



Australian Government

Comcare

Safety, Rehabilitation and
Compensation Commission

Annual Report **2024-25**



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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.


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Acknowledgement of Country

Comcare acknowledges the Traditional Owners and Custodians of Country throughout Australia and acknowledges their continuing connection to land, sea and community. We pay our respects to the people, the cultures and the Elder's past, present and emerging.

Healing Hands
by Dion Devow of DDesigns

Comcare and the Safety, Rehabilitation and Compensation Commission **Annual Report 2024–25**

About these reports

These Annual Reports document the performance and activities of Comcare, its scheme and the Safety, Rehabilitation and Compensation Commission from 1 July 2024 to 30 June 2025.

These reports have been combined to streamline the processes for submission to the Minister and tabling in Parliament.

Comcare's Annual Report has been prepared in accordance with the annual reporting requirements under the *Public Governance, Performance and Accountability Act 2013* and the *Public Governance, Performance and Accountability Rule 2014*.

The Safety, Rehabilitation and Compensation Commission's Annual Report meets specific annual reporting requirements under the *Safety, Rehabilitation and Compensation Act 1988* and the *Safety, Rehabilitation and Compensation Directions 2019*.

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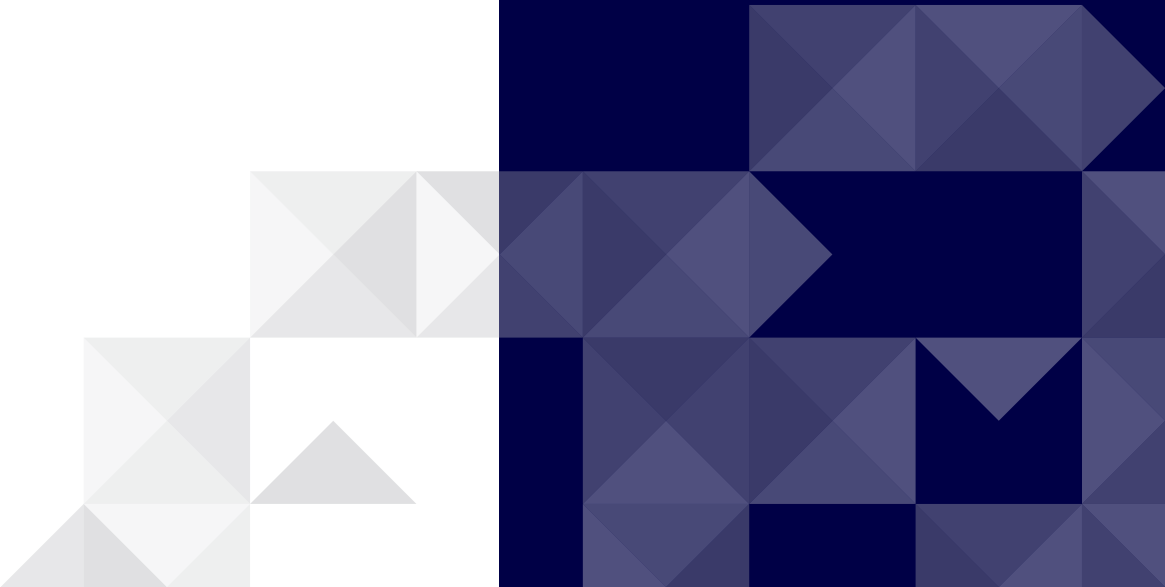
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Letter of transmittal



Australian Government

Comcare

25 September 2025

The Hon Amanda Rishworth MP
Minister for Employment and Workplace Relations
Parliament House
Canberra ACT 2600

Dear Minister

I am pleased to present you with the Comcare Annual Report 2024–25, detailing the performance and activities of Comcare and its scheme for the period from 1 July 2024 to 30 June 2025.

Our Annual Report has been prepared in accordance with section 46 of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) and complies with the relevant requirements prescribed by the *Public Governance, Performance and Accountability Rule 2014* (PGPA Rule).

Our Annual Report includes:

- Annual Performance Statements, as required under section 39 of the PGPA Act
- Financial Statements, as required under section 42 of the PGPA Act
- information we are required to report under other legislation, including the *Safety, Rehabilitation and Compensation Act 1988* and the *Work Health and Safety Act 2011*.

As the Accountable Authority of Comcare, I have approved this Annual Report today based on assurances of the content received throughout the Annual Report preparation process.

As required under section 46 of the PGPA Act, I am submitting our Annual Report 2024–25 to you, as the responsible Minister for Comcare, for presentation in Parliament.

Yours sincerely

Michael Duke

Acting Chief Executive Officer

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COMCARE.GOV.AU

About Comcare

We are the national
work health and safety regulator and
workers' compensation authority

Our purpose is to
promote and enable safe
and healthy work

Comcare Strategy 2024–2028

The Comcare Strategy sets our strategic direction and focuses our effort and investments towards 2 strategic priorities.

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

The elements of our strategy define each priority.

Our strategic priorities



Prevent
work-related
injuries



Deliver better
return to work
outcomes

Are enabled by



Making
data-driven
decisions



Uplifting leadership,
effectiveness and
efficiency



Delivering
client-centric
services

Strategy elements: Key activities – Aspirations – Performance – Risk

Employers and Employees are our key clients at the centre of our scheme, strategy and operations.

Our core roles and services

Our legislated functions shape our core roles as a regulator, claims manager, scheme manager and insurer.

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

Roles



Regulator



Claims
Manager



Scheme
Manager



Insurer

Services



Education



Engagement

Our **enabling functions** inform and support delivery of our core roles,
provide corporate services and ensure we meet government responsibilities.

Our organisational values are foundational to how we work

Earn and
strengthen trust

Collaborate and
innovate

Strive to have
a positive impact

Act with integrity
and respect

CEO introduction



Michael Duke

Acting Chief Executive Officer (CEO)

As the acting CEO and Accountable Authority of Comcare, I present Comcare's Annual Report to the Minister for Employment and Workplace Relations, the Hon Amanda Rishworth MP, and the Australian Parliament on the performance of Comcare for the year ended 30 June 2025.

It is a privilege to be acting as the CEO of Comcare over parts of 2024–25 and leading into 2025–26. Our jurisdiction covers close to half a million workers and more than 200 employers in a diverse range of occupations and industries. The prevalence of preventable workplace injuries means our purpose of promoting and enabling safe and healthy work remains as critical as it has ever been.

This year marked the launch of the Comcare Strategy 2024–2028 and I would like to acknowledge our former CEO Greg Vines who, along with our current Executive leadership team, was integral to its development. This will be Comcare's first year reporting against our new strategic priorities which were developed to reflect the key issues that we need to focus on to improve outcomes for employees, employers and other stakeholders. Recognising our unique role as both a national work health and safety regulator and workers' compensation authority, our refreshed priorities focus on what we think will make the biggest difference, that is, to prevent work-related injuries and deliver better return to work outcomes. These priorities are enabled by making data-driven decisions, uplifting leadership, effectiveness and efficiency, and delivering client-centric services.

The Comcare Strategy has been well received by our staff and acts as an effective 'north star' for the agency, ensuring that our efforts, collaborations and investments are aligned to these priorities and our aspirations. It also sets out the measures we will use to assess our performance, as well as the strategic risks we will monitor throughout delivery.

We have revised our performance measures and targets as part of our refocusing. Our 2024–25 performance measure targets demonstrate that we are establishing a range of tools and exploring new data sets in our first year of reporting. This will set us up for more impactful performance reporting in the years to come.

Our prevention work is underpinned by enforcement activities as a strong work health and safety regulator. Tragically we were notified of 35 fatalities in our jurisdiction this year with vehicle accidents and personal medical conditions contributing to these statistics. I offer my heartfelt condolences to the families and friends affected by these tragedies. We actively investigate each fatality notified to us to determine any work-related factors that may have contributed to these incidents. Our Family Liaison Unit commenced in 2023 and supports bereaved families and seriously injured people to understand the Comcare work health and safety investigations process. The unit offers trauma-informed support, on an opt in basis, from initial engagement soon after the incident, until post finalisation of the matter. The unit assisted 26 injured workers and families throughout 2024–25.

We commenced 4 prosecutions during the reporting period, 3 of which are ongoing and 2 other prosecutions were finalised with fines totalling \$307,000. We accepted a work health and safety undertaking in a third matter which will deliver health and safety outcomes in the waste management industry at an estimated cost of \$925,000. There are currently 11 ongoing prosecutions against the *Work Health and Safety Act 2011* (WHS Act).

We remain committed to providing high quality, client-centric claims management services, that enhance health and return to work outcomes. 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. We helped over 6000 individual workers in 2024–25, supported over 249,000 individual payments for medical treatment and rehabilitation services at a cost over \$39 million and made more than 131,000 payments to injured workers for incapacity benefits at a cost over more than \$139 million.

On 24 June 2024, the Australian Government appointed an independent panel to undertake a comprehensive review of the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act), the legislative framework that underpins the Comcare workers' compensation scheme. We are supportive of the SRC Act Review as well as other initiatives that modernise and futureproof the scheme. Importantly, work has already been underway across Comcare to identify key areas for improvement. Many of these areas of improvement are being addressed without the need for legislative change and presents an opportunity for us to work innovatively with other stakeholders to improve client service as well as return to work outcomes. We will continue to support the work of the Review Panel as well as our portfolio colleagues in the Department of Employment and Workplace Relations as the report is finalised.

We have also been working to address 5 recommendations from the Final Report of the Royal Commission into Defence and Veteran Suicide. We have supported this Royal Commission by providing information, documents and witness evidence to assist it with its important work. The 5 recommendations relate to Comcare's regulatory role in respect of the Australian Defence Force, including incident notification guidance, data assets and sharing, periodic reviews, and a proactive Psychosocial Inspection Program. Through the next reporting period, we will commence implementation of our response.

While I sign off on our 2024–25 results, I would like to acknowledge and thank the hard work, dedication and professionalism of our staff. I am impressed by their shared commitment to health and safety, supporting injured workers often through very trying circumstances, and the way they demonstrate our values by building trust and striving to have a positive impact. Looking forward, I reiterate our commitment to work with you all to improve return to work outcomes, prevent work-related injuries and continue our influence to drive positive change for those employees and employers who work in our scheme.



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These photos are moments in time from the 2024 Comcare National Conference, held in Canberra on 20–21 August. For more details, see page 12.

Scheme performance snapshot 2024–25

This infographic provides a snapshot of our work health and safety and workers' compensation scheme performance and related activities for 2024–25.

2024–25 Year in review

Work health and safety

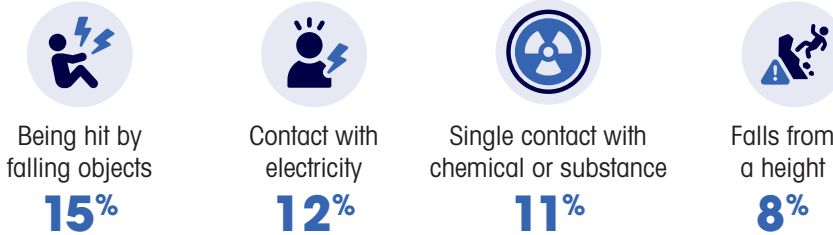
 **459,841** Full-time equivalent employees covered under our work health and safety scheme

1,671 
workplace incidents
were assessed as notifiable

Incident type breakdown



Top 4 incident types



1,283
compliance and enforcement activities completed

 Provide information and advice activities
257

 Monitoring compliance inspections and investigations
1,026

Notices issued

14 Improvement notices
11 Prohibition notices
19 Non-disturbance notices




Prosecutions and proceedings

4 Commenced
11 Continued
3 Concluded

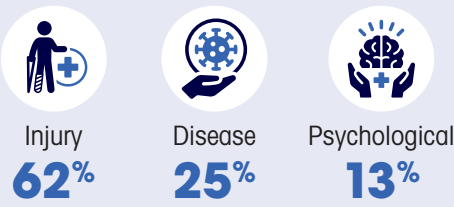


Workers' compensation

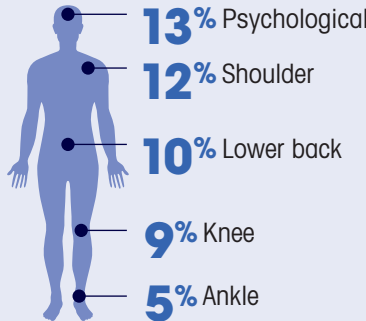
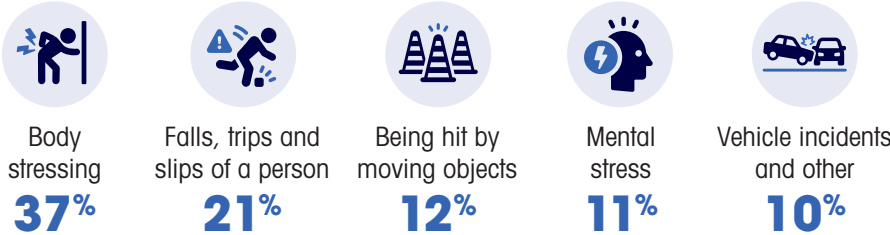
 **491,781** Full-time equivalent employees covered under our workers' compensation scheme

 **Claims incidence rates**
Claims received **13.6** Claims accepted **9.6**
per 1000 full-time equivalent employees

Claim type breakdown




Top 5 causes of claims



Average cost paid per active claim

Cost per claim **\$26,865** Medical only claims **\$7,771**
Time off work (compensated) claims **\$37,597**

 **Number of weeks off work**
Median **7.2** Average **13.2**

 **88%** return to work rate across our scheme

Data is presented as at 30 June 2025.

Education and events summary

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

Education

Throughout 2024–25, there was excellent engagement with our education offerings:

- 10,759 new users registered to our learning management system, bringing the total number of registered users to 38,838
- 19,619 e-learning completions
- 2,262 live learning completions
- 90% overall satisfaction rate with e-learning and live learning.

Top 5 e-learning courses

1. Workplace sexual harassment
2. Introduction to psychological health and safety in the workplace
3. Work health and safety for workers
4. Work health and safety for managers
5. Early intervention – An overview for managers and supervisors

Top 5 live learning courses

1. Workplace Rehabilitation Providers workshop
2. Senior leaders – psychosocial risk management
3. Senior leaders – workplace sexual harassment
4. Psychosocial risk management
5. Officers – Due diligence

New e-learning courses

We released 2 new e-learning courses – ‘An introduction to Health and Safety Representatives (HSRs)’ and ‘Bullying in the workplace – An introduction’.

‘An Introduction to HSRs’ is a 30-minute course that introduces learners to the role and functions of HSRs under the WHS Act. The course is for anyone considering becoming a HSR, or working with HSRs, to better understand what the role might involve.

‘Bullying in the workplace – An introduction’ is a 15-minute course that explores the different types of workplace bullying, the impact bullying can have on individuals and organisations and how to prevent, respond to and report it. It also covers legal duties under the WHS Act.

Learning management system content sharing program

We commenced a content sharing program in 2024–25, providing 82 participating agencies the opportunity to host a range of Comcare’s online training courses through their learning management systems. The program improved access to, and increased utilisation of Comcare’s learning resources by those agencies.

Events

We hosted 20 free events designed to educate, engage and inform a broad range of stakeholders. These events attracted over 8,200 attendees with recordings made available on our website. Post-event survey results reflected strong engagement, with an average satisfaction rating of 92.7% for the year.

Table 1: Comcare event summary 2024–25

Event	Date
2024–25 Regulatory Priorities and WHS Consultation, Cooperation and Coordination	3 July 2024
Rehabilitation Case Manager Forum	30 July 2024
Claims Manager Forum	5 September 2024
Overview of the Guide for Arranging Rehabilitation Assessments and Requiring Examinations	23 September 2024
Rehabilitation Case Manager information Sessions	24 September and 3 October 2024
National Safe Work Month: Psychosocial Health and Safety Forum	10 October 2024
Mental Health Professionals’ Network webinar: The right time for return to work	14 October 2024
Workplace Rehabilitation Provider Forum	15 October 2024
National Safe Work Month: Health and Safety Representative Forum	23 October 2024
National Safe Work Month: Transport Network Forum	30 October 2024
Rehabilitation Case Manager Forum	3 December 2024
Claims Manager Forum	5 December 2024
Psychosocial Health and Safety Forum	7 March 2025
Return to Work Webinar	11 March 2025
Claims Manager Forum	13 March 2025
Workplace Rehabilitation Provider Forum	15 April 2025
Mental Health Professionals’ Network webinar: Understanding and addressing workplace burnout	13 May 2025
Understanding your 2025–26 Comcare Premium	22 May 2025
Claims Manager Forum	5 June 2025

Comcare National Conference 2024

We welcomed 963 delegates to the Comcare National Conference in August 2024 in Canberra to focus on key aspects of work health and safety and workers' compensation.

A total of 695 delegates from 122 organisations within the Comcare scheme attended the conference. The organisations with the highest attendance were typically larger agencies or those with a strong interest in work health and safety, including the Department of Employment and Workplace Relations and Safe Work Australia. The 268 delegates from outside the Comcare scheme came from a variety of sectors, including unions, rehabilitation and injury management providers, insurers, law firms, technology companies, not-for-profits, and state/territory work health and safety regulators and workers' compensation representatives. National businesses were also represented.

Under the theme of *Collaboration for Prevention and Change*, the conference program emphasised the importance of working together in an evolving national work health and safety landscape.

The event featured keynote addresses from former Sex Discrimination Commissioner Kate Jenkins, journalist Stan Grant and interviewer and TV presenter Kirk Docker. More than 30 concurrent sessions over 2 days covered topics including:

- Prevention – Discussing strategies and initiatives for preventing workplace injuries and illnesses with a particular focus on mental wellbeing.
- Regulation – Highlighting Comcare's role in regulating workplace safety and health.
- Early Intervention – The importance of early intervention in managing workplace injuries.
- Return to Work – Sharing best practices and success stories related to returning injured workers to the workplace.
- Leadership and Collaboration – Focusing on the role of leadership and collaboration in achieving workplace safety.

More than 140 HSRs from around Australia attended the conference. Comcare staff presented 8 sessions including a HSR networking session. The event provided an opportunity for HSRs to share ideas and build relationships with colleagues, unions and Comcare inspectors.

There were 430 delegates in attendance at the sold-out conference dinner which included guest speaker, Osher Günsberg, sharing his mental health journey and reflections on the importance of impactful discussions.

According to a post-conference survey, the event achieved a 91% satisfaction rating, with feedback indicating that attendees were highly satisfied, praising the event planning, speaker quality, program content and networking opportunities.

One comment encapsulates the general sentiment:

"I was thoroughly impressed with the Comcare conference. The organisation was seamless, from registration to the sessions. The speakers were knowledgeable and engaging, offering valuable insights that I can apply to my work. The resources provided were helpful and relevant. Additionally, the staff were friendly, professional, and always ready to assist. Overall, it was a well-organised and enriching experience."



Initiatives focused on preventing work-related injuries

Building safety and integrity across the Australian Public Service

Comcare and the Australian Public Service (APS) Commission secured funding from the APS Capability Reinvestment Fund to design and deliver a leadership capability uplift project 'Building safety and integrity capability across the APS'.

The initiative delivered 3 pilot projects that built safety and integrity capability in APS leaders. Two of the projects focused on using good work design to build psychosocially safe work environments. A total of 504 APS staff participated.

Formative and summative evaluation reports are now underway and will be finalised in 2025. These will provide further insights into the impact and effectiveness of this innovative capability initiative and support sustainable learning solutions.

Regulatory priorities and our Psychosocial Inspection Program

Targeted activities were delivered to address our 2024–25 regulatory priorities, summarised in Table 2. These initiatives reflect a comprehensive and evolving strategy to improve workplace health and safety across the jurisdiction.

Table 2: Progress towards 2024–25 regulatory priorities

Regulatory priority	Progress
Psychosocial hazards	We launched our Psychosocial Inspection Program after a successful pilot conducted in 2023 and 2024. The program helps employers meet their work health and safety obligations and prevent work-related injuries and illnesses. It also helps us understand how well employers are managing psychosocial hazards and risks at their workplaces. We also provided guidance and education to the jurisdiction to build organisation capability in managing psychosocial risks, including at the Psychosocial Health and Safety Forum and Comcare's National Conference.
Work health and safety management systems	Over 200 inspections were conducted to assess work health and safety management systems, with findings informing better practices and a shift toward risk management in 2025–26
Silica	Silica exposure risks were proactively managed in construction projects, with inspections conducted for all workplace exposure standard exceedances
Body stressing – hazardous manual tasks	Body stressing was addressed through stakeholder engagement and participation in musculoskeletal disorder working groups
Contractor management	Contractor management efforts continued through incident response and enhanced inspector guidance
Being hit by moving objects	A targeted approach addressed injuries from moving objects, including data analysis and collaboration with persons conducting a business or undertaking (PCBUs)

Before Blue

Before Blue is an evidence-based early intervention mental health program available to all APS agencies. It has been developed based on the successful NewAccess workplaces trial hosted by Comcare and Beyond Blue in previous years.

It is a low-intensity cognitive behavioural therapy program for people with mild-to-moderate anxiety and depression. It is now available to all APS agencies, established as a structured program of support across multiple weeks, with dedicated coaches focusing on practical skill building to allow participants to get on top of everyday issues.

The service includes a new digital platform offering an interactive learning approach, fresh digital content and practical exercises, and a personalised user portal. Before Blue can complement existing workplace support services, such as employee assistance programs.

We continue to promote the program and onboard new agencies. As of 30 June 2025, 21 Commonwealth employers have registered to participate in Before Blue.

Mental Notes

Our Mental Notes awareness program is now established. Mental Notes is a stigma awareness program that aims to reduce mental health-related stigma and improve psychosocial wellbeing at work through providing practical resources that can be applied in the workplace. Within the APS, psychological injuries account for about a third of new workers' compensation claims, with bullying and harassment and work pressures being the main causes.

Workplaces that proactively support the mental health and wellbeing of workers, including by tackling stigma and encouraging help-seeking behaviours, are more likely to experience less absences, presenteeism, turnover and mental injury claims. We have developed resources and tools that aim to make a positive impact in the workplace and support the psychosocial safety of workers. The toolkit includes a resource kit for managers, a conversation guide, fact sheets and editable templates.

Evidence review: Interventions to reduce workplace sexual harassment

In September 2024, we conducted an evidence review on workplace sexual harassment interventions. Comcare reviewed 14 studies on the effectiveness of interventions to reduce and prevent workplace sexual harassment. We found that a multi-pronged approach is most effective in preventing and addressing workplace sexual harassment. Single interventions, such as training, can have a positive effect on single outcomes, however, single interventions were less effective when used in isolation – especially if the organisational culture overlooks gender-based harassment.

To be effective in reducing workplace sexual harassment, a range of interventions are needed, including comprehensive policies, complaints systems, and wide-reaching training and education. Importantly, the organisation needs a zero-tolerance policy, supported by strong leadership that models anti-harassment and gender-equal values and behaviours.

Workplace bullying: Six key prevention factors

We partnered with Edith Cowan University to design and trial a toolkit that supports workplaces to assess their capability in preventing workplace bullying. This is especially important as the Australian Government approved a new code of practice to support amended work health and safety laws prescribing how organisations manage risks to workers' mental health.

The Workplace Bullying Prevention Toolkit was piloted in 2 organisations and evaluated through expert academic reviews and interviews with practitioners and stakeholders. We are currently reviewing the evaluation findings to refine the Toolkit and support its broader release to workplaces in the future. The project identified 6 key factors commonly in place in organisations that are successful in stamping out or alleviating workplace bullying.

Closure of Comcare's Prevention Strategy 2022–2025

Comcare's Prevention Strategy 2022–2025 closed on 30 June 2025. We are evaluating outcomes and identifying insights to inform our Prevention and Return to Work Action Plan.





Initiatives focused on delivering better return to work outcomes

Enhancing claims management

We have commenced work to enhance our claims management model. Progress to date includes:

- A trial focused on early engagement with treating health practitioners to build positive working relationships and assist in obtaining medical information that supports timely decision making and better return to work outcomes.
- Revised claim review process ensuring a multi-disciplinary, collaborative review in the early stages of a claim to develop strategies that will support injured employees return to health and work.
- Refreshed onboarding program for new starters with the creation of 2 new workshops dedicated to influencing return to work outcomes and optimising the client experience.
- Commenced delivering a return to work onboarding module to all claims operations teams to set a baseline of understanding and foundational knowledge in delivering better return to work outcomes.

Telephony interactions are vital for quality claims management and return to work outcomes. Throughout the year, we have been upgrading our telephony solutions and developing a coaching framework to enhance our client experience, enable data driven decisions and reporting, and build employee capability and confidence.

Career Transition Program with Employers Mutual Limited

The Career Transition Program was launched in July 2024 following the success of the Return to Work Your Future Program pilot and subsequent brokerage service. It is designed to improve return to work outcomes for injured employees with primary or secondary psychological injury and employees with a longer-term injury. This program is for Comcare scheme employers to use.

We presented on our role in the Career Transition Program, and the return to work outcomes achieved for injured workers at the 2024 Personal Injury Education Foundation National Conference.

Increasing General Practitioner capability in compensable health

We sponsored 3 General Practitioners to attend a new course, Compensable Health and Medicine, developed by the Monash School of Public Health and Preventive Medicine and the Personal Injury Education Foundation, designed for healthcare professionals treating and managing people with compensable injuries and illnesses.

Feedback from attendees to date shows high satisfaction with course quality. Post-course, attendees are reporting that they consider a greater emphasis on return to life activities (home, work, community), validated tools for rehabilitation assessments, and are integrating biopsychosocial approaches in treatment planning.

Engaging with Rehabilitation Case Managers and Workplace Rehabilitation Providers

We delivered multiple stakeholder forums to Rehabilitation Case Managers and supervisors on a range of topics including social prescribing, supporting neurodiversity, and navigating mental health challenges as a supervisor. 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 and supervisors to engage effectively with employees to support positive return to work outcomes. The forums continue to be well received by our stakeholders.

We continued our communication and engagement with Workplace Rehabilitation Providers, delivering 2 forums, bimonthly updates and regular direct engagement. We uplifted and expanded our quarterly consultant update to a new return to work update, that is also targeted at Rehabilitation Case Managers. The update aims to highlight key matters relating to return to work in the Comcare scheme and better practice initiatives. These activities support providers and their consultants to deliver effective and efficient services that improve recovery and return to work across the scheme.

