



Australian Government
Comcare

CORPORATE PLAN **2024-25**



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Contents

Introduction	1
CEO's introduction	1
Acknowledgement of country	1
Our Corporate Plan	2
About Comcare	3
Subsidiaries and supporting entities	3
The Comcare scheme	4
Operating Context	5
Environment	5
Cooperation	6
Partnering with the Australian Public Service Commission	6
Comcare Strategy 2024–2028	7
Refocusing our strategy towards 2028	7
Structure of our strategy	8
Risk oversight and management	9
Performance against our strategic priorities and key activities	10
Regulator performance	10
Strategic Priority Features	11
Capability	17
Workforce capability	17
APS Strategic Commissioning Framework	18
Infrastructure capability	18
ICT Capability	19
Appendix A – Corporate plan content requirements	20
Appendix B – Stakeholder acronyms	21
Appendix C – Changes to 2023–24 performance measures	22

List of tables

Table 1: Summary of Comcare's core roles	3
Table 2: Environmental Change Drivers and Considerations	5
Table 3: Strategic risk statements	9
Table 4: List of Corporate Plan Requirements	20
Table 5: Stakeholder Acronyms	21
Table 6: Changes to 2023–24 Performance Measures	22

List of figures

Figure 1: High level Comcare Planning and Performance Framework	2
Figure 2: Comcare scheme composition	4
Figure 3: Comcare external stakeholders	6
Figure 5: Comcare Strategy elements	8
Figure 6: Comcare People Strategy Vision, Target Outcomes and Employee Experience	17
Figure 7: Comcare office location	18
Figure 8: Comcare ICT and Digital Strategy Guiding Principles and Priorities	19

Introduction



CEO Greg Vines

CEO's introduction

As the accountable authority of Comcare, I present the Comcare Corporate Plan for 2024–25, which covers the reporting periods 2024–25 to 2027–28 as required under section 35(1)(b) of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act).

This is an exciting milestone for Comcare as we start 2024–25 with new strategic priorities, key activities and aspirations to refocus our efforts and investments to deliver towards our purpose, **Promote and enable safe and healthy work**. This year we will implement a strategic roadmap, embed our new strategic priorities and look at new ways of working to ensure effective delivery.

Greg Vines

Comcare Chief Executive Officer (CEO)



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 elders past and present.

Healing Hands
by Dion Devow of DDesigns

Our Corporate Plan

Our Corporate Plan is our primary external planning document that provides Parliament, the public and our clients and stakeholders with an understanding of:

- our purpose
- roles and responsibilities
- strategic priorities and key activities
- operating context
- how we will measure performance.

Our Corporate Plan provides more context to the performance information detailed in our Portfolio Budget Statements (PBS), and is one component of publications required under the [Commonwealth Performance Framework](#).

Our PBS and Corporate Plan are prepared based on our new Comcare Strategy 2024–2028 and supporting enabling strategies. We have developed 4-year roadmaps of work against our strategic and enabling priorities that will be operationalised through group business plans and individual performance development plans. Delivery and performance will be managed and monitored through our governance and reporting frameworks.

We report our performance against the commitments in our PBS and Corporate Plan externally through our Annual Report, which includes our Annual Performance Statements and Financial Statements.

We are a work health and safety regulator. Government expectations on how we regulate are set out in our Ministerial Statement of Expectations. Our Regulator Statement of Intent confirms how we will deliver on these expectations.

