General Insurance Claims*.

The provision for pre-premium claims represents an actuarial assessment of the expected payments to be made in the future by Comcare in relation to workers' compensation claims incurred prior to 1 July 1989. The provision is recognised on a gross basis with an intended 75% probability of sufficiency.

Economic assumptions used in determining the amount of the provision for pre-premium claims liability are the same as those applied for the premium business.

	2024 \$'000	2023 \$'000
2.5F Provision for common law asbestos-related disease claims		
Carrying amount at 1 July	594,973	695,593
Change in application of risk margin*	-	(38,806)
Revised carrying amount at 1 July	594,973	656,787
Increase/(Decrease) in provisions made during the year	(27,624)	(17,036)
Claims payments made during the year	(27,998)	(19,485)
Unwinding of discount	20,172	12,723
Change in discount and inflation rate	1,903	(6,927)
Change in risk margin	-	(31,089)
Closing balance at 30 June**	561,426	594,973

* A decrease due to a change in accounting estimate from applying the net risk margin on a net central estimate basis instead of a gross central estimate basis.

** Refer to Overview for disclosure of the funding available to Comcare to meet this liability.

The valuation of common law asbestos-related disease claims liabilities was undertaken as at 30 June 2024 by an independent firm of consulting actuaries, Taylor Fry. Taylor Fry has stated that its valuation complies with actuarial Professional Standard PS302 *Valuations of General Insurance Claims*.

The provision for common law asbestos-related disease claims represents an actuarial assessment of the expected payments to be made in the future by Comcare in relation to common law claims against the Australian Government by individuals seeking compensation as a result of direct or indirect exposure to asbestos. The provision is recognised on a gross basis with an intended 75% probability of sufficiency. The estimate for third party recoveries is included in trade and other receivables. Refer to Note 2.1B.

The following assumptions have been made in determining the provision amount.

Economic assumptions	2024 %	2023 %
Wage inflation	3.54 to 3.87	3.31 to 4.45
Superimposed inflation	2.00	2.00
Discount rate	3.89 to 5.04	3.76 to 4.73

Funding

This section identifies Comcare's funding structure.

2024	2023
\$'000	\$'000

Note 3.1: Cash flow reconciliation

Reconciliation of cash and cash equivalents as per statement of financial position and cash flow statement

Cash and cash equivalents as per

Cash flow statement	404,922	435,278
Statement of financial position	404,922	435,278
Difference	-	-

Reconciliation of net cost of services to net cash from/(used by) operating activities

Net contribution by services	(142,401)	(75,643)
Revenue from Government	55,869	51,218

Adjustments for non-cash items

Depreciation/Amortisation	10,980	11,232
Net write-down of non-financial assets	-	689
Loss on disposal of assets	5	20
Unwinding of discount	28	18
Available funding from movement in claims provision	81,047	26,209

Movements in assets and liabilities:

Assets

Increase/(Decrease) in net receivables	(78,076)	14,223
(Increase)/Decrease in accrued revenues	(11,971)	(2,342)
(Increase)/Decrease in prepayments	(1,101)	293

Liabilities

Increase/(Decrease) in payables	(4,406)	(7,990)
Increase/(Decrease) in provisions	64,152	(74,147)
(Increase)/Decrease in assets payables	-	-
(Increase)/Decrease in make good provision	(2)	(55)
(Increase)/Decrease in lease liabilities	5,846	5,530
Net cash from/(used by) operating activities	(20,030)	(50,745)

	2024	2023
	\$'000	\$'000

Note 3.2: Regulatory charging summary

Amounts applied

Own-source revenue	19,633	19,236
Total amounts applied	19,633	19,236

Expenses

Regulatory charging activities	23,022	19,331
Total expenses	23,022	19,331

External revenue

Own-source revenue	19,633	19,236
Total external revenue	19,633	19,236

Total amounts written-off

	-	-
--	---	---

Regulatory charging activities

Comcare undertakes cost recovery to fund the functions and activities of the Safety, Rehabilitation and Compensation Commission and Comcare.

Cost recovered activities for charges reported above include:

- > Processing of annual self-insurance licence applications made under the SRC Act
- > Processing of reconsideration determinations made under the *Seafarers Rehabilitation and Compensation Act 1992*
- > Processing of workplace rehabilitation provider applications made under the SRC Act.

Further information regarding cost recovered activities, including Cost Recovery Implementation Statements, can be found at <https://www.comcare.gov.au/scheme-legislation/recovering-costs>.

People and relationships

This section describes a range of employment and post employment benefits provided to our people and our relationship with other key people.

2024	2023
\$'000	\$'000

Note 4.1: Employee provisions

Employee provisions

Leave and other entitlements	20,644	15,221
Total employee provisions	20,644	15,221

Accounting policy

Liabilities for short-term employee benefits and termination benefits expected within twelve months of the end of the reporting period are measured at their nominal amounts.

Other long-term employee benefits are measured as net total of the present value of the defined benefit obligation at the end of the reporting period minus the fair value at the end of the reporting period of plan assets (if any) out of which the obligations are to be settled directly.

Leave

The liability for employee benefits includes provisions for annual leave and long service leave.

The leave liabilities are calculated on the basis of employees' remuneration at the estimated salary rates that will be applied at the time the leave is taken, including Comcare's employer superannuation contribution rates to the extent that the leave is likely to be taken during service rather than paid out on termination.

The liability for long service leave has been determined as at 30 June 2024 by reference to the work of the Department of Finance's actuarial model. The estimate of the present value of the liability takes into account attrition rates and pay increase through promotion and inflation.

Superannuation

Employees of Comcare are members of the Public Sector Superannuation Scheme (PSS), the PSS accumulation plan (PSSap) or other superannuation funds held outside the Australian Government.

The PSS is a defined benefit scheme for the Australian Government. The PSSap is a defined contribution scheme.

The liability for defined benefits is recognised in the financial statements of the Australian Government and is settled by the Australian Government in due course. This liability is reported in the Department of Finance's administered schedules and notes.

Comcare makes employer contributions to the employees' defined benefit superannuation scheme at rates determined by an actuary to be sufficient to meet the current cost to the Government. Comcare accounts for the contributions as if the amounts were contributions to defined contribution plans.

The liability for superannuation recognised as at 30 June represents outstanding contributions.

Note 4.2: Key management personnel remuneration

Key management personnel are those persons having authority and responsibility for planning, directing and controlling the activities of the entity, directly or indirectly, including any director (whether executive or otherwise) of that entity. The entity has determined the key management personnel to be the Portfolio Minister (the Minister for Employment and Workplace Relations), Chief Executive Officer, Chief Operating Officer and General Managers (and any persons acting in these positions for at least 90 days). Key management personnel remuneration is reported in the table below.

Short-term employee benefits ¹	1,906	1,694
Post-employment benefits	273	247
Other long-term benefits	84	(65)
Total key management personnel remuneration expenses	2,263	1,876

The total number of key management personnel included in the above table is nine (2023: 9).

¹ The above key management personnel remuneration excludes the remuneration and other benefits of the Portfolio Minister. The Portfolio Minister's remuneration and other benefits are set by the Remuneration Tribunal and are not paid by Comcare.

Note 4.3: Related party disclosures

Related party relationships

Comcare is an Australian Government controlled entity. Related parties to this entity are Key Management Personnel including the Portfolio Minister and Executive, and other Australian Government entities.

Transactions with related parties

Given the breadth of Government activities, related parties may transact with the government sector in the same capacity as ordinary citizens. Such transactions include the payment or refund of taxes, receipt of a Medicare rebate or higher education loans. These transactions have not been separately disclosed in this note.

The following transactions with related parties occurred during the financial year:

- > The entity transacts with other Australian Government controlled entities consistent with normal day-to-day business operations provided under normal terms and conditions, including the payment of workers' compensation and insurance premiums. These are not considered individually significant to warrant separate disclosure as related party transactions.
- > Refer to Note 4.1 Employee provisions for details on superannuation arrangements with the Commonwealth Superannuation Scheme (CSS), the Public Sector Superannuation Scheme (PSS), and the PSS accumulation plan (PSSap).

Managing uncertainties

Note 5.1: Contingent assets and liabilities

Quantifiable contingencies

As at 30 June 2024 Comcare has no quantifiable contingencies.

Unquantifiable contingencies

As at 30 June 2024 Comcare has no unquantifiable contingencies.

Accounting policy

Contingent liabilities and contingent assets are not recognised in the statement of financial position but are reported in the notes. These amounts may arise from uncertainty as to the existence of a liability or asset or represent an asset or liability in respect of which the amount cannot be reliably measured. Contingent assets are disclosed when settlement is probable but not virtually certain and contingent liabilities are disclosed when settlement is greater than remote.

	2024 \$	2023 \$
Note 5.2: Remuneration of auditors		
Financial statement audit services provided to Comcare by KPMG under contract from the Australian National Audit Office	250,000	238,000
Other services provided by KPMG		
Continuous monitoring	60,000	51,000
Annual desktop reviews	40,250	40,250
SRC PAYG Advice	-	9,000
Central reporting model services	-	20,900
Total other services provided by KPMG	100,250	121,150

2024
\$'000

2023
\$'000

Note 5.3: Financial instruments

5.3A Financial assets

Financial assets at amortised cost

Cash and cash equivalents	404,922	435,278
Receivables for goods and services	826	599
Other receivables and claims recoveries	2,881	2,101
Other financial assets	23,971	12,000
Total financial assets at amortised cost	432,600	449,978

Total financial assets	432,600	449,978
-------------------------------	----------------	----------------

Financial liabilities

Financial liabilities measured at amortised cost

Trade creditors	2,744	2,865
Workers' compensation payables	4,092	2,897
Total financial liabilities measured at amortised cost	6,836	5,762

Total financial liabilities	6,836	5,762
------------------------------------	--------------	--------------

Accounting Policy

Financial assets

In accordance with AASB9 *Financial Instruments*, Comcare classifies its financial assets as financial assets measured at amortised cost. The classification depends on both Comcare's business model for managing the financial assets and the contractual cash flow characteristics at the time of initial recognition. Financial assets are recognised when the entity becomes a party to the contract and, as a consequence, has a legal right to receive or a legal obligation to pay cash and derecognised when the contractual rights to the cash flows from the financial asset expire or are transferred upon 'trade date'.

Financial assets at amortised cost

Financial assets included in this category need to meet two criteria:

1. The financial asset is held in order to collect the contractual cash flows.
2. The cash flows are solely payments of principal and interest (SPPI) on the principal outstanding amount.

Effective interest method

Income is recognised on an effective interest rate basis for financial assets that are recognised at amortised cost.

Financial assets at fair value through other comprehensive income (FVOCI)

Financial assets measured at fair value through other comprehensive income are held with the objective of both collecting contractual cash flows and selling the financial assets and the cash flows meet the SPPI test.

Any gains or losses as a result of fair value measurement or the recognition of an impairment loss allowance is recognised in other comprehensive income.

Financial assets at fair value through profit or loss (FVTPL)

Financial assets are classified as financial assets at fair value through profit or loss where the financial assets either don't meet the criteria of financial assets held at amortised cost or at FVOCI (i.e. mandatorily held at FVTPL) or may be designated.

Financial assets at FVTPL are stated at fair value, with any resultant gain or loss recognised in profit or loss. The net gain or loss recognised in profit or loss incorporates any interest earned on the financial asset.

Impairment of financial assets

Financial assets are assessed for impairment at the end of each reporting period based on Expected Credit Losses, using the general approach which measures the loss allowance based on an amount equal to lifetime expected credit losses where risk has significantly increased, or an amount equal to 12-month expected credit losses if risk has not increased.

The simplified approach for trade, contract and lease receivables is used. This approach always measures the loss allowance as the amount equal to the lifetime expected credit losses.

A write-off constitutes a derecognition event where the write-off directly reduces the gross carrying amount of the financial asset.

Financial liabilities

Financial liabilities are classified as either financial liabilities 'at fair value through profit or loss' or other financial liabilities. Financial liabilities are recognised and derecognised upon 'trade date'.

Financial liabilities at fair value through profit or loss

Financial liabilities 'at fair value through profit or loss' are initially measured at fair value. Subsequent fair value adjustments are recognised in profit or loss. The net gain or loss recognised in profit or loss incorporates any interest paid on the financial liability.

Financial liabilities at amortised cost

Financial liabilities, including borrowings, are initially measured at fair value, net of transaction costs. These liabilities are subsequently measured at amortised cost using the effective interest method, with interest expense recognised on an effective interest basis. Supplier and other payables are recognised at amortised cost. Liabilities are recognised to the extent that the goods or services have been received (and irrespective of having been invoiced).

		2024	2023
		\$'000	\$'000
5.3B	Net gains or losses on financial assets		
	Financial assets at amortised cost		
	Interest revenue	25,448	16,720
	Net gains on financial assets at amortised cost	25,448	16,720
	Net gains on financial assets	25,448	16,720
5.3C	Net gains or losses from financial liabilities		
	There were no gains or losses from financial liabilities during the year (2023: Nil).		

5.3D Credit risk

Comcare is exposed to minimal credit risk as the majority of its financial assets are cash on deposit with banks. The major exposure to credit risk is the risk that arises from the potential default by a bank. This amount is equal to the total amount of cash at bank (2024: \$404.9 million and 2023: \$435.3 million). Comcare's current Investment Policy requires all investments to be placed with a financial institution with a Standard and Poor's rating of at least BBB/Baa. To mitigate credit risk, the Investment Policy restricts investment with any single financial institution to no more than 50% of the total investment portfolio.

As at 30 June 2024	Credit rating				Total
	AA-	A+	BBB+	Not rated	
	\$'000	\$'000	\$'000	\$'000	\$'000
Cash and cash equivalents	352,922	52,000	-	-	404,922
Receivables				826	826
Other receivables (net)				2,881	2,881
Other financial assets				23,971	23,971

As at 30 June 2023	Credit rating				Total
	AA-	A+	BBB+	Not rated	
	\$'000	\$'000	\$'000	\$'000	\$'000
Cash and cash equivalents	250,278	135,000	50,000	-	435,278
Receivables	-	-	-	599	599
Other receivables (net)	-	-	-	2,101	2,101
Other financial assets	-	-	-	12,000	12,000

Comcare holds no collateral to mitigate against credit risk.

	2024 \$'000	2023 \$'000
Maximum exposure to credit risk (excluding any collateral or credit enhancement)		
Cash and cash equivalents	404,922	435,278
Receivables for goods and services	826	599
Other receivables and claims recoveries	2,881	2,101
Other financial assets	23,971	12,000
Total financial assets carried at amount not best representing maximum exposure to credit risk	432,500	449,978

5.3E Liquidity risk

Liquidity risk is the risk that Comcare will not be able to meet its obligations as amounts fall due. Comcare's financial liabilities were trade creditors, workers' compensation payables and other payables. Comcare has negligible liquidity risk as it has substantial cash holdings to meet its short-term financial obligations at 30 June 2024. Under Comcare's Investment Policy, investments are managed in a manner which maximises investment return while minimising risk, which ensures that accessibility of funds is maintained and cash flow requirements are met.

Maturities for non-derivative financial liabilities 2024	On demand \$'000	Within 1 year \$'000	1 to 2 years \$'000	2 to 5 years \$'000	> 5 years \$'000	Total \$'000
Trade creditors	-	2,744	-	-	-	2,744
Workers' compensation claims payable	-	4,092	-	-	-	4,092
Total	-	6,836	-	-	-	6,836

Maturities for non-derivative financial liabilities 2023	On demand \$'000	Within 1 year \$'000	1 to 2 years \$'000	2 to 5 years \$'000	> 5 years \$'000	Total \$'000
Trade creditors	-	2,865	-	-	-	2,865
Workers' compensation claims payable	-	2,897	-	-	-	2,897
Total	-	5,762	-	-	-	5,762

Comcare has no derivative financial liabilities in the current or prior years.

5.3F Market risk

Currency risk

Comcare is not exposed to currency risk or other price risk.

Interest rate risk

Interest rate risk refers to the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates.

The only interest bearing item on the balance sheet is 'cash and cash equivalents'. 'Cash and cash equivalents' comprises investments in both term deposit accounts and standard banking transaction accounts. Those investments held in term deposit accounts bear interest at a fixed rate and will not fluctuate with changes in market interest rates. The daily cash balance in the standard banking transaction account is stated at a nominal amount and is not subject to interest rate risk.

Note 5.4: Fair value measurement

The following tables provide an analysis of assets and liabilities that are measured at fair value. The remaining assets and liabilities disclosed in the statement of financial position do not apply the fair value hierarchy.

The different levels of the fair value hierarchy are defined below.

Level 1: Quoted prices (unadjusted) in active markets for identical assets or liabilities that the entity can access at measurement date.

Level 2: Inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly or indirectly.

Level 3: Unobservable inputs for the asset or liability.