In the past year we commenced sharing Workplace Rehabilitation Provider performance data with scheme employers. The initiative aims to promote a greater focus on return to work outcomes and service costs, increase transparency around Workplace Rehabilitation Provider performance, and to support employers to make informed, data-driven decisions on Workplace Rehabilitation Provider engagement and management.



Legislative change and scheme guidance

Work health and safety

New Codes of Practice for the Commonwealth – Psychosocial hazards at work and sexual and gender-based harassment

Two new Codes of Practice came into effect across the Commonwealth.

The approved *Work Health and Safety (Managing Psychosocial Hazards at Work) Code of Practice 2024* came into effect in November 2024. The new code contains practical guidance on work health and safety duties, hazard identification and risk management, and addresses common workplace psychosocial hazards and introduces fatigue, intrusive surveillance and job insecurity as common psychosocial hazards, with these hazards identified as relevant in the Commonwealth jurisdiction.

The approved *Work Health and Safety (Sexual and Gender-based Harassment) Code of Practice 2025* came into effect from March 2025. It should be read and applied alongside the existing code of practice for *Managing Psychosocial Hazards at Work*.

Sexual and gender-based harassment can cause physical and psychological harm to anyone affected by or witnessing the behaviour. It can also lead to significant social and economic costs for workers, their families, organisations and the wider community.

Crystalline silica regulations

On 1 July 2024, the supply, processing and manufacture of engineered stone slabs, panels and benchtops became prohibited under the *Work Health and Safety Regulations 2011* (WHS Regulations) in the Commonwealth jurisdiction.

The prohibition means that it is an offence under the WHS Regulations for a PCBU to carry out, or direct or allow a worker to carry out, work involving the manufacture, supply, processing or installation of legacy engineered stone benchtops, panels and slabs, except in limited circumstances.

On 1 September 2024, stronger regulation of all crystalline silica substances came into effect in the Commonwealth jurisdiction. The amendments to the WHS Regulations apply to all materials containing at least 1% crystalline silica, including engineered stone. This means that from 1 September 2024, PCBUs who process crystalline silica substances at the workplace using power tools or other machinery are required to assess whether the processing is high risk, meaning it is likely to result in a risk to the health of someone at the workplace.

Comcare has granted a Class Exemption on its own initiative, allowing PCBUs to reinstall engineered stone benchtops, panels, or slabs temporarily removed to access and repair or modify underlying cabinetry or components. The exemption came into effect on 25 January 2025.

New work health and safety regulations for blood lead levels

Amended WHS Regulations that increase protections for workers exposed to lead came into effect across the Commonwealth jurisdiction in March 2025.

Blood lead levels are the concentration of lead in whole blood and are used in the WHS Regulations to trigger additional work health and safety requirements to be met by PCBUs.

Workers' compensation

New Guide for Arranging Rehabilitation Assessments and Requiring Examinations

The Guide for Arranging Rehabilitation Assessments and Requiring Examinations (the Guide) came into effect on 18 September 2024. The application date, which was 30 October 2024, was later to give rehabilitation and relevant authorities time to understand and apply the Guide.

The Guide's purpose is to support ethical, transparent and accountable decision making. Rehabilitation authorities must comply with the Guide when they arrange rehabilitation assessments or require rehabilitation examinations under section 36 of the SRC Act. Relevant authorities must comply with the Guide when requiring examinations under section 57 of the SRC Act.

We prepared additional explanatory materials and hosted sessions on the new requirements through our Rehabilitation Case Manager and Claims Manager Forums to support stakeholders with understanding and applying the new requirements.

New fact sheets – Post-traumatic stress disorder

We continue to support the implementation of changes to the presumptive liability provisions for first responders who suffer from post-traumatic stress disorder under the SRC Act.

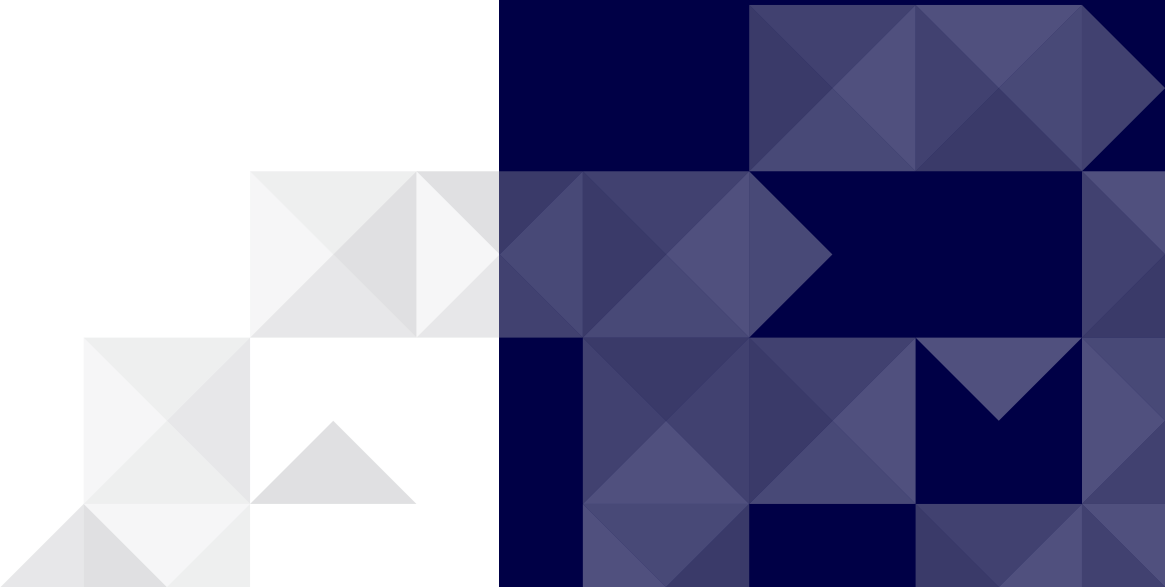
We have developed fact sheets to support certain first responders and health care professionals with post-traumatic stress disorder make a claim for workers' compensation.





Chapter 2: About Comcare

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Purpose

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

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

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

Governing legislation

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

Core roles, services and enabling functions

Education and engagement are key services we offer and deliver to our clients and stakeholders to promote and enable safe and healthy work. We also have essential enabling functions that inform and support delivery of our core roles, provide corporate services and ensure we meet our government responsibilities. Our key services and enabling functions are summarised in Table 3.

Table 3: Summary of key services and enabling functions

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

Our legislated functions and responsibilities shape our core roles as a regulator, claims manager, scheme manager and insurer summarised in Table 4.

Table 4: Summary of core roles

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

Our scheme

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

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

Our work health and safety scheme covers:

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

Our workers' compensation scheme covers:

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

As of 30 June 2025, our scheme comprised of:



Comcare Strategy 2024–2028

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

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

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

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

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

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

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

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

Strategic Roadmap

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

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

Organisational values

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

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



Strategic and enabling priorities

Strategy elements

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

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

We are actively monitoring risks aligned to our priorities and values.



Strategic priority: Prevent work-related injuries

Key activity

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

2028 aspiration

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



Strategic priority: Deliver better return to work outcomes

Key activity

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

2028 aspiration

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



Enabling priority: Making data-driven decisions

Key activity

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

2028 aspiration

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



Enabling priority: Uplifting leadership, effectiveness and efficiency

Key activity

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

2028 aspiration

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




Enabling priority: Delivering client-centric services

Key activity

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

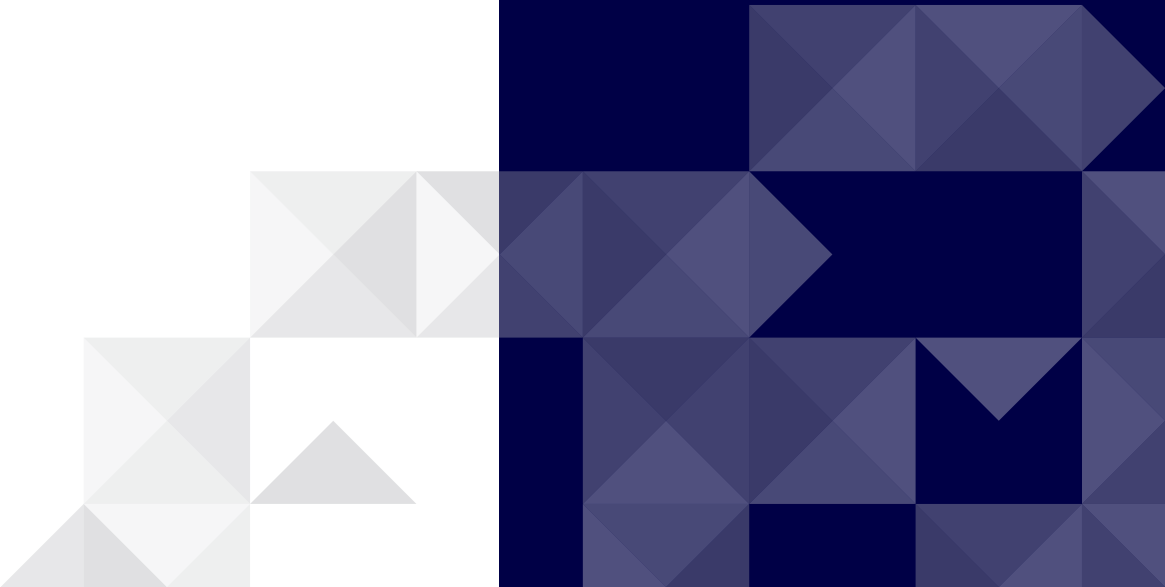
2028 aspiration

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



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Statement of preparation

I, Michael Duke, as the acting CEO and Accountable Authority of Comcare, present the 2024–25 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 detail the results for the performance measures and targets set out in our Portfolio Budget Statements and Corporate Plan 2024–25 that are used to measure performance towards delivery of the Comcare Strategy to achieve our purpose – promote and enable safe and healthy work.

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* (PGPA Rule).



Michael Duke
CEO and Accountable Authority
19 September 2025

Overview

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

Our performance measures and targets were revised in 2024–25 as part of developing the Comcare Strategy. We shifted to a smaller set of specific measures and targets that are better aligned to our strategic priorities and will measure performance towards our purpose, key activities and aspirations.

We committed to 13 performance measures and 16 targets in 2024–25. These are set out in our 2024–25 Portfolio Budget Statements and Corporate Plan.

This is the first year of reporting towards our revised performance framework. The results reflect that in our first year of working towards the Comcare Strategy, we have developed new tools and set baselines for a range of new data sets that will set us up for more impactful reporting in the years to come.

Planning and performance framework

Figure 1 represents the internal and external strategic and operational planning documents we prepare and deliver based on decisions made through our enterprise planning process. It includes the Commonwealth Performance Framework publications required under the PGPA Act.

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

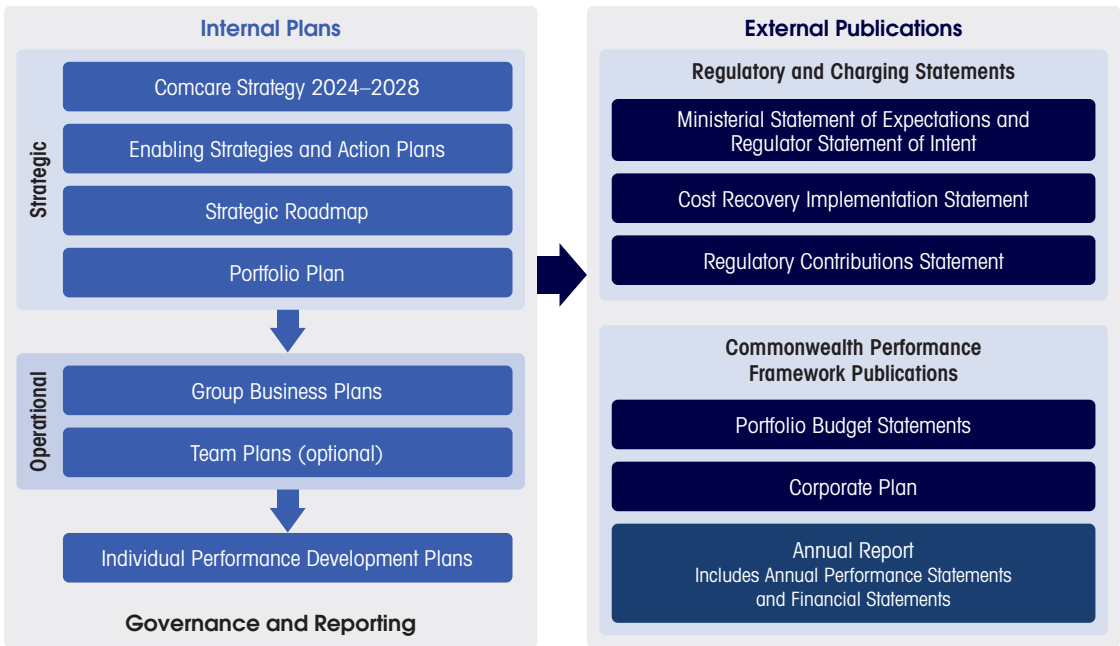


Figure 1: Comcare planning and performance framework

We are represented in the Employment and Workplace Relations Portfolio Budget Statements. Our purpose ‘promote and enable safe and healthy work’ is also our outcome statement for the Portfolio Budget Statements.

Performance measures and targets in our Portfolio Budget Statements are replicated in our Corporate Plan to ensure consistency and provide a clear read between the publications.

Performance governance and results

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

A result will be determined for each target against the performance measures at the end of the reporting period. The results will be reported in our annual performance statements in our Annual Report.

Table 5: Key for target results

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

Regulator performance

We have work health and safety regulatory functions under the *Work Health and Safety Act 2011* (WHS Act) and Workplace Rehabilitation Provider regulatory functions under the *Safety Rehabilitation and Compensation Act 1988* (SRC Act).

We are committed to applying the 3 principles of regulator best practice through delivery of our strategy and regulatory operations, as required by [Department of Finance Resource Management Guide 128 – Regulator Performance](#).¹ They are:

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

Our commitment has been formalised through the Ministerial Statement of Expectation, issued to Comcare, and our corresponding Regulator Statement of Intent, available on our [website](#).²

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

1 www.finance.gov.au/government/managing-commonwealth-resources/regulator-performance-rmg-128, accessed 9 September 2025.

2 www.comcare.gov.au/about/governance/statement-of-intent, Accessed 9 September 2025

Result summary 2024–25

Out of 16 targets against 13 performance measures, we:

- Achieved 9 targets
- Established baselines for 5 new targets
- Did not achieve 2 targets.

Tables 6 – 10 summarise our 2024–25 performance results towards the strategic and enabling priorities. A result analysis for each performance measure and target follows.

Table 6: Result summary for performance measures towards the strategic priority ‘prevent work-related injuries’

Intended result	Performance measure	2024–25 Target	2024–25 Results
Our proactive prevention initiatives drive positive change with employers and employees	1. Evaluation confirms planned outcomes of targeted prevention initiatives are achieved and inform insights to share with the jurisdiction	Design and implement an evaluation framework to measure change in employers and employees	Achieved
	2. Average Commonwealth premium rate	1% of payroll or lower	Achieved 0.95%
Our compliance and enforcement activities influence positive health and safety outcomes	3. % of entities that report improved work health and safety practices as a result of Comcare’s compliance and enforcement activities	Establish a baseline and define targets for 2025–26 and beyond for targets:	
		a: Persons conducting a business or undertaking (PCBU) that resolved non-compliance identified during initial inspection, confirmed during a subsequent verification inspection b: Total positive response rate to question in Comcare’s Employer Survey related to ‘what extent have Comcare activities supported you to improve your WHS systems and practices’	a: Baseline established 100% b: Baseline established 70%

Table 7: Result summary for performance measures towards the strategic priority ‘deliver better return to work outcomes’

Intended result	Performance measure	2024–25 Target	2024–25 Results
Our decisions are timely on claims for compensation	4. % of determinations on injury and disease claims for compensation are made within statutory timeframes	a. 100% of determinations for injury claims are made within 20 calendar days	a: Not achieved 99%
		b. 100% of determinations for disease claims are made within 60 calendar days	b: Not achieved 99%
Our support and interventions lead to employees in our scheme returning to work	5. % return to work rate	85% for accepted claims initially determined within the previous 24 months	Achieved 88%

Table 8: Result summary for performance measures towards the enabling priority ‘making data-driven decisions’

Intended result	Performance measure	2024–25 Target	2024–25 Results
Our data capability matures over time	6. Data and analytics maturity rating	Data maturity rating of Level 3 – Defined	Achieved Level 3 – Defined
Our support and interventions lead to employees in our scheme returning to work	7. % of stakeholders that report satisfaction with access to our data and reporting products	Establish a baseline and define targets for 2025–26 and beyond	Baseline established 71%



Table 9: Result summary for performance measures towards the enabling priority ‘uplifting leadership, effectiveness and efficiency’

Intended result	Performance measure	2024–25 Target	2024–25 Results
Our leaders are effective and our people are aligned to our purpose	8. Leadership index ratings	Establish a baseline and define targets for 2025–26 and beyond	Baseline established 85.5%
	9. Employee engagement with Comcare’s purpose and objectives scores	Establish a baseline and define targets for 2025–26 and beyond	Baseline established 88%
Our scheme is financially sustainable	10. Minimum funding ratio	110% (minimum threshold)	Achieved 120%
	11. Administrative cost ratio	15–25%	Achieved 21.8%

Table 10: Result summary for performance measures towards the enabling priority ‘delivering client-centric services’

Intended result	Performance measure	2024–25 Target	2024–25 Results
Our clients are satisfied with our services	12. % overall client satisfaction with services	a: Employer satisfaction rating of 75%	a: Achieved 78%
		b. Design a new mechanism for measuring employee satisfaction	b: Achieved
Our client service design and delivery capability matures over time	13. Maturity rating against a client service design and delivery maturity model	Client service design and delivery maturity model identified, and baseline maturity rating obtained to define targets for 2025–26 and beyond	Achieved





Surveys referenced in results

We use the annual Employer Survey as the methodology for targets against performance measures 3, 7 and 12, as well as our agency results from the APS Employee Census as the methodology for targets against performance measures 8 and 9.

Details about the surveys referenced throughout these annual performance statements have been summarised in Table 11 for context on the validity of the results.

Table 11: Details of surveys referenced in 2024–25 performance results

Survey	Year	Survey period	Response rate
Employer Survey	2024	4 March – 2 April 2024	47% response rate 93 out of 199 organisations participated
Employer Survey	2025	13 March – 22 April 2025	61% response rate 123 out of 201 organisations participated
APS Employee Census	2024	6 May – 7 June 2024	88% response rate 638 out of 726 employees participated
APS Employee Census	2025	5 May – 6 June 2025	88% response rate 656 out of 746 employees participated



Prevent work-related injuries

Intended result: Our proactive prevention initiatives drive positive change with employers and employees

Performance measure 1	2024–25 Target	Result
Evaluation confirms planned outcomes of targeted prevention initiatives are achieved and inform insights to share with the jurisdiction	Design and implement an evaluation framework to measure change in employers and employees	Achieved

Rationale

Our prevention initiatives vary in size, approach and clients targeted. We will design and implement an evaluation framework that can be used to consistently measure change in employers and employees as a result of our prevention initiatives so we can share findings, learnings and insights with the jurisdiction.

The targets for this measure will change in the coming years as we develop and embed the evaluation framework and deliver prevention initiatives.

Result analysis

We designed an evaluation framework and toolkit tailored to Comcare’s environment, considering the resources in the Commonwealth Evaluation Toolkit and learning available through the APS Academy. The evaluation framework and toolkit were endorsed by Comcare’s Executive for implementation in June 2025.

Looking forward to 2025–26

The target for this performance measure has changed for 2025–26 to ‘Evaluation confirms planned outcomes of prevention initiatives are achieved and insights are shared with the jurisdiction’.

Our regional engagement program has been selected as the first prevention initiative to be evaluated and to test the new resources to inform future improvements.

Measure and target details
Measure type: Qualitative, output measure
Methodology: Assessment of deliverables at the end of the reporting period against endorsed deliverables in planning documentation
Data sources: Internal planning and governance documentation
Aligns to regulator performance best practice principles 1, 2 and 3
Changes during the reporting period: Removal of the word ‘positive’ from the target
Previous results: Not applicable – first year of reporting

Performance measure 2	2024–25 Target	Result
Average Commonwealth premium rate	1% of payroll or lower	Achieved 0.95%

Rationale

The final premium pool is the total premium to be charged across all entities in the Comcare insured scheme in respect of forecast claims from injuries and diseases sustained in the financial year. The premium pool is driven by the number of accepted claims and the cost of those claims.

It is one way of looking at performance by agencies and us, working with agencies, of preventing injuries and, where an injury occurs, in returning injured employees to health and to work.

Agencies can reduce their premiums by reducing claim costs through prevention of work-related injuries. Changes to the premium rate may represent the effectiveness of our prevention initiatives for employers in our scheme.

Result analysis

The average Commonwealth premium rate increased to 0.95% from 0.84% last year. The drivers of the increase from last year include:

- higher projected psychological disease claim frequency resulting from continued increases over the 12 months since the previous premium pool estimate
- higher projected claim administration expenses resulting from observed increases in administration expenses over the 12 months since the previous premium pool estimate
- a 4% loading for post-traumatic stress disorder presumption that was introduced into legislation in December 2023.

Looking forward to 2025–26

There is continued upward pressure on the average Commonwealth premium rate as a result of continued increases in psychological disease claim frequency and claims administration expenses over the last year.

Measure and target details
Measure type: Quantitative, effectiveness measure
Methodology: Sum of Commonwealth premium amounts / sum of Commonwealth payrolls
Data sources: Commonwealth agency payroll submissions data and actuarial premium reports
Aligns to regulator performance best practice principle 1
Changes since the Corporate Plan 2024–25: Nil
Previous results: 2023–24 0.84% 2022–23 0.83% 2021–22 0.79% 2020–21 0.85%
These results were assessed using the same methodology, against the same target

Intended result: Our compliance and enforcement activities influence positive health and safety outcomes

Performance measure 3	2024–25 Target	Result
% of entities that report improved work health and safety practices as a result of Comcare’s compliance and enforcement activities	Establish a baseline and define targets for 2025–26 and beyond for:	
	a: PCBUs that resolved non-compliance identified during initial inspection, confirmed during a subsequent verification inspection b: Total positive response rate to question in Comcare’s Employer Survey related to ‘what extent have Comcare activities supported you to improve your work health and safety systems and practices’	a: Baseline established 100% b: Baseline established 70%

Rationale

We deliver a range of proactive and reactive work health and safety compliance and enforcement activities in line with our Compliance and Enforcement Policy. Changes to an entity’s level of work health and safety compliance between our initial inspection and subsequent verification inspection, together with direct feedback from entities on improvements to their work health and safety systems as a result of our activities, provides a strong measure of how we are driving and influencing positive health and safety outcomes. The result is represented in 2 targets due to separate methodologies used in the first year of reporting.

Target a: PCBUs that resolved non-compliance identified during initial inspection, confirmed during a subsequent verification inspection

Result analysis

All inspections conducted by us can result in non-compliance being identified. If non-compliance is identified and remains outstanding at completion of the inspection, a verification inspection will be conducted. During the verification inspection, the identified non-compliance is followed up to determine if it has been resolved by the PCBU.

We have tracked 100% of non-compliances identified during initial inspections through subsequent verification inspections. There were 64 verification inspections conducted, and 64 non-compliances resolved in this reporting period. We will continue to track ongoing non-compliances which will be reported on in the next period.

Looking forward to 2025–26

We have agreed to continue working towards a 100% target for 2025–26 and will continue to conduct compliance and enforcement activities in accordance with our Compliance and Enforcement Policy, working to improve work health and safety practices throughout the jurisdiction.

Measure and target details – Target a
Measure type: Quantitative, effectiveness
Methodology: % of PCBU's that resolved non-compliance identified during initial inspection, confirmed during a subsequent verification inspection
Data sources: Integrated Regulatory Information System Data, Inspector Reports
Aligns to regulator performance best practice principles 1, 2 and 3
Changes since the Corporate Plan 2024–25: Nil
Previous results: Not applicable – first year of reporting

Target b: Total positive response rate to question in Comcare’s Employer survey related to ‘what extent have Comcare activities supported you to improve your work health and safety systems and practices’

Result analysis

To understand employer perceptions on whether our activities have resulted in improved practices in their own organisation, we included a new question in the 2025 Employer Survey ‘Thinking about the last 12 months, to what extent do you agree or disagree that the following Comcare activities improved your organisation’s work health and safety knowledge, systems and practices?’

Participants were asked to provide a response against 6 activities. The overall positive response to these activities is averaged to provide the result.

70% of employers agreed that Comcare activities improved work health and safety knowledge, systems and practices, providing the baseline result for this target. A breakdown of the results for each activity is provided in Table 12.

Table 12: 2025 Employer Survey result – What extent have Comcare activities supported you to improve your work health and safety systems and practices

Activity	Overall % agree and strongly agree
Information on website and emails	88%
Webinars and forums	82%
Education and training	80%
Proactive inspection	70%
Inspection as a result of incident/concern	50%
Verification Inspection	48%
Average of results	70%

The results show higher ratings for the website, webinars and forums, and education and training. Lower satisfaction with inspections may be a result of fewer employers conducting the survey having experienced these activities.

In connection with this result, the 2025 Employer Survey results also found:

- the perception that Comcare is an effective workplace health and safety regulator has reached an all-time high of 86%, up from 78% in 2024
- employers are seeking more Comcare guidance and information about injury prevention, psychosocial hazards and changes to work health and safety regulations.

Looking forward to 2025–26

We have agreed to a 70% target for 2025–26, with an aim to maintain or improve on the baseline result and will consider opportunities for improvement based on the 2025 Employer Survey results.

Measure and target details – Target b
Measure type: Quantitative, effectiveness
Methodology: Total positive response rate (strongly agree or agree) to question in Comcare’s Employer survey related to ‘what extent have Comcare activities supported you to improve your work health and safety systems and practices’
Data source: Comcare’s annual Employer Survey results
Aligns to regulator performance best practice principles 1, 2, 3
Changes since the Corporate Plan 2024–25: Nil
Previous results: Not applicable – first year of reporting





Deliver better return to work outcomes

Intended result: Our decisions are timely on claims for compensation

Performance measure 4	2024–25 Target	Result
% of determinations on injury and disease claims for compensation are made within statutory timeframes	a. 100% of determinations for injury claims are made within 20 calendar days	a. Not achieved 99%
	b. 100% of determinations for disease claims are made within 60 calendar days	b. Not achieved 99%

Rationale

Statutory timeframes for making determinations on injury and disease claims for compensation came into effect on 1 April 2024 through changes to the SRC Act and *Safety, Rehabilitation and Compensation Regulations 2019* (SRC Regulations).