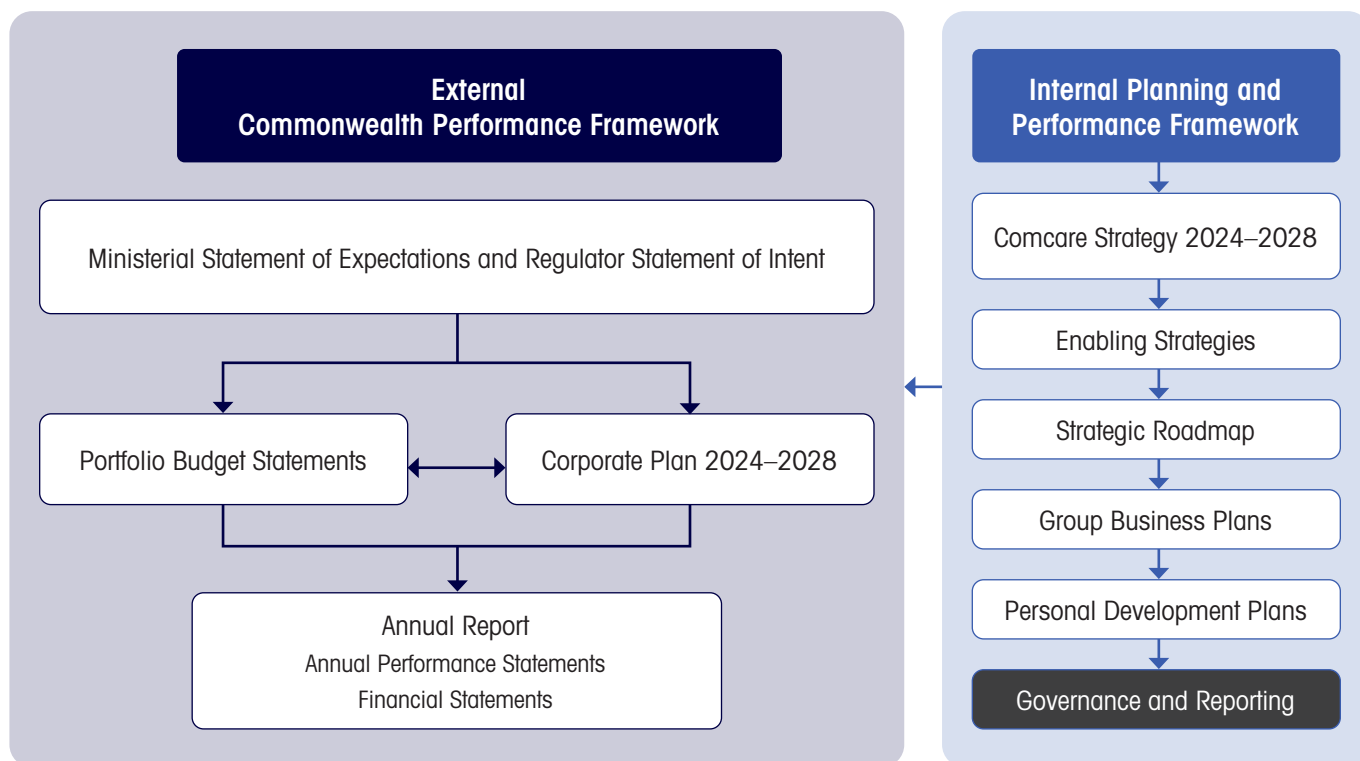


Figure 1: High level Comcare Planning and Performance Framework

Our Corporate Plan has been prepared in accordance with the content requirements of the *Public Governance, Performance and Accountability Rule 2014* (PGPA Rule). [Appendix A](#) provides a list of content requirements and how we have met them throughout the document.

About Comcare

Comcare is established under the *Safety, Rehabilitation and Compensation Act 1988* (SRC Act) and is the national authority for work health and safety and workers' compensation. 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.






Comcare is an Agency within the Employment and Workplace Relations Portfolio and classified as a Corporate Commonwealth entity.

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

We have several important core roles as a regulator, scheme manager, insurer and claims manager represented in Table 1. We also have essential enabling roles, focused on supporting education, engagement and better practice approaches to health and safety across our scheme and the capability and capacity of our own workforce.

Our purpose is to promote and enable safe and healthy work

Table 1: Summary of Comcare's core roles

 <h3>Regulator</h3> <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. 	 <h3>Scheme manager</h3> <p>We manage the Comcare workers' compensation scheme which covers premium paying employers and self-insured licensees 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 under the SRC Act • providing support through expert advice and services to the SRCC and the Seafarers Safety, Rehabilitation and Compensation Authority (Seacare Authority), and supporting the SRCC to manage and monitor self-insured licensees.
 <h3>Claims manager</h3> <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. 	 <h3>Insurer</h3> <p>We set and collect premiums specific to each Australian Government agency to meet our claims liability and claims administration costs.</p>
 <h3>Enabling roles and services</h3> <p>Education Partnerships and Engagement Research Policy Legal Governance Communications Strategy Program and Project delivery Property Finance and Procurement Information Management Technology</p>	

Subsidiaries and supporting entities

We do not have any subsidiary bodies. We have a duty under the SRC Act to provide secretariat support and other assistance to the SRCC and Seacare Authority. The SRCC and Seacare Authority do not employ their own staff. Comcare make its staff and resources available to enable them to perform their respective functions and exercise their powers.

The Comcare scheme

The Comcare 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 including government services, defence, law enforcement, transport, logistics, financial, banking services, health services, manufacturing, construction, telecommunications, and postal services.

The Comcare scheme encompasses two separate jurisdictions, each delivering consistent outcomes to a diverse range of employees.

