Rehabilitation management system   
pre-licence AUDIT report

<Applicant name>

<Date of Pre-Licence Audit>

Disclaimer

Published by Comcare  
© Commonwealth of Australia 2021

The material contained in this publication provides guidance to people, agencies and other entities in the [Comcare scheme](https://www.comcare.gov.au/scheme-legislation/about-comcare-scheme) and to inform the general public.

Comcare frequently updates our publications, so please return to the [Comcare website](https://www.comcare.gov.au/) as required to ensure you have the latest information.

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

Copyright

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

Creative Commons Licence

The details of the relevant licence conditions and the full legal code for the licence are available on the [Creative Commons website](https://creativecommons.org/licenses/by/4.0/).

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

Use of the Coat of Arms

[Guidelines for use of the Commonwealth Coat of Arms](https://www.pmc.gov.au/government/commonwealth-coat-arms) are published by the Department of Prime Minister and Cabinet.

Contact us

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

Comcare  
GPO Box 9905 Canberra ACT 2601  
Ph: 1300 366 979  
Email: [marcomms@comcare.gov.au](mailto:marcomms@comcare.gov.au)

For the latest disclaimer and copyright advice please visit the [Comcare website](https://www.comcare.gov.au/site-information/disclaimer).

|  |  |
| --- | --- |
| **Document number** |  |
| **Version** | 2.0 |
| **Release Date** | February 2021 |
| **Release Status** | Cleared draft |
| **Approval Status** | Approved |
| **Prepared by** | Secretariat and Scheme Support Services |
| **Confidentiality Category** | Unclassified |

Contents

[SCOPE OF pre-licence audit 5](#_Toc64634667)

[EXECUTIVE SUMMARY 7](#_Toc64634668)

[TABLE OF CRITERIA 9](#_Toc64634669)

[ELEMENT 1: COMMITMENT AND CORPORATE GOVERNANCE 11](#_Toc64634670)

[ELEMENT 2: PLANNING 12](#_Toc64634671)

[ELEMENT 3: IMPLEMENTATION 14](#_Toc64634672)

[ELEMENT 4: MEASUREMENT AND EVALUATION 17](#_Toc64634673)

[ELEMENT 5: Review and improvement 19](#_Toc64634674)

# 

# SCOPE OF pre-licence audit

|  |  |
| --- | --- |
| **Organisation** | [Applicant name] |
| **Site/Workplace** | [location] |
| **Scope of evaluation** | The pre-licence audit examined [applicant name]’s rehabilitation management system, processes and outcomes to validate that [applicant name]’s proposed arrangements for the management of rehabilitation of employees have the capacity to meet the Safety, Rehabilitation and Compensation Commission’s (the Commission’s) standards and the requirements of the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act).  The pre-licence audit encompassed a review of all relevant available policies and procedures as they relate to rehabilitation and return to work management and any other relevant supporting documentation. An interview was also conducted with rehabilitation personnel.  Overall findings are based on the identification of issues that are considered to be systemic rather than minor deficiencies. |
| **Pre-licence audit criteria** | This pre-licence audit assessed the rehabilitation management system against five elements:   1. Commitment and corporate governance (three criteria) 2. Planning (four criteria) 3. Implementation (seven criteria) 4. Measurement and evaluation (six criteria) 5. Review and improvement (one criterion) |
| **Ratings** | The findings in the pre-licence audit report have been classified and marked as follows:  **Conformance:** the standard is fully met.  **Capacity to meet:** there is sufficient evidence to demonstrate how the standard will be met upon licence commencement.  **Non-conformance:** the standard is not met and there is insufficient evidence to establish and verify how the standard will be satisfied upon licence commencement.  An ‘observation’ may be made against a criterion rated as ‘conformance’ where the auditor has identified that there has been a minor deviation from the documented management system or reference criteria that would need to be addressed prior to the commencement of the licence. |
| **Date(s) of pre-licence audit** | Date |
| **Auditors** | [auditor names and organisation] |
| **Client contacts** | list |
| **Record of pre-licence audit** | This report contains a summary of the pre-licence audit outcomes. Detailed information is not recorded in the report. A record of the documentation and records sighted, persons interviewed, observations and assessor comments are retained on the auditor’s file. |
| **Acknowledgement** | The auditor(s) wishes to acknowledge the cooperation and assistance provided by the management and staff of [applicant name] and thank them for their contribution to the pre-licence audit process. |

# EXECUTIVE SUMMARY

[the auditor is to provide an overall summary of findings—succinctly outlining the broad strengths and weaknesses of the management system—in particular, an assessment of the applicant’s capacity to meet the Commission’s requirements by the commencement of the licence]

## Non-conformances

A number of non-conformances were identified during the pre-licence audit. They are:

|  |  |
| --- | --- |
| **Criterion** | **Non-conformance** |
|  |  |
|  |  |
|  |  |
|  |  |

## Observations

A number of observations were identified during the pre-licence audit. They are:

|  |  |
| --- | --- |
| **Criterion** | **Observation** |
|  |  |
|  |  |
|  |  |
|  |  |

## Result

In summary, for the 21 rehabilitation management criteria which are applicable, the outcomes are:

|  |  |
| --- | --- |
|  | **Number of criteria** |
| **Conformance** |  |
| **Capacity to meet** |  |
| **Non-conformance** |  |

*If a non-conformance is identified through the pre-licence audit process, it will need to be addressed before the Commission will consider the licence application.*

*Any criteria that have been rated as ‘Capacity to meet’ will be reviewed as part of the applicant’s transition plan, as part of the applicant’s corrective action plan (CAP) or, if required, at a post-licence audit.*

A corrective action plan (CAP), addressing both non-conformances and observations, and which includes completion/review dates and responsibilities, must be developed by [enter timeframe] and submitted to Comcare for review. Ideally, the CAP should also outline progress against those criteria rated ‘Capacity to meet’.