Timely decisions on claims for compensation enables employees to receive the treatment and rehabilitation supports they need to return to work.

Result analysis

In 2024–25, determining authorities³ in our workers' compensation scheme made:

- 99% of determinations for injury claims within 20 calendar days
- 99% of determinations for disease claims within 60 calendar days.

The result indicates that in the majority of cases, determining authorities achieved the target.

In the small percentage of cases the target was not achieved, determining authorities were adjusting to the new legislative provisions.

Looking ahead to 2025–26

We will continually review and improve processes and guidance for determining authorities, and work with stakeholders to facilitate timely receipt of information required to make determinations within statutory timeframes.

³ Comcare, or authorised staff within an agency participating in delegated claims arrangements (on behalf of Comcare), are the determining authority for claims from employees of Australian Government agencies. The employer, or their approved claims management provider, is the determining authority for claims from employees of self-insured licensees.

Measure and target details

Measure type: Quantitative, efficiency measure

Methodology: Number of days taken to make a determination on a claim from the date of receipt by the statutory timeframes in Section 11A of the SRC Regulations. Exclude the days not counted for the reasons specified under section 11A(3) of the SRC Regulations.

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

Changes since the Corporate Plan 2024–25: Nil

Previous results: Not applicable – first year of reporting

Intended result: Our support and interventions lead to employees in our scheme returning to work

Performance measure 5	2024–25 Target	Result
% return to work rate	85% for accepted claims initially determined within the previous 24 months	Achieved 88%

Rationale

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

Result analysis

The return to work rate for our workers' compensation scheme in 2024–25 is 88%. The target is achieved for this year, with the result remaining stable over the past 5 years.

A summary of initiatives with a focus on delivering better return to work outcomes that Comcare drive and support is included in [Chapter 1: Year in review](#) in this Annual Report.

Looking ahead to 2025–26

We will continue to work towards an 85% or higher return to work rate for the Comcare Scheme in 2025–26. Comcare is continually considering new initiatives and support we can offer across our scheme to deliver better return to work outcomes.

Measure and target details

Type: Quantitative, effectiveness

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

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

Changes since the Corporate Plan 2024–25: Nil

Previous results: 2023–24 89% | 2022–23: 89% | 2021–22: 88% | 2020–21: 87%



Making data-driven decisions

Intended result: Our data capability matures over time

Performance measure 6	2024–25 Target	Result
Data and analytics maturity rating	Defined – Level 3	Achieved Defined – Level 3

Rationale

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

Result analysis

When we established our Data and Analytics Strategy 2024–2026 (Data and Analytics Strategy) in 2023, a tailored, industry data and analytics maturity model was used to assess Comcare’s maturity across a data and analytics life cycle. Our maturity was assessed as ‘stable – level 2’, with an aspiration set to achieve a maturity rating of ‘embedded – level 4’ based on the uplift activities that would be delivered as part of the Data and Analytics Strategy. This was used to inform the original performance measure and target set in our Corporate Plan 2024–25.

As part of the Australian Government Data and Digital Strategy, Department of Finance implemented a [Data Maturity Assessment Tool \(DMAT\)](#)⁴ in 2024 to provide agencies with a consistent approach to measuring and understanding their organisation’s data maturity, providing a consistent, longitudinal evidence-based means of measuring APS data maturity and capability. The tool involves a self-assessment for each of the 7 focus areas: Strategy and Governance, Architecture, Operations, Risk, Quality, Reference and Metadata and Integration and Analytics.

We completed a self-assessment against the APS DMAT in July 2024. Department of Finance issued an agency level assessment report confirming Comcare achieved an overall data maturity score of 3.09, with a maturity rating of ‘defined – level 3’ based on the APS DMATs maturity scale. Comcare scored highly across the strategy and governance focus area, with lower scores across the integration focus area. The result is above the APS average score of 2.02.

In March 2025, Comcare’s Executive agreed to use the DMAT as the enterprise data and analytics maturity assessment tool and methodology for this performance measure. The 2024–25 target was also updated to reflect the revised scale and align with the baseline result as we expect to make incremental improvements while maintaining a ‘defined – level 3’ for the next 2 years.

We completed our second self-assessment against APS DMAT in July 2025 and achieved an overall maturity score of 3.10, maintaining a maturity result of ‘defined – level 3’ and similar scores from the baseline assessment, as expected. Department of Finance will not be validating self-assessments in this reporting period.

⁴ www.finance.gov.au/government/public-data/public-data-policy/data-maturity-assessment-tool, accessed 9 September 2025.

Looking ahead to 2025–26

We will continue to deliver projects under our Data and Analytics Strategy and anticipate improvement in the overall maturity score, while maintaining a maturity rating of ‘defined – level 3’ in 2025–26.

Measure and target details
Type: Qualitative, effectiveness
Methodology: Self-assessment against the APS DMAT
Data source: Data maturity assessment tool and final assessment documentation
Aligns to regulator performance best practice principle 2
Changes since the Corporate Plan 2024–25: Methodology changed from using Comcare’s Data and Analytics Maturity Model to the new APS DMAT to enable benchmarking across APS agencies. The target was also amended to align with the DMAT maturity rating scale and Comcare’s 2024 maturity assessment result.
Previous results: Not applicable – first year of reporting



Performance measure 7	2024–25 Target	Result
% of stakeholders that report satisfaction with access to our data and reporting products	Establish a baseline and define targets for 2025–26 and beyond	Baseline established 71%

Rationale

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

Result analysis

We included a new question in our 2024 Employer Survey ‘How satisfied are you with the ability to access data and reporting products from Comcare (e.g. data publications, self-service reporting tools, tailored and regular performance reports)?’ to understand employer perceptions on our data and reporting products.

Overall, 71% of participants reported they were satisfied or very satisfied, establishing the baseline result.

The same question was asked in the 2025 Employer Survey, with 62% of participants reporting they were satisfied or very satisfied. The decline may be due to increased neutrality through the result which may suggest that there is a decreased awareness of, or engagement with, our available data and reporting products.

Looking ahead to 2025–26

Considering the 2024 baseline and 2025 result, we have set a target of 70% to work towards in 2025–26. Future initiatives aimed at driving engagement with our data and reporting products include development of:

- an employer insights tool offering both employer-specific and comparative insights, enabling employers to make informed decisions
- an interactive performance reporting tool for self-insured licensees that will provide insights and enhance overall user experience
- a Workplace Rehabilitation Provider performance report for rehabilitation authorities to track rehabilitation outcomes and improve the effectiveness of their rehabilitation programs.

Measure and target details
Type: Quantitative, effectiveness
Methodology: Total positive response rate (very satisfied or satisfied) to question in Comcare’s Employer survey ‘How satisfied are you with your ability to access data and reporting products from Comcare’
Data source: Comcare’s annual Employer Survey results
Aligns to regulator performance best practice principle 2
Changes since the Corporate Plan 2024–25: Nil
Previous results: Not applicable – first year of reporting



Uplifting leadership, effectiveness and efficiency

Intended result: Our leaders are effective and our people are aligned to our purpose

Performance measure 8	2024–25 Target	Result
Leadership index ratings	Establish a baseline and define targets for 2025–26 and beyond	Baseline established 85.5%

Rationale

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

Result analysis

We selected 4 questions from the ‘Leadership – Immediate Supervisor’ and ‘Leadership – SES Manager’ sections in the annual APS Employee Census survey that best represent leadership performance to inform the result for this measure.

Our results from the 2024 APS Employee Census survey established a baseline result of 85.5%. A similar result of 84% was achieved through the 2025 APS Employee Census. Our results to these questions were higher than the APS average in both years of reporting. The results demonstrate that our people highly rate leadership performance in Comcare.

Table 13: Leadership performance ratings from the 2024 and 2025 APS Employee Census survey

Survey questions	2025 Comcare Positive result	2025 APS Positive result	2024 Comcare Positive result	2024 APS Positive result
My supervisor engages with staff on how to respond to future challenges	86	80	87	80
My supervisor ensures that my workgroup delivers on what we are responsible for	91	88	94	88
My SES manager ensures that work effort contributes to the strategic direction of the agency and the aps	82	76	84	75
My SES manager creates an environment that enables us to deliver our best	77	68	77	65
Average of results	84	78	85.5	77

Looking ahead to 2025–26

We have agreed to a target of 80% for 2025–26. The target is above the APS average and within a 5-percentage point scale of the baseline result. We will consider opportunities for improvement considering the full results of the 2025 APS Employee Census.

Measure and target details
Type: Quantitative, effectiveness
Methodology: Averaged total positive response rates (strongly agree or agree) to the following questions in Comcare’s results for the Annual APS Employee Census survey: <ul style="list-style-type: none">• My supervisor engages with staff on how to respond to future challenges• My supervisor ensures that my workgroup delivers on what we are responsible for• My SES manager ensures that work effort contributes to the strategic direction of the agency and the APS• My SES manager creates an environment that enables us to deliver our best
Data source: Comcare’s results for the annual APS Employee Census survey
Changes since the Corporate Plan 2024–25: Methodology clarified to only use the APS Employee Census as the basis for the result (excludes Comcare’s internal pulse poll). Questions in scope of the result have been clarified to simplify calculation of the result.
Previous results: Not applicable – first year of reporting

Performance measure 9	2024–25 Target	Result
Employee engagement with Comcare’s purpose and objectives score	Establish a baseline and define targets for 2025–26 and beyond	Baseline established 88%

Rationale

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

Result analysis

We selected the ‘I believe strongly in the purpose and objectives of my agency’ question from the Employee Engagement section in the annual APS Employee Census survey to inform the results to this target.

Our result from the 2024 APS Employee Census survey established a baseline result of 88%. A slight improvement was achieved through the 2025 APS Employee Census, with a result of 89%. Comcare’s results to these questions were higher than the APS average in both years of reporting which demonstrates that our people are highly engaged with our purpose and objectives.

Table 14: Employee engagement ratings from the 2024 and 2025 APS Employee Census survey

Survey questions	2025 Comcare Positive result	2025 APS Positive result	2024 Comcare Positive result	2024 APS Positive result
I believe strongly in the purpose and objectives of my agency	89	88	88	86

Looking ahead to 2025–26

We have agreed to a target of 85% for 2025–26. The target is within a 5-percentage point scale of the APS average and baseline result.

We will continue to embed the Comcare Strategy across the agency and ensure our planning, performance and strategic communications activities align with our purpose, priorities and aspirations to maintain high engagement results from our people.

Measure and target details
Type: Quantitative, effectiveness
Methodology: Total positive response rate (strongly agree or agree) to this question in Comcare’s results for the annual APS Employee Census survey ‘I believe strongly in the purpose and objectives of my agency’
Data source: Comcare’s results for the annual APS Employee Census survey
Changes since the Corporate Plan 2024–25: Methodology clarified to only use the APS Employee Census as the basis for the result (excludes Comcare’s internal pulse poll). Questions in scope of the result have been clarified to simplify calculation of the final result.
Previous results: Not applicable – first year of reporting

Intended result: Our scheme is financially sustainable

Performance measure 10	2024–25 Target	Result
Minimum funding ratio	110% (minimum threshold)	Achieved 120%

Rationale

The funding ratio is used to measure the financial sustainability of the compensation scheme. It is based on Comcare’s claims liabilities and the assets available to fund these.

Result analysis

Comcare’s funding ratio on 30 June 2025 was 120%. This represents an increase compared to last year’s result of 112%. This remains above our target minimum funding ratio of 110% for the eighth consecutive year. The result demonstrates 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 \$354.6 million (\$211 million in 2023–24) available to settle future claims liabilities.

The change to the funding ratio compared to last year’s result is primarily due to an increase in premium scheme assets of \$155 million, driven by:

- an increase in the notional balance of funds held in the Consolidated Revenue Fund which increased in line with the Bloomberg AusBond Treasury 5+ Year Index (BATY5:IND)
- Comcare’s premium pool amount plus interest being higher than administration costs and benefits payments in 2024–25.

Comcare’s net premium scheme liabilities at 30 June 2025 are \$1.813 billion, which is an increase of \$11 million from the 30 June 2024 liabilities.

Looking ahead to 2025–26

We expect to maintain a positive funding ratio above the 110% target in 2025–26.

Measure and target details
Type: Quantitative, efficiency
Methodology: Total assets (Comcare retained funds + consolidated revenue fund) / net outstanding claims liability calculated by independent actuary
Data source: Financial statements and liability valuation report
Changes since the Corporate Plan 2024–25: Nil
Previous results: 2023–24 112% 2022–23: 117% 2021–22: 124% 2020–21: 129% These results were assessed using the same methodology, against the same target

Performance measure 11	2024–25 Target	Result
Administrative cost ratio	15 – 25%	Achieved 21.8%

Rationale

The administrative cost ratio represents efficiency of our insurance and claims management operations.

Result analysis

The administrative cost ratio for 2024–25 is 21.8%. This is an improvement from the previous year as a result of changes to our strategic planning process which has strengthened our approach to prioritisation of projects and initiatives with considered budget allocations.

Looking ahead to 2025–26

We aim to maintain the administrative cost ratio within the 15 – 25% range in 2025–26.

Measure and target details
Type: Quantitative, efficiency
Methodology: Administration costs / (administration costs + claims costs), based on Safe Work Australia’s Comparative Performance Monitoring (CPM) methodology
Data source: Commonwealth agency payroll submissions, actuarial premium reports, Comcare’s financial management system data, Comcare’s claims management system data
Changes since the Corporate Plan 2024–25: Nil
Previous results: 2023–24 23.5% 2022–23: 22.6% 2021– 22: 21.7% 2020–21: 20.6%
These results were assessed using the same methodology, against the same target





Delivering client-centric services

Intended result: Our clients are satisfied with our services

Performance measure 12	2024–25 Target	Result
% overall client satisfaction with services	a. Employer satisfaction rating of 75%	a. Achieved 78%
	b. Design a new mechanism for measuring employee satisfaction	b. Achieved

Rationale

We use client satisfaction results to measure if our services are meeting the needs of our clients and identify opportunities for improvement to our service delivery. Our annual Employer Survey has been used to measure client satisfaction for over 5 years.

We are expanding our ability to capture employee satisfaction, providing a more comprehensive understanding of satisfaction and insights from our key clients.

Result for target a – Employer satisfaction rating of 75%

Result analysis

In 2024–25, we changed the methodology for measuring employer satisfaction for this performance measure to be based on a single, overall satisfaction question in the Employer Survey to enable clear measurement and separate results between our key clients – employers and employees.

A new question was included in the 2024 Employer Survey 'Overall, thinking about all of your dealings with Comcare over the last 12 months, would you say your organisation is satisfied or dissatisfied with the services you received?'.

80% of employers reported that they were satisfied or very satisfied with Comcare's services, establishing the baseline result using the new methodology.

The same question was asked in 2025, with 78% of employers reporting that they were satisfied or very satisfied with Comcare's services. This is a strong result that exceeds the 75% target.

Other key findings from the 2025 Employer Survey that provide insight into employer satisfaction include:

- Satisfaction with Comcare staff remains a key strength, averaging 81%. Notably, satisfaction with staff responsiveness rose 7 points in 2025 to 79% – an all-time high.
- Employers reported greater engagement with proactive contact from Comcare. Employers also said they were more inclined to contact Comcare when our support was needed.

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.

Looking forward to 2025–26

Comcare’s overall employer satisfaction target remains at 75% for 2025–26. We will consider opportunities for improvement based on the 2025 Employer Survey results.

Measure and target details – Target a
Type: Quantitative, effectiveness
Methodology: Total positive response rate (very satisfied or satisfied) to question in Comcare’s annual Employer Survey ‘Overall, thinking about all of your dealings with Comcare over the last 12 months, would you say your organisation is satisfied or dissatisfied with the services you received?’
Data source: Comcare’s annual Employer Survey results
Aligns to regulator performance best practice principle 3
Changes since the Corporate Plan 2024–25: Nil
Previous results: 2023–24 85% 2022–23: 85% 2021–22: 84% 2020–21: 74% These results were assessed against higher targets using a different methodology to the current approach

Result for target b – Design a new mechanism for measuring employee satisfaction

Result analysis

We have designed a new mechanism, ‘the Injured Worker Experience Measure’, to capture insights from injured workers on their experience with our claims management process. The new mechanism will allow us to measure satisfaction and identify gaps and opportunities to improve and enhance our service delivery, and ultimately have a positive influence on return to work outcomes.

The Injured Worker Experience Measure and implementation plan was endorsed by Comcare’s Executive Committee in June 2025.

Looking forward to 2025–26

Implementation of the Injured Worker Experience Measure will commence in 2025–26 through a phased approach. Baseline data will be collected to establish targets for 2026–27.

Measure and target details – Target b
Type: Qualitative, output
Methodology: Assessment of deliverables at the end of the reporting period against deliverables endorsed in planning documentation
Data source: Internal planning and governance documentation
Changes since the Corporate Plan 2024–25: Nil
Previous result: Not applicable – first year of reporting

Intended result: Our client service design and delivery capability mature over time

Performance measure 13	2024–25 Target	Result
Maturity rating against a client service design and delivery maturity model	Client service design and delivery maturity model identified, and baseline maturity rating obtained to define targets for 2025–26 and beyond	Achieved

Rationale

Service design and delivery maturity demonstrates our commitment to uplifting our organisational capability to delivery client-centric services.

Result analysis

An audit reviewing Comcare’s approach to client centrism was conducted as part of our internal audit program in 2025. The audit compared our current approach to the 6 elements of the Ernst and Young Customer Experience Model to provide a baseline maturity rating. The 6 elements of the Customer Experience Model are:


- 1. Vision
- 2. Mindset and culture
- 3. Organisation
- 4. Data
- 5. Technology
- 6. Skills

Comcare’s overall maturity was assessed as ‘basic – level 1’, with recommendations made against the 6 elements of the Customer Experience Model that will improve maturity as they are delivered.

Looking ahead to 2025–26

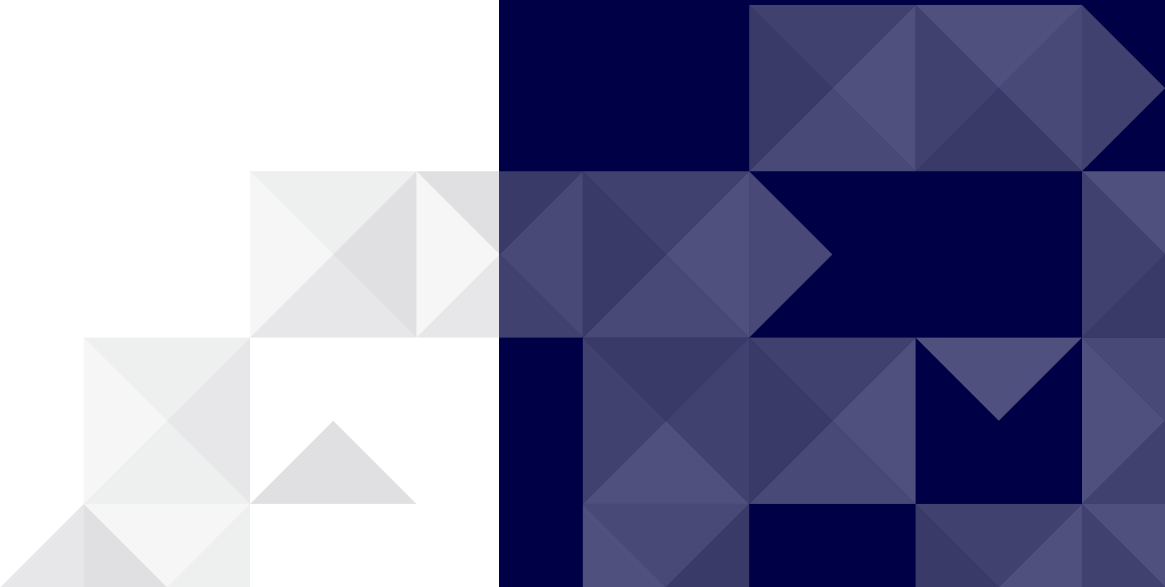
In August 2025, Comcare’s Executive Committee agreed to adopt this Customer Experience Model as the enterprise tool for measuring our client centrism maturity and address the audit recommendations through the establishment of an enterprise-wide service experience framework. This framework will define our target client centrism maturity we aspire to achieve in the coming years through delivery of future uplift initiatives.

Measure and target details
Type: Qualitative, output and effectiveness
Methodology: Research, select and endorse a client service design and delivery maturity model appropriate to Comcare’s operating context. Conduct a maturity assessment based on the endorsed model’s criteria to obtain a baseline maturity rating for the result.
Data source: Internal planning and governance documentation
Changes since the Corporate Plan 2024–25: Nil
Previous result: Not applicable – first year of reporting



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Organisation and Executive

Minister and portfolio

Comcare is an agency within the Employment and Workplace Relations Portfolio.

As of 13 May 2025, the responsible Minister for Comcare is the Hon Amanda Rishworth MP, Minister for Employment and Workplace Relations.

During the reporting period, the following Ministers were responsible for Comcare during former appointments as the Minister for Employment and Workplace Relations.

Senator the Hon Murray Watt

Minister for Employment and Workplace Relations

Period: 29 July 2024 – 13 May 2025

The Hon Tony Burke MP

Minister for Employment and Workplace Relations

Minister for the Arts

Leader of the House

Period: 1 July 2023 – 29 July 2024

Organisational structure

Comcare’s acting CEO and current Accountable Authority is Michael Duke.

Comcare is organised into 6 Groups that report to the CEO.

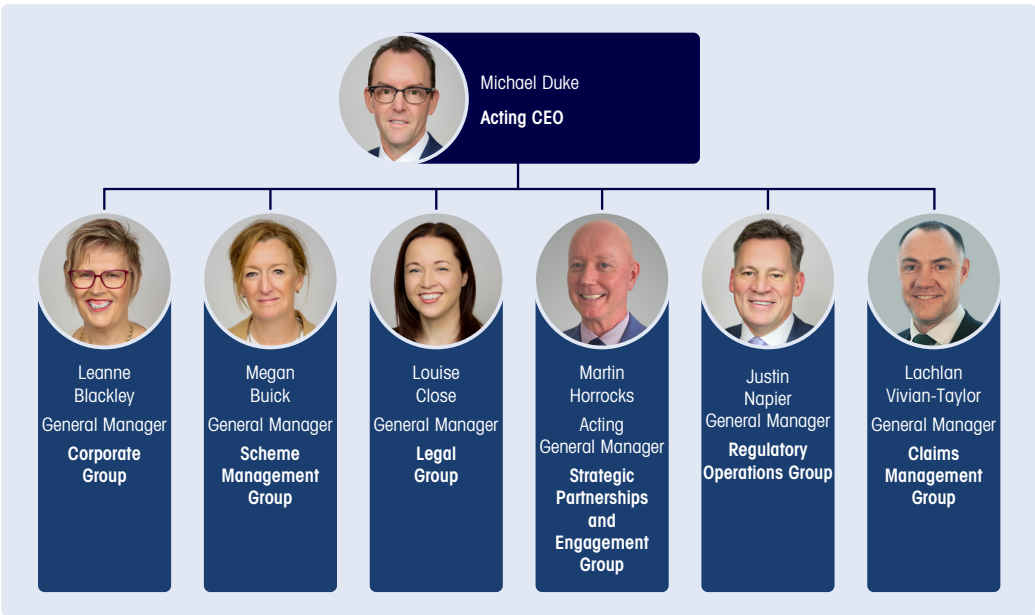


Figure 2: Comcare’s organisational structure as of 30 June 2025

Comcare's Executive Team

Michael Duke – Acting CEO

Michael joined Comcare in 2016 and was permanently appointed to the role of General Manager, Scheme Management Group from 17 September 2020. In 2022, Michael became the Deputy CEO of Comcare and has regularly acted as the Comcare CEO since that time.

Michael has led 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 over 25 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. She has delivered large transformation initiatives and driven 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, Scheme Management 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 is currently the General Manager, Scheme Management Group.

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.

Martin Horrocks – Acting General Manager, Strategic Partnerships and Engagement Group

Martin joined Comcare in 2016 and has been the Acting General Manager of the Strategic Partnerships and Engagement Group since February 2025. In this role, Martin leads Comcare's education programs, targeted research and effective communication strategies to give workplaces the guidance and direction they need to deliver safe and healthy work environments.

Martin has over 20 years' experience leading teams and implementing initiatives in workplace health and safety, injury prevention, and mental health. With a strong focus on strategic alignment and stakeholder collaboration, Martin has helped shape Comcare's research and engagement agenda, ensuring that performance outcomes reflect the agency's commitment to prevention and return to work.

Throughout his tenure at Comcare, Martin has led the education, engagement and research functions. He has demonstrated expertise in public sector management, policy development, stakeholder engagement, strategic planning, research and governance. Martin holds a Bachelor of Applied Science, Master of Public Health, and a Master of Health Science. He is also a graduate of the Australian Institute of Company Directors.

Justin Napier – General Manager, Regulatory Operations Group

Justin joined Comcare in June 2015. He has oversight of Comcare's work health and safety inspectorate, authorisations, intelligence and policy functions and 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. Since November 2024, Justin has been the Chair of the Heads of Workplace Safety Authorities.

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, including public administration, health, insurance, and disability. He has 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 healthy 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.

Departed Executive Members

Greg Vines – CEO from April 2023 – February 2025

Greg Vines ended his role as CEO of Comcare at the end of February 2025. Greg led the Agency through the development of Comcare’s current strategy focused on preventing work-related injuries and delivering better return to work outcomes.

Executive remuneration

The CEO determines the terms and conditions of employment for all Senior Executive Staff employees in Comcare. Determinations are based on individual capability and job requirements and are made under section 24(1) of the *Public Service Act 1999*.

Information about remuneration for key management personnel and senior executives is provided at [Appendix D: Executive remuneration](#) in this Annual Report.