The workers' compensation scheme under the SRC Act covers:

- employees of Australian Government agencies and authorities
- employees of national companies licensed by the SRCC (including ACT Government)
- individuals making claims against the Commonwealth for asbestos-related conditions.

The work health and safety scheme under the WHS Act covers:

- employees of Australian Government agencies and authorities
- employees of some national companies licensed by the SRCC
- employees of private companies with majority Commonwealth ownership
- members of the Australian Defence Force (ADF) while not at war (including reservists and cadets).

As of 30 June 2024, our scheme comprised of:

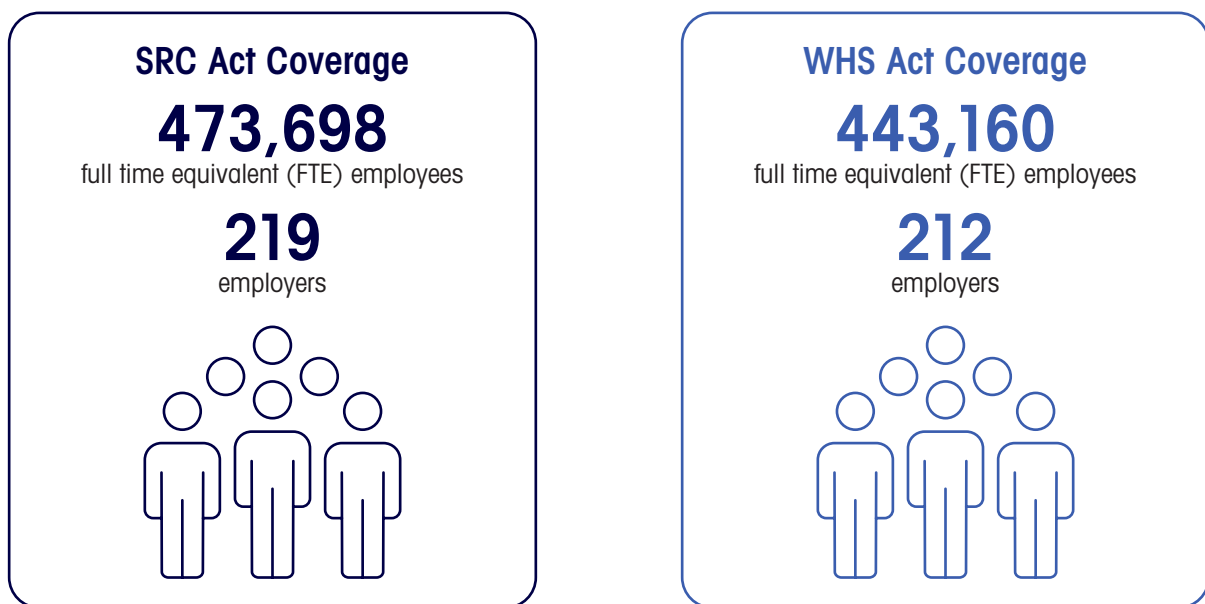


Figure 2: Comcare scheme composition








Operating Context

Environment

Over the coming decade, our operating environment will present several challenges and opportunities for which Comcare needs to prepare. Our refocused strategy has been developed to address and respond to a range of challenges, risks, commitments, and opportunities which will impact our workforce.

The 5 key trends most likely to impact Comcare’s environment in the next 10 years include:

Table 2: Environmental Change Drivers and Considerations

Change driver	Considerations
<p>1  Legislative reform and shifts in the nature and volume of incidents, notifications, injuries and illnesses</p>	<ul style="list-style-type: none"> • Preparing for and responding to changes to the SRC and WHS legislation. • Ensuring our clients and stakeholders are informed and supported through legislative change. • Rise in work related psychological injuries and claims. • Increased focus on prevention activities to achieve better work health and safety outcomes.
<p>2  Shifts in ways of working patterns</p>	<ul style="list-style-type: none"> • Competition for talent and higher employee expectations. • Changes to the uptake in casualised work, short term roles and contractors. • Aging workforce. • Remote work and flexible working arrangements. • Building a diverse and inclusive workplace environment.
<p>3  Rapid advancements in technology including Generative AI on the rise</p>	<ul style="list-style-type: none"> • Rapid advancements in technology including the increased digitisation and use of big data and generative artificial intelligence. • Data protection and privacy needs, new opportunities for data sharing, and increasing cyber-crime, impacting the efficiency and effectiveness of operations. • Rapid technological innovation raising citizen’s expectations for transparency and productivity.
<p>4  Increasing customer expectations on Government and the Public Service</p>	<ul style="list-style-type: none"> • Recognising and responding to the increase in demand for customer-centric service models. • APS Reform: Working towards a vision for a stronger public service. • Rise in climate, environmental, and sustainability considerations.
<p>5  Increased fiscal and economic pressures</p>	<ul style="list-style-type: none"> • Fiscal and economic pressures such as higher inflation and interest rate changes affect our liabilities. • Demonstrating the economic and productivity benefits of investing in work health and safety to our clients and stakeholders.