The auditors invite [applicant name] to discuss any aspect of this evaluation with the auditors.

|  |  |
| --- | --- |
| Signed | Signed |
| Auditor name | Auditor name |
| Date | Date |

# TABLE OF CRITERIA

|  |  |  |
| --- | --- | --- |
| **Pre-licence audit element/criterion description** | **Criterion** | **Rating** |
| **1. Commitment and corporate governance** | | |
| Documented commitment | 1.1 |  |
| Internal and external accountability | 1.2 |  |
| Identify, assess and control risk | 1.3 |  |
| **2. Planning** | | |
| Delegation schedule | 2.1 |  |
| Planning for legislative compliance | 2.2 |  |
| Setting objectives and targets | 2.3 |  |
| Plans to achieve objectives and targets | 2.4 |  |
| **3. Implementation** | | |
| Adequate resources | 3.1 |  |
| Communication—relevant stakeholders | 3.2 |  |
| Employees are aware of rights | 3.3 |  |
| Training and competency | 3.4 |  |
| Early intervention | 3.5 |  |
| Privacy and confidentiality | 3.12 |  |
| Reporting, records, documentation | 3.13 |  |
| **4. Measurement and evaluation** | | |
| Monitoring core rehabilitation activities | 4.1 |  |
| Monitoring provider performance | 4.2 |  |
| Internal audits | 4.3 |  |
| Outcomes of audits are actioned and reviewed | 4.4 |  |
| Communicating audit results | 4.5 |  |
| Providing reports to Comcare and Commission as requested | 4.6 |  |
| **5. Review and improvement** | | |
| Continuous improvement | 5.1 |  |

*\* Note: Criteria 3.6 – 3.11 are not tested at the pre-licence audit stage*

# ELEMENT 1: COMMITMENT AND CORPORATE GOVERNANCE

## Documented commitment

### Criterion 1.1

The applicant will set the direction for its rehabilitation management system through a documented commitment by senior executive.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

## Corporate governance

### Criterion 1.2

The rehabilitation management system will provide for internal and external accountability.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

### Criterion 1.3

The applicant will identify, assess and control risks to the rehabilitation management system.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

# ELEMENT 2: PLANNING

## Administrative arrangements

### Criterion 2.1

The applicant has a delegation schedule to be signed by the principal officer, as per section 41A of the SRC Act, including arrangements for possible suspension of entitlements and the management of reconsiderations.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

## Rehabilitation planning

### Criterion 2.2

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

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

### Criterion 2.3

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

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

### Criterion 2.4

The applicant establishes plans to:

(i) achieve its objectives and targets

(ii) promote continuous improvement

(iii) provide for effective rehabilitation arrangements.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

# 

# ELEMENT 3: IMPLEMENTATION

## Resources

### Criterion 3.1

The applicant will allocate adequate resources to support its rehabilitation management system.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

## Communication and awareness

### Criterion 3.2

The applicant will define and communicate responsibilities to relevant stakeholders.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

### Criterion 3.3

The applicant will communicate relevant information regarding the rehabilitation process to its employees, including their rights and obligations.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

## Training

### Criterion 3.4

The applicant has identified training requirements and will develop and implement training plans to ensure personnel are competent.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

## Early intervention

### Criterion 3.5

The applicant will implement an early intervention program, including the early identification and notification of injury.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

## Confidentiality

### Criterion 3.12

The applicant will maintain the confidentiality of information and apply legislative requirements.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

## Document management

### Criterion 3.13

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

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

# ELEMENT 4: MEASUREMENT AND EVALUATION

## Monitoring

### Criterion 4.1

The applicant will monitor planned objectives and performance measures for core rehabilitation management activities.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

### Criterion 4.2

The applicant will monitor rehabilitation providers’ performance in terms of quality of service delivery, costs, progress reports and outcomes.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

## Auditing and reporting

### Criterion 4.3

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

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

### Criterion 4.4

Audit outcomes will be appropriately documented and actioned. The applicant will report to senior executive on its rehabilitation management system performance, including audit outcomes.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

### Criterion 4.5

The applicant will communicate the outcomes and results of rehabilitation management system audits to its employees.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

### Criterion 4.6

The applicant will provide the Commission or Comcare with reports or documents as requested.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |

# ELEMENT 5: Review and improvement

## Continuous improvement

### Criterion 5.1

The applicant will analyse rehabilitation management system performance outcomes against documented objectives to determine areas requiring improvement, and promote and implement continuous improvement strategies.

### Finding

|  |
| --- |
| **Evidence**: |
| **Comment**: |
| **Observations**: |
| **Non-conformances**: |