Accountable Authority

Table 15: Details of the Accountable Authority during the reporting period

Name	Position Title / Executive or Non-Executive	Start date	End date
Michael Duke	Acting CEO Executive	1 March 2025	30 June 2025
Greg Vines	CEO Executive	1 July 2024	28 February 2025



Corporate governance

Governance framework

We aim for excellence in our governance to promote public trust and confidence. Good governance for us 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.

Our 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.

Our governance framework is based on the 6 key principles summarised in Table 16. The framework supports effective governance and underpins the design of our governance structures and systems. The principles-based approach promotes greater flexibility and responsiveness to Government and customer needs.

Table 16: 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 leadership 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 *Public Governance, Performance and Accountability Act 2013* (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 our governance structure: Executive Committee and Authoritative Committees. Supporting structures to facilitate consultation and inform our 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.

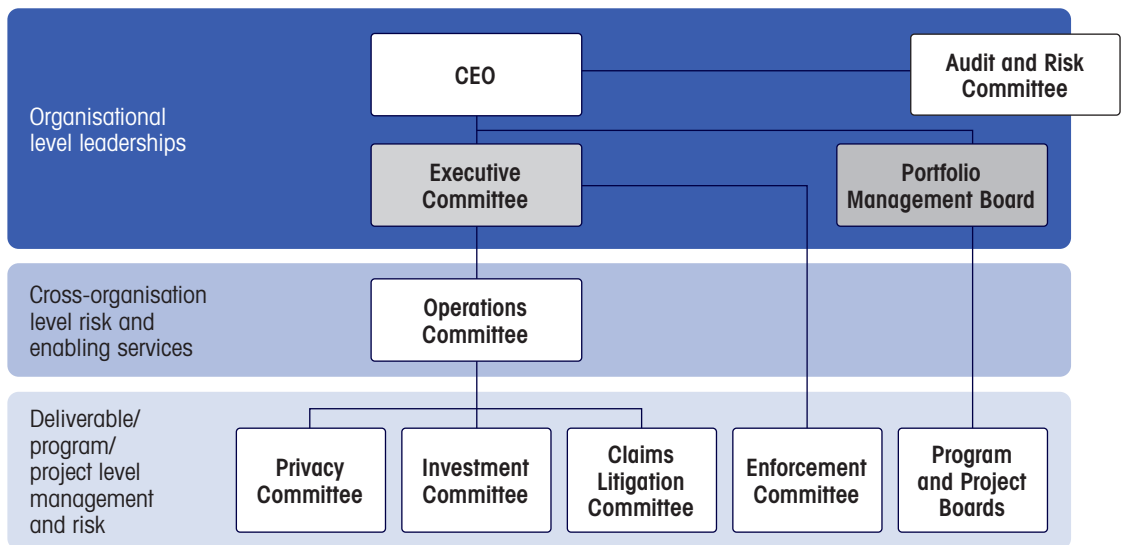


Figure 3: Comcare's governance structure

Audit and Risk Committee

The CEO has established the Audit and Risk Committee 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](#).⁵

For 2024–25, the Audit and Risk Committee consisted of 6 independent members, including the Chairperson appointed by the CEO. Comcare's senior executive, the Chief Financial Officer, internal audit officers and representatives of the Australian National Audit Office regularly attend as observers.

⁵ www.comcare.gov.au/about/forms-pubs/corporate-publications, accessed 9 September 2025.

Table 17: Comcare Audit and Risk Committee members

Member name and role	Qualifications, knowledge, skills or experience	Number of meetings attended	Total annual remuneration (GST inclusive)
Kate Hughes Chairperson until 31 March 2025	<p>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.</p> <p>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 enterprise-wide risk management, resilience, investigations, privacy, compliance and health and safety functions.</p> <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	4/4	\$14,058.05
Stephen Sheehan Member until 31 March 2025 Chairperson from 1 April 2025	<p>Mr Stephen Sheehan (FCPA) has a career spanning more than 40 years across the public and private sectors, with expertise in financial management and reporting, accounting and financial operations, performance reporting, organisational management and governance.</p> <p>Mr Sheehan's Australian Public Service senior executive career included roles as the Chief Financial Officer of the Department of Immigration and Citizenship and the Department of Health and Ageing.</p> <p>Mr Sheehan is an independent committee chair or member of audit and risk committees for various small and medium size Commonwealth entities.</p> <p>Qualifications:</p> <ul style="list-style-type: none">• Bachelor of Commerce (Accounting)	5/5	\$19,406.20

Member name and role	Qualifications, knowledge, skills or experience	Number of meetings attended	Total annual remuneration (GST inclusive)
Peter Hughes Member until 30 April 2025	<p>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 investment governance consultant.</p> <p>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, workers' compensation, compulsory third party, professional indemnity, lender's mortgage and health insurance funds.</p> <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 	4/4	\$15,544.79
David Turvey Member	<p>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.</p> <p>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.</p> <p>Mr Turvey also worked as an economist at the Organisation for Economic Cooperation and Development. He 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.</p> <p>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.</p> <p>Qualifications:</p> <ul style="list-style-type: none"> • Master of Economics from Australian National University • Graduate of the Australian Institute of Company Directors 	4/5	N/A

Member name and role	Qualifications, knowledge, skills or experience	Number of meetings attended	Total annual remuneration (GST inclusive)
Nina Du Thaler Member from 31 July 2024	<p>Ms Nina Du Thaler has worked in the ICT industry for over 25 years. Most recently, Ms Du Thaler managed the information technology and cyber operations of a large ASX listed health and human services provider.</p> <p>Ms Du Thaler has held senior executive roles across a range of industries including healthcare, community services, emergency services, utilities, higher education, and state and local Government.</p> <p>Ms Du Thaler is a non-executive director for an organisation that provides aged care services.</p> <p>Qualifications:</p> <ul style="list-style-type: none"> • Graduate of the Australian Institute of Company Directors • Master of Business Administration from Queensland University of Technology • Bachelor of Informatics from Griffith University 	5/5	\$17,335.69
Virginia Malley Member from 31 January 2025	<p>Ms Virginia Malley has experience in the insurance, investment and environmental sectors, including 30 years of experience in the financial services sector.</p> <p>Ms Malley has served on boards of public and private sector organisations, including NSW Biodiversity Conservation Trust, the Clean Energy Regulator and Perpetual Superannuation Ltd.</p> <p>Ms Malley is a non-executive Director of icare (Insurance and Care NSW), Chair of the icare Risk Committee and a member of the icare Audit Committee.</p> <p>Ms Malley has held senior risk management roles in investment, superannuation and insurance businesses, including Chief Risk Officer at Macquarie Funds Management Group.</p> <p>Qualifications:</p> <ul style="list-style-type: none"> • Graduate and Fellow of the Australian Institute of Company Directors • Bachelor of Arts from Macquarie University • Master of Applied Finance from Macquarie University • Juris Doctor from the University of Technology Sydney • Graduate Diploma of Environmental Law from the University of Sydney • Master of Laws from the University of Sydney 	2/2	\$8,596.20

Risk management

We have embedded systematic risk management as part of our governance and planning processes and organisational culture, with a focus on:

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

Our risk management framework is applied to all our activities and facilitates a positive risk culture where risks are identified early and openly and managed in a way that supports the delivery of our priorities. It is established in accordance with our Accountable Authorities Instructions, the Commonwealth Risk Management Policy (2023), and the PGPA Act.

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

We have specific risk management roles and scheduled reporting of risk at the strategic, group and operational levels. We also monitor emerging risks in our operating environment to ensure these are actively identified and managed. Our employees have a general responsibility to identify and manage areas of potential risk and demonstrate that their actions and decisions reflect appropriate consideration.

Our strategic risks are directly aligned to our strategic priorities and intended results of our performance measures. These risks and mitigation strategies are detailed in the Comcare Corporate Plan 2024–25.

Comcare's Executive Committee is responsible for monitoring and maintaining our strategic risk register. In 2024–25, the strategic risk register was reported quarterly to the Executive Committee and the Audit and Risk Committee for external assurance.

This year, we have:

- achieved a positive overall risk maturity rating of 'Embedded' in the 2025 Comcover risk management benchmarking survey report
- continued to strengthen the approach to monitoring and reporting against operational risks
- completed our first climate risk assessment using the climate risk digital tool and resources provided by the Department of Climate Change, Energy the Environment and Water, and subsequently updated our risk management framework to incorporate climate change and sustainability aspects
- prepared our first climate disclosure, available at [Appendix F: Commonwealth climate disclosure](#) in this Annual Report.

We delivered a risk awareness week from 23 – 27 June 2025 under the theme 'risk management helps us deal with change'. Activities involved a suite of risk focused internal communications from the CEO and Chief Operating Officer and promotion of APS climate action related e-learning to all staff. We hosted 2 risk management events led by external guest presenters on managing risk and change and commonwealth climate disclosure.

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 Audit and Risk Committee, the CEO, the Chair of the Seacare Authority and Executive. It adds value to what we do 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 the Executive Committee and the Audit and Risk Committee. In deciding the final program of internal audit work for the year, the Audit and Risk Committee considers the strategic and operational risk profile of Comcare and relevant audit reports published by the Australian National Audit Office.

Six internal audits were presented to the Audit and Risk Committee in 2024–25, an increase from 4 audits in 2023–24. The audits included:

- an assessment of our business continuity management arrangements
- a review of the governance and management of our regulatory programs
- assessments of our application controls for claims related payments and management of claims treatment plans
- a review of our data analytics maturity model
- a review of our procurement framework and policy.

Internal audit recommendations are tracked and reported to the Audit and Risk Committee to ensure identified risks are addressed. During 2024–25, there were 29 recommendations made through internal audit reports (compared with 47 in the previous year). At the end of 2024–25, 23 recommendations arising from completed audits were closed and 34 recommendations remained open (compared with 28 in the previous year).

Fraud and corruption

We are committed to complying with the Commonwealth Fraud and Corruption Control Framework 2024 under the PGPA Act to minimise fraud.

We maintain 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 our Fraud Control Policy, Plan and supporting procedures.

We undertake 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 2024–25, we updated our Fraud and Corruption Control Policy and Plan to reflect changes associated with the Commonwealth Fraud and Corruption Control Framework 2024 and developed an updated operating model to mature our approach to managing fraud and corruption.

We delivered a Fraud Awareness week program from 18 – 22 November 2024. Activities included:

- internal communications from the CEO and Chief Operating Officer with daily intranet articles and internal screen saver messaging
- a dedicated Fraud and Corruption Awareness page including a daily learning journey with 5 short LinkedIn Learning training sessions
- hosting a webinar on the Commonwealth Fraud and Corruption Control Framework led by an external guest presenter from the Attorney-General's Department.



People and work health and safety

Our people

As of 30 June 2025, we employed 731 ongoing employees and 48 non-ongoing employees, based in 9 locations around Australia. A breakdown of ongoing and non-ongoing employees from 2024–25 and 2023–24 is available at [Appendix C: Ongoing and non-ongoing employees in this Annual Report](#).



Our employees are highly engaged with our work, its purpose, their team, their managers and their roles, which is associated with positive benefits such as increased performance and productivity. This is demonstrated by our strong 2025 APS Employee Census results with 88% of eligible employees participating. Key results included:

- 91% 'I am satisfied with my non-monetary employment conditions' (including flexible working arrangements)
- 83% 'I would recommend my agency as a good place to work'
- 89% 'I believe strongly in the purpose and objective of my agency'
- 86% 'My agency supports and actively promotes an inclusive workplace culture'
- 91% 'I believe my immediate supervisor cares about my health and wellbeing'

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.

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

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

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

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

In 2024–25, we:

- implemented a new change management framework to support a practical enterprise approach to change management
- launched our Reconciliation Action Plan 2024–2027 following endorsement by Reconciliation Australia
- made progress towards implementing a fit for purpose Future Workplace Strategy
- continued to review and modernise our recruitment approach.

Strategic Commissioning Framework

In 2024–25, we took steps to bring core work in-house in line with the APS Strategic Commissioning Framework. The APSC has defined outcomes using categories to inform reporting, summarised in Table 18.

Table 18: APSC Strategic Commissioning Framework reporting categories

Exceeding, fully met	Substantially met	Partially met	Not met
100%	61–99%	16–60%	0–15%

Our target for 2024–25 aimed to bring \$350,000 of core work in-house in Accounting and Finance and ICT and Digital Solutions. This target was substantially met, with an actual reduction of \$163,636 in relevant supplier expenditure in 2024–25. Comcare has set a target of \$254,545 for 2025–26. Targets and results are GST exclusive.

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.

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

Our 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

We deliver a range of initiatives to provide a healthy and safe workplace for our employees.

Table 19: Comcare health and safety initiatives for employees

Initiative	Details
Influenza vaccinations	We fund an annual influenza vaccination program. A total of 231 employees participated in 2024–25.
Health and wellbeing allowance	We provide a health and wellbeing allowance of \$376 to employees under our Enterprise Agreement. A total of 701 employees claimed reimbursement in 2024–25.
Ergonomic workstations	All our offices provide sit-to-stand workstations for employees. Self-help guidance is available to independently set up the workstation. Employees are also offered a workstation assessment if they feel they require non-standard equipment. A total of 83 workstation assessments were completed by qualified providers at the request of staff.
Early intervention	Our early intervention program provides employees with timely and evidence-based support for treatment of work-related injuries. A total of 21 employees accessed support and assistance under the early intervention program.
Before Blue mental health coaching	Before Blue is a free, confidential coaching service, designed to support employees through everyday challenges such as stress and burnout, work, relationships, or health concerns and can be accessed without a general practitioner referral or mental health treatment plan.
Employee Assistance Program	Our Employee Assistance Program provides telephone and face-to-face access to confidential, individual counselling that supports the psychological wellbeing of employees and their families. The program additionally provides a specialist helpline for First Nations employees. Upon request, well-being check-in programs can be used as a proactive support service to employees in high-risk roles to assist with building personal capability and resilience to respond to the psychosocial hazards of their work.
National Safe Work Month activities	<p>In October 2024, we promoted National Safe Work Month through targeted engagement activities to support the year’s theme ‘safety is everyone’s business’. Staff across the country hosted local SafeTea events, encouraging informal conversations about work health and safety including work health and safety fundamentals, psychosocial hazards and risk management fundamentals.</p> <p>We participated in externally run initiatives including the Psychosocial Health and Safety Forum and the Health and Safety Representative Forum, fostering dialogue on psychological safety and work health and safety leadership.</p> <p>World Mental Health Day was acknowledged and we promoted webinars on sleep science and neurodiversity, supported by Diversity communications.</p> <p>Cyber Security Awareness Month was acknowledged in parallel, highlighting its role as a preventative control for workplace wellbeing.</p>

Psychosocial capability and management

Two enterprise-wide psychosocial risk surveys, Psychosocial Safety Climate and People at Work, conducted in early 2024 revealed no single dominant theme, reflecting the varied maturity of psychosocial risk management across Comcare's business units. While overall risk of psychological harm was low, the Psychosocial Capability Uplift Program was developed for targeted improvements to strengthen psychosocial capability and risk management.

During 2024–25, the Psychosocial Capability Uplift Program delivered:

- Psychological First Aid Training to build confidence and core supervisory skills for responding to urgent psychological needs
- Vicarious Trauma Training focused on self-awareness, resilience, and protective strategies for employees and supervisors in client-facing roles
- Managing Aggressive and Distressed Customer Training as part of the existing learning suite, to provide effective strategies for preventing and managing customer aggression and other challenging behaviours, including self-harm and suicide.

The program continues to focus on embedding psychosocial safety into leadership behaviours and organisational culture.

In 2025, Comcare undertook consultation and review to develop and finalise a stand-alone Workplace Sexual Harassment Policy and Procedure. This package includes updates and additions to reporting frameworks, terminology and outlines a person-centred and trauma-informed approach.

Notifiable incidents and investigations

Under section 38 of the *Work Health and Safety Act 2011* (WHS Act), we are required to notify the work health and safety regulator of any deaths, serious injury or illness, or dangerous incidents arising out of our work. In 2024–25, there were no notifiable incidents.

A total of 3 notices under section 155 of the WHS Act were received and remain open at the end of the reporting period, pending inspector reports. No statutory enforcement notices were received.

Workers' compensation claims

During the reporting period, 6 workers' compensation claims were accepted. The average incapacity weeks increased to 16.5 weeks in 2024–25 from 11.9 in 2023–24. The employees were supported to recover at and return to work through the assistance of evidence-based return to work strategies. Our 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.



Accountability

Information in this section covers the period from 1 July 2024 to 30 June 2025.

Significant activities and changes that affected Comcare

No significant activities or changes occurred that affected the operations or structure of the entity.

Ministerial directions

No Ministerial directions received.

Government policy orders

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

Significant non-compliance with finance law

No instances of significant non-compliance with finance law were reported to the Minister.

External scrutiny and 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.

There were 2 recommendations in the report. In 2024–25, Comcare implemented the final recommendation to undertake benchmarking of administration costs against other workers' compensation insurers.

Office of the Australian Information Commissioner

Freedom of information requests for review

The Office of the Australian Information Commissioner notified Comcare that it had received 13 requests for reviews of freedom of information decisions made by Comcare.

We provided submissions in relation to 23 new and ongoing Office of the Australian Information Commissioner reviews.

Privacy complaints

The Office of the Australian Information Commissioner notified Comcare that it had received 1 new privacy complaint about Comcare's actions.

Commonwealth Ombudsman

We received 1 formal investigation notice and 4 preliminary inquiries notices from the Commonwealth Ombudsman. One preliminary inquiry was finalised, with the Commonwealth Ombudsman deciding that no further review of the matters was warranted. Three preliminary inquiries and one investigation received in the period remained ongoing as of 30 June 2025.

Comcare was one of 4 agencies involved in an own motion investigation by the Ombudsman regarding continuous improvement in Tribunal matters. On 13 December 2024, the Ombudsman published their report *Learning from merits review – Best practice principles for agency engagement with merits review*. Comcare has accepted all 3 recommendations. Implementation of the recommendations is expected to be complete in December 2025.

Freedom of information

We are required to publish information to the public as part of the *Freedom of Information Act 1982* (FOI Act) Information Publication Scheme. In accordance with rule 17AH of the *Public Governance, Performance and Accountability Rule 2014* (PGPA Rule), Comcare's Agency Plan and other categories of information specified by the Information Publication Scheme are available on the [Comcare website](https://www.comcare.gov.au/about/governance/comcare-information-publication-scheme).⁶

6 www.comcare.gov.au/about/governance/comcare-information-publication-scheme, accessed 9 September 2025.

Procurement and transactions

Our 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.

We publish our Modern Slavery Statement made under the *Modern Slavery Act 2018* (Cth) on the [Modern Slavery Statements Register on the Attorney-General's Department website](#).⁷

Related entity transactions

Comcare had nil transactions, including grants, to a related Commonwealth entity or company during 2024–25.

Details of contracts for consultancy services

Comcare entered into 15 consultancy contracts with an individual contract value of \$10,000 or more with a total consultancy value of \$1,478,426 (GST inclusive). Nine of these are multi-year contracts.

Services provided under the contracts include the provision of advisory services, strategy support and independent 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](#).⁸ More information on the value of contracts above the relevant threshold of \$400,000 (GST inclusive) is available on the [AusTender website](#).⁹

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.

Comcare paid \$131,022 (GST inclusive) for directors' and officers' insurance in 2024–25.


Advertising and market research

Comcare spent \$74,442 (GST inclusive) on advertising and \$39,325 (GST inclusive) on market research in 2024–25.

7 www.modernslaveryregister.gov.au, accessed 9 September 2025.

8 www.comcare.gov.au/about/governance/comcare-contracts-list, accessed 9 September 2025.

9 www.tenders.gov.au, accessed 9 September 2025.



Chapter 5: 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 2025:

- (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 2025 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 2025 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 and forming part of 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

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
22 September 2025

Comcare Financial Statements

for the period ended 30 June 2025

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Comcare Statement by the Accountable Authority and Chief Financial Officer for the period ended 30 June 2025

In our opinion, the attached financial statements for the year ended 30 June 2025 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 subsections 41(2) of the PGPA Act.

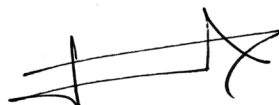
In our opinion, at the date of this statement, there are reasonable grounds to believe that the Comcare will be able to pay its debts as and when they fall due.



Michael Duke

Accountable Authority and A/g Chief Executive Officer

22 September 2025



Seyhan Aka

Chief Financial Officer

22 September 2025

Comcare
Statement of Comprehensive Income
for the period ended 30 June 2025

		2025	2024	Original Budget
	Notes	\$'000	\$'000	\$'000
Net cost of services				
Expenses				
Employee benefits	1.1A	98,095	89,547	92,705
Suppliers	1.1B	33,465	41,209	42,371
Depreciation and amortisation	2.2A	10,918	10,980	11,629
Finance costs	1.1C	144	169	135
Write-down and impairment of other assets	1.1D	1,444	5	-
Workers' compensation claims expense	1.1E	213,042	195,168	200,914
Common law asbestos-related disease claims expense		35,871	24,491	26,004
Total expenses		392,979	361,569	373,758
Own-source revenue				
Revenue from contracts with customers	1.2A	339,263	255,803	302,345
Interest	1.2B	28,292	25,448	24,773
Rental income	1.2C	836	1,478	-
Other revenue		807	453	-
Total own-source revenue		369,198	283,182	327,118
Gains				
Gains/(Losses) from movement in workers' compensation claims provision	1.2D	(118)	(92,315)	(37,394)
Gains/(losses) from movement in common law asbestos-related disease claims provision	1.2E	(28,912)	28,301	20,163
Total gains/(losses)		(29,030)	(64,014)	(17,231)
Total own-source revenue		340,168	219,168	309,887
Net (cost of)/contribution by services		(52,811)	(142,401)	(63,871)
Revenue from Government	1.2F	66,358	55,869	57,600
Available funding from movement in claims provision		(20,544)	81,047	6,271
Surplus on continuing operations		(6,997)	(5,485)	-
Other comprehensive income				
Items not subject to subsequent reclassification to net cost services				
Changes in asset revaluation reserve (net)	2.2A, 2.5B	1,308	26	-
Total other comprehensive income/(loss)		1,308	26	-
Total comprehensive income/(loss)		(5,689)	(5,459)	-

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

Comcare
Statement of Financial Position
as at 30 June 2025

		2025	2024	Original Budget
	Notes	\$'000	\$'000	\$'000
Assets				
Financial assets				
Cash and cash equivalents	2.1A	448,020	404,922	422,533
Trade and other receivables	2.1B	2,202,475	2,208,719	2,192,594
Other financial assets	2.1C	25,909	23,971	12,000
Total financial assets		2,676,404	2,637,612	2,627,127
Non-financial assets¹				
Buildings	2.2A	17,810	22,816	18,654
Plant and equipment	2.2A	3,895	4,453	4,821
Computer software	2.2A	6,183	9,411	7,079
Other non-financial assets	2.2B	2,706	2,339	1,238
Total non-financial assets		30,594	39,019	31,792
Total assets		2,706,998	2,676,631	2,658,919
Liabilities				
Payables				
Suppliers	2.3A	3,236	2,744	2,865
Workers' compensation claims payable		5,955	4,092	2,893
Other payables	2.3B	4,110	3,586	3,221
Total payables		13,301	10,422	8,979
Interest bearing liabilities				
Leases	2.4A	15,355	19,785	16,905
Total interest bearing liabilities		15,355	19,785	16,905
Provisions				
Employee provisions	4.1	23,518	20,644	15,221
Workers' compensation claims	2.5A C D E	2,045,515	2,044,688	2,023,068
Common law asbestos-related disease claims	2.5F	595,344	561,426	569,623
Other provisions	2.5B	652	664	662
Total provisions		2,665,029	2,627,422	2,608,574
Total liabilities		2,693,685	2,657,629	2,634,458
Net assets		13,313	19,002	24,461
Equity				
Contributed equity		7,717	7,717	7,717
Reserves		10,106	9,301	9,275
Retained surplus		(4,510)	1,984	7,469
Total equity		13,313	19,002	24,461

¹ Right-of-use assets are included in the line item Buildings and the line item Plant and equipment.

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

Statement of Changes in Equity

for the period ended 30 June 2025

	Retained Earnings			Asset revaluation surplus			Contributed equity			Total equity		
	2025 \$'000	2024 \$'000	Original Budget \$'000	2025 \$'000	2024 \$'000	Original Budget \$'000	2025 \$'000	2024 \$'000	Original Budget \$'000	2025 \$'000	2024 \$'000	Original Budget \$'000
Opening balance carried forward from the previous period	1,984	7,469	7,469	9,301	9,275	9,275	7,717	7,717	7,717	19,002	24,461	24,461
Comprehensive income												
Surplus/(Deficit) for the period	(6,997)	(5,485)	-	-	-	-	-	-	-	(6,997)	(5,485)	-
Revaluation adjustment	503	-	-	805	26	-	-	-	-	1,308	26	-
Total comprehensive income/(loss)	(6,494)	(5,485)	-	805	26	-	-	-	-	(5,689)	(5,459)	-
Closing balance as at 30 June	(4,510)	1,984	7,469	10,106	9,301	9,275	7,717	7,717	7,717	13,313	19,002	24,461

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

Budget variance commentary is provided in Note 6.4.

Comcare
Cash Flow Statement
for the period ended 30 June 2025

	Notes	2025 \$'000	2024 \$'000	Original Budget \$'000
Operating activities				
Cash received				
Sale of goods and rendering of services		67,671	47,423	61,348
Receipts from Government		62,745	59,646	57,600
Interest		33,663	16,054	24,773
Workers' compensation premiums		264,298	205,774	240,997
GST received from customers		27,488	20,941	16,239
Other		1,643	1,957	-
Total operating cash received		457,508	351,795	400,957
Cash used				
Employees		94,341	83,908	92,705
GST paid to suppliers		6,058	7,401	6,592
Net GST paid		21,353	13,416	9,647
Suppliers		33,402	42,431	42,372
Interest payments on lease liabilities		118	141	135
Workers' compensation claims		212,792	194,753	226,919
Common law asbestos-related disease claims		35,873	24,491	-
Payments to the Official Public Account		3,777	5,284	-
Total operating cash used		407,714	371,825	378,370
Net cash from/(used by) operating activities		49,794	(20,030)	22,587
Investing activities				
Cash received				
Proceeds from sale of property, plant and equipment		4	-	-
Total investing cash received		4	-	-
Cash used				
Purchase of property, plant and equipment		697	4,480	2,230
Total investing cash used		697	4,480	2,230
Net cash from/(used by) investing activities		(693)	(4,480)	(2,230)
Financing activities				
Cash used				
Principal payments of lease liabilities		6,003	5,846	6,415
Total financing cash used		6,003	5,846	(6,415)
Net cash from/(used by) financing activities		(6,003)	(5,846)	(6,415)
Net (decrease)/increase in cash held		43,098	(30,356)	13,942
Cash and cash equivalents at the beginning of the reporting period		404,922	435,278	408,591
Cash at the end of the period	2.1A	448,020	404,922	422,533

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

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

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 1.1.1.