Cooperation

We engage and collaborate with a wide range of stakeholders at strategic and operational levels to achieve our purpose to promote and enable safe and healthy work. We consider both external and internal stakeholders in the development and delivery of our services and work toward our strategy.

For some stakeholders, Comcare may have just one role and relationship. For others there can be multiple roles and relationships at various levels. These could range from WHS regulation, workers’ compensation, information, guidance, education through to strategic partnership, influence and support to promote and enable safe and healthy work.

We seek to communicate, collaborate, partner, influence and work with our stakeholders in a manner that ensures we are:

- service oriented and client centric
- consistent and responsive
- a trusted institution and industry leader.

Comcare’s Engagement Strategy and Stakeholder Engagement Framework guide our approach. Our approaches to engagement include:

- informing or educating through a range of communication channels
- listening to and involving our stakeholders to ensure issues, concerns and insights are understood
- working together with our stakeholders to design and deliver client-centric services

Figure 3 represents some of the external stakeholders we engage and collaborate with.

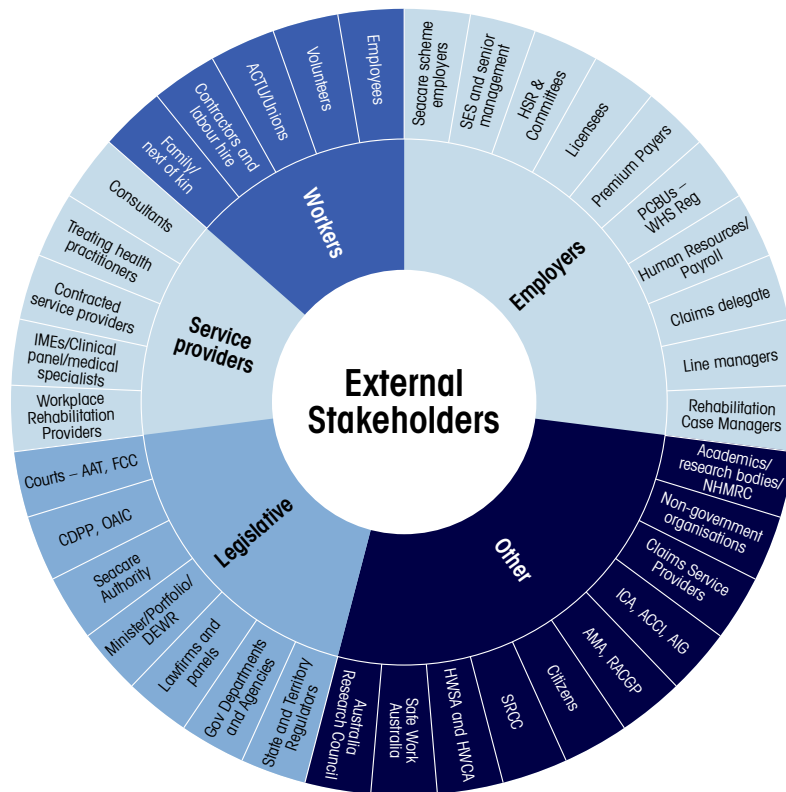


Figure 3: Comcare external stakeholders

Acronyms used in Figure 3 are explained in [Appendix B: Stakeholder Acronyms](#).

Cooperation Example – Partnering with the Australian Public Service Commission

Comcare has secured federal funding through the Australian Public Service (APS) Capability Reinvestment Fund to deliver a new initiative with the Australian Public Service Commission – Building safety and integrity capability. The work will focus on delivering 3 complementary projects to build APS leadership capability in psychological and psychosocial safety, through the application of good work design principles.

Comcare Strategy 2024–2028

Refocusing our strategy towards 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 workers, employers and other stakeholders, while also considering the opportunities of rapid advances in technology and implications of the changing landscape of cybersecurity.

We are starting 2024–25 with a revised strategy to ensure we can respond to the issues of today while adapting for the future. We are building on the important work we’re already doing, and continuing to evolve our services with our clients’ needs at the centre.