5.4A Fair value measurements, valuation techniques and inputs used

	Fair value measurement at the end of the reporting period		For Levels 2 and 3 fair value measurements		
	2024 \$'000	2023 \$'000	Category (Level 1, 2 or 3)	Valuation technique(s) ¹	
Non-financial assets²					
Leasehold improvements	3,859	5,328	Level 3	Cost approach	Actual cost of replacement of similar assets. Price per square metre.
Computer and IT equipment	4,350	2,344	Level 2	Market comparable	Sale prices of comparable computer and IT equipment.
Office equipment	30	27	Level 2	Market comparable	Sale prices of comparable office equipment.
Artwork	54	64	Level 2	Market comparable	Private sales of similar artwork. Professional appraisals of similar artwork.
Total non-financial assets	8,293	7,763			
Total fair value measurements of assets in the statement of financial position	8,293	7,763			

¹ Comcare engaged a professional valuer to undertake a comprehensive valuation of non-financial assets as at 30 June 2022.

² The highest and best use of all non-financial assets are the same as their current use.

5.4B Reconciliation for recurring level 3 fair value measurements

Non-financial assets	Leasehold improvements		Total	
	2024 \$'000	2023 \$'000	2024 \$'000	2023 \$'000
As at 1 July	5,328	6,944	5,328	6,944
Total (losses) recognised in net cost of services ¹	(1,548)	(1,731)	(1,548)	(1,731)
Purchases	79	115	79	115
Total as at 30 June	3,859	5,328	3,859	5,328

¹ These losses are presented in the statement of comprehensive income under note 2.2A.

Accounting policy

Any transfers between levels of the fair value hierarchy are deemed to have occurred at the end of the reporting period.

Other information

Note 6.1: Current/Non-current distinction for assets and liabilities

	2024 \$'000	2023 \$'000
Assets expected to be recovered in:		
No more than 12 months		
Cash and cash equivalents	404,922	435,278
Trade and other receivables	77,081	72,481
Other financial assets	23,971	12,000
Other non-financial assets	2,160	1,215
Total no more than 12 months	508,134	520,974
More than 12 months		
Trade and other receivables	2,131,638	2,058,162
Buildings	22,816	30,152
Plant and equipment	4,453	2,472
Computer software	9,411	10,587
Other non-financial assets	179	23
Total more than 12 months	2,168,497	2,101,396
Total assets	2,676,631	2,622,370
Liabilities expected to be settled in:		
No more than 12 months		
Suppliers	2,744	2,865
Workers' compensation claims payable	4,092	2,897
Other payables	3,331	2,964
Leases	5,782	5,785
Employee provisions	8,219	7,086
Workers' compensation claims	282,824	262,973
Common law asbestos-related disease claims	52,286	48,918
Other provisions	58	56
Total no more than 12 months	359,336	333,544

	2024	2023
	\$'000	\$'000
More than 12 months		
Other payables	255	255
Leases	14,003	19,846
Employee provisions	12,425	8,135
Workers' compensation claims	1,761,864	1,689,467
Common law asbestos-related disease claims	509,140	546,056
Other provisions	606	606
Total more than 12 months	2,298,293	2,264,365
Total liabilities	2,657,629	2,597,909

Note 6.2: Assets held in trust

Comcare Beneficiaries Trust Account

The Beneficiaries Trust Account was established on 1 December 1988 to administer compensation benefits paid under both the *Compensation (Commonwealth Government Employees) Act 1971* and the SRC Act to beneficiaries that are under a legal disability. The majority of these are children under the age of 18 who have been awarded compensation following the death of a parent under compensable circumstances.

These monies are not available for other purposes of Comcare and are not recognised in the financial statements.

	2024 \$'000	2023 \$'000
Cash at bank		
As at 1 July	1,800	1,638
Receipts:		
Funds deposited	-	179
Interest earned	110	17
Payments:		
Final payouts	30	34
Total cash at bank as at 30 June	1,880	1,800

The above values are estimated at fair value at the time when acquired.

Note 6.3: Reporting of outcomes

	Outcome 1		Total	
	2024 \$'000	2023 \$'000	2024 \$'000	2023 \$'000
Expenses				
Employee benefits	89,547	74,851	89,547	74,851
Suppliers	41,209	38,649	41,209	38,649
Depreciation and amortisation	10,980	11,232	10,980	11,232
Finance costs	169	177	169	177
Write-downs and impairment of assets	5	745	5	745
Workers' compensation claims expense	195,168	186,828	195,168	186,828
Common law asbestos-related disease claims expense	24,491	19,485	24,491	19,485
Total expenses	361,569	331,967	361,569	331,967
Income				
Revenue from contracts with customers	255,803	216,890	255,803	216,890
Interest	25,448	16,720	25,448	16,720
Rental Income	1,478	1,356	1,478	1,356
Other revenue	453	399	453	399
Gains from movement in workers' compensation claims provision	(92,315)	(31,008)	(92,315)	(31,008)
Gains/(losses) from movement in common law asbestos-related disease claims provision	28,301	51,967	28,301	51,967
Other gains	-	-	-	-
Revenue from Government	55,869	51,218	55,869	51,218
Available funding from movement in claims provision	81,047	26,209	81,047	26,209
Total income	356,084	333,751	356,084	333,751

	Outcome 1		Total	
	2024 \$'000	2023 \$'000	2024 \$'000	2023 \$'000
Assets				
Cash and cash equivalents	404,922	435,278	404,922	435,278
Trade and other receivables	2,208,719	2,130,643	2,208,719	2,130,643
Other financial assets	23,971	12,000	23,971	12,000
Buildings	22,816	30,152	22,816	30,152
Plant and equipment	4,453	2,472	4,453	2,472
Computer software	9,411	10,587	9,411	10,587
Other non-financial assets	2,339	1,238	2,339	1,238
Total assets	2,676,631	2,622,370	2,676,631	2,622,370
Liabilities				
Suppliers	2,744	2,865	2,744	2,865
Workers' compensation claims payable	4,092	2,897	4,092	2,897
Other payables	3,586	3,220	3,586	3,220
Leases	19,785	25,631	19,785	25,631
Employee provisions	20,644	15,221	20,644	15,221
Workers' compensation claims provision	2,044,688	1,952,440	2,044,688	1,952,440
Common law asbestos-related disease claims provision	561,426	594,973	561,426	594,973
Other provisions	664	662	664	662
Total liabilities	2,657,629	2,597,909	2,657,629	2,597,909

Comcare's program components supporting the outcome are described in the Overview.

Note 6.4 Budget variance commentary

The following table provides a comparison of Comcare's budget as presented in the 2023–24 Portfolio Budget Statements¹ (PBS). The budget is not audited. Explanations of material variances are provided below. Material variances are those deemed relevant to the analysis of Comcare's performance and are not focused only on numerical differences between budget and actual amounts.

Comcare considers that major variances are those where either:

> variance between budget and actual is greater than +/- \$1m and 10% of the original budget

> an item below this threshold is considered important for the reader's understanding or is relevant to an assessment of the discharge of accountability and to an analysis of Comcare's performance.

Affected line items	Note Ref.	Actual 2024 \$'000	Original Budget 2024 \$'000	Variance Amount \$'000	Explanation of major variance
<i>Statement of Comprehensive Income</i>					
Suppliers	1.1B	41,209	34,433	6,776	Supplier expenses were higher due to costs incurred on new projects and initiatives approved during the year.
Interest	1.2B	25,448	19,777	5,671	Interest was higher due to increased interest returns on Comcare's investment portfolio.
Gains/(Losses) from movement in workers' compensation claims provision	1.2D	(92,315)	(6,143)	(86,172)	The variance is due to a change in economic parameters applied in the annual actuarial assessment of workers' compensation claims liabilities.
Gains/(Losses) from movement in common law asbestos-related disease claims provision	1.2E	28,301	19,880	8,421	The variance is due to a change in economic parameters applied in the annual actuarial assessment of common law asbestos-related claims liabilities.
Available funding from movements in claim provision		81,047	22,311	58,736	The variance is due to a change in economic parameters applied in the annual actuarial assessment.

Affected line items		Actual 2024 \$'000	Original Budget 2024 \$'000	Variance Amount \$'000	Explanation of major variance
<i>Statement of Financial Position</i>					
Other Financial assets	2.1C	23,971	9,656	14,315	The variance was due to an increase in interest receivables which increased due to higher interest rates on term deposits and premium adjustments payable to Comcare.
Other payables	2.3B	3,586	1,843	1,743	The variance is due to amounts received for the Comcare National Conference to be held in August 2024 and amounts received for work health and safety workshops being provided by Comcare in 2024-25.
<i>Cashflow Statement</i>					
Total cash used by operating activities		(20,030)	(24,663)	4,633	The variance is largely due to higher premium receipts partly offset by higher supplier costs due new projects and initiatives and the return of excess special appropriations.
Total cash used by financing activities		(4,480)	(2,782)	(1,698)	The variance was due to higher than expected investment in property, plant and equipment.

¹ 2023–24 Portfolio Budget Statements for the Employment and Workplace Relations Portfolio.



RIVERINA MSC
RES WAGGA WAGGA
ACT
238.96

FRAGILE
FRAGILE
FRAGILE

RIVERINA MSC
RES WAGGA WAGGA
ACT
238.96

MON
Delivery

Chapter 5: Scheme and regulatory performance

Scheme performance	160
Regulatory performance and prosecutions	164



Scheme performance

Claims incidence rates

The overall scheme premium rate is decreasing, noting an increase in the incidence of claims received and accepted in 2023–24.

Table 13 shows scheme incidence rate trends from 2019–20 to 2023–24:

- > Claims received – 5.3% decrease
- > Claims accepted – 8.2% decrease
- > Serious claims – 4.6% decrease.

Table 13: Comcare scheme workers' compensation data

	Under the SRC Act	Incidence of claims received*	Incidence of accepted claims*	Incidence of serious claims* ¹	Total number of compensable deaths
2019–20	Premium paying employers	8.7	5.2	3.6	3
	Self-insured licensees	20.5	16.0	8.9	2
	Scheme total	15.0	11.0	6.5	5
2020–21	Premium paying employers	8.1	4.6	3.5	13
	Self-insured licensees	21.0	16.1	9.3	5
	Scheme total	15.2	11.0	6.7	18
2021–22	Premium paying employers	6.6	3.9	3.1	7
	Self-insured licensees	17.8	13.7	8.3	6
	Scheme total	12.9	9.4	6.1	13
2022–23	Premium paying employers	7.6	4.3	3.0	14
	Self-insured licensees	17.9	13.8	8.0	4
	Scheme total	13.5	9.7	5.8	18
2023–24	Premium paying employers	8.3	4.7	3.2	7
	Self-insured licensees	19.0	14.5	8.7	5
	Scheme total	14.2	10.1	6.2	12

Data extracted on 17 July 2024

Note:

*All incidence rates are per 1,000 FTE employees

¹ Serious claims are those claims that reach one week or more of time lost during the reporting period.

Return to Work

Improving recovery and return to work (RTW) outcomes is a key focus for Comcare. We are working to enhance our partnerships with employees, employers, unions and service providers and we are expanding and evaluating pilots and other proactive initiatives to support employees' timely, safe and durable RTW across the scheme.

To support better practice in recovery and RTW activities, this year Comcare led an open tender process to refresh the 2016 Occupational Rehabilitation and Associated Medical Services provider panel. From 1 November 2023, participating Commonwealth Agencies have streamlined access to a range of preventative and rehabilitation services.

We delivered multiple stakeholder forums to rehabilitation case managers on a range of topics including mental health stigma, burnout, and trauma informed practices in workplace rehabilitation. The forums included speakers with lived experience sharing their stories of mental illness in the workplace. These forums focus on practical skills to assist rehabilitation case managers to engage effectively with employees to support positive RTW outcomes. The forums continue to be well received by our stakeholders.

We also continued our communication and engagement with workplace rehabilitation providers, delivering 2 forums, quarterly updates to workplace rehabilitation provider consultants, bimonthly updates to workplace rehabilitation provider managers and regular direct engagement with providers. These activities support providers and their consultants to deliver effective and efficient services that improve recovery and RTW across the scheme.

We continue to publish a suite of guidance and resources and deliver face-to-face and digital training for stakeholders on effective rehabilitation and RTW practices.

Reconsiderations and appeals

An employee or employer who is dissatisfied with a decision made under the SRC Act may ask for that decision to be reviewed through a reconsideration request. The decision is reviewed by an officer not involved in the original decision.

If an employee or employer is dissatisfied with the reconsideration outcome, they may apply to the AAT for review of the reconsideration decision.

Table 14: Claim disputation rates

	Under the SRC Act	Number of reconsideration requests received	Reconsideration affirmation rate ¹	Number of applications to the AAT	AAT affirmation rate ²
2019–20	Premium paying employers	942	80%	396	53%
	Self-insured licensees	1,313	86%	654	72%
	Scheme total	2,255	84%	1,050	60%
2020–21	Premium paying employers	743	77%	338	49%
	Self-insured licensees	1,311	87%	651	70%
	Scheme total	2,054	83%	989	60%
2021–22	Premium paying employers	801	79%	341	54%
	Self-insured licensees	1,227	86%	668	72%
	Scheme total	2,028	84%	1,009	65%
2022–23	Premium paying employers	864	78%	310	49%
	Self-insured licensees	1,283	90%	709	74%
	Scheme total	2,147	85%	1,019	65%
2023–24	Premium paying employers	1,022	79%	413	42%
	Self-insured licensees	1,374	86%	771	76%
	Scheme total	2,396	83%	1,184	64%

Data extracted on 17 July 2024

Note:

¹ Reconsideration affirmation rate is the percentage of reviewable decisions that affirmed the original determination with a decision in the reporting period. Excludes initiated by own motion and withdrawn.

² AAT affirmation rate is 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.

Workplace incidents

The WHS Act defines certain events as notifiable. This requires PCBUs to notify Comcare of incidents that result in the death, serious injury or illness of a person, or are dangerous.

Table 15: Notifiable work health and safety incidents – as the national regulator

	WHS jurisdiction	Serious injury or illness	Dangerous incidents	Notifiable worker fatalities*
2019–20	Australian Government	215	401	4
	Self-insured licensees	186	259	4
	Australian Defence Force	126	134	1
	WHS jurisdiction total	527	794	9
2020–21	Australian Government	312	321	7
	Self-insured licensees	210	226	10
	Australian Defence Force	120	108	9
	WHS jurisdiction total	642	655	26
2021–22	Australian Government	388	535	7
	Self-insured licensees	303	274	11
	Australian Defence Force	119	133	13
	WHS jurisdiction total	810	942	31
2022–23	Australian Government	275	465	10
	Self-insured licensees	175	239	5
	Australian Defence Force	133	114	9
	WHS jurisdiction total	583	818	24
2023–24	Australian Government	361	444	6
	Self-insured licensees	217	286	4
	Australian Defence Force	178	124	9
	WHS jurisdiction total	756	854	19

*The notifiable worker fatality number may change after publication each year due to the time taken to complete the notifiability assessment process.

¹ Serious Injury or Illness, Dangerous Incident and Notifiable Worker Fatalities data for 2023–24 extracted on 12 July 2024. Data for all previous FYs is as published in previous annual reports.

² Not all self-insured licensees within Comcare's scheme are covered by the WHS Act.

Regulatory performance and prosecutions

Regulatory performance

This section reports Comcare’s regulatory performance and statistics required under Schedule 2, Part 3 of the *Work Health and Safety Act 2011* (Cth) (WHS Act).

Table 16: Notifiable incidents notified to Comcare under section 38 of the WHS Act

Type of notifiable incidents	2019–20	2020–21	2021–22	2022–23	2023–24
Total notifiable incidents	1,344	1,338	1,801	1,442	1,634
Serious injury or illness	527	641	811	583	756
Dangerous incident	794	650	942	818	854
Death of a person*	23	47	48	41	24
<i>Worker deaths</i>	9	26	31	24	19
<i>Other person deaths</i>	17	22	19	17	11

In 2023–24, Comcare undertook proactive inspections with PCBUs in the jurisdiction, in relation to injury management systems which included the requirement to notify the regulator. The increase in the ‘Serious injury or illness’ incident category this year may be as a result of this program, as well as an increased understanding of psychosocial illness in the jurisdiction.

* An incident may result in harm (or death) to one or more people. Therefore, the total number of Worker and Other Person deaths may be equal to or greater than the total number of notifiable death incidents. These numbers may change after publication each year due to the period of time taken to complete the notifiability assessment process.

Serious Injury or Illness, Dangerous Incident and Notifiable Worker Fatalities data for 2023–24 extracted on 12 July 2024. Data for all previous financial years is as published in previous annual reports.

Not all self-insured licensees within Comcare’s scheme are covered by the WHS Act.