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 required by Section 42 of the *Public Governance, Performance and Accountability Act 2013*.

The financial statements have been prepared in accordance with the:

- a) Public Governance, Performance and Accountability (Financial Reporting) Rule 2015 (FRR)
- b) Australian Accounting Standards and Interpretations – including simplified disclosures for Tier 2 Entities under AASB 1060 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 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 and values.

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

New accounting standards

Adoption of new Australian accounting standards 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	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. ASB 2022-10 applies to annual periods beginning on or after 1 January 2024.
AASB 2022-9 Amendments to Australian Accounting Standards – Insurance Contracts in the Public Sector	1 July 2026	AASB 2022-9 applies to annual periods beginning on or after 1 July 2026. AASB amends AASB 1050 to provide an accounting policy choice for government departments to apply either AASB 17 or AASB 137 Provisions, Contingent Liabilities and Contingent Assets when determining the information to be disclosed about administered captive insurer activities.

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 2025 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 2025 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 2025 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.

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

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.

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

Premium business

The value of the provision for premium claims liability has increased by \$12 million in 2024–25 (\$104 million increase in 2023–24).

Changes to premium claims liability	\$' million
Opening balance of gross liability as at 1 July 2024	1,809
Roll forward to 30 June 2024 valuation date	73
Projected gross liability as at 30 June 2025	1,883
Alignment of inflation bases	-
Changes in economic assumptions	29
Number of active incapacity and/or medical claims	21
Number of new claimants receiving incapacity and/or medical payments	(14)
Shorter-term continuance rates	(21)
Longer-term continuance rates, including effect of retirement	(20)
Changes in claims administration expenses	(23)
Assumed average quarterly payments	(33)
Asbestos experience and model changes	(1)
Closing balance of gross liability as at 30 June 2025	1,821

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.

Sensitivity of central estimate to assumptions	Change (-)		Change (+)	
	%	\$' million	%	\$' million
Claim duration				
+ 0.5% continuance rates at high duration	-4%	(71.4)	6%	88.2
+ 0.5% continuance rates at low duration	-6%	(89.3)	6%	103.0
+ 1.0% continuance rates at high duration for 5 years	-3%	(46.7)	3%	54.2
Claim size				
+ 10% average benefits	-9%	(142.0)	9%	142.0
Economic environment				
+/- 1.0% investment return	-6%	(93.6)	7%	106.8
Claims management expenses				
+ 20% long term average expense rate	-4%	(57.2)	4%	57.2
State Pension Age				
Increase the State Pension Age to 70 by 1 July 2030			6%	101.4

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

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

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 2023–24) has been applied to the central estimate for premium claims liabilities and 17% (17% in 2023–24) for pre-premium claims liabilities, which gives an intended 75% probability of sufficiency. The probability of sufficiency remain unchanged from 2023–24.

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 -\$53 million to +\$33 million (i.e. -14% to +9%) as a result of some plausible changes in the valuation basis.

Sensitivity of central estimate to assumptions	Change	
	%	\$' million
Economic		
Reduce the gap between inflation and discount rate by 1%	9%	32.7
Reduce the gap between inflation and discount rate by 1%	-14%	(52.7)
Claims numbers		
Scale the claim number curves to match the last 3 years of experience	3%	11.8
Scale the claim number curves to match the last 5 years of experience	-13%	(47.5)
Average claim sizes		
Average claim size assumptions equal to the 5-year average	0%	(1.6)
Average claim size assumptions equal to the 10-year average	-5%	(17.7)
Recovery rates		
Decrease recovery rates by 10%	2%	8.2
Decrease ARCo insurance recoverability to 50%	1%	2.4

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 (2024: 34%).

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

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 2025 the notional balance of these funds was \$1,720.4 million (2024: 1,615.0 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 2024-25 is \$105.4 million (2024: \$42.5 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 2025 is \$1,821.8 million (2024: \$1,809.7 million).

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

	Note	2025 \$'000	2024 \$'000
Net premiums held in the Commonwealth Consolidated Revenue Fund ¹		1,720,410	1,615,014
Cash and cash equivalents		447,505	397,931
Actuary assessed third party recoveries		8,511	7,802
Actuary assessed gross outstanding liability for payment of premium related claims ²	2.5C	(1,821,843)	(1,809,738)
Total other payables		354,583	211,009

¹ \$1,377.1 million has been recognised as a receivable from the Commonwealth Consolidated Revenue Fund as at 30 June 2025 (2024: \$1,415.3 million).

² Excludes \$11.3 million (2024: \$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.

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

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 2025 is \$212.4 million (2024: \$223.6 million).

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

		2025	2024
	Note	\$'000	\$'000
Special appropriation receivable		211,200	222,640
Cash and cash equivalents		1,172	1,010
Actuary assessed gross outstanding liability for payment of premium related claims	2.5E	(212,372)	(223,650)
Total other payables		-	-

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 2025 is \$595.3 million (2024: \$561.4 million).

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

		2025	2024
	Note	\$'000	\$'000
Special appropriation receivable		513,199	476,736
Cash and cash equivalents		(4,785)	2,767
Actuary assessed third party recoveries		86,930	81,923
Actuary assessed gross outstanding liability for payment of premium related claims	2.5F	(595,344)	(561,426)
Total other payables		-	-

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.

1. Departmental financial performance

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

Note 1.1: Expenses

	2025	2024
	\$'000	\$'000
1.1A Employee benefits		
Wages and salaries	73,811	65,851
Superannuation		
Defined contribution plans	10,992	9,609
Defined benefit plans	2,135	2,117
Leave and other entitlements	9,728	10,981
Separation and redundancies	126	-
Other	1,303	989
Total employee benefits	98,095	89,547

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	1,083	887
Legal expenses	3,218	3,470
Contractors	8,350	8,232
Fees for professional services	3,598	7,616
External claims services	2,900	3,022
Education and conference delivery	897	397
Information communication technology	7,311	10,868
Property services	1,795	1,542
Travel	1,630	1,635
Other	1,807	2,983
Total goods and services supplied or rendered	32,589	40,652

Goods supplied	617	520
Services rendered	31,972	40,132
Total goods and services supplied or rendered	32,589	40,652

Other suppliers

Workers' compensation expenses	876	557
Total other suppliers	876	557
Total suppliers	33,465	41,209

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

Accounting policy

Short-term leases and low-value leases

Comcare has not elected 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 per asset). Comcare recognises the lease payments associated with these leases as an expense on a straight-line basis over the lease term.

	2025 \$'000	2024 \$'000
1.1C Finance costs		
Interest on lease liabilities	118	141
Unwinding of discount	26	28
Total finance costs	144	169

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-down and impairment of other assets

Write-down of property, plant and equipment	(2)	5
Impairment of intangible assets	1,446	-
Total write-down and impairment of assets	1,444	5

1.1E Workers' compensation claims expense

Workers' compensation claims expenses paid and payable (net)	213,042	195,168
Total workers' compensation claims expense	213,042	195,168

Premium claims expense

Incapacity	136,307	120,380
Legal including common law	13,174	14,325
Medical, travel and other	49,888	45,701
	199,369	180,406
(Less): Recoveries from third parties	(568)	(136)
Total premium claims expense	198,801	180,270

Pre-premium claims expense

Incapacity	3,000	3,436
Legal including common law	532	564
Medical, travel and other	10,709	10,898
	14,241	14,898
(Less): Recoveries from third parties	-	-
Total pre-premium claims expense	14,241	14,898

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

Note 1.2: Own-source revenue and gains

	2025 \$'000	2024 \$'000
Own-source revenue		
1.2A Revenue from contracts with customers		
Total revenue from contracts with customers	339,263	255,803
Total revenue from customers with contracts	339,263	255,803
Disaggregation of revenue from contracts with customers		
Major service:		
Premium		
Australian Government entities (related parties)	274,147	210,082
External entities	4,844	3,043
Regulatory contribution	30,195	20,417
Licence fees	26,909	19,597
Other	3,167	2,664
	339,263	255,803

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	28,292	25,448
Total interest	28,292	25,448

Accounting policy

Interest revenue is recognised using the effective interest method.

	2025	2024
	\$'000	\$'000
1.2C Rental income		
Rental income	836	1,478
Total rental income	836	1,478

Operating Leases

The sub-lease with the National Emergency Management Agency (NEMA) ended in November 2024.

Maturity analysis of operating lease income receivables

Within one year	-	534
Total undiscounted lease payments receivables	-	534

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 worker's compensation claims provision

Gains/(Losses) from the movement in workers' compensation claims provision	(118)	(92,315)
Total gains/(Losses) from the movement in workers' compensation claims provision	(118)	(92,315)

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

Movement during reporting period:

Premium claims provision	(12,104)	(104,212)
Recoveries receivable	709	(67)
Total gains/(losses) from the movement in premium claims provision	(11,395)	(104,279)

Gains from the movement in pre-premium claims provision

Movements during the reporting period:

Pre-premium claims provision	11,277	11,964
Total gains from the movement in pre-premium claims provision	11,277	11,964

1.2E Gains/(losses) from the movement in common law asbestos-related disease claims provision

Movement during reporting period:

Asbestos claims provision	(33,918)	33,547
Recoveries receivable	5,006	(5,246)
Total gains/(losses) from the movement in common law asbestos-related disease claims provision	(28,912)	28,301

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

	2025	2024
	\$'000	\$'000
1.2F Revenue from Government		
Department of Employment and Workplace Relations		
Appropriations	6,679	6,029
Departmental appropriations	59,679	49,840
Total revenue from government	66,358	55,869

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.

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

2. 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.

Note 2.1: Financial assets

	2025	2024
	\$'000	\$'000
2.1A Cash and cash equivalents		
Cash at bank and on hand	1,141	1,141
Deposits at call	19,879	14,781
Term deposits	427,000	389,000
Total cash and cash equivalents	448,020	404,922

Accounting policy

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 2025 and \$1.9 million in 2024. 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	483	862
Total goods and services receivables	483	862

Appropriation receivables

For existing programs*	2,101,527	2,114,681
Total appropriation receivables	2,101,527	2,114,681

Other receivables

Third party claims recoveries receivable- workers' compensation claims	8,511	7,802
Third party claims recoveries receivable - common law asbestos-related claims	86,930	81,923
Claims recoveries	6,601	5,118
GST receivables from the Australian Taxation Office	528	605
Other	1	1
Total other receivables	102,571	95,449
Total trade and other receivables (gross)	2,204,581	2,210,992

(Less) impairment loss allowance

Goods and services	-	(36)
Claims recoveries	(2,106)	(2,237)
Total impairment loss allowance	(2,106)	(2,273)
Total trade and other receivables (net)	2,202,475	2,208,719

Notes to and forming part of the financial statements

for the period ended 30 June 2025

* 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 (2024: 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, that 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 2025

	Goods and services	Other receivables	Total
	\$'000	\$'000	\$'000
As at 1 July 2024	36	2,237	2,273
Amounts written off	-	(944)	(944)
Amounts recovered and reversed	(36)	571	535
Increase/(Decrease) recognised in net cost of services	-	242	242
Total as at 30 June 2025	-	2,106	2,106

Movements in relation to 2024

	Goods and services	Other receivables	Total
	\$'000	\$'000	\$'000
As at 1 July 2023	36	2,704	2,740
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	36	2,237	2,273

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.

	2025	2024
	\$'000	\$'000
2.1C Other financial assets		
Interest accrued	10,629	16,000
Revenue accrued	15,280	7,971
Total cash and cash equivalents	25,909	23,971

Note 2.2: Non-financial assets

2.2.A Reconciliation of the opening and closing balances of property, plant and equipment, and intangibles (2025)

	Buildings \$'000	ROUA Buildings \$'000	Buildings subtotal \$'000	Plant and equipment \$'000	ROUA Plant and equipment \$'000	Plant and equipment subtotal \$'000	Computer software \$'000	Total \$'000
As at 1 July 2024								
Gross book value	25,730	38,663	64,393	10,964	352	11,316	27,635	103,344
Accumulated depreciation and impairment	(21,872)	(19,705)	(41,577)	(6,531)	(332)	(6,863)	(18,224)	(66,664)
Total as at 1 July 2024	3,858	18,958	22,816	4,433	20	4,453	9,411	36,680
Additions:								
By purchase	98	1,459	1,557	468	114	582	-	2,139
By internally developed Impairments recognised in net cost of services	-	-	-	-	-	-	105	105
Depreciation and amortisation	(1,446)	-	(1,446)	(1,257)	-	(1,257)	(1,446)	(1,446)
Depreciation on right-of-use assets	-	(6,255)	(6,255)	-	(73)	(73)	(1,887)	(4,590)
Disposals	-	-	-	(2)	-	(2)	-	(6,328)
Revaluations and impairments recognised in other comprehensive income	1,138	-	1,138	192	-	192	-	(2)
Total as at 30 June 2025	3,648	14,162	17,810	3,834	61	3,895	6,183	27,888
Total as at 30 June 2025 represented by:								
Gross book value	23,270	38,310	61,580	8,923	430	9,353	26,294	97,227
Accumulated depreciation/amortisation and impairment	(19,622)	(24,148)	(43,770)	(5,089)	(369)	(5,458)	(20,111)	(69,339)
Total as at 30 June 2025	3,648	14,162	17,810	3,834	61	3,895	6,183	27,888

Notes to and forming part of the financial statements

for the period ended 30 June 2025

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	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	-	-	-	-	-	-	-	-
Net asset disposals	-	-	-	(5)	-	(5)	-	(5)
Total as at 30 June 2024	3,858	18,958	22,816	4,433	20	4,453	9,411	36,680
Total as at 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)
Total as at 30 June 2024	3,858	18,958	22,816	4,433	20	4,453	9,411	36,680

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

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. An independent assets revaluation was conducted by an independent qualified valuer from Pickles Auctions Pty Limited as at 30 June 2025.

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.

Notes to and forming part of the financial statements

for the period ended 30 June 2025

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:

	2025	2024
Office machines and equipment	2 to 14 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 2025 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 (2024: 3 to 15 years).

All software assets were assessed by qualified Comcare officers for indications of impairment as at 30 June 2025.

	2025	2024
	\$'000	\$'000
2.2B Other non-financial assets		
Prepayments	2,706	2,339
Total other non-financial assets	2,706	2,339

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

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

Note 2.3: Payables

	2025	2024
	\$'000	\$'000
2.3A Suppliers		
Trade creditors and accruals	3,236	2,744
Total supplier payables	3,236	2,744

Settlement is usually made within 30 days (2024: 30 days).

2.3B Other payables

Income in advance	2	358
Salaries and wages	2,602	2,025
Superannuation	411	321
Other	1,095	882
Total other payables	4,110	3,586

Note 2.4: Interest bearing liabilities

2.4A Leases

Lease liabilities	15,355	19,785
Total leases	15,355	19,785

Total cash outflow for leases for the year ended 30 June 2025 was \$6,110,012. (2024: \$6,435,359).

Maturity analysis - contractual undiscounted cash flows

Within 1 year	5,891	6,332
Between 1 to 5 years	9,747	14,136
Total leases	15,638	20,468

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.

Note 2.5: Provisions

		2025	2024
	Notes	\$'000	\$'000
2.5A Workers' compensation claims			
Premium claims	2.5C	1,821,843	1,809,738
Commonwealth latent mental disease claims	2.5D	11,300	11,300
Pre-premium claims	2.5E	212,372	223,650
Total workers' compensation claims		2,045,515	2,044,688
2.5B Other provisions			
Provision for restoration obligations		652	664
Total other provisions		652	664
Provision for restoration obligations			
Carrying amount 1 July		664	662
Adjustment in provision as a result of revaluation		22	(26)
Derecognition		(59)	-
Unwinding of discount		25	28
Closing balance as at 30 June		652	664

Comcare currently has two (2024: 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.

	2025	2024
	\$'000	\$'000
2.5C Provision for premium claims		
Carrying amount at 1 July	1,809,738	1,705,526
Increase/(Decrease) in provisions made during the year	99,298	228,548
Claims payments made during the year	(195,771)	(180,270)
Unwinding of discount	73,438	69,551
Change in discount rate	16,884	(29,506)
Change in inflation rate	18,256	15,889
Closing balance at 30 June*	1,821,843	1,809,738

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

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

The valuation of premium claims liabilities was undertaken as at 30 June 2025 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.

	2025	2024
Economic assumptions	%	%
Medical payments inflation	4.82 to 5.21	4.81 to 5.17
Other payments inflation	3.53 to 3.87	3.54 to 3.87
Discount rate	3.07 to 5.67	3.89 to 5.04

	2025	2024
Premium business liability assumptions		
Claim frequency	0.5%	0.5%
Third party recoveries	0.7%	0.7%
Claims administration expenses	21.1%	21.8%
Average claim size	\$198,870	\$179,064

	2025	2024
	\$'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	(705)	(395)
Unwinding of discount	485	486
Change in discount rate	105	(195)
Change in inflation rate	115	104
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 2025 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.

Notes to and forming part of the financial statements

for the period ended 30 June 2025

	2025	2024
	\$'000	\$'000
2.5E Provision for pre-premium claims		
Carrying amount at 1 July	223,650	235,614
Increase/(Decrease) in provisions made during the year	(7,360)	(6,831)
Claims payments made during the year	(15,222)	(14,898)
Unwinding of discount	9,318	9,881
Change in discount rate	2,005	(4,450)
Change in inflation rate	(18)	4,334
Closing balance at 30 June*	212,373	223,650

* 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 2025 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.

	2025	2024
	\$'000	\$'000
2.5F Provision for common law asbestos-related disease claims		
Carrying amount at 1 July	561,426	594,973
Increase/(Decrease) in provisions made during the year	57,144	(27,624)
Claims payments made during the year	(43,987)	(27,998)
Unwinding of discount	18,959	20,172
Change in discount and inflation rate	1,802	1,903
Closing balance at 30 June*	595,343	561,426

* 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 2025 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.

	2025	2024
Economic assumptions	%	%
Wage inflation	3.53 to 3.87	3.54 to 3.87
Superimposed inflation	2.00	2.00
Discount rate	3.07 to 5.67	3.89 to 5.04

3. Funding

This section identifies Comcare's funding structure.

Note 3.1: Cash flow reconciliation

	2025 \$'000	2024 \$'000
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	448,020	404,922
Statement of Financial Position	448,020	404,922
Difference	-	-
Reconciliation of net contribution by services to net cash from/(used by) operating activities		
Net contribution by services	(52,811)	(142,401)
Revenue from Government	66,358	55,869
Adjustments for non-cash items		
Depreciation/amortisation	12,366	10,980
Net write-down of non-financial assets	(4)	-
Loss on disposal of assets	-	5
Unwinding of discount	26	28
Available funding from movement in claims provision	(20,544)	81,047
Movements in assets and liabilities		
Assets		
(Increase) / decrease in net receivables	10,021	(78,076)
(Increase) / decrease in accrued revenues	8,978	(11,971)
(Increase) / decrease in prepayments	(367)	(1,101)
Liabilities		
Increase / (decrease) in payables	(11,836)	(4,406)
Increase / (decrease) in provisions	37,619	64,152
Increase / (decrease) in make good provision	(12)	(2)
Increase / (decrease) in lease liabilities	-	5,846
Net cash from/(used by) operating activities	49,794	(20,030)

Comcare
Notes to and forming part of the financial statements
for the period ended 30 June 2025

Note 3.2: Regulatory charging summary

	2025	2024
	\$'000	\$'000
Amounts applied		
Own-source revenue	26,928	19,633
Total amounts applied	26,928	19,633
Expenses		
Regulatory charging activities	25,753	23,022
Total expenses	25,753	23,022
External revenue		
Own-source revenue	26,928	19,633
Total external revenue	26,928	19,633
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>.

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

4. 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.

Note 4.1: Employee provisions

	2025	2024
	\$'000	\$'000
Leave and other entitlements	23,518	20,644
Total employee provisions	23,518	20,644

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 2025 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

	2025	2024
	\$'000	\$'000
Short-term employee benefits ¹	2,011	1,906
Post-employment benefits	283	273
Other long-term employee benefits	64	84
Total key management personnel remuneration expenses	2,358	2,263

The total number of key management personnel included in the above table is 9 (2024: 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).

Comcare

Notes to and forming part of the financial statements
for the period ended 30 June 2025

5. Managing uncertainties

Note 5.1: Contingent assets and liabilities

Quantifiable contingencies

As at 30 June 2025 Comcare has no quantifiable contingencies (2024: nil).

Unquantifiable contingencies

As at 30 June 2025 Comcare has no unquantifiable contingencies (2024: nil).

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.

Note 5.2: Remuneration of auditors

	2025 \$'000	2024 \$'000
Financial statement audit services provided to Comcare by KPMG under contract from the Australian National Audit Office	250,000	250,000
Other services provided by KPMG		
Continuous monitoring	41,182	60,000
Annual desktop reviews	23,000	40,250
Total other services provided by KPMG	64,182	100,250

Note 5.3: Financial instruments

	2025	2024
	\$'000	\$'000
5.3A Financial instruments		
Financial Assets		
Financial assets at amortised cost		
Cash and cash equivalents	448,020	404,922
Receivables for goods and services	483	826
Other receivables and claims recoveries	4,495	2,881
Other financial assets	25,909	23,971
Total financial assets at amortised cost	478,907	432,600
Total financial assets	478,907	432,600
Financial Liabilities		
Financial liabilities measured at amortised cost		
Trade creditors	3,236	2,744
Workers' compensation payables	5,956	4,092
Total financial liabilities measured at amortised cost	9,192	6,836
Total financial liabilities	9,192	6,836

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.

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

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).

	2025 \$'000	2024 \$'000
5.3B Net gains or losses on financial assets		
Financial Assets		
Financial assets at amortised cost		
Interest revenue	28,291	25,448
Total financial assets at amortised cost	28,291	25,448
Total financial assets	28,291	25,448

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

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 (2025: \$448.0 million and 2024: \$404.9 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 2025	Credit rating				
	AA-	A+	A1	Not rated	Total
	\$'000	\$'000	\$'000	\$'000	\$'000
Cash and cash equivalents	408,020	-	40,000	-	448,020
Receivables	-	-	-	483	483
Other receivables (net)	-	-	-	4,495	4,495
Other financial assets	-	-	-	25,909	25,909

As at 30 June 2024	Credit rating				
	AA-	A+	A1	Not rated	Total
	\$'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

Comcare holds no collateral to mitigate against credit risk.

	2025	2024
	\$'000	\$'000
Maximum exposure to credit risk (excluding any collateral or credit enhancement)		
Cash and cash equivalents	448,020	404,922
Receivables for goods and services	483	826
Other receivables and claims recoveries	4,495	2,881
Other financial assets	25,909	23,971
Total financial assets carried at amount not best representing maximum exposure to credit risk	478,907	432,600

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

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 2025. 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 2025						
	On demand	Withing 1 year	1 to 2 years	2 to 5 years	> 5 years	Total
	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000
Trade Creditors	-	3,236	-	-	-	3,236
Workers' compensation claims payable	-	5,955	-	-	-	5,955
Total	-	9,191	-	-	-	9,191

Maturities for non-derivative financial liabilities 2024						
	On demand	Withing 1 year	1 to 2 years	2 to 5 years	> 5 years	Total
	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000
Trade Creditors	-	2,744	-	-	-	2,744
Workers' compensation claims payable	-	4,092	-	-	-	4,092
Total	-	6,836	-	-	-	6,836

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 measurements at the end of the reporting period		For Levels 2 and 3 fair value measurements		
	2025 \$'000	2024 \$'000	Category (Level 1, 2 or 3)	Valuation technique(s) ¹	
Non-financial assets²					
Leasehold Improvements	3,648	3,859	Level 3	Cost approach	Actual cost of replacement of similar assets. Price per square metre.
Computer and IT equipment	3,734	4,350	Level 2	Market comparable	Sale prices of comparable computer and IT equipment.
Office equipment	26	30	Level 2	Market comparable	Sale prices of comparable office equipment.
Artwork	75	54	Level 2	Market comparable	Private sales of similar artwork. Professional appraisals of similar artwork.
Total non-financial assets	7,483	8,293			
Total fair value measurements of assets in the statement of financial position	7,483	8,293			

¹ Comcare engaged a professional valuer to undertake a comprehensive valuation of non-financial assets as at 30 June 2025.

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	
	2025	2024	2025	2024
	\$'000	\$'000	\$'000	\$'000
As at 1 July	3,859	5,328	3,859	5,328
Total (losses) recognised in net cost of services ¹	(1,446)	(1,548)	(1,446)	(1,548)
Total gains recognised in other comprehensive income	1,138	-	1,138	-
Purchases	98	79	98	79
Total as at 30 June	3,649	3,859	3,649	3,859

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.

6. Other Information

Note 6.1: Current/non-current distinction for assets and liabilities

	2025	2024
	\$'000	\$'000
Assets expected to be recovered in:		
No more than 12 months		
Cash and cash equivalents	448,020	404,922
Trade and other receivables	99,742	77,081
Other financial assets	25,909	23,971
Other non-financial assets	2,706	2,160
Total no more than 12 months	576,377	508,134
More than 12 months		
Trade and other receivables	2,102,733	2,131,638
Buildings	17,810	22,816
Plant and equipment	3,895	4,453
Computer software	6,183	9,411
Other non-financial assets	-	179
Total more than 12 months	2,130,621	2,168,497
Total assets	2,706,998	2,676,631
Liabilities expected to be settled in:		
No more than 12 months		
Suppliers	3,236	2,744
Workers' compensation claims payable	5,955	4,092
Other payables	3,855	3,331
Leases	5,709	5,782
Employee provisions	9,129	8,219
Workers' compensation claims	298,026	282,824
Common law asbestos-related disease claims	64,242	52,286
Other provisions	557	58
Total no more than 12 months	390,709	359,336
More than 12 months		
Other payables	255	255
Leases	9,646	14,003
Employee provisions	14,389	12,425
Workers' compensation claims	1,747,489	1,761,864
Common law asbestos-related disease claims	531,102	509,140
Other provisions	95	606
Total more than 12 months	2,302,976	2,298,293
Total liabilities	2,693,685	2,657,629

Comcare

Notes to and forming part of the financial statements

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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.