The Comcare Strategy 2024–2028 refocuses our efforts and investments to deliver against, and make an impact towards, 2 key 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 will be 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.**

A foundational value that will underpin how we deliver our strategy is **earning and strengthening trust internally and with our stakeholders.**

We have developed roadmaps with a 4-year horizon of work against each priority that captures the work we have in flight and new ideas for potential delivery in the future.

As we embed our strategy this year, we will be considering new ways of working, governance and reporting arrangements and the leadership and capability needed to ensure we are set up to effectively deliver towards our purpose and revised strategic priorities and performance measures.

Our Purpose – Promote and enable safe and healthy work



Figure 4: Comcare Strategy 2024–2028

Structure of our strategy

We have built our strategy around the following elements. Our [Strategic Priority Features](#) bring all the elements together to define what we aspire to achieve against our purpose and strategic priorities and how we will measure performance over the lifetime of this plan.

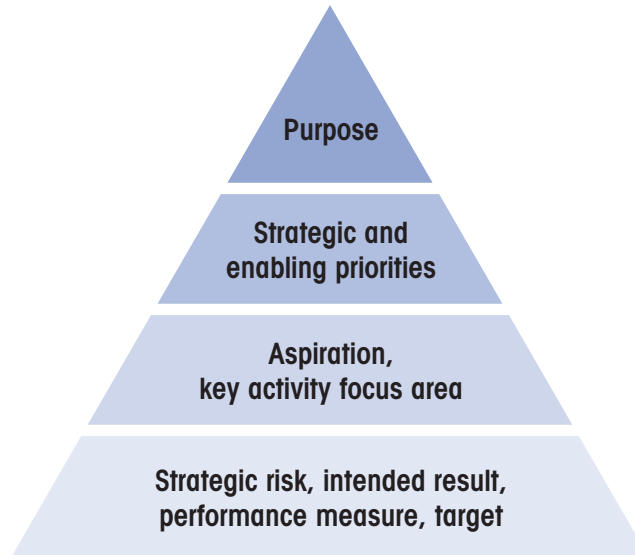


Figure 5: Comcare Strategy elements

Element	Description
Purpose	What our agency is here to do.
Strategic priorities	Core objectives of our strategy that drive how we deliver towards our purpose and direct agency effort and decision making.
Enabling priorities	Foundational capability we need to deliver our strategic priorities and direct agency effort and decision making.
Aspiration	The future state we aspire to achieve by 2028 to guide our key activities, performance measures and supporting projects and initiatives.
Key activity	Scope of the strategic or enabling priority that our performance measures and supporting projects and initiatives are aligned to.
Focus area	Represents the common goal supporting projects and initiatives under each key activity aim to achieve.
Strategic risk	Comcare’s key risks aligned to each strategic and enabling priority and the intended results.
Intended result	Results we expect by delivering towards our strategic priorities, key activities and aspirations.
Performance measure	Metrics used to measure performance against intended result.
Target	Targets used to drive performance and confirm if we have achieved our intended result.



Risk oversight and management

Effective risk oversight and management is an integral part of all aspects of Comcare’s business. It drives and supports our ability to effectively deliver on our strategic priorities over the period of this plan.

Comcare’s Risk Oversight and Management Policy and Framework is applied to all our activities and facilitates a positive risk culture where risks are identified early and openly and managed in a way that supports the delivery of our business priorities. It aligns with the Commonwealth Risk Management Policy and the international risk management standard (ISO 31000:2018).

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

We have specific risk management roles and 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. All employees are required to complete online fundamentals of risk management training to identify and mitigate risks that will impact their work and their team’s outcomes.

Comcare’s Chief Operating Officer is the delegated Risk Champion supporting the Chief Executive Officer with oversight of the framework. Risk management oversight and reporting is also incorporated into our governance structure through the Executive Committee and Operations Committee. Our Audit and Risk Committee provides independent, external advice on the appropriateness of Comcare’s system of risk oversight and management.

Comcare’s key risks are directly aligned to our strategic priorities and intended results of our performance measures, represented in the table below and within the [Strategic Priority Features](#). The key mitigation strategies for the strategic risks are the key activities and focus areas within the Strategic Priority Features. The CEO with the Executive Committee confirms strategic risk at least annually. These are reviewed and reported quarterly to the Executive Committee and Audit and Risk Committee.