Table 17: Telecommunications Asbestos Safety Compliance program activities commenced

Type of notifiable incidents	2019–20	2020–21	2021–22	2022–23	2023–24
Total Telecommunications Asbestos Safety Compliance program activities	2,058	1,151	1,325	625	481

Data for 2020–21 and prior years included program activities that are no longer counted, most significantly ‘No Work Observed’ site attendances where inspectors were unable to observe work activities due to contractors not being present as planned. No Work Observed instances have been minimised and the data for 2021–22 onwards only includes inspections conducted.

Table 18: Inspectorate activities commenced

			2023–24
Total Inspectorate Compliance and Enforcement Activities			1280
Provide information and advice activities			252
Monitoring compliance inspections and investigations			1028
Historical Investigation and Inspection Totals			
2019–20	2020–21	2021–22	2023–24
1,337	1,875	1287	969

Table 19: Notices issued under the WHS Act

	2019–20	2020–21	2021–22	2022–23	2023–24
Improvement notices issued under section 191	7	24	8	16	14
Prohibition notices issued under section 195	1	10	4	10	4
Non-disturbance notices issued under section 198	6	10	67	4	8

Table 20: Other statutory reporting requirements under the WHS Act

	2019–20	2020–21	2021–22	2022–23	2023–24
Seizures made under section 175 or 176	0	6	4	0	1
Remedial action taken under section 211 or 212	0	0	0	0	0
Applications for internal review under section 224	3	4	4	6	1
Applications for external review made under section 229	0	0	0	1	1
Written undertakings accepted by Comcare under section 216	0	1	1	0	0
*Infringement notices given under section 243	0	0	0	0	0

*The WHS Regulations do not currently prescribe any provision of the WHS Act that is enforceable by infringement notice.

Prosecutions

In 2023–24, Comcare commenced 4 criminal proceedings under the WHS Act. At 30 June 2024, 10 proceedings have continued, and one set of proceedings has concluded during this period.

Cleanaway Operations Pty Ltd – commenced

On 18 April 2024, criminal proceedings were commenced in the Local Court of New South Wales for offences against section 32 of the WHS Act. The proceedings relate to an incident on 18 April 2024, where a worker was seriously injured when a fire occurred at a Cleanaway liquid waste processing facility in St Mary's, New South Wales.

Commonwealth (Department of Defence – Army) – commenced

On 28 March 2024, criminal proceedings were commenced in the Brisbane Magistrates' Court for offences against sections 32 and 33 of the WHS Act. The proceedings relate to an incident on 29 March 2022, where an Army member attempted to take their own life in an Army office in Rockhampton, Queensland.

Commonwealth (Department of Defence – Army) – commenced

On 29 August 2023, criminal proceedings were commenced in the Brisbane Magistrates' Court for offences against section 32 of the WHS Act. The proceedings relate to an incident on 30 August 2021, where 2 workers died when the heavy vehicle they were travelling in, rolled off the road during a training exercise at the Townsville Field Training Area in Queensland.

Commonwealth (Department of Defence – Army) – commenced

On 4 August 2023, criminal proceedings were commenced in the Brisbane Magistrates' Court for offences against section 32 of the WHS Act. The proceedings relate to an incident on 6 August 2021, when 2 Army members were attacked by a crocodile while at work in Portland Road, Queensland.

Cleanaway Operations Pty Ltd – continued

On 2 June 2023, criminal proceedings were commenced in the Magistrates Court of the Australian Capital Territory against Cleanaway Operations Pty Ltd for an offence against section 32 of the WHS Act. The proceedings relate to an incident that occurred at Cleanaway's recycling depot in Hume, ACT, when a worker's hand was caught in a machine that compresses cardboard bales.

Commonwealth (Department of Defence – RAAF) – continued

On 27 July 2022, criminal proceedings were commenced in the Local Court of New South Wales against the Commonwealth (Department of Defence) for offences against sections 32 and 33 of the WHS Act. The proceedings relate to allegations that the Department of Defence failed to manage psychosocial risks in relation to the death by suicide of a worker at RAAF Base Williamtown.

Commonwealth (Royal Australian Mint) – continued

On 3 May 2021, criminal proceedings were commenced in the Magistrates Court of the Australian Capital Territory against the Commonwealth (Royal Australian Mint) for offences against sections 32 and 33 of the WHS Act. The proceedings relate to an incident on 4 May 2019 where, during transportation of a coin press, the press fell from forklift tynes narrowly missing a worker.

Commonwealth (Department of Home Affairs) and International Health and Medical Services Pty Ltd – continued

On 3 March 2021, criminal proceedings were commenced in the Local Court of New South Wales against the Commonwealth (Department of Home Affairs) and International Health and Medical Services Pty Ltd for offences against section 32 of the WHS Act. The proceedings relate to an incident on 4 March 2019 at the Villawood Immigration Detention Centre where a detainee died by suicide.

John Holland Pty Ltd, Omega Constructions Pty Ltd and Universal Reo Pty Ltd – continued

On 31 January 2019, criminal proceedings were commenced in the Magistrates Court of Western Australia against John Holland Group Pty Ltd, Omega Constructions Pty Ltd and Universal Reo Pty Ltd for offences against section 32 of the WHS Act. The proceedings relate to an incident on 1 February 2017, in which a worker sustained serious injuries after being struck by a telescopic handler.

Cleanaway Operations Pty Ltd – continued

On 15 August 2016, criminal proceedings were commenced in the Magistrates Court of South Australia against Cleanaway Operations Pty Ltd for offences against section 32 of the WHS Act. The proceedings relate to a fatal collision involving a Cleanaway vehicle on Adelaide's South-Eastern Freeway on 18 August 2014. On 19 April 2021, Cleanaway was found guilty on all 8 charges. Cleanaway lodged an appeal in the Supreme Court of South Australia. The appeal was heard on 30 June 2021 and the decision was handed down on 28 June 2022. The Supreme Court of South Australia dismissed Cleanaway's appeal in relation to charges one and 2 and overturned its convictions on charges 3 to 8. On 14 June 2022, Cleanaway filed a Notice of Appeal in the South Australian Court of Appeal. The Court's decision is reserved.

Commonwealth (Department of the Environment and Energy) and Helicopter Resources Pty Ltd – concluded

On 20 December 2017, criminal proceedings were commenced in the Magistrates Court of the Australian Capital Territory against the Commonwealth (Department of the Environment and Energy) and Helicopter Resources Pty Ltd for offences against section 32 of the WHS Act. The proceedings related to an incident where a helicopter pilot sustained fatal injuries after falling down a crevasse in Antarctica on 11 January 2016. The Commonwealth was found guilty on 2 charges and acquitted of a third. Helicopter Resources Pty Ltd was found not guilty on all charges. On 3 January 2020, an appeal was lodged in the Supreme Court of the Australian Capital Territory in relation to the acquittal of Helicopter Resources Pty Ltd. On 11 March 2020, the Commonwealth lodged an appeal in relation to the findings of guilt. The Supreme Court of the Australian Capital Territory dismissed the appeal against acquittal (HeliRes) and allowed the appeal against conviction (Department of the Environment and Energy). On 7 July 2021, the Commonwealth Director of Public Prosecutions lodged an appeal to the Australian Capital Territory Court of Appeal in relation to both decisions. The appeal was heard between 8 and 11 February 2023. The Court's decision was handed down on 1 March 2024. The prosecution's appeal was dismissed.



Chapter 6: Appendices

Appendix A – Ecologically sustainable development and environmental performance	170
Appendix B – Compliance index	174



Appendix A – Ecologically sustainable development and environmental performance

Overview

Under section 516A of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), government organisations must report annually on their ecologically sustainable development (ESD) and environmental performance. Comcare is committed to advancing the principles of ESD and practicing these principles in its everyday activities and long-term projects.

We recognise that day to day activities consume resources and create waste. This year, we have continued several activities to reduce our environmental impact with a focus on ICT and building operations as the major consumers of energy and other resources.

Our Canberra office has been a part of organics recycling program GOTERRA since 2012 and we continue to be reaccredited with Business Recycling Program.

Comcare continues to achieve a 5-star National Australian Built Environment Rating System (NABERS) Energy Tenancy rating for levels 3 to 5, 121 Marcus Clarke Street, Canberra in the ACT, and a 5.5 star NABERS Energy Tenancy rating for our tenancy on levels 5 to 7, 535 Bourke Street, Melbourne in Victoria.

NABERS is a national rating system that measures the environmental performance of Australian buildings, tenancies, and homes. NABERS measures the energy efficiency, water usage, waste management and indoor environment quality of a building or tenancy and its impact on the environment.

Comcare continues to undertake activities to reduce our environmental impact including:

- > participate in whole-of-government purchasing arrangements for stationery and office supplies
- > 100% of the paper that is procured is recycled and 100% recycling of paper waste
- > ensuring Comcare exceeds the whole-of-government Net Zero 2030 requirements for 2024 by having leasing arrangements for more than 50% of fleet vehicles to be electric vehicles
- > providing end of trip facilities to encourage employees to cycle to work
- > electronic workflows are aimed to reduce the use of paper as well as the need to retain paper copies
- > using cloud services to reduce both power consumption and computer hardware requirements
- > using the power saving features of computer monitors and televisions
- > participating in whole-of-government purchasing arrangements for electricity
- > installing sensor lighting systems in all office fit outs with lux testing being conducted to prevent excess lighting
- > using the energy saving features of the Windows operating system.

Technology equipment upgrade

Comcare is advancing its migration to cloud-based services as part of its ICT strategy. Currently, Comcare is enhancing its physical infrastructure and data centres, which has led to a reduction in its physical footprint and lower energy usage.

Comcare has reduced the multi-functional devices from 38 to 23 devices, this is a 40% reduction, which has led to the reduction of power usage.

Information management

Comcare is continuing to transition to a fully digital portfolio by converting our paper information assets to digital formats. This is ongoing work that will increase information availability and efficiencies to meet current and future needs of government and community. In the last year alone, we have scanned 3759 boxes which equates to just over 10.03 million pages.

We are continuing to make process improvements by undertaking initiatives for information uplift by adopting technology while also promoting record management awareness and compliance amongst staff.

Waste and recycling

Comcare continues to participate in the ACT Government ACTSmart Office Recycling Program in its Canberra office. The Canberra office renewed its accreditation in June 2024 and currently sends approximately 75% of its waste to a recycling centre. Comcare provides recycling streams (including co-mingled, cardboard and paper recycling) and also has waste and recycling systems in place.

Comcare recycles 100% of toner cartridges and florescent light tubes and maintains a battery recycling facility in the Canberra office.

Externally, Comcare provides the ability to download publications from its website. This allows documents to be sent and stored electronically, reducing the impact of printing and distribution of hard copy material.

Environmental performance

Power consumption per person decreased in 2023–24, which reflects Comcare’s commitment for a more environmentally sustainable office environment. The table below shows Comcare’s power consumption over 5 financial years.

Comcare measures paper consumption by purchases made during the financial year. In 2023–24, Comcare’s paper consumption decreased by 31% from the previous year, which reflects our commitment to reducing our environmental impact and the move to a digital environment.

Comcare’s primary data centre infrastructure is hosted externally. The objective of Comcare’s Data Centre and Network Refresh project is to relocate the primary data centre service and storage infrastructure to its Canberra office by the end of 2024. This move aims to lower data centre operational costs while ensuring a reliable, available, and well-supported server and storage facility.

Table 21: Comcare’s environmental performance over the last 5 financial years

Environmental performance	2019–20	2020–21	2021–22	2022–23	2023–24
Average power consumption per full-time equivalent employee (Mega joules/person/annum)	4,598	3,951	3,443	8,186	2,530
Paper consumption ¹ (reams of paper)	2,946	926	645	716	872
Offsite data centre power consumption (kilowatt-hour kWh)	–	–	–	63,349	61,520

¹ Amount purchased during the financial year

APS Net Zero 2030

APS Net Zero 2030 is the Government’s policy for the APS to reduce its greenhouse gas emissions to net zero by 2030, and transparently report on its emissions. As part of the Net Zero in Government Operations Strategy, non-corporate Commonwealth entities, corporate Commonwealth entities and Commonwealth companies are required to report on their operational greenhouse gas emissions, non-corporate Commonwealth entities, corporate Commonwealth entities and Commonwealth companies are required to report on their operational greenhouse gas emissions.

The Greenhouse Gas Emissions Inventory presents greenhouse gas emissions over the 2023–24 period. Results are presented based on Carbon Dioxide Equivalent (CO₂-e) emissions. Greenhouse gas emissions have been calculated in line with the APS Net Zero Emissions Reporting Framework, consistent with the Whole-of-Australian Government approach as part of the APS Net Zero 2030 policy. Not all data sources were available at the time of the report and amendments to data may be required in future reports.

Comcare's emissions data includes data for the SRCC and the Seafarers Safety, Rehabilitation and Compensation Authority (Seacare Authority) as they use Comcare's travel systems and offices.

- > Not all waste data was available at the time of the report and amendments to data may be required in future reports.
- > Emissions from hire cars for 2023–24 have been sourced from third party and may be incomplete.
- > The quality of data is expected to improve over time as emissions reporting matures.

Table 22: 2023–24 Greenhouse gas emissions inventory – location-based method

Emission Source	Scope 1 † CO ₂ -e	Scope 2 † CO ₂ -e	Scope 3 † CO ₂ -e	Total † CO ₂ -e
Electricity (Location Based Approach)	N/A	327.963	29.302	357.265
Natural Gas	0.000	N/A	0.000	0.000
Solid Waste*	N/A	N/A	81.984	81.984
Refrigerants*†	0.000	N/A	N/A	0.000
Fleet and Other Vehicles	10.889	N/A	2.770	13.658
Domestic Commercial Flights	N/A	N/A	301.395	301.395
Domestic Hire Car*	N/A	N/A	17.527	17.527
Domestic Travel Accommodation*	N/A	N/A	146.082	146.082
Other Energy	0.000	N/A	0.000	0.000
Total † CO₂-e	10.889	327.963	579.058	917.910

Note: the table above presents emissions related to electricity usage using the location-based accounting method. CO₂-e = Carbon Dioxide Equivalent.

*indicates emission sources collected for the first time in 2023–24. The quality of data is expected to improve over time as emissions reporting matures.

†indicates optional emission source for 2023–24 emissions reporting.

Table 23: 2023–24 Electricity greenhouse gas emissions

Emission Source	Scope 2 t CO ₂ -e	Scope 3 t CO ₂ -e	Total t CO ₂ -e	Percentage of electricity use
Electricity (Location Based Approach)	327.963	29.302	357.265	100%
Market-based electricity emissions	179.892	22.209	202.101	43.77%
Total renewable electricity	–	–	–	56.23%
<i>Mandatory renewables</i> ¹	–	–	–	18.72%
<i>Voluntary renewables</i> ²	–	–	–	37.51%

Note: the table above presents emissions related to electricity usage using both the location-based and the market-based accounting methods. CO₂-e = Carbon Dioxide Equivalent.

- 1 Mandatory renewables are the portion of electricity consumed from the grid that is generated by renewable sources. This includes the renewable power percentage.
- 2 Voluntary renewables reflect the eligible carbon credit units surrendered by the entity. This may include purchased large-scale generation certificates, power purchasing agreements, GreenPower and the jurisdictional renewable power percentage (ACT only).

Appendix B – Compliance index

This annual report has been prepared in accordance with the requirements of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) and the Public Governance, Performance and Accountability Rule 2014 (PGPA Rule).

Below is the table set out in Schedule 2A of the PGPA Rule. Section 17BE(u) requires that this table be included in entities' annual reports.