	2025	2024
	\$'000	\$'000
Cash at bank		
As at 1 July	1,880	1,800
Receipts		
Funds deposited	-	-
Interest earned	96	110
Payments		
Final payouts	39	30
Total cash at bank as at 30 June	1,937	1,880

The above values are estimated at fair value at the time when acquired.

Note 6.3: Reporting of outcomes

	Outcome 1		Total	
	2025	2024	2025	2024
	\$'000	\$'000	\$'000	\$'000
Expenses				
Employee benefits	98,095	89,547	98,095	89,547
Suppliers	33,465	41,209	33,465	41,209
Depreciation and amortisation	10,918	10,980	10,918	10,980
Finance costs	144	169	144	169
Write-down and impairment of Other assets	1,444	5	1,444	5
Workers' compensation claims expense	213,042	195,168	213,042	195,168
Common law asbestos-related disease claims expense	35,871	24,491	35,871	24,491
Total expenses	392,979	361,569	392,979	361,569
Income				
Revenue from contracts with customers	339,263	255,803	339,263	255,803
Interest	28,292	25,448	28,292	25,448
Rental Income	836	1,478	836	1,478
Other revenue	807	453	807	453
Gains/(Losses) from movement in workers' compensation claims provision	(118)	(92,315)	(118)	(92,315)
Gains/(losses) from movement in common law asbestos-related disease claims provision	(28,912)	28,301	(28,912)	28,301
Other gains	-	-	-	-
Revenue from Government	66,358	55,869	66,358	55,869
Available funding from movement in claims provision	(20,544)	81,047	(20,544)	81,047
Total income	385,982	356,084	385,982	356,084
Assets				
Cash and cash equivalents	448,020	404,922	448,020	404,922
Trade and other receivables	2,202,475	2,208,719	2,202,475	2,208,719
Other financial assets	25,909	23,971	25,909	23,971
Buildings	17,810	22,816	17,810	22,816
Plant and equipment	3,895	4,453	3,895	4,453
Computer software	6,183	9,411	6,183	9,411
Other non-financial assets	2,706	2,339	2,706	2,339
Total assets	2,706,998	2,676,631	2,706,998	2,676,631
Liabilities				
Suppliers	3,236	2,744	3,236	2,744
Workers' compensation claims payable	5,955	4,092	5,955	4,092
Other payables	4,110	3,586	4,110	3,586
Leases	15,355	19,785	15,355	19,785
Employee provisions	23,518	20,644	23,518	20,644
Workers' compensation claims	2,045,515	2,044,688	2,045,515	2,044,688
Common law asbestos-related disease claims	595,344	561,426	595,344	561,426
Other provisions	652	664	652	664
Total liabilities	2,693,685	2,657,629	2,693,685	2,657,629

Comcare's program components supporting the outcome are described in the Overview.

Comcare

Notes to and forming part of the financial statements

for the period ended 30 June 2025

Note 6.4: Budget variances commentary

The following table provides a comparison of Comcare's budget as presented in the 2024–25 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 2025 \$'000	Original Budget 2025 \$'000	Variance Amount \$'000	Explanation of major variance
Statement of Comprehensive Income					
Employee benefits	1.1A	98,095	92,705	5,390	The variance is primarily due to meeting resourcing requirements by engaging personnel under APS arrangements. Additionally, changes in the profile of employees annual leave and long service leave balances contributed to the variance.
Suppliers	1.1B	33,465	42,371	(8,906)	Supplier costs have decreased due to reduced expenditure on external services, particularly in projects where resourcing requirements were met by engaging personnel under APS arrangements to complete the work.
Write-down and impairment of other assets	1.1D	1,444	-	1,444	The variance is due to the impairment of an internally generated software asset after a re-assessment of business requirements.
Common law asbestos-related disease claims expense		35,871	26,004	9,867	The increase in Asbestos-related payments was mainly due to several large settlements in the period.
Revenue from contracts with customers	1.2A	339,263	302,345	36,918	The variance is primarily due to higher than budgeted premiums and premiums adjustments payable to Comcare as a result of APS agencies' increased staffing and payroll estimates.
Interest	1.2B	28,292	24,773	3,519	Interest was higher due to increased cash holdings and interest returns on Comcare's investment portfolio.
Gains/(Losses) from movement in workers' compensation claims provision	1.2D	(118)	(37,394)	37,276	The variance was mainly due to revised economic parameters, assumptions and claims experience applied in the annual actuarial assessment of workers' compensation liabilities.
Gains/(losses) from movement in common law asbestos-related disease claims provision	1.2E	(28,912)	20,163	(49,075)	The variance is due to higher than expected claims experience in the annual actuarial assessment of common law asbestos-related claims liabilities.
Revenue from Government	1.2F	66,358	57,600	8,758	The increase in revenue was primarily attributed to higher funding allocated for asbestos-related benefit payments in 2024-25 (refer to the comment above regarding Common Law asbestos-related disease claims expense).
Available funding from movement in claims provision		(20,544)	6,271	(26,815)	Lower funding from Government was due to an increase in the workers compensation premium related cash.

Comcare

Notes to and forming part of the financial statements

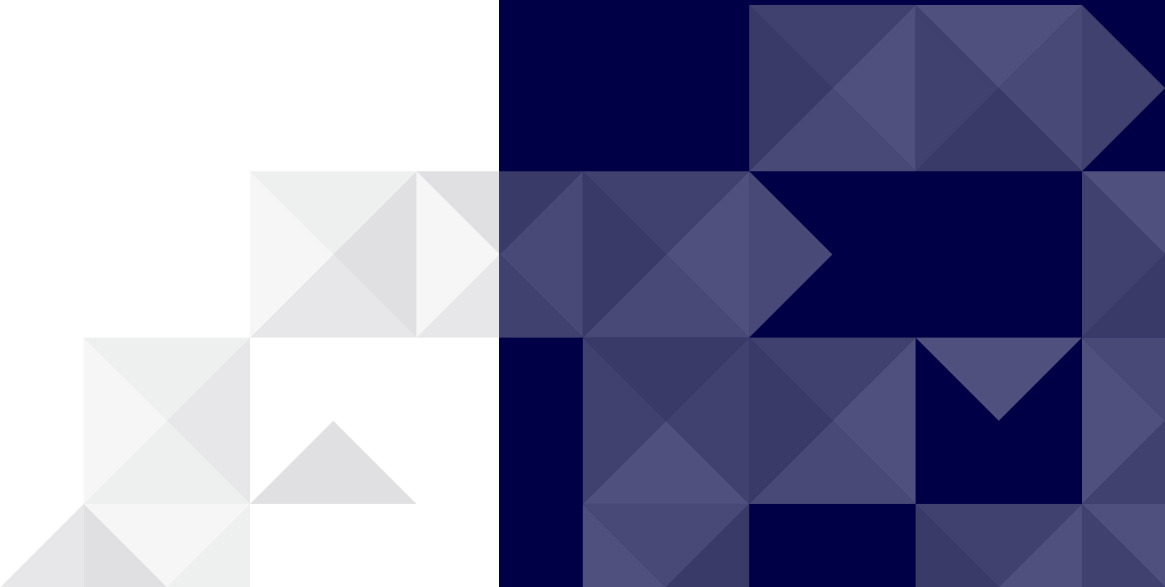
for the period ended 30 June 2025

Statement of Financial Position					
Other financial assets	2.1C	25,909	12,000	13,909	The variance was due an increase in interest receivables, resulting from higher interest rates on term deposits and premium adjustments payable to Comcare.
Other non-financial assets	2.2B	2,706	1,238	1,468	The variance is primarily due to pre-payments associated with higher software costs and the growth of software as a service agreements.
Workers' compensation claims payable		5,955	2,893	3,062	The variance relates to the timing of claims payments, with the increase driven by an effort to improve timeliness of payments in the last quarter of 2025.
Employee provisions	4.1	23,518	15,221	8,297	The variance was due to an increase in salaries as per the Enterprise Agreement, as well as changes in the staffing profile, including changes to employees' annual leave and long service leave balances for employee provisions.
Cashflow Statement					
Total operating cash received		457,508	400,957	56,551	The variance was mainly due to higher premiums, receipts from government and interest.
Total investing cash used		697	2,230	(1,533)	The variance was primarily due to lower capital expenditure resulting from the deferrals of an office accommodation fit-out and the replacement of technology hardware assets.



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Appendix A: Work health and safety regulatory performance


This appendix summarises Comcare’s work health and safety regulatory performance based on our functions and powers under the *Work Health and Safety Act 2011* (WHS Act). Data is current as at 30 June 2025.

Notifiable incidents

The WHS Act defines certain events as notifiable. This requires persons conducting a business or undertaking to notify Comcare of incidents that result in the death, serious injury or illness of a person, or are dangerous.

Table 20: Total notifiable incidents notified to Comcare, by type of incident

	2020–21	2021–22	2022–23	2023–24	2024–25
Total notifiable incidents	1,338	1,801	1,442	1,634	1,671
Serious injury or illness	641	811	583	756	747
Dangerous incident	650	942	818	854	889
Death of a person¹⁰	47	48	41	24	35
Worker deaths	26	31	24	19	21
Other person deaths	22	19	17	11	14



¹⁰ An incident may result in harm (or death) to one or more people. Therefore, the total number of ‘Worker deaths’ and ‘Other person deaths’ may be equal to or greater than the total number of notifiable ‘Death of a person’ incidents. These numbers may change after publication each year due to the time it takes to complete the notifiability assessment process.

Telecommunications Asbestos Safety Compliance Program activities

The Telecommunications Asbestos Safety Compliance Program aims to ensure the highest levels of work health and safety are applied to the rollout of the National Broadband Network. The program's primary focus is ensuring effective management of the risks relating to the removal of asbestos-containing material and associated civil construction works. These activities are delivered in addition to the inspectorate compliance and enforcement activities.

Table 21: Telecommunications Asbestos Safety Compliance Program activities commenced

	2020–21	2021–22	2022–23	2023–24	2024–25
Total Telecommunications Asbestos Safety Compliance program activities	1,151	1,325	625	481	428

Inspectorate compliance and enforcement activities

Our compliance and enforcement activities in relation to work health and safety combine proactive and reactive components. We have various compliance tools that we can apply in different circumstances. Some of these are based on reaching agreement with regulated entities. These activities are delivered in accordance with our Compliance and Enforcement Policy.

Table 22: Total inspectorate compliance and enforcement activities

	2020–21	2021–22	2022–23	2023–24	2024–25
Total inspectorate compliance and enforcement activities	1,875	1,287	969	1,280	1,283
Provide information and advice activities	487	271	206	252	257
Monitoring compliance inspections and investigations	1,388	1,016	763	1,028	1,026

Powers and enforcement measures

Comcare undertakes a range of compliance and enforcement activities under the WHS Act to promote compliance or to deter or respond to non-compliance. These activities may or may not involve the use of compliance tools.

Compliance tools are specific measures that Comcare can use to achieve an outcome in relation to compliance. Some compliance tools are established by specific legislative provisions.

Table 23: Use of powers and enforcement measures

	2020–21	2021–22	2022–23	2023–24	2024–25
Seizures	6	4	0	1	3
Improvement notices	24	8	16	14	14
Prohibition notices	10	4	10	4	11
Non-disturbance notices	10	67	4	8	19
Remedial action taken	0	0	0	0	0
Infringement notices ¹¹	0	0	0	0	0
Written undertakings accepted by Comcare	1	1	0	0	1

Review of decisions

For some WHS Act decisions made by Comcare, our inspectors and delegates, there is a statutory process to allow persons affected by the decision to seek internal and/or external review. Comcare will advise of the specific details of any statutory internal or external review rights when giving the relevant decision.

Table 24: Applications for internal and external review of decisions

	2020–21	2021–22	2022–23	2023–24	2024–25
Applications for internal review	4	4	6	1	6
Applications for external review	0	0	1	1	1

¹¹ The WHS Regulations do not currently prescribe any provision of the WHS Act that is enforceable by infringement notice.

Prosecutions

In 2024–25, Comcare commenced 4 criminal proceedings under the WHS Act. At 30 June 2025, 11 proceedings have continued, and 3 sets of proceedings have concluded during this period.

Commonwealth (Services Australia) – commenced

On 22 May 2025, criminal proceedings were commenced in the Magistrates' Court of Victoria for an offence against section 32 of the WHS Act. The proceedings relate to an incident that occurred on 23 May 2023 where a Centrelink worker was seriously injured when assaulted by a customer at the Centrelink Airport West customer service centre in Victoria.

K&S Freighters Pty Ltd – commenced

On 19 December 2024, criminal proceedings were commenced against K&S Freighters Pty Ltd in the Adelaide Magistrates' Court for an offence against section 32 of the WHS Act. The proceedings relate to an incident where 2 pedestrian workers were seriously injured when a worker driving a forklift collided with them at K&S Freighters' Mt Gambier depot in South Australia.

Commonwealth (Department of Defence) – commenced/concluded

On 5 September 2024, criminal proceedings were commenced in the Brisbane Magistrates' Court for an offence against section 38 of the WHS Act. Following a guilty plea, the Department of Defence was convicted and fined \$7,000 on 27 June 2025 for a failure to notify the regulator of a notifiable incident. The proceedings relate to an incident where a worker sustained a serious thumb laceration while participating in a training exercise at the Gallipoli Barracks in Enoggera, Queensland.

Commonwealth (Department of Industry, Science and Resources) – commenced

On 18 July 2024, criminal proceedings were commenced in the Magistrates Court of the Australian Capital Territory for an offence against section 32 of the WHS Act. The proceedings relate to an incident at the Canberra science and technology centre, 'Questacon', where a visitor's hands caught fire while interacting with a plasma ball display.

Commonwealth (Department of Defence – Army) – continued

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) – continued

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) – continued

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.

Commonwealth (Department of Defence – RAAF) – continued

On 27 July 2022, criminal proceedings were commenced in the Local Court of New South Wales 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 in NSW.

Commonwealth (Royal Australian Mint) – continued

On 3 May 2021, criminal proceedings were commenced in the Magistrates Court of the Australian Capital Territory for offences against sections 32 and 33 of the WHS Act. The proceedings relate to an incident at the Royal Australian Mint in Canberra 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.

Cleanaway Operations Pty Ltd – concluded

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. Following a guilty plea, Cleanaway was convicted and fined \$300,000 on 6 February 2025. The proceedings relate to an incident where a worker was seriously injured when a fire occurred at a Cleanaway liquid waste processing facility in St Marys, New South Wales.

Cleanaway Operations Pty Ltd – concluded

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 prosecution was discontinued on 20 February 2025 following the acceptance of a WHS Undertaking from Cleanaway. The proceedings related 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.



Appendix B: Workers' compensation scheme performance

This appendix summarises the performance of Comcare’s workers’ compensation scheme, managed under the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act). Data is current as at 30 June 2025.

Claims incidence rates

There has been an increase in the incidence of claims received and accepted in 2024–25. Table 25 shows scheme incidence rate trends from 2020–21 to 2024–25:

- Claims received – 10.5% decrease
- Claims accepted – 12.7% decrease
- Serious claims – 7.5% decrease.

Table 25: Comcare workers’ compensation scheme claims summary data¹²

		2020–21	2021–22	2022–23	2023–24	2024–25
Incidence of claims received	Scheme total	15.2	12.9	13.5	14.2	13.6
	Premium paying employers	8.1	6.6	7.6	8.3	7.7
	Self-insured licensees	21.0	17.8	17.9	19.0	18.8
Incidence of accepted claims	Scheme total	11.0	9.4	9.7	10.1	9.6
	Premium paying employers	4.6	3.9	4.3	4.7	4.5
	Self-insured licensees	16.1	13.7	13.8	14.5	14.0
Incidence of serious claims ¹³	Scheme total	6.7	6.1	5.8	6.2	6.2
	Premium paying employers	3.5	3.1	3.0	3.2	3.3
	Self-insured licensees	9.3	8.3	8.0	8.7	8.7
Total number of compensable deaths	Scheme total	18	13	18	12	18
	Premium paying employers	13	7	14	7	16
	Self-insured licensees	5	6	4	5	2

12 All incidence rates are per 1,000 full time equivalent (FTE) employees.

13 Serious claims are those claims that reach one week or more of time lost during the reporting period.

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 Administrative Review Tribunal (ART) for review of the reconsideration decision.

Table 26: Workers' compensation claims disputation rates

		2020–21	2021–22	2022–23	2023–24	2024–25
Number of reconsideration requests received	Scheme total	2,054	2,028	2,147	2,396	2,386
	Premium paying employers	743	801	864	1,022	1,111
	Self-insured licensees	1,311	1,227	1,283	1,374	1,275
Reconsideration affirmation rate¹⁴	Scheme total	83%	84%	85%	83%	81%
	Premium paying employers	77%	79%	78%	79%	72%
	Self-insured licensees	87%	86%	90%	86%	89%
Number of applications to the ART	Scheme total	989	1,009	1,019	1,184	1,084
	Premium paying employers	338	341	310	413	402
	Self-insured licensees	651	668	709	771	682
ART affirmation rate¹⁵	Scheme total	60%	65%	65%	64%	64%
	Premium paying employers	49%	54%	49%	42%	45%
	Self-insured licensees	70%	72%	74%	76%	74%

14 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.

15 ART affirmation rate is the percentage of ART 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.

Appendix C: Ongoing and non-ongoing employees

As of 30 June 2025, we employed 731 ongoing employees and 48 non-ongoing employees, based in 9 locations around Australia. A breakdown of ongoing and non-ongoing employees from 2024–25 and 2023–24 is available in tables 27 – 30.

Table 27: All ongoing employees 2024–25

	Man/Male			Woman/Female			Non-binary			Prefers not to answer			Uses a different term			Total
Location	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	
ACT	111	6	117	172	48	220	2	0	2	0	0	0	0	0	0	339
NSW	28	0	28	22	5	27	0	0	0	0	0	0	0	0	0	55
NT	1	0	1	3	1	4	0	0	0	0	0	0	0	0	0	5
QLD	9	2	11	22	1	23	0	0	0	0	0	0	0	0	0	34
SA	5	0	5	5	3	8	0	0	0	0	0	0	0	0	0	13
TAS	9	1	10	6	3	9	0	0	0	0	0	0	0	0	0	19
VIC	104	1	105	122	23	145	1	0	1	0	0	0	0	0	0	251
WA	8	1	9	4	2	6	0	0	0	0	0	0	0	0	0	15
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	275	11	286	356	86	442	3	0	3	0	0	0	0	0	0	731

Table 28: All ongoing employees 2023–24

	Man/Male			Woman/Female			Non-binary			Prefers not to answer			Uses a different term			Total
Location	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	
ACT	109	5	114	167	44	211	1	0	1	0	0	0	0	0	0	326
NSW	24	0	24	21	3	24	0	0	0	0	0	0	0	0	0	48
NT	2	0	2	5	1	6	0	0	0	0	0	0	0	0	0	8
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
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 29: All non-going employees 2024–25

Location	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	
ACT	8	1	9	13	5	18	1	0	1	0	0	0	0	0	0	28
NSW	2	0	2	0	0	0	0	0	0	0	0	0	0	0	0	2
NT	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
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	8	0	8	4	4	8	1	0	1	0	0	0	0	0	0	17
WA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
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	19	1	20	17	9	26	0	0	0	0	0	0	0	0	0	48

Table 30: All non-going employees 2023–24

Location	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	
ACT	5	1	6	13	6	19	1	0	1	0	0	0	0	0	0	26
NSW	1	0	1	1	0	1	0	0	0	0	0	0	0	0	0	2
NT	0	0	0	1	0	1	0	0	0	0	0	0	0	0	0	1
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
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

Appendix D: Executive remuneration

The CEO determines the terms and conditions of employment for all Senior Executive Staff employees in Comcare. Determinations are based on individual capability and job requirements and are made under section 24(1) of the *Public Service Act 1999*.

Key management personnel information in Table 31 has been prepared in accordance with the requirements in [Department of Finance Resource Management Guide 138 – Commonwealth entities' executive remuneration reporting guide for annual reports](#).¹⁶

Table 31: Information about remuneration for key management personnel

Name	Position Title	Base salary	Short-term benefits		Post employment benefits	Other long-term benefits			Total remuneration (\$)
			Bonuses (\$)	Other benefits and allowances (\$)	Superannuation contributions (\$)	Long service leave (\$)	Other long-term benefits (\$)	Termination benefits (\$)	
Gregory Vines	Chief Executive Officer	292,549	–	4,062	26,878	–	–	–	323,489
Michael Duke	Acting Chief Executive Officer/General Manager	282,312	–	22,283	42,967	12,872	–	–	360,434
Leanne Blackley	Chief Operating Officer	242,247	–	3,859	45,723	12,648	–	–	304,477
Megan Buick	General Manager	231,721	–	5,906	34,789	8,357	–	–	280,773
Louise Close	General Manager	210,394	–	5,595	33,965	8,062	–	–	258,017
Justin Napier	General Manager	240,028	–	30,211	36,142	11,375	–	–	317,756
Lachlan Vivian-Taylor	General Manager	229,006	–	136	36,089	2,723	–	–	267,955
Martin Horrocks	Acting General Manager	78,477	–	7,757	8,091	3,172	–	–	97,496
Gregory Webb	Acting General Manager	124,621	–	–	18,734	4,315	–	–	147,670
Total		1,931,356	–	79,808	283,379	63,524	–	–	2,358,066

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.

¹⁶ <https://www.finance.gov.au/government/managing-commonwealth-resources/commonwealth-entities-executive-remuneration-reporting-guide-annual-reports-rmg-138>, accessed on 9 September 2025

Appendix E: Ecological and sustainable development and environmental performance

Under section 516A of the *Environment Protection and Biodiversity Conservation Act 1999*, government organisations must report annually on their ecologically sustainable development and environmental performance. Comcare is committed to advancing the principles of ecologically sustainable development 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 technology, building operations and information management as the major consumers of energy and other resources.

Workplaces and infrastructure

Our Data Centre and Network Refresh project was completed in January 2025 and established a new primary data centre service to reduce operational costs and ensure reliable and well supporting service storage. We are hosting minimum infrastructure on premise across offices. We also migrated the final on-premise applications to the cloud that were in scope of our Cloud Transitions project. Overtime, we have reduced 40% of multi-functional devices, going from 38 to 23 devices. Environmental outcomes of these projects and initiatives include reduced ICT infrastructure, physical footprint, lower energy usage and overall savings in operational running costs.

We have commenced a future workplace project to align with flexible work practices. The project vision is to create contemporary, cost-effective, safe and efficient workplaces that enhance collaboration, learning, and service excellence. The project is targeting a 30% reduction in workspace that will decrease our office footprint, energy consumption and greenhouse gas emissions as part of sustainability goals. The project will run until 2028.

The National Australian Built Environment Rating System (NABERS) is a national rating system that measures the energy efficiency, water usage, waste management and indoor environment quality of a building or tenancy and its impact on the environment. Our Canberra tenancy has a 5-star NABERS rating, and our Melbourne tenancy has a 5.5-star NABERS rating.

Our Canberra office has been part of the Goterra organics recycling program since 2012 and renewed its accreditation with the ACT Government ACTSmart Office Recycling Program in June 2024. We provide recycling streams including co-mingled, cardboard and paper recycling in our offices. All paper that is procured is recycled.

We recycle 100% of toner cartridges and fluorescent light tubes and maintain a battery recycling facility in our Canberra Office.

We provide end of trip facilities at our workplaces to encourage employees to cycle to work.

We are increasing electric vehicles in our fleet with consideration to whole-of-government Net Zero 2030 requirements and our operational needs.

Power and paper consumption

We have implemented the following practices in our operations to reduce consumption:

- participation in whole-of-government purchasing arrangements for stationery, office supplies and electricity
- use of power saving features of windows operating systems; computer monitors and televisions
- installation of sensor lighting systems in all office fit outs with lux testing being conducted to prevent excess lighting.

Table 32 presents our power and paper consumption over 5 years. Power consumption per person remains consistent with usage from 2023–24, which reflects Comcare’s commitment to a more environmentally sustainable office environment.

Comcare tracks paper consumption based on purchases during each financial year. In 2024–25, Comcare’s paper usage declined compared to the prior year, corresponding with increased adoption of digital processes.

Table 32: Comcare’s environmental performance over the last 5 financial years

Consumption	2020–21	2021–22	2022–23	2023–24	2024–25
Average power consumption per FTE employee (Mega joules/person/annum)	3,951	3,443	8,186	2,530	2,567
Paper consumption (Reams of paper purchased during the year)	926	645	716	872	638

Digital records and online content

Our Information Management Uplift project is underway to improve information management practices and technology. We continue to make process improvements by promoting record management awareness and compliance amongst staff.

We are transitioning to a fully digital portfolio by converting our paper information assets to digital formats. We have scanned a total of 16,931,621 pages from 223,144 files within 17,500 boxes, resulting in saving in the storage of physical records.

Most business processes are centred around electronic workflows, reducing the requirements for paper records. We provide the ability to download publications from our website, reducing the impact of printing and distribution of hard copy material.

Appendix F: Commonwealth climate disclosure

Overview

Commonwealth climate disclosure is the Government's policy for Commonwealth entities to publicly disclose their exposure to climate-related risks and opportunities, as well as their actions to manage them, delivering transparent and consistent climate disclosures to the Australian public. Climate disclosure also contributes to reporting requirements under section 516A of the *Environment Protection and Biodiversity Conservation Act 1999*.

This section presents Comcare's first climate disclosure that has been prepared considering the following publications and resources:

- The Australian Government's approach to Climate Risk and Opportunity Management in the Public Sector 2024–2026 and supporting Climate Risk and Opportunity Management Program resources published on the [Department of Climate Change, Energy, the Environment and Water website](#).¹⁷
- The Commonwealth Climate Disclosure Policy, requirements and application guidance available on the [Department of Finance website](#).¹⁸
- The Net Zero in Government Operations Strategy and Australian Government Emissions reporting framework available on the [Department of Finance website](#).¹⁹

As Comcare meets the thresholds of Tranche 1 in the Commonwealth Climate Disclosure Policy, we are required to start including climate disclosures in our Annual Report from 2024–25. This climate statement has been prepared in accordance with the Year 1 Reporting Provisions for Tranche 1 entities.