Table 3: Strategic risk statements

Priority	Strategic risk statement
Prevent work-related injuries	1. Our activities are not designed or targeted appropriately to prevent work related injuries, especially psychosocial prevention is not driving positive change with employers and employees.
Deliver better return to work outcomes	2. Complicated processing and delayed decision making of claims impedes better return to work outcomes.
Making data-driven decisions	3. Our inability to deliver support and interventions for the recovery needs of injured employees, focusing on psychological injuries, impedes their returning to work.
Uplifting leadership, effectiveness and efficiency	4. Our data capability is not sufficiently mature to support meaningful, transparent and consistent decision making.
Delivering client-centric services	5. The lack of empowered, quality leadership and direction is deteriorating Comcare’s purpose, performance, effectiveness and efficiency.
Earning and strengthening trust internally and with our stakeholders	6. Our scheme is not financially sustainable to achieve our priorities.
	7. Our services are not appropriately designed and delivered to meet the changing needs of our clients leading to client dissatisfaction and immaturity of our service delivery capability.
	8. Weaknesses in our culture, collaboration and innovation cause our stakeholders to lose trust in Comcare’s advice and decisions.

Performance against our strategic priorities and key activities

We have revised our performance measures and targets as part of refocusing our strategy for 2024–2028. We have shifted to a smaller set of specific measures and targets that are better aligned to our strategic priorities that will measure performance against our key activities and towards our aspirations. Our performance measures and targets are detailed within our [Strategic Priority Features](#). [Appendix C](#) provides a record of changes we have made to our 2023–24 performance measures.

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 against our refocused strategy that will set us up for more impactful performance reporting in the years to come. Actions and outcomes against performance measures and targets will be actively monitored throughout the year, with quarterly reporting to Comcare’s Executive Committee and Audit and Risk Committee. Final results will be published through our Annual Performance Statements in our Annual Report. Performance measures and targets will be formally reviewed annually in line with our planning process.

Regulator performance

Comcare has work health and safety regulatory functions and powers for compliance and enforcement under the SRC Act and WHS Act.

We are committed to applying the 3 principles of regulatory best practice through delivery of our strategy and regulatory operations, as required by [Department of Finance Resource Management Guide 128](#). This commitment has been formalised through the Ministerial Statement of Expectation issued to Comcare and our corresponding Regulatory Statement of Intent, available on our website.

Our revised performance measures and targets for 2024–25 consider linkages to the 3 principles of best practice. Linkages are highlighted using the principle icons below.



Principle 1: Continuous Improvement and building trust

Regulators adopt a whole-of-system perspective, continuously improving their performance, capability and culture to build trust and confidence in Australia’s regulatory settings.

The Government expects all regulators to commit to continuous improvement in their processes, governance and capabilities, and identify and develop organisational values and a positive culture that supports best practice.



Principle 2: Risk based and data driven

Regulators manage risks proportionately and maintain essential safeguards while minimising regulatory burden, and leveraging data and digital technology to support those they regulate to comply and grow.

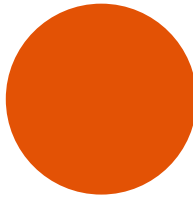
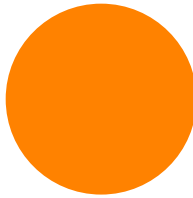
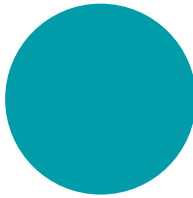
The Government expects regulators to weigh the efficiency and cost-effectiveness of their regulatory actions, seeking to impose the least burden on those that are regulated while maintaining essential safeguards.



Principle 3: Collaboration and engagement

Regulators are transparent and responsive communicators, implementing regulations in a modern and collaborative way.

Strategic Priority Features





Prevent work-related injuries

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.

Key activity	Focus areas	Strategic risk statement
<p>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.</p>	<ul style="list-style-type: none"> • Optimise regulatory and safe work approaches • Enable employers to prevent work-related injuries • Improve prevention through insights, innovation and influence 	<p>Our activities are not designed or targeted appropriately to prevent work related injuries, especially psychosocial prevention is not driving positive change with employers and employees.</p>