Table 24: List of requirements

PGPA Rule Reference	Part of report	Description	Requirement
17BE	Contents of annual report		
17BE(a)	About Comcare – Governing legislation	Details of the legislation establishing the body	Mandatory
17BE(b)(i)	About Comcare – Governing legislation	A summary of the objects and functions of the entity as set out in legislation	Mandatory
17BE(b)(ii)	About Comcare – Purpose and strategic priorities	The purposes of the entity as included in the entity's corporate plan for the reporting period	Mandatory
17BE(c)	About Comcare – organisational structure	The names of the persons holding the position of responsible Minister or responsible Ministers during the reporting period, and the titles of those responsible Ministers	Mandatory
17BE(d)	Management and accountability – Accountability	Directions given to the entity by the Minister under an Act or instrument during the reporting period	If applicable, mandatory
17BE(e)	Management and accountability – Accountability	Any government policy order that applied in relation to the entity during the reporting period under section 22 of the Act	If applicable, mandatory
17BE(f)	Management and accountability – Accountability	Particulars of non-compliance with: (a) a direction given to the entity by the Minister under an Act or instrument during the reporting period; or (b) a government policy order that applied in relation to the entity during the reporting period under section 22 of the Act	If applicable, mandatory
17BE(g)	Annual performance statements	Annual performance statements in accordance with paragraph 39(1)(b) of the Act and section 16F of the rule	Mandatory
17BE(h), 17BE(i)	Management and accountability – Accountability	A statement of significant issues reported to the Minister under paragraph 19(1)(e) of the Act that relates to non-compliance with finance law and action taken to remedy non-compliance	If applicable, mandatory

PGPA Rule Reference	Part of report	Description	Requirement
17BE	Contents of annual report		
17BE(j)	About Comcare – Executive team	Information on the accountable authority, or each member of the accountable authority, of the entity during the reporting period	Mandatory
17BE(k)	About Comcare – Organisational structure	Outline of the organisational structure of the entity (including any subsidiaries of the entity)	Mandatory
17BE(ka)	Management and accountability – People	Statistics on the entity’s employees on an ongoing a non-ongoing basis, including the following: (a) statistics on full-time employees; (b) statistics on part-time employees; (c) statistics on gender; (d) statistics on staff location	Mandatory
17BE(l)	About Comcare – Office locations	Outline of the location (whether or not in Australia) of major activities or facilities of the entity	Mandatory
17BE(m)	Management and accountability – Governance	Information relating to the main corporate governance practices used by the entity during the reporting period	Mandatory
17BE(n), 17BE(o)	Management and accountability – Accountability	For transactions with a related Commonwealth entity or related company where the value of the transaction, or if there is more than one transaction, the aggregate of those transactions, is more than \$10,000 (inclusive of GST): (a) the decision-making process undertaken by the accountable authority to approve the entity paying for a good or service from, or providing a grant to, the related Commonwealth entity or related company; and (b) the value of the transaction, or if there is more than one transaction, the number of transactions and the aggregate of value of the transactions	If applicable, mandatory
17BE(p)	Not applicable – there were no significant activities and changes that affected Comcare	Any significant activities and changes that affected the operation or structure of the entity during the reporting period	If applicable, mandatory
17BE(q)	Not applicable	Particulars of judicial decisions or decisions of administrative tribunals that may have a significant effect on the operations of the entity	If applicable, mandatory

PGPA Rule Reference	Part of report	Description	Requirement
17BE	Contents of annual report		
17BE(r)	Management and accountability – Accountability	Particulars of any reports on the entity given by: (a) the Auditor-General (other than a report under section 43 of the Act); or (b) a Parliamentary Committee; or (c) the Commonwealth Ombudsman; or (d) the Office of the Australian Information Commissioner	If applicable, mandatory
17BE(s)	Not applicable – Comcare do not have subsidiaries	An explanation of information not obtained from a subsidiary of the entity and the effect of not having the information on the annual report	If applicable, mandatory
17BE(t)	Management and accountability – Accountability	Details of any indemnity that applied during the reporting period to the accountable authority, any member of the accountable authority or officer of the entity against a liability (including premiums paid, or agreed to be paid, for insurance against the authority, member or officer's liability for legal costs)	If applicable, mandatory
17BE(taa)	Management and accountability – Governance framework	The following information about the audit committee for the entity: (a) a direct electronic address of the charter determining the functions of the audit committee; (b) the name of each member of the audit committee; (c) the qualifications, knowledge, skills or experience of each member of the audit committee; (d) information about each member's attendance at meetings of the audit committee; (e) the remuneration of each member of the audit committee	Mandatory
17BE(ta)	Management and accountability – People	Information about executive remuneration	Mandatory
17BF(1)(a)(i)	Not applicable	An assessment of significant changes in the entity's overall financial structure and financial conditions	If applicable, mandatory
17BF(1)(a)(ii)	Not applicable	An assessment of any events or risks that could cause financial information that is reported not to be indicative of future operations or financial conditions	If applicable, mandatory
17BF(1)(b)	Not applicable	Information on dividends paid or recommended	If applicable, mandatory

PGPA Rule Reference	Part of report	Description	Requirement
17BE	Contents of annual report		
17BF(1)(c)	Not applicable	Details of any community service obligations the government business enterprise has including: (a) an outline of actions taken to fulfil those obligations; and (b) an assessment of the cost of fulfilling those obligations	If applicable, mandatory
17BF(2)	Not applicable	A statement regarding the exclusion of information on the grounds that the information is commercially sensitive and would be likely to result in unreasonable commercial prejudice to the government business enterprise	If applicable, mandatory

Part of report	Description	Requirement
WHS Act – Part 3 – Comcare		
Scheme and regulatory performance – Regulatory performance and prosecutions	Notifiable incidents of which Comcare is notified under section 38 during the period	Statistics, with appropriate details
Scheme and regulatory performance – Regulatory performance and prosecutions	All investigations conducted by Comcare during the period	Statistics, with appropriate details
Scheme and regulatory performance – Regulatory performance and prosecutions	All seizures made under section 175 or 176 during the period	Statistics, with appropriate details
Scheme and regulatory performance – Regulatory performance and prosecutions	All improvement notices issued under section 191 during the period	Statistics, with appropriate details
Scheme and regulatory performance – Regulatory performance and prosecutions	All prohibition notices issued under section 195 during the period	Statistics, with appropriate details
Scheme and regulatory performance – Regulatory performance and prosecutions	All non disturbance notices issued under section 198 during the period	Statistics, with appropriate details
Scheme and regulatory performance – Regulatory performance and prosecutions	All remedial action taken under section 211 or 212 during the period	Statistics, with appropriate details
Scheme and regulatory performance – Regulatory performance and prosecutions	All written undertakings accepted by Comcare under section 216 during the period	Statistics, with appropriate details
Scheme and regulatory performance – Regulatory performance and prosecutions	All applications for internal review made under section 224 during the period	Statistics, with appropriate details
Scheme and regulatory performance – Regulatory performance and prosecutions	All applications for external review made under section 229 during the period	Statistics, with appropriate details
Scheme and regulatory performance – Regulatory performance and prosecutions	All infringement notices given under section 243 during the period	Statistics, with appropriate details

Part of report	Description	Requirement
Scheme and regulatory performance – Regulatory performance and prosecutions	Details of prosecutions instituted under this Act during the period	Must include
N/A	Any other matter prescribed	Must include
WHS Act – Part 4 – Other persons		
Management and accountability – Work Health and Safety Management and Performance	(a) initiatives taken during the year to ensure the health, safety and welfare of workers who carry out work for the entity	Must include
Management and accountability – Work Health and Safety Management and Performance	(b) health and safety outcomes (including the impact on injury rates of workers) achieved as a result of initiatives mentioned under paragraph (a) or previous initiatives	Must include
Management and accountability – Work Health and Safety Management and Performance	(c) statistics of any notifiable incidents of which the entity becomes aware during the year that arose out of the conduct of businesses or undertakings by the entity	Must include
Management and accountability – Work Health and Safety Management and Performance	d) any investigations conducted during the year that relate to businesses or undertakings conducted by the entity, including details of all notices given to the entity during the year under Part 10 of this Act	Must include
N/A	(e) such other matters as are required by guidelines approved on behalf of the Parliament by the Joint Committee of Public Accounts and Audit	Must include
SRC Act		
N/A	<p><i>73 Directions by Minister</i></p> <p>(1) The Minister may, by notice in writing given to the Chief Executive Officer, give a direction to Comcare with respect to the performance of its functions or the exercise of its powers under this Act, the Parliamentary Business Resources Act 2017 or the Work Health and Safety Act 2011, otherwise than in relation to a particular case.</p>	Must include

Part of report	Description	Requirement
Environment Protection and Biodiversity Conservation Act		
Ecologically sustainable development and environmental performance – Overview	Include a report on how the activities of, and the administration (if any) of legislation by, the reporter during the period accorded with the principles of ecologically sustainable development	Must include
N/A	Identify how the outcomes (if any) specified for the reporter in an Appropriations Act relating to the period contribute to ecologically sustainable development	Must include
Ecologically sustainable development and environmental performance – Environmental performance	Document the effect of the reporter’s activities on the environment	Must include
Ecologically sustainable development and environmental performance – Overview	Identify any measures the reporter is taking to minimise the impact of activities by the reporter on the environment	Must include
Ecologically sustainable development and environmental performance – Overview	Identify the mechanisms (if any) for reviewing and increasing the effectiveness of those measures	Must include
Commonwealth Electoral Act 1918		
Management and accountability – Accountability	Subject to this section, the principal officer of each Commonwealth Department must attach a statement to its annual report setting out particulars of all amounts paid by, or on behalf of, the Commonwealth Department during the financial year to: <ul style="list-style-type: none"> > advertising agencies > market research > organisations > polling organisations > direct mail organisations > media advertising organisations > and the persons or organisations to whom those amounts were paid. 	Must include



Australian Government
**Safety, Rehabilitation and
Compensation Commission**

Part 2:
**Safety,
Rehabilitation
and
Compensation
Commission
(SRCC)
Annual Report
2023–24**

About this report	182
Letter of Transmittal – SRCC	183
Chairperson’s review	184
About the SRCC	186
Operation of the SRCC	189
Stakeholder engagement	192
Regulatory performance	193
Operation of licensees	199
Operation of the Licence Compliance and Performance Model	202

About this report

The Safety, Rehabilitation and Compensation Commission (SRCC) annual report documents the activities of the SRCC from 1 July 2023 to 30 June 2024.

The SRCC is subject to specific annual reporting requirements under the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act) and the *Safety, Rehabilitation and Compensation Directions 2019* (Directions) to include particulars of:

- > Directions given by the Minister
- > Guidelines issued by the SRCC
- > The operations of each licensee
- > Records required to be kept in relation to licensees under the Directions.

Letter of Transmittal – SRCC



Australian Government
**Safety, Rehabilitation and
Compensation Commission**

**GPO Box 9905
Canberra ACT 2601
Tel: 1300 366 979**

23 September 2024

Senator the Hon Murray Watt
Minister for Employment and Workplace Relations
Parliament House
CANBERRA ACT 2600

Dear Minister

I have pleasure in submitting the annual report for the Safety, Rehabilitation and Compensation Commission (SRCC) for the financial year ending 30 June 2024.

The report is provided to you in accordance with the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act).

Section 89S of the SRC Act provides that the Chairperson must give the Minister, for presentation to the Parliament, a report of the SRCC's activities during the financial year. Following its tabling in Parliament, the report will be placed on the SRCC's website.

Yours faithfully

A handwritten signature in black ink, appearing to read 'D. Oliver'.

David Oliver
Chairperson

Chairperson's review



**David Oliver, Chairperson
SRCC**

I am pleased to present my first annual report as Chairperson, to the Minister for Employment and Workplace Relations, Senator the Hon Murray Watt, and the Australian Parliament, on the operations of the SRCC for the year ending 30 June 2024.

The SRCC's program of work, including the performance of its functions and the exercise of powers has continued to be conducted and delivered efficiently this year. The SRCC maintained and achieved its yearly meeting schedule and actively consulted with licensees and affiliated unions, remaining highly responsive to issues and enquiries raised.

A key focus of the SRCC this year was reviewing elements within the Licence Compliance and Performance Model (LCPM) to ensure that it remains contemporary and aligns with recent legislative amendments. In addition, the SRCC placed an emphasis on risk management through environmental scanning and monitoring developments across the jurisdiction in relation to reviews and other matters that may have the potential to impact on its regulatory operations.

Priorities

The SRCC has a range of functions under the SRC Act and the *Work Health and Safety Act 2011* (WHS Act). These are set out on page 186.

To fulfil its functions, the SRCC's priorities for 2023–24 were focused on the following key areas:

- > operation of the SRCC
- > stakeholder engagement
- > operation of licensees
- > operation of the LCPM.

I am pleased to report that the SRCC undertook a range of activities to achieve outcomes against these priority areas in 2023–24. Some of the key highlights were:

- > maintaining an adaptive approach to the SRCC's operation and regulation to ensure our regulatory approach takes into account our operating environment and emerging issues relevant to licensees
- > ongoing consultation with stakeholders to review and improve the SRCC's regulatory model
- > consideration of the operation of the LCPM, in which the SRCC took action to evaluate its effectiveness, refine current practices and identify areas for further improvement.

Further detail of the SRCC's activities in 2023–24 is set out in this report.

Self-insurance

The SRCC granted licence extensions, under section 105 of the SRC Act, to the following entities:

- > Bis Industries Limited
- > John Holland Pty Ltd
- > John Holland Group Pty Ltd
- > John Holland Rail Pty Ltd
- > K&S Freighters Pty Ltd
- > National Australia Bank Limited
- > Virgin Australia Airlines Pty Ltd.

Meetings with licensees and affiliated unions

The SRCC meets annually with licensees and affiliated unions (unions and their members representing employees of self-insured licensees). These meetings provide a valuable opportunity for the SRCC, licensees and affiliated unions to participate in open discussion on the implementation and operation of the LCPM. This includes identifying further areas of review as part of continuous improvement.

The annual meeting between the SRCC and licensees was held on 14 June 2024. The meeting with the affiliated unions will be held in 2024–25.

The SRCC undertook a range of other stakeholder engagement activities in 2023–24, further detail is provided within this report.

Strategic risk register

The SRCC manages current and emerging risks through its strategic risk register. In 2023–24, the SRCC reviewed the register and incorporated changes to ensure it remained current and effective.

Finally, I would like to thank the staff of Comcare for their professional support, guidance and assistance throughout the year.



David Oliver

About the SRCC

Responsible Minister

The SRCC is established under section 89A of the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act), operates within the Employment and Workplace Relations portfolio and reports to the Minister for Employment and Workplace Relations.

From 1 July 2023 to 28 July 2024, SRCC reported to the following Minister:

The Hon Tony Burke MP

Minister for Employment and Workplace Relations

Minister for the Arts Leader of the House

From 29 July 2024, the SRCC reports to the following Minister:

Senator the Hon Murray Watt

Minister for Employment and Workplace Relations

The Minister has the power to give directions to the SRCC on the performance of its functions and the exercise of its powers. These directions may include criteria and procedures for the scope of licences, record keeping and reporting requirements, and related matters.

Role and functions

The SRCC administers functions under the SRC Act, other than those functions attributed to Comcare. The SRC Act establishes the workers' compensation scheme covering Commonwealth employees and the employees of licensed entities.

The SRCC has several general and specific roles and functions conferred on it by the SRC Act and WHS Act. The role and functions under the SRC Act are to:

- > ensure that, as far as practicable, there is equity of outcomes resulting from administrative practices and procedures used by Comcare and a licensee in the performance of their respective functions under the SRC Act
- > advise the Minister about anything relating to the operation of the SRC Act or to the SRCC's functions or powers
- > prepare and issue general policy guidelines to Comcare or licensees in relation to their respective powers and functions
- > be the issuing authority and regulator of self-insurance licences under the SRC Act, including setting licence fees
- > provide guidelines on the setting of premiums and a review point (if required) for employers' premium and regulatory contribution determinations
- > undertake other functions as conferred on the SRCC by any other Act.

Under the WHS Act, the functions of the SRCC are to:

- > advise the Minister on the administration of the WHS Act
- > advise and make recommendations to the Minister on the most effective means of giving effect to the objects of the WHS Act
- > enquire into and make recommendations to the Minister on any matter relating to work health and safety referred to the SRCC by the Minister
- > provide a forum for consultation between Comcare and persons conducting business or undertakings, workers and the bodies that represent them.

SRCC accountabilities

The SRCC has an evaluation framework which it uses to provide assurance that it has appropriately discharged its statutory responsibilities. The framework includes an annual assessment of the outcomes and activities of the SRCC against each of its statutory functions.

The outcomes and activities against each functional category enable the SRCC to make an informed assessment of its performance in meeting its regulatory functions as listed above.

Evidence that the SRCC is meeting its accountabilities, and fulfilling its statutory responsibility, is demonstrated by the Chairperson reporting to the Minister on the key outcomes of each regular SRCC meeting.

Membership

The SRC Act provides for the SRCC to have 11 Members, each appointed by the Minister (other than Safe Work Australia's CEO). Members other than the Chairperson may appoint a deputy, subject to the Minister's approval. A Member, other than Safe Work Australia's CEO, holds office on a part-time basis for a term not longer than 3 years, as specified in the instrument of appointment. Members are eligible for reappointment.

The SRCC comprised the following members during 2023–24:

- > Mr Peter Richards, Chairperson¹
- > Mr David Oliver, Chairperson²
- > Ms Melissa Payne, Member nominated by the Australian Council of Trade Unions (ACTU)
- > Mr Trevor Gauld, Member nominated by the ACTU
- > Mr Michael Flinn, Member nominated by the ACTU³
- > Ms Deborah Vallance, Member nominated by the ACTU⁴
- > Ms Louisa Hudson, Member representing the licensees
- > Ms Jody Anderson, Member representing the Commonwealth and Commonwealth authorities
- > Ms Michelle Baxter, CEO of Safe Work Australia⁵
- > Ms Marie Boland, CEO of Safe Work Australia⁶
- > Ms Catherine Hudson, Member representing the interests of the Australian Capital Territory's public sector employers
- > Mr Stephen Somogyi, Member with qualifications or experience relevant to the SRCC's functions, or the exercise of its powers⁷
- > Ms Jane Hall, Member with qualifications or experience relevant to the SRCC's functions, or the exercise of its powers⁸
- > The Member representing the interests of members and former members of the Defence Force position remained vacant.