[Appendix G: Annual report requirements](#) in this Annual Report includes an index to enable readers to cross reference our climate disclosure with the reporting requirements.

Governance

Climate risk and opportunity management is incorporated within our existing governance and risk management policies and procedures. Climate-related risk is addressed in our risk management framework as an operational risk category in our Risk Appetite and Tolerance statement. Our approach aligns with the Climate Risk and Opportunity Management Program's tools and resources.

¹⁷ www.dcccew.gov.au/climate-change/policy/adaptation/climate-risk-opportunity-management-program, accessed on 9 September

¹⁸ www.finance.gov.au/government/climate-action-government-operations/commonwealth-climate-disclosure-policy, accessed on 9 September

¹⁹ www.finance.gov.au/government/climate-action-government-operations, accessed on 9 September

The roles and responsibilities from the CEO as the Accountable Authority to the operational level are detailed in our climate risk governance structure at Figure 5.

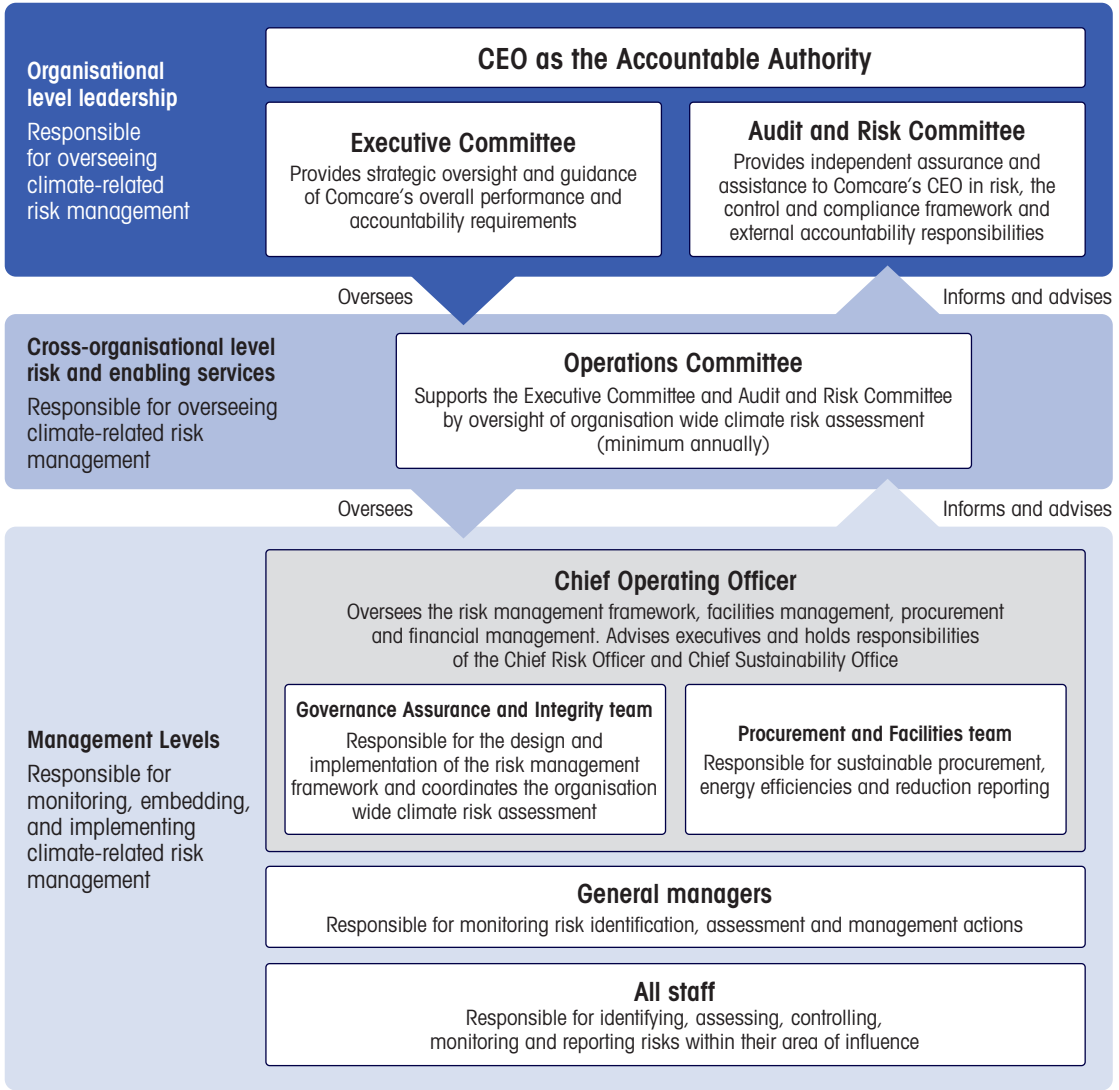


Figure 5: Climate risk governance structure

The CEO, Executive Committee, Audit and Risk Committee and the Operations Committee provide oversight and assurance over our climate risk management practices. Our CEO and Executive Committee are responsible for ensuring the risk management framework is embedded in our aligned strategies, policies and plans, investment decisions and climate related targets.

Our Chief Operating Officer also fulfills the roles of the Chief Risk Officer and Chief Sustainability Officer. They are responsible for overseeing the risk management framework and governance as well as advising the CEO and Executive Committee, including through their role on the Audit and Risk Committee. They are responsible for implementing and embedding government policy on climate risk and Net Zero in government operations across Comcare and support attendance at the Department of Finance Chief Sustainability Officer Network.

Members of the Corporate Group have completed the Climate Risk and Opportunity Management Program and Foundations of Net Zero in Government Operations training modules. They also participate in the Climate Action in Government Operations and the Climate Risk Management communities in GovTEAMS.

As part of our risk awareness week in June 2025, a member of the Department of Finance Climate Action team presented to all staff. An awareness article on climate risk was also published to all staff encouraging their completion of the climate related training modules.

Strategy

Through our climate risk assessment, we have identified and categorised our material climate-related risks and opportunities as identified in Table 33.

Table 33: Categorisation of material climate-related risks and opportunities

Risk or Opportunity Statement	Risk/Opportunity	Risk Type	Time Horizon
WHS of staff on urgent, remote regulatory field work	Risk	Physical	Current, 2030, 2050
Emissions reduction	Opportunity	Transition	Current, 2030, 2050

These risks and opportunity statements have been assessed across a variety of timeframes and climate scenarios. The relevant timeframes include 2030 (short-term), and 2050 (mid-term) as recommended within the climate risk and opportunity organisation application guide.

We expect the identified physical risk to increase over time, with the likely increase in extreme weather events associated with climate change. Conversely, we anticipate the identified opportunities to reduce in benefit over time, reinforcing the value of early climate action.

The current and anticipated effects on Comcare's operational model include how severe weather may impact the physical and psychological health of our inspectors whilst on urgent unavoidable work at an inspection site or commuting to or from the inspection site. This may result in a workplace incident, claim for workers' compensation and potential reputational damage to Comcare.

In response a review of work health and safety field work procedures and equipment is planned. Our Business Continuity Management Framework and procedures are also being revised to better address organisational climate risks.

With acknowledging the Net Zero in Government Operations Strategy and our emissions reduction opportunity, we plan to:

- consider emissions reduction through our Future Workplace Strategy, for example, prioritisation of all electric buildings as part of our leasing approach
- review fleet and hire vehicles policies and recommend the use of low emission reduction vehicles where practicable
- continue the rationalisation and reduction of on-premise data centres including the replacement of ICT assets with less energy consuming equipment
- improve end-user computing energy saving controls and enable computer power management features for the shortest time and lowest power mode
- continue to use sustainable disposal of ICT assets through our vendor, Greenbox IT
- improve our sustainable procurement practices
- promote the use of virtual meetings and combined scheduling of appointments to reduce travel.

Risk management

We started work on our first climate risk and opportunity assessment this year under the Australian Government's Approach to Climate Risk and Opportunity Management in the Public Sector 2024–2026, in line with the Climate Risk and Opportunity Management Program's Organisation Application Guide.

Climate risks and opportunities are assessed, rated for likelihood and impact, prioritised, monitored and managed using our existing risk management framework and the climate risk and opportunity management program resources. We will continue to review and refine this process next year as we embed climate risk in our risk management framework.

The scope of our first climate risk assessment included our staff, assets and operations. We considered internal risk registers and assessments, incident notification and claims data, plans made under our Future Workplace Strategy and a range of external climate related reports and scenarios to inform our risk assessment.

Metrics and targets

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 a corporate Commonwealth entity, we are contributing to the APS Net Zero 2030 target. We support the reduction of greenhouse gas emissions to mitigate impacts associated with climate change. We are currently reviewing our approach to targets and reducing emissions in line with our risk assessment. Actions for pursuing our emission reduction opportunity are outlined in the Strategy section.

The Greenhouse Gas Emissions Inventory and Electricity Greenhouse Gas Emissions tables present greenhouse gas emissions over 2024–25. The greenhouse gas emissions reported are calculated on the basis of Carbon Dioxide Equivalent (CO₂-e) and in line with the Emissions Reporting Framework. This is consistent with a Whole-of-Australian Government approach, outlined in the Net Zero in Government Operations Strategy, and Commonwealth Climate Disclosure requirements.

Comcare's emissions data includes data for the Safety, Rehabilitation and Compensation Commission and the Seafarers Safety, Rehabilitation and Compensation Authority as they use Comcare's travel systems and offices.

Table 34: Greenhouse gas emissions inventory – location based method 2024–25

Emission Source	Scope 1 t CO ₂ -e	Scope 2 t CO ₂ -e	Scope 3 t CO ₂ -e	Total t CO ₂ -e
Electricity (Location Based Approach)	N/A	354.55	29.11	383.66
Natural Gas	-	N/A	-	-
Solid Waste	-	N/A	-	-
Refrigerants	-	N/A	N/A	-
Fleet and Other Vehicles	12.01	N/A	3.05	15.06
Domestic Commercial Flights	N/A	N/A	277.70	277.70
Domestic Hire Car	N/A	N/A	19.70	19.70
Domestic Travel Accommodation	N/A	N/A	86.84	86.84
Other Energy	-	N/A	-	-
Total t CO₂-e	12.01	354.55	416.41	782.97

Note: the table above presents emissions related to electricity usage using the location-based accounting method. CO₂-e = Carbon Dioxide Equivalent.

n/a = not applicable

Table 35: Electricity greenhouse gas emissions 2024–25

Emission Source	Scope 2 † CO ₂ -e	Scope 3 † CO ₂ -e	Total † CO ₂ -e	Electricity kWh
Electricity (Location Based Approach)	354.55	29.11	383.66	555,558.44
Market-based electricity emissions	169.95	23.08	193.02	209,809.17
Total renewable electricity consumed	n/a	n/a	n/a	345,749.27
<i>Renewable Power Percentage¹</i>	n/a	n/a	n/a	101,083.86
<i>Jurisdictional Renewable Power Percentage^{2, 3}</i>	n/a	n/a	n/a	244,665.41
<i>GreenPower²</i>	n/a	n/a	n/a	-
<i>Large-scale generation certificates²</i>	n/a	n/a	n/a	-
<i>Behind the meter solar⁴</i>	n/a	n/a	n/a	-
Total renewable electricity produced	n/a	n/a	n/a	-
<i>Large-scale generation certificates²</i>	n/a	n/a	n/a	-
<i>Behind the meter solar⁴</i>	n/a	n/a	n/a	-

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. Electricity usage is measured in kilowatt hours (kWh).

- 1 Listed as mandatory renewables in 2023–24 Annual Reports. The renewable power percentage accounts for the portion of electricity used, from the grid, that falls within the Renewable Energy Target.
- 2 Listed as Voluntary renewables in 2023–24 Annual Reports.
- 3 The Australian Capital Territory is currently the only state with a jurisdictional renewable power percentage.
- 4 Reporting behind the meter solar consumption and/or production is optional. The quality of data is expected to improve over time as emissions reporting matures.

Note

Not all data sources were available at the time of the report and amendments to data may be required in future reports.

Reporting on refrigerants is being phased in over time as emissions reporting matures.

Solid waste data was unable to be sourced for 2024–25 and has not been included.

Emissions from hire cars for 2024–25 have been sourced from third party providers and may be incomplete.

The quality of data is expected to improve over time as emissions reporting matures.

Appendix G: Annual report requirements

This annual report has been prepared in accordance with the requirements of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) and *Public Governance, Performance and Accountability Rule 2014* (PGPA Rule).

Table 36 is set out in Schedule 2A of the PGPA Rule. Section 17BE(u) requires that this table be included in the annual report.

Table 36: PGPA Rule list of requirements

Legislative reference	Description	Location in the report	Requirement
17BE(a)	Details of the legislation establishing the body	Chapter 2: About Comcare – Governing legislation	Mandatory
17BE(b)(i)	A summary of the objects and functions of the entity as set out in legislation	Chapter 2: About Comcare – Governing legislation and core roles, services and enabling functions	Mandatory
17BE(b)(ii)	The purposes of the entity as included in the entity's corporate plan for the reporting period	Chapter 2: About Comcare – Purpose	Mandatory
17BE(c)	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	Chapter 4: Management and Accountability – Organisation and Executive – Minister and portfolio	Mandatory
17BE(d)	Directions given to the entity by the Minister under an Act or instrument during the reporting period	Chapter 4: Management and Accountability – Accountability – Ministerial directions	If applicable, mandatory
17BE(e)	Any government policy order that applied in relation to the entity during the reporting period under section 22 of the Act	Chapter 4: Management and Accountability – Accountability – Government policy orders	If applicable, mandatory
17BE(f)	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	Chapter 4: Management and accountability – Accountability – Ministerial directions and Government policy orders	If applicable, mandatory
17BE(g)	Annual performance statements in accordance with paragraph 39(1)(b) of the Act and section 16F of the rule	Chapter 3: Annual performance statements – Statement of preparation	Mandatory

Legislative reference	Description	Location in the report	Requirement
17BE(h), 17BE(i)	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	Chapter 4: Management and accountability – Accountability – Significant non-compliance with finance law	If applicable, mandatory
17BE(j)	Information on the accountable authority, or each member of the accountable authority, of the entity during the reporting period	Chapter 4: Management and accountability – Organisation and Executive – Accountable Authority	Mandatory
17BE(k)	Outline of the organisational structure of the entity (including any subsidiaries of the entity)	Chapter 4: Management and accountability – Organisational structure	Mandatory
17BE(ka)	Statistics on the entity's employees on an ongoing and 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	Appendix C: Ongoing and non-ongoing employees	Mandatory
17BE(l)	Outline of the location (whether or not in Australia) of major activities or facilities of the entity	Chapter 4: Management and accountability – Our people	Mandatory
17BE(m)	Information relating to the main corporate governance practices used by the entity during the reporting period	Chapter 4: Management and accountability – Corporate governance	Mandatory
17BE(n), 17BE(o)	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	Chapter 4: Management and accountability – Procurement and transactions – Related entity transactions	If applicable, mandatory
17BE(p)	Any significant activities and changes that affected the operation or structure of the entity during the reporting period	Chapter 4: Management and accountability – Accountability – Significant activities and changes that affected Comcare	If applicable, mandatory

Legislative reference	Description	Location in the report	Requirement
17BE(q)	Particulars of judicial decisions or decisions of administrative tribunals that may have a significant effect on the operations of the entity	Chapter 4: Management and accountability – Accountability – External scrutiny and judicial decisions and reviews by outside bodies	If applicable, mandatory
17BE(r)	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	Chapter 4: Management and accountability – Accountability – External scrutiny and judicial decisions and reviews by outside bodies	If applicable, mandatory
17BE(s)	An explanation of information not obtained from a subsidiary of the entity and the effect of not having the information on the annual report	Not applicable	If applicable, mandatory
17BE(t)	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)	Chapter 4: Management and accountability – Procurement and transactions – Indemnities and insurance	If applicable, mandatory
17BE(taa)	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	Chapter 4: Management and accountability – Corporate governance – Audit and risk committee	Mandatory
17BE(ta)	Information about executive remuneration	Chapter 4: Management and accountability – Comcare's Executive Team and Appendix D – Executive Remuneration	Mandatory

Legislative reference	Description	Location in the report	Requirement
17BF	Disclosure requirements for government business enterprises		
17BF (1)(a)(i)	An assessment of significant changes in the entity's overall financial structure and financial conditions	Not applicable	If applicable, mandatory
17BF (1)(a)(ii)	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	Not applicable	If applicable, mandatory
17BF (1)(b)	Information on dividends paid or recommended	Not applicable	If applicable, mandatory
17BF (1)(c)	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	Not applicable	If applicable, mandatory
17BF(2)	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	Not applicable	If applicable, mandatory

Commonwealth climate disclosure index

Appendix F presents Comcare's first climate disclosure, prepared in accordance with the Australian Government's approach to Climate Risk and Opportunity Management in the Public Sector 2024–2026 and supporting Climate Risk and Opportunity Management Program resources published on the [Department of Climate Change, Energy, the Environment and Water website](#).²⁰

This index enables readers to cross reference our climate disclosure with the reporting requirements.

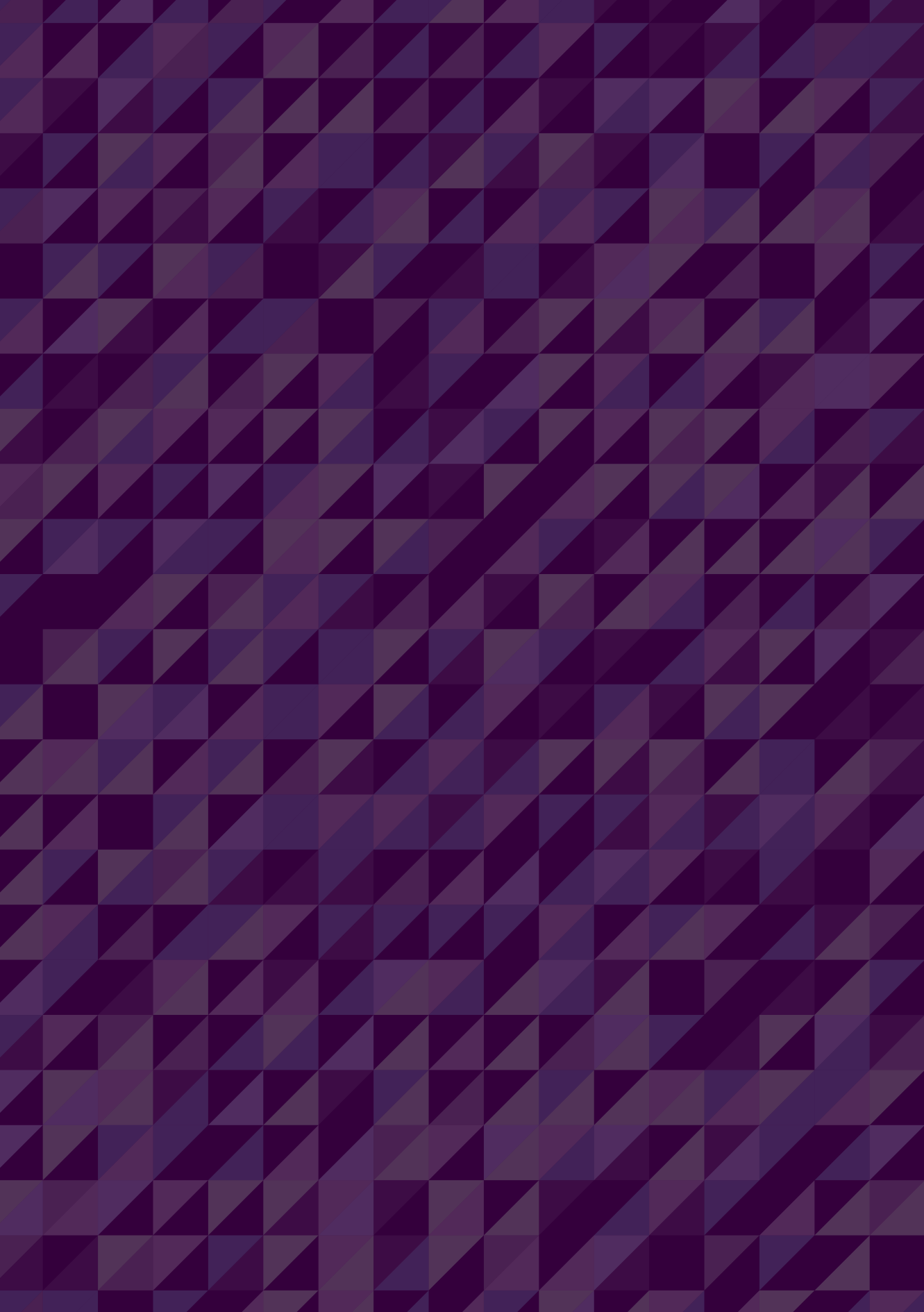
Table 37: Commonwealth climate disclosure requirements index

G0	Governance objective	Achieved through G1
G1(a)	Identify Accountable Authority	Chapter 4: Management and accountability – Corporate governance – Executive committee and senior management committees Appendix F: Commonwealth climate disclosure – Governance
G1(a)i	Responsibilities of Accountable Authority	Appendix F: Commonwealth climate disclosure – Governance
G1(a)ii	Skills and competencies	Appendix F: Commonwealth climate disclosure – Governance
G1(a)iii	Informing accountable authority	Appendix F: Commonwealth climate disclosure – Governance
G1(a)iv	Strategy and risk management	Appendix F: Commonwealth climate disclosure – Governance
G1(a)v	Setting targets	Appendix F: Commonwealth climate disclosure – Governance
G1(a)vi	Risk oversight	Appendix F: Commonwealth climate disclosure – Governance
G1(b)	Controls and procedures	Appendix F: Commonwealth climate disclosure – Governance
G2(a)	Regard to CROMP approach	Appendix F: Commonwealth climate disclosure – Governance Same as R2(a), S3
G2(b)	Alignment with other policies – CCEs may choose to refer to the Net Zero in Government Operations Strategy and Commonwealth Risk Management Policy as a matter of good practice.	Chapter 4: Management and accountability – Corporate governance – Risk Management Appendix F: Commonwealth climate disclosure – Governance
S0	Strategy objective	Achieved through S1

²⁰ www.dccceew.gov.au/climate-change/policy/adaptation/climate-risk-opportunity-management-program – accessed on 9 September

G0	Governance objective	Achieved through G1
S1(a)- S1(b)	Disclosure of information of risks and opportunities and their effects.	Achieved through S2-4
S2(a)	Identify the entity's material organisation climate-related risks and opportunities.	Appendix F: Commonwealth climate disclosure – Strategy
S2(b)	Physical and transition risks	Appendix F: Commonwealth climate disclosure – Strategy
S2(c)	Time horizon specification	Appendix F: Commonwealth climate disclosure – Strategy
S2(d)	Explain how the entity defines 'short term', 'medium term' and 'long term' and the reasons these definitions were selected	Appendix F: Commonwealth climate disclosure – Strategy
S3(a)	CROMP or alternative methodology	Same as R2(a), G2(a) Appendix F: Commonwealth climate disclosure – Governance
S4(a)	Current and anticipated effects on operational model	Appendix F: Commonwealth climate disclosure – Strategy
S4(b)	Description of current and anticipated effects of the risks and opportunities on the entity's operational model.	Appendix F: Commonwealth climate disclosure – Strategy
R0	Risk management objective	Achieved through R1
R1(a)	Processes and related policies	Chapter 4: Management and accountability – Corporate governance – Risk management and Appendix F: Commonwealth climate disclosure – Governance
R1(a)i	Risk assessment inputs and parameters	Appendix F: Commonwealth climate disclosure – Risk management
R1(a)ii	Nature, likelihood and magnitude of effects	Appendix F: Commonwealth climate disclosure – Risk management
R1(a)iii	Prioritising climate-related risks	Appendix F: Commonwealth climate disclosure – Risk management
R1(a)iv	Managing climate-related risks	Chapter 4: Management and accountability – Corporate governance – Risk management
R1(a)v	Monitoring climate-related risks	Chapter 4: Management and accountability – Corporate governance – Risk management and Appendix F: Commonwealth climate disclosure – Risk management
R1(a)vi	Changes to risk management processes	Appendix F: Commonwealth climate disclosure – Risk management
R1(b)	Risk management processes	Chapter 4: Management and accountability – Corporate governance – Risk management and Appendix F: Commonwealth climate disclosure – Risk management

G0	Governance objective	Achieved through G1
R1(c)	Integration of processes	Chapter 4: Management and accountability – Corporate governance – Risk management and Appendix F: Commonwealth climate disclosure – Governance
R2(a)	Regard to CROMP Approach <i>Whether (and how) the entity implements CROMP processes.</i>	Appendix F: Commonwealth climate disclosure – Governance Same as G2(a), S3 (a)
M0	Metrics and targets objective	Achieved through M1
M1(b)	Information on greenhouse gases in accordance with M3	Achieved through M3
M1(c)	Targets and progress towards targets in accordance with M5-9.	Appendix F: Commonwealth climate disclosure – Metrics and targets
M3(a)	Greenhouse gas emissions generated in tonnes CO2e	Appendix F: Commonwealth climate disclosure – Metrics and targets
M3(b)	Greenhouse gas emissions approach, inputs, assumptions and methodologies.	Appendix F: Commonwealth climate disclosure – Metrics and targets
M3(e)	Scope 2 and 3 greenhouse gas emissions using location-based and market-based for electricity-related greenhouse gas emissions.	Appendix F: Commonwealth climate disclosure – Metrics and targets
M3(f)	Confirmation of the scope 3 emissions categories included.	Appendix F: Commonwealth climate disclosure – Metrics and targets
M5	Climate-related targets	Appendix F: Commonwealth climate disclosure – Metrics and targets
M6	Approach to reviewing and monitoring targets	Appendix F: Commonwealth climate disclosure – Strategy and Metrics and targets
M8	Target scope	Appendix F: Commonwealth climate disclosure – Metrics and targets
M9	Voluntary and obligatory targets	Appendix F: Commonwealth climate disclosure – Metrics and targets





Australian Government

Safety, Rehabilitation and
Compensation Commission

Part 2: Safety, Rehabilitation and Compensation Commission Annual Report 2024–25

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About this report

The Safety, Rehabilitation and Compensation Commission (SRCC) annual report documents the activities of the SRCC from 1 July 2024 to 30 June 2025.