Performance summary				
Intended result	Performance measure	Targets	Rationale	Measure type, methodology and data source
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 positive change in employers and employees.	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 positive change in employers and employees as a result of our prevention initiatives. The targets for this measure will change in the coming years as we develop and embed the evaluation framework.	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.
	Regulatory best practice principle link: 1, 2, 3	2024–25 ✓ 2025–26 TBC 2026–27 TBC 2027–28 TBC		
	2. Average Commonwealth premium rate.	1% of payroll or lower.	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. Agencies can reduce their premiums by reducing claim costs through prevention of work-related injuries. Changes to the premium rate represent the effectiveness of our prevention initiatives for employers in our Scheme.	Type: Quantitative, effectiveness. Methodology: Sum of Commonwealth premium amounts / sum of Commonwealth payrolls. Data sources: Commonwealth agency payroll submissions data and actuarial premium reports.
	Regulatory best practice principle link: 1	2024–25 ✓ 2025–26 ✓ 2026–27 ✓ 2027–28 ✓		
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.	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 WHS compliance between Comcare’s initial inspection and subsequent verification inspection, together with direct feedback from entities on improvements to their WHS systems as a result of our activities, provides a strong measure of how we are driving and influencing positive health and safety outcomes.	Type: Quantitative, effectiveness. Methodology: Results for 2 data sets: A: % of person’s conducting a business or undertaking (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 WHS systems and practices’. Data sources: Integrated Regulatory Information System Data, Inspector Reports and Annual Comcare Employer Survey Results.
	Regulatory best practice principle link: 1, 2, 3	2024–25 ✓ 2025–26 TBC 2026–27 TBC 2027–28 TBC		



Deliver better return to work outcomes

2028 Aspiration We partner with our stakeholders to provide leading return to work guidance and services, significantly improving return to work outcomes for employees.

Key activity	Focus areas	Strategic risk statement
<p>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.</p>	<ul style="list-style-type: none"> • Improve the claims experience and operations • Enable employers to improve return to work outcomes • Improve return to work outcomes through insights, innovation and influence 	<ul style="list-style-type: none"> • Complicated processing and delayed decision making of claims impedes better return to work outcomes • Our inability to deliver support and interventions for the recovery needs of injured employees, focusing on psychological injuries, impedes their returning to work

Performance summary												
Intended result	Performance measure	Targets	Rationale	Measure type, methodology and data source								
Our decisions are timely on claims for compensation.	4. % of determinations on injury and disease claims for compensation are made within statutory timeframes.	<p>a. 100% of determinations made for injury claims are made within 20 calendar days.</p> <p>b. 100% of decisions made for disease claims are made within 60 calendar days.</p> <table border="1"> <tr> <td>2024-25</td> <td>2025-26</td> <td>2026-27</td> <td>2027-28</td> </tr> <tr> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> </tr> </table>	2024-25	2025-26	2026-27	2027-28	✓	✓	✓	✓	<p>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 Regulations.</p> <p>Comcare’s ability to make timely decisions on claims for compensation demonstrates our commitment to support one component of the return to work process for employees.</p>	<p>Type: Quantitative, Efficiency.</p> <p>Methodology: Numbers of days taken to make a determination on a claim from the date of receipt by the statutory timeframes in Section 11A of the <i>Safety, Rehabilitation and Compensation Regulations 2019</i>. Exclude the days not counted for the reasons specified under Section 11A(3).</p> <p>Data Source: Comcare’s internal claims management system and the Commission Data Warehouse.</p>
2024-25	2025-26	2026-27	2027-28									
✓	✓	✓	✓									
Our support and interventions lead to employees in our scheme returning to work.	5. % return to work rate.	<p>85% for accepted claims initially determined within the previous 24 months.</p> <table border="1"> <tr> <td>2024-25</td> <td>2025-26</td> <td>2026-27</td> <td>2027-28</td> </tr> <tr> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> </tr> </table>	2024-25	2025-26	2026-27	2027-28	✓	✓	✓	✓	<p>Comcare’s return to work rate is an indicator of how effective our support and interventions are to better meet the recovery needs of employees.</p>	<p>Type: Quantitative, Effectiveness.</p> <p>Methodology: The percentage and volume of accepted claims that have experienced return to work outcomes.</p> <p>Data sources: Comcare’s internal claims management system and the Commission Data Warehouse.</p>
2024-25	2025-26	2026-27	2027-28									
✓	✓	✓	✓									





Making data driven decisions

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.

Key activity	Focus areas	Strategic risk statement
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.	<ul style="list-style-type: none"> • Generate insights through data and analytics • Improve data infrastructure and technology • Build internal capability and innovate 	Our data capability is not sufficiently mature to support meaningful, transparent and consistent decision making.

Performance summary				
Intended result	Performance measure	Targets	Rationale	Measure type, methodology and data source
Our data capability matures over time.	6. Maturity rating against Comcare's Data & Analytics Maturity Model.	Data maturity rating of level 2 or above.	Increases to our data maturity level demonstrates progress towards achieving our aspiration to be a data-led organisation.	Type: Qualitative, effectiveness. Methodology: Self-assessment, including interviews against specified criteria in Comcare's Data & Analytics Business Value & Capability Maturity Model to gain a score that determines the overall maturity rating. Data Source: Data maturity assessment tool and evaluation assessment.
	Regulatory best practice principle link: 2 	2024-25 ✓ 2025-26 2.5 or above 2026-27 3 or above 2027-28 4 or above		
	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.	Stakeholder feedback demonstrates performance towards enabling transparent and consistent engagement with our data and reporting products.	Type: Quantitative, effectiveness. Methodology: Total positive response to question in Comcare's Employer survey 'How satisfied are you with your ability to access data and reporting products from Comcare'. Data source: Annual Comcare Employer Survey Results.
	Regulatory best practice principle link: 2 	2024-25 ✓ 2025-26 ✓ 2026-27 ✓ 2027-28 ✓		



Uplifting leadership, effectiveness and efficiency

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.