¹ Until 23 January 2024

² From 20 March 2024

³ Until 7 May 2024

⁴ From 11 June 2024

⁵ Until 31 October 2023

⁶ From 1 November 2023

⁷ Until 14 December 2023

⁸ Until 14 March 2024

Operation of the SRCC

The SRCC meets on a quarterly basis with additional meetings held as required. Five Members constitute a quorum, providing the following Members are present:

- > at least one Member nominated by the ACTU
- > the Member representing licensees
- > the Member representing the Commonwealth and Commonwealth authorities.

The SRCC held 4 meetings in 2023–24 on: 15 September 2023, 5 December 2023, 19 April 2024 and 13 June 2024. Details of attendance at SRCC meetings during 2023–24 are shown in table 25. Additionally, the SRCC held a number of out of session meetings in 2023–24 to support the SRCC in delivering its functions.

Table 25: SRCC meeting attendance

Commissioner	Meetings eligible to attend	Meetings attended	Meetings attended by deputy*
Peter Richards	2	2	–
David Oliver	2	2	–
Trevor Gauld	4	4	–
Melissa Payne	4	4	–
Michael Flinn	3	0	–
Deborah Vallance	1	1	–
Louisa Hudson	4	4	–
Michelle Baxter	1	1	–
Marie Boland	3	3	–
Catherine Hudson *	4	3	1
Jane Hall	2	2	–
Stephen Somogyi	2	2	–
Jody Anderson*	4	2	2

*During 2023–24 the following Deputies attended SRCC meetings:

- > Adrian Breen, Deputy to Jody Anderson; and
- > Michael Young, Deputy to Catherine Hudson.

SRCC sub-committees

The following sub-committee operated during the reporting year.

Reviewing the Regulation of Self-Insured Licensees sub-committee

Purpose: To review the regulation of self-insured licensees and advise and make recommendations as appropriate.

Throughout the reporting period, and in consultation with licensee representatives, affiliated unions and other stakeholders, the sub-committee monitored and reviewed the operation of the SRCC's regulatory model.

Members (as at 30 June 2024): Four (4) members with a member nominated to Chair, one licensee representative, the Commonwealth representative and one union representative to ensure tripartite representation is retained.

Decision making

The SRCC has the powers and functions to make a wide range of decisions under the SRC Act, the SRC Directions and other legislative instruments. SRCC decisions of an administrative character are subject to judicial review.

Directions and Guidelines

Under section 89S of the SRC Act the SRCC is required to provide a report to the Minister to give to Parliament on its activities for each financial year. Among other things, the report must include particulars of any Directions given by the Minister under section 89D and any Guidelines issued by the SRCC under section 73A of the SRC Act.

The Minister did not issue any Directions to the SRCC under the SRC Act during 2023–24.

The SRCC did not issue any Guidelines under section 73A of the SRC Act during 2023–24.

Delegations

At its 5 December 2023 meeting, the SRCC agreed that the current delegations to the CEO of Comcare for its functions under the following sections of the SRC Act remain appropriate, namely to:

- > Estimate the amount of the licence fee payable each financial year by the licensee under section 104A(1) in accordance with section 104A(2)(a)-(b) and notify the licensee of this amount in writing;
- > Estimate the amount of the licence application fee under section 102(2)
- > Notify the applicant of the amount in writing in line with subsections 102(3)(a) and (b).

Code of Conduct

The SRCC has a Code of Conduct to describe the standards of behaviour and conduct expected from Commissioners in their dealings with Members, stakeholders and the public. The Code of Conduct is available on the SRCC website.

Stakeholder engagement

Effective stakeholder engagement continued to be a key priority for the SRCC in 2023–24, with a key outcome being that the SRCC is open and transparent in its dealings with regulated entities.

In 2023–24, the SRCC engaged with licensee representatives on 14 June 2024.

The SRCC will continue to engage with the licensees and affiliated unions on current and emerging priority items. The annual meeting with the affiliated unions will be held in 2024–25.

Regulatory performance

In order to meet the requirements of the Regulator Performance Guide 2021, as well as the Regulator Performance Resource Management Guide (December 2021), the SRCC publishes information relating to high level regulatory activities it has undertaken during the period. As the SRCC is not required to report under the *Public Governance, Performance and Accountability Act 2013*, and therefore does not publish a corporate plan, this report is provided against the SRCC's operational plan, which is available on the SRCC website.

Key activities in 2023–24 which the SRCC delivered to meet its roles and functions are described in table 26. These activities sit under 4 key priority areas:

- > Operation of the Regulatory Model
- > Operation of Licensees
- > Operation of the Commission
- > Stakeholder Engagement.

Table 26: SRCC Operational Plan 2023–24

Outcome	Reference	Activity	Outcomes
Priority area – 1. Operation of the Regulatory Model			
1.1 The Commission actively contributes to the continuous improvement of regulatory frameworks and does not unnecessarily impede the effective operation of regulated entities.	Regulatory Performance Guide – Continuous Improvement and building trust	Establish and maintain a schedule to review the LCPM, with changes to be implemented on a half yearly basis. Including <ul style="list-style-type: none"> > regulatory response framework > annual review of dispute resolution. <hr/> <ul style="list-style-type: none"> > Quarterly Reviewing the Regulation of Self-Insured Licensees sub-committee (RRSIL) meetings held to consider the Commission's regulatory framework. 	The Commission considered and approved version 11 of the LCPM at its June 2024 meeting. Reviews of the LCPM conducted in line with the endorsed 2022–27 LCPM review schedule. <hr/> RRSIL meetings were held on 23 August 2023, 8 May 2024 and 31 May 2024. The November 2023 and February 2024 RRSIL meetings were cancelled.

Outcome	Reference	Activity	Outcomes
1.2 The Commission communicates with regulated entities in clear, targeted and effective manner.	Regulatory Performance Guide – Collaboration and Engagement	Licencees consulted on changes to the LCPM and performance targets.	<p>Licencees were consulted during the review of performance measures.</p> <p>Changes to the LCPM</p> <p>Meeting No 231, 15 September 2023</p> <ul style="list-style-type: none"> > Section 6: Revised wording for requirements, management systems and prudential conditions > Removal of Attachment K: Targeted Review Report Template. <p>Meeting No 237, 13 June 2023</p> <ul style="list-style-type: none"> > Section 7: Revised wording to reflect the amendments to the Safety, Rehabilitation and Compensation Regulations 2019 and introduction of the Safety, Rehabilitation and Compensation Amendment (Period for Decision Making) Regulations 2023, prescribing timeframes for decision making under the SRC Act > Section 8: Inclusion of a new section: Risk Management – Changes to a licensee’s risk profile > Section 9: Revised wording to explicitly recognise changes in a licensee’s risk profile > Attachment D: Revised Licence Compliance and Performance Report Template to reflect legislative amendments to timeframes and targets for LKPIs 6 and 7 Removal of Attachment J – Targeted review template.
1.3 Review of premium determinations and regulatory contributions.	s97K SRC Act	<p>As required, the Commission (through a sub-committee):</p> <ol style="list-style-type: none"> a) considers requests for review by the Commission on a case by case basis; b) considers, in each case, whether Comcare has followed the Commission’s Guidelines for the Determination of Premiums and Regulatory Contributions issued under Section 97E of the SRC Act; and c) make recommendations to the Commission as appropriate. 	<p>No requests for review of premium or regulatory contribution determinations were received.</p>
		Reporting on Guidelines and review requests to the Commission.	The Comcare CEO reported compliance with the <i>Premium Determination Guidelines 2022</i> and <i>Regulatory Contributions Determination Guidelines 2022</i> on 22 January 2024.
1.4 Guidance advice and directions to Comcare or licensees.	73A s97E(1) s97E(2) s97H	The Commission issues guidance, advice and directions to the scheme with the assistance of Comcare.	No guidance, advice or directions have been issued by the Commission.

Outcome	Reference	Activity	Outcomes
Priority area – 2. Operation of licensees			
2.1 Consider licence applications.	s102 - s107 SRC Act	Licence applications are considered by the Commission against the requirements in the SRC Act and decisions made based on evidence considered.	<p>Licence applications</p> <p>The Commission considered a licence application from Wilson Parking Australia 1992 Pty Ltd at its 19 April 2024 meeting. At the applicant's request, the Commission agreed to defer the decision to grant a self-insurance licence until a future meeting.</p> <p>Licence extensions</p> <p>At its 13 June 2024 meeting, the Commission considered licence extensions for:</p> <ul style="list-style-type: none"> > Bis Industries Limited > John Holland Pty Limited > John Holland Group Pty Limited > John Holland Rail Pty Ltd > K&S Freighters Pty Ltd > National Australia Bank Limited > Virgin Australia Airlines Pty Ltd. <p>All licence extensions were granted for a four-year period to 30 June 2028.¹</p>
		Comcare conducts licence application assessments on behalf of the Commission and advises on the merits of licence applications and compliance with legislative provisions.	Comcare's assessment on the merits of licence applications and extension requests against legislative requirements, along with recommendations, tabled at each meeting where applications are considered.
		Scope and conditions are set on an individual basis and reflected in licence conditions.	Licence scope and conditions are tabled at each meeting where applications are considered.
2.2 Monitoring of licensees.	S89B(a) SRC Act	Commission consideration of licensee performance reports.	<p>The Commission considered the performance of licensees at its:</p> <ul style="list-style-type: none"> > 15 September 2023 meeting for quarter 4 2022–23 reporting > 5 December 2023 meeting for quarter 1 2023–24 reporting > 19 April 2024 meeting for quarter 2 2023–24 reporting > 13 June 2024 meeting for quarter 3 2023–24 reporting.
		Commission consideration of licensee prudential reporting.	<p>Licensees are assessed on prudential and financial risk and performance reported at each quarterly Commission meeting through Licence Compliance and Performance Model reporting.</p> <p>Nine regulatory responses have been taken in relation to breaches of licence related to prudential reporting in 2023–24:</p> <ul style="list-style-type: none"> > DHL Supply Chain (Australia) Pty Ltd > Linfox Armaguard Pty Ltd > Prosegur Australia Pty Limited > Reserve Bank of Australia > Ron Finemore Transport Services > Star Track Express Pty Ltd > StarTrack Retail Pty Limited > Thales Australia Limited > Virgin Australia Airlines Pty Ltd.

Outcome	Reference	Activity	Outcomes
2.3 Compliance and monitoring approaches are streamlined and coordinated.	S89B(a) SRC Act	Continue to review reporting to identify opportunities to streamline and reduce regulatory burden.	Considered as part of the review of performance measures.
2.4 Charging of licence fees.	S89s and s108D(b) SRC Act	Fees, scope and conditions are set on an individual basis and reflected in licence conditions.	
		Charging of 2023–24 licence fees by Comcare’s Chief Executive Officer under delegation from the Commission.	2023–24 licence fees were charged in August 2023. Indicative 2024–25 licence fees were notified to licensees in May 2024.
2.5 Determining and implementing regulatory responses in relation to the action of licensees.	Part VIII, Division 2, SRC Act	Maintain the regulatory decision precedent log.	A register of regulatory decisions is maintained following each meeting.
		Utilise the Commission regulatory response framework.	<p>The Commission used its regulatory response framework in taking the following regulatory actions in 2023–24:</p> <p>Encouragement</p> <p>In accordance with the Encouragement stage, the Commission engaged with 5 licensee principal officers, this focussed on education and voluntary compliance, including requesting information or action.</p> <p>Direction</p> <p>In accordance with the Direction stage, the Commission engaged with 4 licensee principal officers, which included directing an action such as a targeted review, requesting information, or requesting the principal officer of the licensee attend a meeting of the Commission to provide relevant information and to respond to any Commission enquiries.</p>

Outcome	Reference	Activity	Outcomes
Priority area – 3. Operation of the SRCC			
3.1 The Commission ensures, as far as practicable, there is equity of outcomes resulting from administrative practices and procedures used by Comcare and a licensee in the performance of their respective functions.	SRC Act s89B(a)	The Commission can issue guidelines.	No guidelines were issued by the Commission in 2023–24.
		Where required, Comcare provides reasonable resources to facilitate the development of guidelines.	Complaints are reported to the Commission quarterly as part of the Licence Compliance and Performance Model reporting.
		The Commission reviews information about licensees and their performance in undertaking their functions and powers under the SRC Act.	An equity of outcomes report is provided to the Commission twice a year. The equity of outcomes report for the period ending 30 June 2023 was considered at the 5 December 2023 meeting. The equity of outcomes report for the period ending 31 December 2023 was considered at the 19 April 2024 meeting.
3.2 To advise the Minister about anything relating to the operation of the SRC Act or to the Commission's functions and powers.	s89B(b) SRC Act	Outcome letters from quarterly meetings provided to the Minister.	Outcome letters sent to Minister: > 12 October 2023 – outcomes of meeting 231, 15 September 2023 > 2 January 2024 – outcomes of meeting 234, 5 December 2023. > 2 May 2024 – outcomes of meeting 235, 19 April 2024. > 26 June 2024 – outcomes of meeting 237, 13 June 2024.
3.3 To advise the Minister on the administration of the WHS Act; To advise and make recommendations to the Minister on the most effective means of giving effect to the objects of the WHS Act; and To enquire into and make recommendations to the Minister on any matter relating to work health and safety referred to the Commission by the Minister.	Schedule 2, Part 2, s2 (a – c) WHS Act	Outcome letters from quarterly meetings provided to the Minister. Advice to Minister as required following stakeholder forums. Comcare drafts advice based on the Commission's views and provides research and analysis about the operations of the Act to the Commission.	Outcome letters sent to Minister: > 12 October 2023 – outcomes of meeting 231, 15 September 2023 > 2 January 2024 – outcomes of meeting 234, 5 December 2023. > 2 May 2024 – outcomes of meeting 235, 19 April 2024. > 26 June 2024 – outcomes of meeting 237, 13 June 2024.
3.4 Commission endorsed annual report released including relevant licensee performance information.	s89R, s89S SRC Act	Endorsement of 2022–23 annual report content.	The Commission endorsed its annual report content through an email out of session meeting 232 held from 15 to 22 August 2023. This included: > a list of licensees, the licence type and expiry date and claims management arrangements; > licence applications, extensions, variations and revocations; > licensee performance against key performance indicators; > any relevant directions given by the Minister under section 89D of the SRC Act; and any guidelines issued by the Commission under section 73A of the SRC Act.

Outcome	Reference	Activity	Outcomes
3.5 Actions undertaken by the Commission are proportionate to the regulatory risk being managed.	Regulator Performance – RMG 128	Regular review of strategic risk register. Control measures monitored for effectiveness at each meeting.	The Commission considered risks 1–4 and 7 and endorsed updates to the risk register at its 5 December 2023 meeting. The Commission undertook a full review of its risk register at its 19 April 2024 meeting.
3.6 Governance and reporting.		Review of published policies and materials.	The Commission reviewed and updated the Licence Compliance and Reporting Model at its 15 September 2023 and 13 June 2024 meetings. The Commission Data Warehouse Specifications were updated in March 2024. The Licensee Key Performance Indicator Specifications were updated in May 2024.

Priority area – 4. Stakeholder management

4.1 Stakeholder engagement to include Minister, Comcare, licensees and union representatives. The Commission is open and transparent in its dealings with regulated entities.	Schedule 2, Part 2, WHS Act s89B(a) SRC Act	Invitation to meeting extended to Minister.	The Minister was invited through outcomes letters dated 12 October 2023, 2 January 2024, 2 May 2024 and 26 June 2024.
		Annual consultation forum with Licensees.	The annual consultation forum with licensees was held following the 13 June 2024 Commission meeting.
		Updates provided to licensees by the Commissioner representing licensees following each Commission Meeting at the Licensee Liaison Forum, conducted by Comcare.	Licence Liaison Forums (LLF) were held on: > 21 September 2023 > 14 December 2023 > 2 May 2024; and > 14 June 2024.
		Annual consultation forum with affiliates.	The meeting with the affiliated unions was not held in the 2023/24 financial year. The next meeting with the affiliated unions be held following the December 2024 Commission meeting.
		The Commission to reflect on its engagement with the Department annually.	This was considered through the Commission’s 2022/23 annual report against the operational plan, which was endorsed through out of session email meeting 232 on 15 to 22 August 2023.

Notes:

¹ At its June 2024 meeting, the Commission agreed, within the context of the existing policy, to grant and extend licences for a period of up to 4 years for the next 12 months, after which time it will reassess this position.

Operation of licensees

Licensing

Under the SRC Act, certain Commonwealth authorities and eligible corporations may apply for a licence to self-insure their workers' compensation liabilities and manage compensation claims.

Comcare provides support to the SRCC in the performance of its functions regarding licensing. Comcare evaluates licence applications, recommends the amount to be charged for licence application fees, monitors licensee performance against licence conditions and recommends actions to the SRCC.