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**

25 September 2025

The Hon Amanda Rishworth MP
Minister for Employment and Workplace Relations
Parliament House
CANBERRA ACT 2600

Dear Minister

I am pleased to submit the annual report for the Safety, Rehabilitation and Compensation Commission (SRCC) for the financial year ending 30 June 2025.

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 stylized, handwritten signature in dark blue ink, appearing to read 'D. Oliver'.

David Oliver
Chairperson

Chairperson's review

As Chairperson, I am pleased to present my annual report, to the Minister for Employment and Workplace Relations, the Hon Amanda Rishworth MP, and the Australian Parliament, on the operations of the SRCC for the year ending 30 June 2025.

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) set out on pages 160 – 161. To fulfil its functions, the SRCC's priorities areas for 2024–25 were:

1. Operation of the Regulatory Model
2. Operation of Licensees
3. Operation of the SRCC
4. Stakeholder Engagement.

I am pleased to report that the SRCC undertook a range of activities to achieve outcomes against these priority areas. Highlights include:

- 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 2024–25 is set out in this report.

Self-insurance

During the reporting period, the SRCC granted a self-insurance licence to:

- Wilson Parking Australia 1992 Pty Ltd

The SRCC granted licence extensions, under section 105 of the SRC Act, to the following entities:

- Australian Air Express Pty Limited
- Pacific National Services Pty Ltd
- Prosegur Australia Pty Limited
- Ron Finemore Transport Services Pty Limited
- Thales Australia Limited.

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 affiliated unions was held on 12 December 2024.

The annual meeting between the SRCC and licensees was held on 13 June 2025.

The SRCC undertook a range of other stakeholder engagement activities in 2024–25, detailed within this report.

Strategic risk register

The SRCC manages current and emerging risks through its strategic risk register. In 2024–25, 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 SRC Act, operates within the Employment and Workplace Relations portfolio and reports to the Minister for Employment and Workplace Relations.

As of 13 May 2025, the responsible Minister for the SRCC is the Hon Amanda Rishworth MP, Minister for Employment and Workplace Relations.

During the reporting period, the following Ministers were responsible for the SRCC during former appointments as the Minister for Employment and Workplace Relations.

Senator the Hon Murray Watt
Minister for Employment and Workplace Relations
Period: 29 July 2024 – 13 May 2025

The Hon Tony Burke MP
Minister for Employment and Workplace Relations
Minister for the Arts
Leader of the House
Period: 1 July 2023 – 29 July 2024

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 three years, as specified in the instrument of appointment. Members are eligible for reappointment.

The SRCC comprised the following members during 2024–25:

- Mr David Oliver, Chairperson
- Ms Melissa Payne, Member nominated by the Australian Council of Trade Unions (ACTU)
- Mr Trevor Gauld, Member nominated by the ACTU¹
- Dr Deborah Vallance, Member nominated by the ACTU
- Ms Lorraine Biviano, Member nominated by the ACTU²
- Ms Louisa Hudson, Member representing the licensees
- Ms Jody Anderson, Member representing the Commonwealth and Commonwealth authorities
- Ms Marie Boland, CEO of Safe Work Australia
- Ms Catherine Hudson, Member representing the interests of the Australian Capital Territory's public sector employers
- Mr Bradley Crofts, Member with qualifications or experience relevant to the SRCC's functions, or the exercise of its powers³
- Ms Jane Hall, Member with qualifications or experience relevant to the SRCC's functions, or the exercise of its powers⁴
- The Member representing the interests of members and former members of the Defence Force position remained vacant.

1 Until 14 October 2024

2 From 4 November 2024

3 From 16 July 2024

4 From 16 July 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 5 meetings in 2024–25 on: 5 September 2024, 21 October 2024, 12 December 2024, 13 March 2025 and 12 June 2025. Details of attendance at SRCC meetings during 2024–25 are shown in table 38. Additionally, the SRCC held a number of out of session meetings in 2024–25, to support the SRCC in delivering its functions.

Table 38: SRCC meeting attendance

SRCC Members	Meetings eligible to attend	Meetings attended	Meetings attended by deputy*
David Oliver	5	5	-
Trevor Gauld	1	1	-
Melissa Payne	5	5	-
Deborah Vallance	5	4	-
Lorraine Biviano	3	3	-
Louisa Hudson	5	5	-
Marie Boland*	5	3	2
Catherine Hudson	5	5	-
Jane Hall	5	5	-
Brad Crofts	5	5	-
Jody Anderson	5	3	2

*During 2024–25, the following Deputies attended an SRCC meeting:

- Adrian Breen, Deputy to Jody Anderson
- Sarah Costelloe, Former Deputy to Marie Boland
- Angela Wallbank, Deputy to Marie Boland.

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 2025): 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 2024–25.

The SRCC did not issue any Guidelines under section 73A of the SRC Act during 2024–25.

Delegations

At its 12 December 2024 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 2024–25, with a key outcome being that the SRCC is open and transparent in its dealings with regulated entities.

The SRCC engaged with affiliated unions on 12 December 2024 and licensee representatives on 13 June 2025. The SRCC will continue to engage with the licensees and affiliated unions on current and emerging priority items.

SRCC Operational Plan

The SRCC prepare and publish an annual Operational Plan to demonstrate how it will deliver its legislated functions. The Operational Plan sets out key activities the aligned to 4 priority areas:

Key activities in 2024–25 which the SRCC delivered to meet its roles and functions are described in table xx. These activities sit under 4 key priority areas:

1. Operation of the Regulatory Model
2. Operation of Licensees
3. Operation of the SRCC
4. Stakeholder Engagement.

Deliverables towards the activities in the 2024–25 Operational Plan have been summarised in tables 39 – 42.

Regulator performance

In order to meet the requirements of the Department of Finance Resource Management Guide 128 – Regulatory Performance, 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.

The SRCC's commitment has been formalised through the Ministerial Statement of Expectations, issued to the SRCC, and our corresponding Regulatory Statement of Intent, available on the SRCC website.

Deliverables towards the SRCC Operational Plan 2024–25

Table 39: Performance towards priority area 1 – Operation of the Regulatory Model

Outcome	Reference	Activity	2024–25 Deliverables
1.1 The SRCC actively contributes to the continuous improvement of regulatory frameworks and does not unnecessarily impede the effective operation of regulated entities	Regulator performance best practice principle 1 – continuous improvement and building trust	<p>Establish and maintain a schedule to review the Licence Compliance and Performance model (LCPM), with changes to be implemented on a half yearly basis. Including</p> <ul style="list-style-type: none"> • regulatory response framework • annual review of dispute resolution 	<p>The SRCC considered and approved version 12 of the LCPM at its June 2025 meeting. Reviews of the LCPM are conducted in line with the endorsed 2022–27 LCPM review schedule.</p> <p>Changes to the LCPM</p> <p>Updates agreed at SRCC meeting No. 243, 13 March 2025:</p> <ul style="list-style-type: none"> • Attachment A: Standard Licence Template to reflect changes to the guarantee conditions of the licence template to clarify the circumstances the SRCC may call in a guarantee <p>Updates agreed at SRCC meeting No. 244, 12 June 2025:</p> <ul style="list-style-type: none"> • Section 5: Removal of target setting for Licensee Key Performance Indicator (LKPI) 3 and 4 • Section 7: Revision to include Commission Data Warehouse (CDW) submissions by fifth working day, rehabilitation and claims management system audits/reviews or equivalent success factors and all system maintenance audits/reviews or equivalent results to align with Licence Compliance and Performance Improvement (LCPI) reporting assessment and, Organisational Performance Metric (OPM) survey references and scores corrected • Section 9: Revision to reflect Scheduled Review Methodology at Year 2 • Attachment B: Revised to remove version control table • Attachment D: Revision of LKPI 6 title and Prevention and Communication correction and, Summary of LCPI Report table • Attachment E: Revised to reflect legislative amendments introducing statutory timeframes and OPM survey scores corrected • Attachment J: Re-title and revise content to reflect inclusion of Year 2 in Scheduled Review Methodology
	Regulator performance best practice principle 1 – continuous Improvement and building trust	<p>Quarterly Reviewing the Regulation of Self-Insured Licensees sub-committee (RRSIL) meetings held to consider the SRCC’s regulatory framework</p>	<p>RRSIL meetings were held on 8 August 2024, 15 November 2024 and 8 May 2025</p> <p>The February 2025 RRSIL meeting was cancelled</p>

Outcome	Reference	Activity	2024–25 Deliverables
1.2 The SRCC communicates with regulated entities in clear, targeted and effective manner	Regulator performance best practice principle 3–collaboration and engagement	Licensees consulted on changes to the LCPM and performance targets	Licensees were consulted during the review of performance measures. Consultation occurred during: <ul style="list-style-type: none"> • 12 November to 25 November 2024 regarding proposed changes to the licence template for guaranties • 14 April to 23 May 2025 regarding proposed updates to the LCPM, in relation to the Performance Assessment Methodology and non-substantive amendments
1.3 Review of premium determinations and regulatory contributions	s97K SRC Act	As required, the SRCC (through a sub-committee): <ul style="list-style-type: none"> • considers requests for review by the SRCC on a case by case basis • considers, in each case, whether Comcare has followed the SRCC's Guidelines for the Determination of Premiums and Regulatory Contributions issued under Section 97E of the SRC Act • make recommendations to the SRCC as appropriate 	No requests for review of premium or regulatory contribution determinations were received in 2024–25
		Reporting on Guidelines and review requests to the SRCC	The Comcare CEO reported compliance with the <i>Premium Determination Guidelines 2022</i> and <i>Regulatory Contributions Determination Guidelines 2022</i> on 28 January 2025
1.4 Guidance advice and directions to Comcare or licensees	s73A SRC Act s97E(1) SRC Act s97E(2) SRC Act s97H SRC Act	The SRCC issues guidance, advice and directions to the scheme with the assistance of Comcare	At its 13 March 2025 meeting the SRCC endorsed updates to the Issues of Current Interest document (which supports the Significant Matter Reporting Policy)

Table 40: Performance towards priority area 2 – Operation of Licensees

Outcome	Reference	Activity	2024–25 Deliverables
2.1 Consider licence applications	s102 – s107 SRC Act	Licence applications are considered by the SRCC against the requirements in the SRC Act and decisions made based on evidence considered	<p>Licence applications</p> <p>The SRCC considered a licence application from Wilson Parking Australia 1992 Pty Ltd at its 5 September 2024 meeting. The SRCC agreed to grant the licence for a 4-year period, to commence from 1 December 2024 through to 30 November 2028</p> <p>Licence extensions</p> <p>At its 13 March 2025 meeting, the SRCC granted licence extensions for a 4-year period to 30 June 2029 for:</p> <ul style="list-style-type: none">• Prosegur Australia Pty Limited• Ron Finemore Transport Services Pty Limited• Thales Australia Limited• Pacific National Services Pty Ltd <p>At its request, a 2-year licence extension was granted to:</p> <ul style="list-style-type: none">• Australian Air Express Pty Limited
		Comcare conducts licence application assessments on behalf of the SRCC and advises on the merits of licence applications and compliance with legislative provisions	<p>Comcare’s assessment on the merits of licence applications and extension requests against legislative requirements, along with recommendations, are tabled at each meeting where applications are considered</p> <p>In 2024–25 Comcare conducted one licence application assessment on behalf of the SRCC, for Wilson Parking Australia 1992 Pty Ltd.</p>
		Scope and conditions are set on an individual basis and reflected in licence conditions	<p>Licence scope and conditions are tabled at each meeting where applications are considered</p>
2.2 Monitoring of licensees	S89B(a) SRC Act	SRCC consideration of licensee performance reports	<p>The SRCC considered the performance of licensees at its:</p> <ul style="list-style-type: none">• 5 September 2024 meeting, for quarter 4 2023–24 reporting• 12 December 2023 meeting, for quarter 1 2024–25 reporting• 13 March 2025 meeting, for quarter 2 2024–25 reporting• 12 June 2025 meeting, for quarter 3 2024–25 reporting
		SRCC consideration of licensee prudential reporting	<p>Licensees are assessed on prudential and financial risk and performance reported at each quarterly SRCC meeting, through LCPM reporting</p> <p>In 2024–25, 4 regulatory responses occurred in relation to breaches of licence related to prudential conditions</p>

Outcome	Reference	Activity	2024–25 Deliverables
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	Licence application fees charged to Wilson Parking Australia 1992 Pty Ltd
		Charging of 2024–25 licence fees by Comcare's Chief Executive Officer under delegation from the SRCC	2024–25 licence fees were charged in July 2024. Indicative 2025–26 licence fees were notified to licensees in April 2025
2.5 Determining and implementing regulatory responses in relation to the action of licensees	Part VIII, Division 2, SRC Act Regulator performance best practice principle 2 – risk based and data driven	Maintain the regulatory decision precedent log	A register of regulatory decisions is maintained following each meeting
		Utilise the SRCC regulatory response framework	<p>The SRCC used its regulatory response framework in taking the following regulatory actions in 2024–25</p> <p>Encouragement</p> <p>In accordance with the Encouragement stage, the SRCC engaged with 4 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 SRCC engaged with 3 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 SRCC, to provide relevant information and address SRCC enquiries</p>

Table 41: Performance towards priority area – Operation of the SRCC

Outcome	Reference	Activity	2024–25 Deliverables
3.1 The SRCC 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	s89B(a) SRC Act Regulator performance best practice principle 2 – risk based and data driven	The SRCC can issue guidelines. Where required, Comcare provides reasonable resources to facilitate the development of guidelines	No guidelines were issued by the SRCC in 2024–25
		The SRCC reviews information about licensees and their performance in undertaking their functions and powers under the SRC Act Comcare collects, manages and reports data to the SRCC Comcare manages complaints made about the performance of licensees of their functions	Complaints are reported to the SRCC quarterly, as part of the LCPM reporting
		The SRCC considers, and reviews equity of outcomes reports and implements actions where required	An equity of outcomes report is provided to the SRCC twice a year The equity of outcomes report for the period ending 30 June 2024 was considered at the 5 September 2024 meeting The equity of outcomes report for the period ending 31 December 2024 was considered at the 13 March 2025 meeting
		Review and incorporate any data and digital strategies into SRCC policies	The SRCC is considering opportunities to support improvements to effective and efficient use of data to gain insights and, monitoring of licensee performance
3.2 To advise the Minister about anything relating to the operation of the SRC Act or to the SRCC's functions and powers	s89B(b) SRC Act	Outcome letters from quarterly meetings provided to the Minister	Outcome letters to the Minister were sent on: <ul style="list-style-type: none">• 1 October 2024 – outcomes of meeting 239, 5 September 2024• 23 December 2024 – outcomes of meeting 241, 12 December 2024• 10 April 2025 – outcomes of meeting 243, 13 March 2025• 26 June 2025 – outcomes of meeting 244, 12 June 2025

Outcome	Reference	Activity	2024–25 Deliverables
<p>3.3 To advise the Minister on the administration of the WHS Act</p> <p>To advise and make recommendations to the Minister on the most effective means of giving effect to the objects of the WHS Act</p> <p>To enquire into and make recommendations to the Minister on any matter relating to work health and safety referred to the SRCC by the Minister</p>	Schedule 2, Part 2, s2 (a – c) WHS Act	<p>Outcome letters from quarterly meetings provided to the Minister</p> <p>Advice to Minister as required following stakeholder forums</p> <p>Comcare drafts advice based on the SRCC's views and provides research and analysis about the operations of the Act to the SRCC</p>	<p>Outcome letters to the Minister were sent on:</p> <ul style="list-style-type: none"> • 1 October 2024 – outcomes of meeting 239, 5 September 2024 • 23 December 2024 – outcomes of meeting 241, 12 December 2024 • 10 April 2025 – outcomes of meeting 243, 13 March 2025 • 26 June 2025 – outcomes of meeting 244, 12 June 2025
3.4 SRCC endorsed annual report released including relevant licensee performance information	s89R, s89S SRC Act	Endorsement of 2023–24 annual report content	<p>The SRCC endorsed its annual report content through an email out of session meeting 238 held from 19 to 23 August 2024. This included:</p> <ul style="list-style-type: none"> • 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 • any guidelines issued by the SRCC under section 73A of the SRC Act
3.5 Actions undertaken by the SRCC are proportionate to the regulatory risk being managed	Regulator performance best practice principle 2 – risk based and data driven	<p>Regular review of strategic risk register</p> <p>Control measures monitored for effectiveness at each meeting</p>	<p>The SRCC considered:</p> <ul style="list-style-type: none"> • risks 4 and 5 at its 5 September 2024 meeting • risks 6 and 7 at its 12 December 2024 meeting • a full review of the risk register was undertaken at its 13 March 2025 meeting • risks 1 to 3 at its 12 June 2025 meeting
3.6 Governance and reporting		Review of published policies and materials	<p>The SRCC reviewed and updated the LCPM at its 13 March 2025 and 12 June 2025 meetings</p> <p>The SRCC reviewed and updated the LKPI Specifications at its 5 September 2025 and 12 December 2025 meetings</p>

Table 42: Performance towards priority area 4 – Stakeholder Engagement

Outcome	Reference	Activity	2024–25 Deliverables
4.1 Stakeholder engagement to include Minister, Comcare, licensees and union representatives The SRCC 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 1 October 2024, 23 December 2024, 10 April 2025 and 26 June 2025
		Annual consultation forum with Licensees	The annual consultation forum with licensees was held on 13 June 2025
		Updates provided to licensees by the Commissioner representing licensees following each SRCC meeting at the Licensee Liaison Forum, conducted by Comcare	Licence Liaison Forums (LLF) were held on 11 September 2024, 13 December 2024, 19 March 2025 and 13 June 2025
		Annual consultation forum with affiliates	The meeting with the affiliated unions was held on 4 December 2024 following the SRCC meeting
		The SRCC to reflect on its engagement with the Department annually	This was considered through the SRCC’s 2023–24 annual report against the operational plan, which was endorsed through out of session email meeting 238 on 19 to 23 August 2024

Notes:

¹ At its 12 June 2025 meeting, the SRCC 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. The scope of a licence determines claims management arrangements for the licensee, and whether the licensee has authorisation to arrange a third-party to manage claims on their behalf.

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 43 and 44 details Corporation and declared Commonwealth Authority licensees and their claims management arrangements as at 30 June 2025.

Table 43: Corporation licensees and claims management arrangements as at 30 June 2025

Licensee	Licence expiry date	Claims management arrangements
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	30/06/2027	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 Crawford & Company (Australia) 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	30/06/2031	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

Licensee	Licence expiry date	Claims management arrangements
Fleetmaster Services Pty Ltd	30/06/2031	In house with reconsiderations performed by Crawford & Company 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)	30/06/2029	Employers Mutual Limited
Prosegur Australia Pty Limited (formerly Chubb Security Services Limited)	30/06/2029	Linfox Australia Pty Ltd
Ramsay Health Care Australia Pty Limited	30/11/2028	QBE Insurance (Australia) Limited
Ron Finemore Transport Services Pty Limited	30/06/2029	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)	30/06/2029	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

Table 44: Declared Commonwealth Authority licensees and claims management arrangements as at 30 June 2025

Licensee	Licence expiry date	Claims management arrangements
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	Comcare

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 two 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, return to work 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 2024–25 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 LKPI 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 45 provides a summary of each licensee's claims activity during 2024–25. Table 46 provides a summary of SRCC monitoring of overall licensee performance against the LKPIs during 2024–25.

Care should be exercised in comparing the claims activity of licensees given the different risk profiles of individual employers.

Licensee data

Table 45: Licensees’ claims activity

	Number of FTE employees		Incidence of claims received ¹		Incidence of claims accepted ¹	
	2023–24	2024–25	2023–24	2024–25	2023–24 ²	2024–25 ³
Amplitel Pty Ltd	126	127	0.0	0.0	0.0	0.0
Australia and New Zealand Banking Group Limited	18,319	18,434	2.3	3.0	1.0	1.6
Australian Air Express Pty Ltd	223	223	58.3	44.8	31.4	31.4
Australian Capital Territory Government	28,620	29,783	23.3	22.6	18.0	17.9
Australian National University	4,257	4,647	6.3	7.3	3.5	5.4
Australian Postal Corporation	26,460	27,230	70.7	67.6	58.3	54.1
BevChain Pty Limited	1,029	1,029	22.4	18.5	np	np
Bis Industries Limited	335	229	98.5	56.8	92.5	48.0
Border Express Pty Ltd	1,160	1,200	20.7	22.5	14.7	14.2
BWA Group Services Pty Ltd	3,035	2,460	2.3	5.7	np	np
Cleanaway Operations Pty Ltd	8,467	9,123	25.5	28.4	20.0	19.0
Commonwealth Bank of Australia Ltd	33,246	34,384	3.4	3.3	1.7	1.1
CSL Limited	2,741	3,058	2.9	2.9	np	np
DHL Express (Australia) Pty Ltd	1,353	1,353	20.7	13.3	11.1	8.9
DHL Supply Chain (Australia) Ltd	4,864	4,864	12.3	15.6	7.0	8.0
FedEx Express Australia Pty Ltd	5,390	5,267	44.3	43.5	35.8	31.1
Fleetmaster Services Pty Ltd	383	390	28.7	25.6	18.3	17.9
John Holland Group Pty Ltd	4,105	4,209	10.0	5.7	8.5	4.0
John Holland Pty Ltd	1,266	1,010	79.0	127.7	75.8	128.7
John Holland Rail Pty Ltd	50	46	0.0	np	0.0	np
K&S Freighters Pty Limited	1,828	1,650	29.0	28.5	21.3	20.6
Linfox Armaguard Pty Ltd	1,561	1,561	14.7	12.8	6.4	4.5
Linfox Australia Pty Ltd	5,837	5,954	14.2	9.9	4.8	2.9
Medibank Private Limited	2,189	2,357	5.5	5.9	np	np
National Australia Bank Limited	27,639	27,183	2.7	3.2	1.4	1.4
Optus Administration Pty Limited	6,101	6,249	5.7	3.5	4.1	2.1
Pacific National Services Pty Ltd	2,684	2,684	21.6	21.6	15.6	16.0

	Number of FTE employees		Incidence of claims received ¹		Incidence of claims accepted ¹	
	2023–24	2024–25	2023–24	2024–25	2023–24 ²	2024–25 ³
Prosegur Australia Pty Limited	651	521	29.2	21.1	18.4	np
Ramsay Health Care Australia Pty Ltd	20,254	20,308	14.3	17.2	11.4	13.1
Reserve Bank of Australia	1,575	1,990	3.8	np	np	np
Ron Finemore Transport Services Pty Ltd	1,411	1,415	30.5	21.9	20.6	22.6
StarTrack Express Pty Limited	4,328	3,808	38.8	52.8	30.5	42.0
StarTrack Retail Pty Ltd	99	85	np	np	np	0.0
Telstra Corporation Limited	1,120	1,186	10.5	34.6	7.6	19.4
Telstra Limited	21,403	20,047	5.9	5.8	4.2	3.8
Thales Australia Limited	3,810	3,664	10.5	10.1	8.4	7.1
Virgin Australia Airlines Pty Ltd	6,473	6,649	32.3	32.0	27.7	26.5
Visionstream Pty Ltd	809	950	19.8	14.7	17.3	11.6
Wilson Parking Australia 1992 Pty Ltd 4	-	394	-	0.0	-	0.0
Wilson Security Pty Ltd	5,675	5,815	12.5	12.0	6.0	7.1
All Licensees	260,876	263,536	19.0	18.8	14.5	14.0

Notes: np – not publishable. To protect privacy, results are not published where the numbers used to calculate incidence rates are between one and five.

¹ All incidence rates are calculated per 1,000 FTE employees.

² Initially accepted in 2023–24.

³ First determined in 2024–25 and with a status of accepted at the end of that year (to accord with revised LKPI 3 criteria).

⁴ Wilson Parking Australia 1992 Pty Ltd licence commenced on 1 December 2024.

Table 46: Performance against LKPIs – All licensees

	2023–24	2024–25
Number of notifiable worker fatalities ¹	4	9
Incidence of accepted claims ^{2, 3}	14.5	14.0
Incidence of claims reaching one week of incapacity ²	8.7	8.7
Percentage of accepted claims that have experienced return to work outcomes ^{4, 5}	91%	90%
Percentage of claims determined within 20 days (injury) and 60 days (disease)	98%	99%
Percentage of reconsiderations decided within 30 days	99%	98%
Number of reconsideration requests decided	1,547	1,348
Number of ART appeals received	771	682

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 47: Recordkeeping requirements under Directions

Requirement	Number	Details
Applications for licence received	Nil	
Applications for licence withdrawn	Nil	
Refusals to grant licence	Nil	
Expiry of licence	5 extensions of licence	Australian Air Express Pty Limited Pacific National Services Pty Ltd Prosegur Australia Pty Ltd Ron Finemore Transport Services Pty Limited Thales Australia Limited
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*	1 licence granted	Wilson Parking Australia 1992 Pty Ltd
	5 variations granted due to change in scope or conditions of licence	Border Express Pty Ltd Fleetmaster Services Pty Ltd Linfox Armaguard Pty Ltd Prosegur Australia Pty Limited Visionstream Pty Ltd
Breaches of licences	26 breaches of licence	<p>2 licensees breached their licence in relation to compliance requirements with Commonwealth, state or territory safety laws:</p> <ul style="list-style-type: none"> • Australian Capital Territory, in relation to a breach of the WHS Act • Cleanaway Operations Pty Ltd, in relation to a breach of the WHS Act. <p>24 licensees breached their licence in relation to legislative and licence compliance, with:</p> <ul style="list-style-type: none"> • 17 in relation to compliance with SRC Act requirements • 4 in relation to prudential condition requirements • 3 in relation to fee condition requirements.

*The scope and conditions of licences granted by the SRCC are available on the Federal Register of Legislation.



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Glossary

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.
ANAO	Australian National Audit Office
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>
ART	Administrative Review Tribunal – The ART 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.
ATO	Australian Taxation Office
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)	<p>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.</p> <p>The Comcare Portfolio Budget Statements are contained within the Portfolio Budget Statements for the Employment and Workplace Relations Portfolio.</p>
Corporate governance	The process by which agencies are directed and controlled. It is generally understood to encompass authority, accountability, stewardship, leadership, direction and control.
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.
EAP	Employee Assistance Program
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
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
HSR	Health and Safety Representative
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.
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
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

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