Table 27 summarises licence types, licensees and expiry dates as at 30 June 2024.

Table 27: Licence types, licensees and expiry dates – as at 30 June 2024

Licence type	Features	Licensee (expiry date)	Claims management arrangements
Corporation	<i>Self-management of claims (with capacity to arrange for third-party claims managers)</i>	Amplitel Pty Ltd (2/04/2031)	Telstra Limited
		Australia and New Zealand Banking Group Limited (30/06/2029)	In house
		Australian air Express Pty Ltd (30/06/2025)	QBE Insurance (Australia) Limited
		Bevchain Pty Limited (30/06/2029)	Linfox Australia Pty Ltd
		Bis Industries Limited (30/06/2028)	In house with claims review performed by QBE Insurance (Australia) Limited
		Border Express Pty Ltd (30/06/2030)	In house with reconsiderations performed by Paratus Claims Pty Ltd
		BWA Group Services Pty Ltd (30/06/2030)	Commonwealth Bank of Australia
		Cleanaway Operations Pty Ltd (formerly Transpacific Industries Pty Ltd) (30/06/2030)	QBE Insurance (Australia) Limited
		Commonwealth Bank of Australia (30/06/2030)	In house
		CSL Limited (30/6/2031)	QBE Insurance (Australia) Limited
		DHL Express (Australia) Pty Ltd (31/12/2026)	DHL Supply Chain (Australia) Pty Ltd
		DHL Supply Chain (Australia) Pty Ltd (30/06/2030)	In house
		FedEx Express Australia Pty Ltd (formerly TNT Australia Pty Ltd) (30/06/2030)	In house with reconsiderations performed by QBE Insurance

Licence type	Features	Licensee (expiry date)	Claims management arrangements
		Fleetmaster Services Pty Ltd (30/06/2031)	In house with reconsiderations performed by Paratus Claims Pty Ltd
		John Holland Group Pty Ltd (30/06/2028)	In house
		John Holland Pty Ltd (30/06/2028)	John Holland Group Pty Ltd
		John Holland Rail Pty Ltd (30/06/2028)	John Holland Group Pty Ltd
		K&S Freighters Pty Limited (30/06/2028)	In house
		Linfox Armaguard Pty Ltd (30/06/2031)	Linfox Australia Pty Ltd
		Linfox Australia Pty Ltd (30/06/2031)	In house
		Medibank Private Limited (30/06/2031)	Employers Mutual Limited
		National Australia Bank Limited (30/06/2028)	In house with reconsiderations performed by QBE Insurance (Australia) Limited
		Optus Administration Pty Limited (30/06/2031)	QBE Insurance (Australia) Limited
		Pacific National Services Pty Ltd (formerly Asciano Services Pty Ltd) (30/06/2025)	Employers Mutual Limited
		Prosegur Australia Pty Limited (formerly Chubb Security Services Limited) (30/06/2025)	In house with reconsiderations performed by Moray & Agnew
		Ramsay Health Care Australia Pty Limited (30/11/2028)	QBE Insurance (Australia) Limited
		Ron Finemore Transport Services Pty Limited (30/06/2025)	In house
		StarTrack Express Pty Limited (30/06/2030)	Australian Postal Corporation
		StarTrack Retail Pty Ltd (30/06/2030)	Australian Postal Corporation
		Telstra Corporation Limited (30/06/2030)	Telstra Limited
		Telstra Limited (formerly Network Design and Construction Limited) (31/12/2029)	In house
		Thales Australia Limited (formerly ADI Limited) (30/06/2025)	In house with reconsiderations performed by QBE Insurance (Australia) Limited
		Virgin Australia Airlines Pty Ltd (29/09/2028)	QBE Insurance (Australia) Limited
		Visionstream Pty Ltd (30/06/2031)	Gallagher Bassett Services Pty Ltd
		Wilson Security Pty Ltd (30/06/2031)	QBE Insurance (Australia) Limited

Licence type	Features	Licensee (expiry date)	Claims management arrangements
Declared Commonwealth Authority	<i>Self-management of claims</i>	Australian Capital Territory Government (28/02/2027)	Employers Mutual Limited
		Australian National University (30/06/2026)	Comcare
		Australian Postal Corporation (30/06/2030)	In house
		Reserve Bank of Australia (30/06/2031)	Australian Postal Corporation

Licence conditions and performance standards of licence

The SRCC expects licensees to have a continuous improvement focus on prevention, rehabilitation and claims management performance outcomes, to comply with licence conditions and to meet performance standards of licence.

Licence conditions require compliance with the SRC Act and any applicable laws and regulations regarding the health, safety and rehabilitation of employees. Licensees are required to meet financial, prudential and performance reporting requirements as part of licence conditions.

Performance standards of licences require licensees to develop and implement effective management systems for prevention, rehabilitation and claims management and meet outcome-based performance goals.

Operation of the Licence Compliance and Performance Model

The LCPM is the regulatory framework under which the SRCC monitors and assesses licensee compliance and performance. The LCPM seeks to ensure compliance with licence conditions and focuses on licensee performance against the SRCC's standards and measures in prevention, rehabilitation and claims management by using a holistic, risk-based approach to performance evaluation. The LCPM contributes to reducing regulatory burden on business by affording a reduced level of regulatory oversight for established licensees that have mature management systems and demonstrated high performance against the SRCC's standards and measures.

The LCPM examines licensees' prudential performance, results of internal and external reviews in prevention, rehabilitation and claims management performance, and provides for regulatory action by the SRCC where non-compliance or performance concerns are identified.

Under the LCPM, licensees are classified as a 'developing/transitioning licensee' or an 'established licensee'. Developing/transitioning licensees are new scheme participants in their first 2 years of licence. Following the initial two-year period, licensees are considered to be established in the scheme.

Developing/transitioning licensees work closely with Comcare to develop systems by participating in, and being subject to, reviews throughout the first 2 years of licence to ensure that a licensee can meet the conditions of licence and performance standards set by the SRCC.

The SRCC uses this initial period to closely monitor the performance of a new licensee as they transition into the scheme. The SRCC may choose to lessen the extensive reviews in the developing/transitioning phase where a licensee can evidence strong, consistent results against compliance and performance requirements.

Established licensees are required to be compliant with the conditions of licence and continue to meet the performance standards set by the SRCC.

The SRCC can, at any time, determine that due to issues with compliance, reporting or performance results, a regulatory response is required. The status of a licensee (that is, developing/transitioning or established) does not inhibit the SRCC from taking action to address a compliance or performance issue. For example, a targeted review may be conducted at any point should the SRCC consider the performance of a licensee warrants a more thorough review.

A key feature of the LCPM is the quarterly monitoring of the SRCC-defined performance standards and measures, including the Licensee Key Performance Indicators (LKPI). The SRCC measures performance against these LKPIs, which include the incidence of accepted claims, incidence of claims reaching one week of incapacity, RTW performance, and timeliness of claims management and reconsideration decisions. Licensees are provided with the opportunity to provide input and information regarding their quarterly results for consideration. The SRCC uses the LKPI results and any further information provided by licensees to determine whether any regulatory action is required.

The LCPM also includes the SRCC's prudential and financial framework for the oversight of licensee prudential and financial obligations. This includes the provision of a liability report estimating the licensee's outstanding workers' compensation liabilities in accordance with the licence (this information is used to calculate the guarantee amount), the provision of a guarantee, reinsurance, and yearly accounts. Licensees are subject to an annual financial risk assessment. Some licensees are also subject, based on risk, to ongoing financial monitoring which comprises continuous monitoring through media and rating agencies.

Each year, licensees provide an annual Licensee Compliance and Performance Improvement (LCPI) report certified by licensee senior management. The LCPI report provides the SRCC with an overview of key activities undertaken and outcomes achieved by a licensee during the previous year. The LCPI report also details a licensee's objectives for the coming year and is the primary tool for licensees to report to the SRCC on performance against the SRCC's performance standards and measures; provide annual certification of compliance against the conditions of licence; and to demonstrate continuous improvement.

Continuous improvement

The SRCC has an ongoing focus on the continuous improvement of its regulatory model. In the 2023–24 year, the SRCC has undertaken the following activities to improve the operation of the LCPM:

- > targeted consultation with stakeholders to review and improve the SRCC's regulation
- > published an updated version of the Licensee Key Performance Indicator Specifications incorporating changes agreed by the SRCC
- > reviewed licensee reporting requirements to reduce duplication and streamline reporting
- > considered the operation of the LCPM to evaluate its effectiveness and identify areas for further improvement
- > reviewed licensee performance measures to ensure that these remain contemporary and do not impose unnecessary regulatory burden on those entities which it regulates.

Licensees' performance

Table 28 provides a summary of each licensee's claims activity during 2023–24. Table 29 provides a summary of SRCC monitoring of overall licensee performance against the LKPIs during 2023–24.

Care should be exercised in comparing the claims activity of licensees given the different risk profiles of individual employers.

Licensee data

Table 28: Licensees' claims activity

	Number of FTE employees		Incidence of claims received ¹		Incidence of claims accepted ¹	
	2022–23	2023–24	2022–23	2023–24	2022–23 ²	2023–24 ³
Amplitel Pty Ltd ⁴	90	126	0.0	0.0	0.0	0.0
Australia and New Zealand Banking Group Limited	19,193	18,319	2.6	2.3	1.4	1.0
Australian air Express Pty Ltd	234	223	np	58.3	np	31.4
Australian Capital Territory Government	27,922	28,620	20.5	23.3	16.8	18.0
Australian National University	4,257	4,257	5.6	6.3	3.8	3.5
Australian Postal Corporation	28,545	26,460	61.4	70.7	51.3	58.3
BevChain Pty Limited	868	1,029	17.3	22.4	np	np
Bis Industries Limited	1,037	335	49.2	98.5	39.5	92.5
Border Express Pty Ltd	993	1,160	28.2	20.7	22.2	14.7
BWA Group Services Pty Ltd	3,242	3,035	2.5	2.3	1.9	np
Cleanaway Operations Pty Ltd	7,954	8,467	30.7	25.5	23.1	20.0
Colonial Services Pty Limited ⁵	0		0.0		0.0	
Commonwealth Bank of Australia Ltd	33,259	33,246	2.7	3.4	1.6	1.7
Commonwealth Insurance Limited ⁶	131		0.0		0.0	
Commonwealth Securities Limited ⁷	0		0.0		0.0	
CSL Limited	2,759	2,741	np	2.9	0.0	np
DHL Express (Australia) Pty Ltd	1,523	1,353	20.4	20.7	11.8	11.1
DHL Supply Chain (Australia) Ltd	3,274	4,864	15.9	12.3	10.7	7.0
FedEx Express Australia Pty Ltd	5,542	5,390	41.0	44.3	29.1	35.8
Fleetmaster Services Pty Ltd	362	383	16.6	28.7	np	18.3
John Holland Group Pty Ltd	3,768	4,105	9.8	10.0	6.6	8.5
John Holland Pty Ltd	1,034	1,266	122.8	79.0	111.2	75.8
John Holland Rail Pty Ltd	6	50	np	0.0	np	0.0
K&S Freighters Pty Limited	2,000	1,828	33.0	29.0	24.5	21.3

	Number of FTE employees		Incidence of claims received ¹		Incidence of claims accepted ¹	
	2022–23	2023–24	2022–23	2023–24	2022–23 ²	2023–24 ³
Linfox Armaguard Pty Ltd	1,531	1,561	9.1	14.7	np	6.4
Linfox Australia Pty Ltd	5,779	5,837	13.0	14.2	3.6	4.8
Medibank Private Limited	1,905	2,189	5.8	5.5	4.2	np
National Australia Bank Limited	27,743	27,639	2.0	2.7	1.2	1.4
Optus Administration Pty Limited	5,952	6,101	6.9	5.7	3.7	4.1
Pacific National Services Pty Ltd	2,684	2,684	23.1	21.6	14.2	15.6
Prosegur Australia Pty Limited	799	651	42.6	29.2	30.0	18.4
Ramsay Health Care Australia Pty Ltd	20,166	20,254	14.4	14.3	10.9	11.4
Reserve Bank of Australia	1,348	1,575	np	3.8	np	np
Ron Finemore Transport Services Pty Ltd	1,374	1,411	25.5	30.5	21.1	20.6
StarTrack Express Pty Limited	3,527	4,328	54.2	38.8	47.9	30.5
StarTrack Retail Pty Ltd	104	99	np	np	np	np
Telstra Corporation Limited	1,185	1,120	10.5	10.5	7.6	7.6
Telstra Limited ⁸	21,430	21,403	3.1	5.9	1.8	4.2
Thales Australia Limited	3,597	3,810	11.4	10.5	7.5	8.4
Virgin Australia Airlines Pty Ltd	5,551	6,473	27.0	32.3	22.2	27.7
Visionstream Pty Ltd	835	809	13.2	19.8	np	17.3
Wilson Security Pty Ltd	5,052	5,675	9.5	12.5	4.9	6.0
ALL LICENSEES	257,295	260,876	17.9	19.0	13.8	14.5

Notes: np – not publishable. To protect privacy, results are not published where the numbers used to calculate incidence rates are between 1 and 5.

¹ All incidence rates are calculated per 1,000 FTE employees.

² Initially accepted in 2022–23.

³ First determined in 2023–24 and with a status of accepted at the end of that year (to accord with revised LKPI 3 criteria).

⁴ Ampitel Pty Ltd licence commenced on 4 March 2023.

⁵ Colonial Services Pty Limited licence was revoked on 30 June 2023.

⁶ Commonwealth Insurance Limited licence was revoked on 1 October 2022.

⁷ Commonwealth Securities Limited licence was revoked on 30 June 2023.

⁸ Telstra Limited licence commenced on 8 December 2022.

Table 29: Performance against LKPIs – All licensees

	2022–23	2023–24
Number of notifiable worker fatalities ¹	5	4
Incidence of accepted claims ^{2,3}	13.7	14.5
Incidence of claims reaching one week of incapacity ²	8.0	8.7
Percentage of accepted claims that have experienced RTW outcomes ^{4, 5}	92 per cent	91 per cent
Percentage of claims determined within 20 days (injury) and 60 days (disease)	98 per cent	98 per cent
Percentage of reconsiderations decided within 30 days	99 per cent	99 per cent
Number of reconsideration requests decided	1230	1547
Number of AAT appeals received	709	771

Notes:

¹ A notifiable fatality refers to the death of a person, whether an employee or contractor.

² Incidence rates are calculated per 1,000 FTE employees.

³ This measure captures those claims that were initially accepted in the reporting period.

⁴ Commenced being a Key Performance Indicator in 2023–24.

⁵ Measure applies to claims that have experienced at least 0.1 weeks of time off work.

Recordkeeping and reporting requirements under the Directions

The following table provides details of the recordkeeping requirements outlined in the Directions and is reported in accordance with section 20 of the Directions.

Table 30: Recordkeeping requirements under Directions

Requirement	Number	Details
Applications for licence received	1 application for licence	Wilson Parking Australia 1992 Pty Ltd
Applications for licence withdrawn	Nil	
Refusals to grant licence	Nil	

Requirement	Number	Details
Expiry of licence	7 extensions of licence	Bis Industries Limited John Holland Pty Ltd John Holland Group Pty Ltd John Holland Rail Pty Ltd K&S Freighters Pty Ltd National Australia Bank Limited Virgin Australia Pty Ltd
Suspension of licence	Nil	
Revocations of licence	Nil	
Grants of licences, including the scope of the licences and the conditions to which the licences are subject*	Nil	
	7 variations granted due to change in scope or conditions of licence	Australian Capital Territory Hollard Insurance Partners Limited (formerly Commonwealth Insurance Limited) Medibank Private Limited Pacific National Services Pty Ltd Prosegur Australia Limited Reserve Bank of Australia Thales Australia Limited
Breaches of licences	10 breaches of licence	The following licensees breached their licence: > DHL Supply Chain (Australia) Pty Ltd: Breach of prudential condition > Linfox Armaguard Pty Ltd: Breach of prudential condition > Prosegur Australia Pty Ltd: Breach of prudential condition > Reserve Bank of Australia: Breach of prudential condition > Ron Finemore Transport Services Pty Ltd: Breach of prudential condition > Star Track Express Pty Ltd: Breach of prudential condition > StarTrack Retail Pty Ltd: Breach of prudential condition > Thales Australia Limited: Breach of prudential condition and WHS Act breach > Virgin Australia Airlines Pty Ltd: Breach of prudential condition

*The scope and conditions of licences granted by the SRCC are available on the Federal Register of Legislation.



A



Glossary and index



Glossary

AAT	Administrative Appeals Tribunal – The AAT can, on request, review reconsideration decisions made by Comcare and licensees under the SRC Act. Either an employee or an employer may request a review of a decision.
ACT	Australian Capital Territory
ACTU	Australian Council of Trade Unions
Affirmation rate	Affirmation rate is the percentage of original decisions which were upheld following a request for reconsideration.
AIHW	Australian Institute of Health and Welfare
ANAO	Australian National Audit Office
ANZRC	Australian New Zealand Research Collaboration
APS	Australian Public Service
APSC	Australian Public Service Commission
ARC	Audit and Risk Committee
ARC Act	<i>Asbestos-related Claims (Management of Commonwealth Liabilities) Act 2005</i>
ATO	Australian Taxation Office
Bankwest	BWA Group Services Pty Limited
Case manager	Responsible for workplace-based management of an injured worker’s RTW plan, as well as for initiating, coordinating and monitoring the rehabilitation process. The employer is responsible for providing case managers, who are usually employees of the agency.
CEO	Chief Executive Officer
Claim	Any claim for compensation, for example, the initial injury claim, claim for payment of medical expenses, or claim for incapacity benefits.
Claims Manager (CM)	Claims Managers are employees with a role in managing claims for workers’ compensation – formerly known as Claims Services Officers (CSOs).

Comcare Portfolio Budget Statements (PBS)	Departmental portfolio budget statements provide information on the proposed allocation of funds to achieve government outcomes. They include budget statements for the department as well as agencies working under the department. The statements provide information to assist parliament to understand the purpose of each proposed outcome. The Comcare Portfolio Budget Statements are contained within the Portfolio Budget Statements for the Employment and Workplace Relations Portfolio.
Corporate governance	The process by which agencies are directed and controlled. It is generally understood to encompass authority, accountability, stewardship, leadership, direction and control.
Corporate Plan	Comcare Corporate Plan 2023–24
Cth	Commonwealth
Date of Injury	Date of occurrence (injury), date first sought medical treatment, or first resulted in incapacity or impairment (disease).
Delegation	The written assignment of authority and responsibility to another person to carry out specific activities.
Determination	A decision to accept or reject a claim.
Disease	From 13 April 2007, any ailment suffered by an employee, or the aggravation of such an ailment, that is contributed to, to a significant degree, by the employee's employment by the Commonwealth or a licensee.
DSSC	Deputy Secretaries' Safety and Compensation Forum
EAP	Employee Assistance Program
EL	Executive Level
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPMO	Enterprise Portfolio Management Office
ESD	Ecologically sustainable development
FOI	Freedom of Information
FOI Act	<i>Freedom of Information Act 1982</i>
FTE	Full-time equivalent, in the context of staffing levels
GP	General practitioner

GST	Goods and services tax
HWCA	Heads of Workers' Compensation Authorities
HWSA	Heads of Workplace Safety Authorities
ICT	Information communication technology
Impairment	The loss, the loss of use, or the damage or malfunction, of any bodily system or function or part of such system or function. A permanent impairment is one that is likely to continue indefinitely.
Incapacity for work	An incapacity to engage in any work, or an incapacity to engage in work at the same level.
Incapacity benefit	A weekly compensation payment made to the employee (whether directly or indirectly), calculated by reference to the employee's pre-injury earnings.
Injury	An injury in respect of which compensation is payable. 'Injury' includes a disease, an injury or an aggravation of a physical or mental injury (other than a disease) suffered by an employee that arose out of, or in the course of, that employee.
IPS	Information Publication Scheme
KPI	Key performance indicator
LCPI	Licensee Compliance and Performance Improvement
LCPM	Licence Compliance and Performance Model. The LCPM provides the regulatory framework under which the SRCC monitors and assesses licensee performance and replaced the previous Licensee Improvement Program and Tier Model.
Liability	The effect of a determination, creating a legal obligation to pay compensation under the SRC Act.
Licensed self-insurers	A Commonwealth authority or a corporation that is a holder of a licence under Part VIII of the SRC Act.
Licensees	Licensed self-insurers
LKPIs	Licensee Key Performance Indicators
LMS	Comcare Learning Management System

Monitoring compliance inspection	Monitoring compliance is a general term for activities that may have specific labels, like 'audits' or 'inspections'. It may be proactive or reactive. The purpose of a monitoring compliance activity is to assess the level of compliance by a duty holder to their duties and obligations as defined under the <i>Work Health and Safety Act 2011</i> (Cth). This then allows Comcare to tailor the appropriate regulatory response.
MHCoP	Mental Health Community of Practice
MHFA	Mental health first aid
NABERS	National Australian Built Environment Ratings Scheme
NBN	National Broadband Network
OAIC	Office of the Australian Information Commissioner
OH&S	Occupational health and safety
PAW	People at Work tool
PCBUs	Person Conducting Business or Undertaking
PDP	Performance Development Plan
People Plan	Comcare's People Plan
PGPA Act	<i>Public Governance, Performance and Accountability Act 2013</i>
PGPA Rule	Public Governance, Performance and Accountability Rule 2014
PICS	Parliamentary Injury Compensation Scheme
Premium	A contribution made to Comcare in respect of the estimated costs of a customer agency's workers' compensation costs for a given financial year. It is based on fully funded principles and is designed to be responsive to the employing agency's claims experience.
Premium claim	Claim in respect of an employee of the Commonwealth, or a premium paying Commonwealth authority, with a date of injury after the introduction of Comcare's premium system on 1 July 1989. Also referred to as an 'insured' claim.
Premium paying employers	Commonwealth departments and agencies, and Commonwealth authorities, who pay a workers' compensation premium under the <i>Safety, Rehabilitation and Compensation Act 1988</i> .

Premium rate	The rate, expressed as a percentage of wage/salary dollar, which, when multiplied by the estimate of wage/salary, will provide the premium payable by that agency.
Pre-premium claim	Claim in respect of an employee of the Commonwealth, or a premium paying Commonwealth authority, with a date of injury before the introduction of Comcare's premium system on 1 July 1989. These claims and the resultant expenditure may also be called 'uninsured'.
Privacy Act	<i>Privacy Act 1988</i>
Provider	Person or organisation providing medical, rehabilitation or health services in relation to a work-related injury or disease.
Public Service Act	<i>Public Service Act 1999</i>
Reconsideration	A determination (under section 60 of the SRC Act) can be reconsidered either on request by a claimant or an employer, or on Comcare's own motion. The reconsideration is undertaken by a person who was not involved in the initial determination. The decision at reconsideration can be reviewed by the AAT.
Rehabilitation	Rehabilitation is a process to support the employee's recovery and work participation as they return to health. It helps an employee recover and/or return to work.
RTW	Return to work
RWAPM	Regulatory Work Activity Planning Model
Seacare Authority	Seafarers Safety, Rehabilitation and Compensation Authority. Comcare provides the Seacare Authority with secretarial and other support; and makes available the services of its staff and resources to enable the proper performance of its functions and exercise of its powers (s72, SRC Act).
Seafarers Act	<i>Seafarers Rehabilitation and Compensation Act 1992</i>
Serious claims	Those claims that reach one week or more of time lost during the reporting period.
SES	Senior Executive Service
SRC Act	<i>Safety, Rehabilitation and Compensation Act 1988</i> – the legislation which established Comcare, the Commission and the workers' compensation and rehabilitation scheme for employees of the Commonwealth, Commonwealth authorities and licensed corporations.
SRCC	Safety, Rehabilitation and Compensation Commission
SRC Directions	Safety, Rehabilitation and Compensation Directions 2019

SRR	Strategic Risk Register
TASC	Telecommunications Asbestos Safety Compliance
The Commission – same as SRCC	Safety, Rehabilitation and Compensation Commission – responsible for issuing and managing licences for self-insurance and claims management, with other functions under the SRC Act and the WHS Act. Until 1992 it was referred to as the Commission for the Safety, Rehabilitation and Compensation of Commonwealth Employees. It reports to the Minister for Employment.
The scheme	The Comcare scheme
WHS	Work health and safety
WHS Act	<i>Work Health and Safety Act 2011</i> (Cth)
WRP	Workplace rehabilitation provider

Alphabetical index

A

- accountability *see* management and accountability
- activities and changes, significant 93
- ACTSmart Office Recycling Program 171
- Adeney, Yvette 25
- Administrative Appeals Tribunal (AAT)
 - appeals 161–2
 - engagement with 45
 - litigation program 30, 47
 - management of litigation activities 47
 - review of reconsideration 161–2
- administrative cost ratio 68
- advertising 95, 180
- Aka, Seyhan 25, 103
- Amplitel Pty Ltd 199, 204
- Anderson, Jody 188, 189
- Anderson, Ngaire 25
- annual reports vi, 16, 182
- appeals 161–2
- asbestos-related claims, management of (performance) 12, 29
 - common law settlements 41
 - governing legislation 12
 - performance measure results 41
 - resolution payments 41
 - results, summary of 41
- Asbestos-related Claims (Management of Commonwealth Liabilities) Act 2005 (ARC Act)*
 - Comcare responsibilities 12, 13
- Assurance Program 2023–24 43
- audit
 - external 93–4
 - internal 86–7
- Audit and Risk Committee (ARC) 19, 82, 85, 87
 - internal audit 86
 - meeting attendance 91
 - members 89–92
- Australia and New Zealand Banking Group (ANZ) 199, 204
- Australian Air Express Pty Ltd 199, 204
- Australian Capital Territory Government 201, 204, 207
- Australian Government Investigations Standards 2022 86

Australian National Audit Office (ANAO) 86
 independent auditor's report 100–1
Australian National University 201, 204
Australian Postal Corporation 201, 204
Australian Public Service (APS)
 2024 Employee Census 70, 71, 74
 APS Academy MasterCraft Series 51
 Capability Review 6, 93
 Disability Employment Strategy 66
 Gender Equality Strategy 66
 Net Zero 2030 170–4
 Reform Program 66
 Workforce Strategy 66
authoritative Committees 84, 85

B

Baxter, Michelle 188, 189
being adaptive and sustainable in the face of change (strategic priority) v, 2, 3, 11
 analysis of performance 64–7
 performance measure results 68–71
 results, summary of 31–2
better practice initiatives (performance) 31, 51, 63
BevChain Pty Limited 199, 204
Beyond Blue 2, 52, 79
Beyond the Office 57
Bis Industries Limited 185, 199, 204, 207
Blackley, Leanne 22, 78
Bobbinmarsilio, Jessica 9
body stressing 2, 44, 46, 52, 55, 59, 60, 80
Boland, Marie 188
Border Express Pty Ltd 199, 204
Breen, Adrian 189
Brown, Leah 25
Buick, Megan 23, 78
Building safety and integrity capability across the APS 7
bullying and harassment 2, 52, 57, 80
Burke, the Hon Tony 19, 186
BWA Group Services Pty Limited 199, 204

C

- Capability Reinvestment Fund 7
- Career Transition Program 34
- Centre for Transformative Work Design Conference 51
- Chief Executive Officer (CEO) 19, 20, 85, 88
 - accountable authority 84, 103
 - letter of transmittal i
 - SRCC delegations 191
 - year in review 3–7
- claim management operating model 33
- claims
 - asbestos 12, 29, 41
 - delegated claims arrangements 94
 - disputation rates 162
 - internal audit 87
 - licensee activity 204–5
 - timeliness of determination 4, 33, 34
 - workers' compensation *see* workers' compensation claims
- claims management 4, 5, 15, 33, 35, 50, 58, 63, 94, 199, 201, 202
 - solution project 87
- Claims Management Group 50
- Claims Manager Forums 34, 50, 63
- Claims Payment Automation Project 2
- Claims Review Process 50
- Cleanaway Operations Pty Ltd 166, 167 199, 204
- Close, Louise 23, 78
- Cloud Governance Framework 87
- collaboration 3, 5, 6, 37, 55, 93
- Colonial Services Pty Ltd 204
- Comcare National Conference 2, 38
- Comcare National Work Health and Safety Awards 2, 6, 8–9
- Comcare Research Plan Towards 2026 57

Comcare scheme

- claims manager role 15
- coverage 1, 17–18
- executive team 9, 21–5
- forums 2, 34, 44, 51, 59, 63
- governance 12, 82–92
- guidance 63
- insurer role 15
- manager role 15
- office locations 1, 26
- organisational structure 19–20
- performance v, 29–32, 160–3
- purpose v, 3, 11, 29
- regulator role 14
- roles and responsibilities 12, 14–16
- snapshot v
- strategic priorities v, 2, 11, 29
- values v
- website 49

Comcare Strategy 2024–2028 82

Commission *see* Safety, Rehabilitation and Compensation Commission (SRCC)

Commonwealth Aboriginal and Torres Strait Islander Workforce Strategy 66

Commonwealth Bank of Australia 199, 204

Commonwealth Fraud Control Framework 2024 85, 86

Commonwealth Insurance Limited 204, 207

Commonwealth Ombudsman inquiries 94

Commonwealth Procurement Rules 12, 94

Commonwealth Securities Limited 204

communication channels, targeted 44

compensation and rehabilitation 11

complaints

- privacy 94

Complaints Management system 87

compliance and enforcement activities vi, 14, 55, 165

Compliance and Enforcement Policy 14, 42

compliance index 175–80

consistency 41, 63, 64, 88
consultancy services 95
consultation with licensees
 SRCC 190
Consultative Committee 85
contractor management 2, 44, 46, 48, 55, 59, 60
Corporate Plan 2023–24 28, 29, 82, 87
 strategic planning and reporting 82
COVID-19, adaptive response to 2
Cox, Tlesha 25
CSL Limited 199, 204

D

Data and Analytics Strategy 2024-2026 56, 67, 74
data governance 56
Data Operating Model 67
The Data Placemat 58
Data Strategy 56
de Brouwer, Dr Gordon 8
Department of Employment and Workplace Relations (DEWR) 19
DHL Express (Australia) Pty Ltd 199, 204
DHL Supply Chain (Australia) Pty Ltd 199, 204, 207
digital environment 64, 172
Digital Strategy 2028 6, 64, 65, 66, 74
dispute resolution 193
Diversity Inclusion Group 67
Donohoe, Sarah 25
Duke, Michael 22, 25, 78

E

early intervention v, 2, 3, 4, 11, , 30, 50–4, 58, 79, 81
Eaton, Chloë 25, 78
ecologically sustainable development (ESD) 170–4
Edith Cowan University 57, 80
education 5, 30, 48
 performance results, summary of 1, 48–9
education and engagement services 30, 48–9
Employee Assistance Program (EAP) 80

- employees 1, 74–8
 - education 81
 - engagement 70–1
 - First Nations employees 75, 80
 - key management remuneration 142
 - non-ongoing and 76–7
 - ongoing 76
 - People Strategy 2028 6, 64, 65–7, 74, 79
 - statistics 76–7
 - wellbeing 32, 64, 66, 67, 71, 71, 75, 79, 80
 - work health and safety *see* work health and safety (WHS)
 - workplace diversity 66, 67, 75
- Employer Satisfaction Survey 5, 37, 44
- Employers Mutual Limited (EML) 34, 53
- energy consumption 170, 173
- engagement with stakeholders (strategic priority) 5, 11
 - analysis of performance 44–5
 - customer reach, increase 49
 - performance measure results 47–9
 - performance results, summary of 30
 - SRCC 184, 185, 192
- Enterprise Agreement 2024–2027 6, 79
- Enterprise Portfolio Management Office (EPMO) 64
- Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) vi, 170
- environmental performance 172
- equipment
 - technology upgrade 171
- ergonomic workstations 79
- event and engagement highlights 46
- evidence-based practice 2, 3, 12, 31, 56–8, 83
- excellence in service provision (strategic priority) v, 2, 3, 6, 11, 29
 - analysis of performance 33–7
 - performance measure results 38–43
 - results, summary of 29
- Executive Committee 84, 85, 87
- Executive Team 9, 21–4
 - Acting Executive 25
 - remuneration 78

F

Fair Work Legislation Amendment (Closing Loopholes) Act 2023 450
FedEx Express Australia Pty Ltd 199, 204
finance law, non-compliance with 93
financial performance 96
financial statements 99–157
First Nations employees 75
Fleetmaster Services Australia Pty Ltd 200, 204
Flinn, Michael 188, 189
Ford, John 86
fraud 85–6
Fraud Awareness Week 86
Fraud Control Policy 85
freedom of information 94
Freedom of Information Act 1982 94
funding ratio 31, 69, 97

G

Gauld, Trevor 188, 189
General Policy Orders 93
glossary 210–15
Good Work Design initiative 52, 54
GOTERRA 170
governance 12, 82–92
 framework 83
 principles 83
 structure 85
governing legislation 12
 responsibilities 13
Grewal, Dilpreet 25

H

Hall, Jane 188, 189
Health and Safety Representatives (HSRs)
 Handbook 44
 network 44
Health and Wellbeing allowance 79

Heran, Kellie 25
Holland Insurance Partners Limited 207
Horrocks, Martin 25
Hudson, Catherine 188, 189
Hudson, Louisa 188, 189
Hughes, Kate 88, 89, 91
Hughes, Peter 90, 92

ICT Strategy 171
Incident Management Systems 35, 50
indemnities 95
Independent Auditor's Report 100–1
Indigenous Procurement Policy 94
influenza vaccinations 79
Information Communication technology (ICT) and Digital Strategy 2028 6, 64, 65
information management 170
Information Publication Scheme (IPS) 94
infringement notices 165, 178
injury management 11
innovation 64, 65
insight driven and risk and evidence-based practice (strategic priority) v, 2, 3, 11
 analysis of performance 56–9
 performance measure results 61
 performance results, summary of 31
inspections
 verification inspections 31, 61
inspectorate activities 165
inspectorate compliance 165
inspectors 35, 45, 50, 60
Institute of Public Administration Australia
 Future Leaders Program 51
insurance 5, 95
integrity v, 5, 30, 45, 47, 83
Intelligence and Data Analysis section 56
Internal Capability Review 6
investigations 2, 80, 86, 165
 Ombudsman 94
It Pays to Care, Influencing Employers Symposium 51

J

Janke, John Paul 8
John Holland Group Pty Ltd 185, 200, 204, 207
John Holland Pty Ltd 167, 185, 200, 204, 207
John Holland Rail Pty Ltd 204, 207

K

K&S Freighters Pty Limited 185, 200, 204, 207

L

leadership 6, 7, 51, 83
Learning Management System (LMS) 42, 49, 62
legislation, governing 12
 responsibilities 13
letter of transmittal
 Comcare i
 SRCC 183
Licence Compliance and Performance Improvement (LCPI) 203
Licence Compliance and Performance Model (LCPM) 202–7
licensed self-insurers 13
Licensee Key Performance Indicators (LKPIs) 202
 performance against 206
Licensee Liaison forums 34, 44, 198
licensing 199–201
 applications 195, 199, 206
 breaches 195, 207
 claims activity 204–5
 conditions 201
 consultation with licensees 190, 198
 continuous improvement 203
 data 204–6
 expiry 199–201
 extensions 195, 207
 grants 207
 licensees' performance 203, 206
 performance standards 201
 recordkeeping 206–7

- refusals to grant 206
- reporting requirements 206–7
- revocations 207
- Linfox Armaguard Pty Ltd 200, 205, 207
- Linfox Australia Pty Ltd 200, 205
- litigation program 30, 47
- Litigation Strategy 5, 45
- looking ahead 7

M

- McDermott, Chris 86
- McKenzie, Georgina 25
- Major Infrastructure Project team 2
- management and accountability 12, 73, 93–5
- Managing Aggressive and Distressed Customers 80
- market research 95
- Medibank Private Limited 200, 205, 207
- Medipass 2
- Mental Health Community of Practice (MHCoP) 2, 48, 62
- Mental Health First Aid Officers 79
- Mental Health Professionals' Network 46, 51
- Minister for Employment and Workplace Relations i, 19, 186
- Ministerial directions 93
- Modern Slavery Act 2018* (Cth) Statement 94
- moving objects, being hit by 2, 55, 59, 60

N

- Napier, Justin 24, 78
- National Anti-Corruption Commission 86
- National Australia Bank Limited 185, 200, 205, 207
- National Australian Built Environment Rating System (NABERS) Energy Tenancy rating 170
- National Broadband Network (NBN) 60
- National Return to Work Survey 38
- National Work Safe Month 38, 59, 80
- Net Zero 2030 172–4
- NewAccess Workplace Program 2, 52, 54, 79
 - mental health coaching program 52, 79
- Noonan, Kevin 89, 91
- notifiable incidents 1, 81, 164

O

Occupational Rehabilitation and Associated Medical Services (ORAMS) panel 2
office locations 1, 26
Office of the Australian Information Commissioner (OAIC) 94–5
Oliver, David 183, 184–5, 188, 189
Ombudsman inquiries 94
Optus Administration Pty Limited 200, 205

P

Pacific National Services Pty Ltd 200, 205, 207
Parliamentary Business Resources Act 2017 12
Parliamentary Injury Compensation Scheme (PICS) 12, 13, 15
Payne, Melissa 188, 189
People at Work 62, 80
People Strategy 2028 6, 64, 65–7, 74, 79, 80
Performance Development Framework 75
performance measures 29–32
performance statements 27–71
 results against performance, summary 29–32
 statement of preparation 28
 strategic priorities v, 29
Pilot Proactive Psychological Inspection Program 4, 45
planning, governance and risk 82–92
 Executive Committee and senior management committees 84
 fraud *see* fraud
 governance framework 83
 internal audit 86–7
 risk management *see* risk management
 strategic planning and reporting 82
Portfolio Budget Statements 28, 82
Portfolio management approach 64
Portfolio Management Board (PMB) 64, 85
Portfolio, Program and Project Management Maturity 64
positive impact v, 83
post-traumatic stress disorder (PTSD)
 claims management 33

- premium rate 160
 - average 31, 68, 70
 - average ratio 68
 - notional 70
- premium scheme 97
- prevention and early intervention in our scheme (strategic priority) v, 11, 3, 11, 50, 52
 - analysis of performance 54–5
 - performance results, summary of 30
- Prevention Committee 52, 85
- Prevention of Workplace Bullying Pilot 80
- Prevention Strategy 2022–2025 2, 52, 55, 59
- privacy complaints 94
- procurement 95
- Program and Project Management Maturity 64
- prosecutions 1, 166
 - Cleanaway Operations Pty Ltd 166, 167
 - Commonwealth (Department of Defence) 166
 - Commonwealth (Department of Environment and Energy) and Helicopter Resources Pty Ltd 167
 - Commonwealth (Department of Home Affairs) and International Health and Medical Services Pty Ltd 167
 - Commonwealth (Royal Australian Mint) 166
 - John Holland Group Pty Ltd, Omega Constructions Pty Ltd and Universal Reo Pty Ltd 167
- Prosegur Australia Pty Limited 200, 205, 207
- Psychological Inspections teams 2
- psychosocial capability and management 80
- Psychosocial Capability Uplift program 80
- psychosocial hazards 2, 4, 44, 45, 46, 55, 59, 79, 80
- Psychosocial Health and Safety Forum 59
- psychological injury 4, 33, 34
- Psychosocial Inspectorate Pilot Program 52
- Psychosocial Law Reform Special Interest Group (SIG) 44–5
- Psychosocial Regulation Team 59
- psychosocial risk 44, 45, 62, 80
- Psychosocial Risk Management System 80
- Psychosocial Safety Climate survey 80
- Public Governance, Performance and Accountability Act 2013* (PGPA Act) vi, 12, 28, 84, 88, 93, 95, 103, 111, 175, 193
- Public Governance, Performance and Accountability Rule 2014 (PGPA Rule) vi, 28, 94, 175
 - fraud prevention 85, 86
- purpose v, 3, 11, 29

Q

quality service to stakeholders (performance)
performance measure results 29, 38–40

R

Ramsay Health Care Australia Pty Limited 200, 205
Reconciliation Action Plan 67
reconsiderations 4, 33, 161–2
record management 171
recordkeeping
SRCC Directions, under 206–7
recycling 171
Regional Engagement Program 50
Regulator Performance Guide 2021 193
Regulator Performance Resource Management Guide 193
regulatory activity (performance) 1, 2, 30, 55, 193–8
Regulatory Operations Assurance Program 87
Regulatory Operations Group 39, 43, 56
regulatory priorities 2, 55, 59, 60
Regulatory Risk Model 56
rehabilitation 11
Rehabilitation Case Managers forums 63, 161
remedial action 61, 165
remuneration
executive 78
reporting requirements vi
SRCC Directions, under 182, 206–7
WHS Act, under 165
Reserve Bank of Australia 201, 205, 207
respect v, 11, 63
Respect@Work: National Inquiry into Sexual Harassment in Australian Workplaces Report 2, 51
return to work (RTW) 1, 5, 31, 161
animated videos 2
performance results, summary of 68–70
pilot 2, 53
rate 69
Return to Work Brokerage service 34–5, 53
Reviewing the Regulation of Self-Insured Licensees sub-committee 190

Richards, Peter 188, 189
Risk Awareness Week 88
risk management 87–8
Ron Finemore Transport Services Pty Limited 200, 205, 207
RTW Pilot 2, 34, 53

S

Safe Work Australia (SWA) 2, 59, 187
 Australian Work Health and Safety Strategy 2023–2033 59
Safe Work Month events 38, 52, 59, 80
Safety, Rehabilitation and Compensation Act 1988 (SRC Act) i, 4, 12, 16, 79
 Comcare responsibilities 13, 16
 directions and guidelines 190
 establishment of SRCC 12, 186
 licence extensions, grant of 185
 reporting requirements vi
 scheme coverage under 1, 4, 12, 13, 17
 self-insured licensees 15, 199
 workers' compensation under 15
 workplace rehabilitation
Safety, Rehabilitation and Compensation Commission (SRCC)
 accountabilities 187
 annual report vi, 16, 182
 Chairperson's review 184–5
 Code of Conduct 191
 Comcare support 16, 36, 40, 186
 decision making 190
 delegations 191
 directions and guidelines 190
 establishment 12, 186
 functions 16, 186–7
 governing legislation 182, 183
 letter of transmittal 183
 licensing 199–201
 meetings 189
 meetings with licensees and affiliated unions 185
 membership 187–8

- operation 189–1, 197–8
- Operational Plan 2023–24 193–8
- powers 12
- priorities 184
- regulatory performance 193
- responsible Minister 186
- role and functions 186–7
- self-insurance 185
- stakeholder engagement 192
- strategic risk register 185
- sub-committees 190
- work health and safety *see* work health and safety (WHS)
- Safety, Rehabilitation and Compensation Directions 2019 36, 182
- Safety, Rehabilitation and Compensation Directions Amendment Instrument 2023 36
- scheme manager role 15
- Schweicker, Penelope 25
- Seacare Authority Exemption Guidelines 36
- Seacare Safety Net Fund 36
- Seacare scheme 12
 - review of 36
- Seafarers Rehabilitation and Compensation Act 1992 (Seafarers Act)* 12
- Seafarers Safety, Rehabilitation and Compensation Authority (Seacare Authority)
 - Comcare support 12, 16, 36
 - establishment 16
 - governing legislation 12
 - relationship with Comcare 16
 - role and functions 14
- Seafarers Rehabilitation and Compensation Directions 2023 36
- self-initiated capability review 93
- self-insurance 185
- self-insured licensees
 - Comcare scheme, covered by 18
 - fees 15
 - management and monitoring 15
- Senate Order on entity contracts 94
- senior management committees 84
- Service Transformation and Engagement Program (STEP) 35
- sexual harassment 2

Sheehan, Stephen 90, 92
 silica 2, 55, 59, 60
 Smith, Beverley 25
 Somogyi, Stephen 188, 189
 staff *see* employees
 stakeholders

- digital environment 64, 172
- engagement and partnership 3, 5, 11, 63
- interactions with 44
- satisfaction rating 1, 38
- SRCC, engagement 192

 StarTrack Express Pty Limited 200, 205, 207
 StarTrack Retail Pty Ltd 200, 205, 207
 statement of preparation 28
 stewardship 64, 66, 75, 83
 strategic direction assessment 82
 strategic planning and reporting 82
 strategic priorities v, 2, 11, 29

- achievements 2
- excellence in service provision 11, 29–30, 33–7, 38–43
- performance against 29–32

 Strategic Risk Register (SRR) 87, 185

T

Taylor Fry Pty Ltd 34
 Telecommunications Asbestos Safety Compliance program 60, 164
 Telstra Corporation Limited 200, 205
 Telstra Limited 205
 tendering *see* consultancy services
 Thales Australia Limited 200, 205, 207
 training 48, 80, 161
 Transport Network Forums 48, 51
 Turvey, David 90, 92

U

University of South Australia

- International Centre for Allied Health Evidence 57, 62

V

Vallance, Deborah 188, 189
values v
Vines, Greg i, 2, 3–7, 8, 19, 21, 28, 78, 103
Virgin Australia Airlines Pty Ltd 185, 200, 205, 207
Visionstream Pty Ltd 205
Vivian-Taylor, Lachlan 24, 78

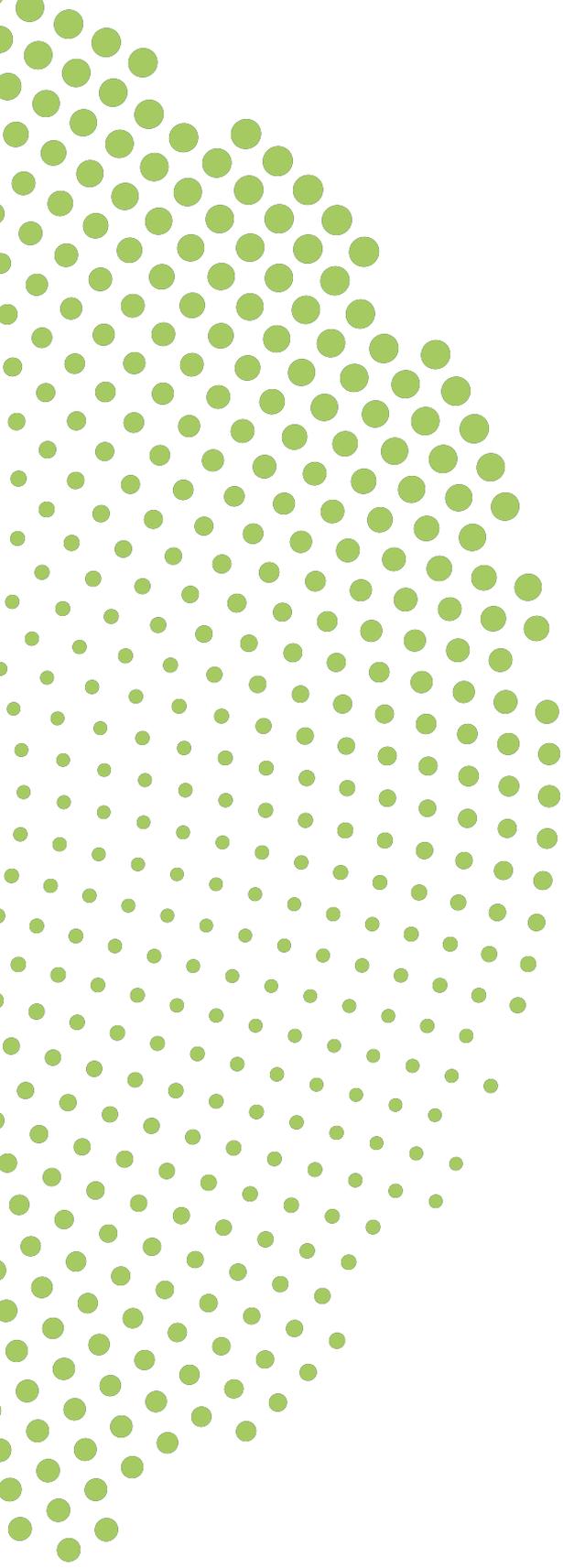
W

waste 171
Watt, the Hon Murray i, 19, 183, 184, 186
Webb, Gregory 25
wellbeing, employee 32, 64, 66, 67, 71, 71, 75, 79, 80
 Employee Assistance Program 80
Wellbeing@Comcare 79
Weston, Sue 2
WHS Law Reform program 51
Wilson Parking Pty Ltd 206
Wilson Security Pty Ltd 200, 205
work health and safety (WHS)
 analysis of performance 33–6
 compliance 12, 55, 61
 early intervention 11
 education 81
 ergonomic workplace assessments 79
 health and safety initiatives 79–80
 management and performance 79–81
 management systems 59, 60, 80
 notifiable incidents 81, 163
 regulatory practice, building and embedding 42–3
 training and awareness 87
Work Health and Safety Act 2011 (WHS Act) i, 4, 79
 Comcare responsibilities 12, 13, 16
 compliance and enforcement 12
 criminal prosecutions under 1, 39
 external review applications 165

- infringement notices 165
- internal review applications 165
- investigations and inspections 2, 165
- notices issued 165
- notifiable incidents 81, 163, 164
- prosecutions under 1
- psychosocial risk 80
- regulatory activities 35
- remedial action 165
- scheme coverage under 1, 13, 18
- seizures 165
- SRCC functions 187
- SRCC priorities 184
- statutory reporting under 165, 187
- WHS undertakings 165
- Work Health and Safety Strategy 59
- workers' compensation claims 15, 81
 - claims accepted 1, 69, 81, 160
 - claims received 1, 160
 - common law asbestos-related disease 15, 41
 - data 160
 - disputation rates 162
 - management by Comcare 3
 - provisions 33, 96
 - serious claims 1, 160
- workplace incidents 163
- Workplace Mental Health Symposium 51
- Workplace Rehabilitation Providers (WRP) portal 57
- Workplace Research Monthly alert 62
- Workplace Sexual Harassment National Forum 2
- Workplace Strategy 67
- World Congress on Safety and Health at Work 51

Y

- Young, Michael 189
- Your Future 53



1300 366 979
COMCARE.GOV.AU