Key activity	Focus areas	Strategic risk statement
<p>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.</p>	<ul style="list-style-type: none"> Improve leadership and governance effectiveness Enhance our people experience Strengthen funding and cost-recovery arrangements Enhance foundational ICT 	<ul style="list-style-type: none"> The lack of empowered, quality leadership and direction is deteriorating Comcare’s purpose, performance, effectiveness and efficiency Our scheme is not financially sustainable to achieve our priorities

Performance summary

Intended result	Performance measure	Targets	Rationale	Measure type, methodology and data source				
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.	The results of this measure represent our people’s views on the effectiveness of Comcare’s leadership at certain points in the reporting period.	<p>Type: Quantitative, effectiveness.</p> <p>Methodology: Average of the final index score for ‘SES leadership’ and the index score of the ‘Immediate Supervisor’ question (EL1 and above) from the annual APS Census, and results of the same question in our internal pulse poll.</p> <p>Data Source: Annual APS Census Results for Comcare and survey results from Comcare’s internal pulse poll.</p>				
		<table border="1"> <tr> <th>2024–25</th> <th>2025–26</th> <th>2026–27</th> <th>2027–28</th> </tr> <tr> <td>✓</td> <td>TBC</td> <td>TBC</td> <td>TBC</td> </tr> </table>			2024–25	2025–26	2026–27	2027–28
2024–25	2025–26	2026–27	2027–28					
✓	TBC	TBC	TBC					
Our scheme is financially sustainable.	9. Employee engagement with Comcare’s purpose and objectives scores.	Establish a baseline and define targets for 2025–26 and beyond.	The results of this measure represent our people’s views on how engaged they are with Comcare’s purpose and the objectives of our strategy at certain points in the reporting period.	<p>Type: Quantitative, effectiveness.</p> <p>Methodology: Average of the ‘Employee Engagement’ Index Score’ from the annual APS Census, and results of the same question in our internal pulse poll.</p> <p>Data source: Annual APS Census Results for Comcare and survey results from Comcare’s internal pulse poll.</p>				
		<table border="1"> <tr> <th>2024–25</th> <th>2025–26</th> <th>2026–27</th> <th>2027–28</th> </tr> <tr> <td>✓</td> <td>TBC</td> <td>TBC</td> <td>TBC</td> </tr> </table>			2024–25	2025–26	2026–27	2027–28
2024–25	2025–26	2026–27	2027–28					
✓	TBC	TBC	TBC					
Our scheme is financially sustainable.	10. Minimum funding ratio.	110% (minimum threshold).	The funding ratio, based on Comcare’s claims liabilities, is used to measure the financial sustainability of the compensation scheme.	<p>Type: Quantitative, efficiency.</p> <p>Methodology: Total assets (Comcare Retained funds + Consolidated Revenue Fund) / Net outstanding claims liability calculated by independent actuary</p> <p>Data source: Financial statements and liability valuation report</p>				
		<table border="1"> <tr> <th>2024–25</th> <th>2025–26</th> <th>2026–27</th> <th>2027–28</th> </tr> <tr> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> </tr> </table>			2024–25	2025–26	2026–27	2027–28
2024–25	2025–26	2026–27	2027–28					
✓	✓	✓	✓					
Our scheme is financially sustainable.	11. Administrative cost ratio.	15 – 25%.	The administrative cost ratio represents efficiency of Comcare’s insurance and claims management operations.	<p>Type: Quantitative, efficiency.</p> <p>Methodology: Administration costs / (Administration costs + Claims costs), based on Safe Work Australia’s Comparative Performance Monitoring (CPM) methodology.</p> <p>Data source: Commonwealth Agency Payroll submissions, Actuarial premium reports, Comcare’s financial management system data, Comcare’s claims management system</p>				
		<table border="1"> <tr> <th>2024–25</th> <th>2025–26</th> <th>2026–27</th> <th>2027–28</th> </tr> <tr> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> </tr> </table>			2024–25	2025–26	2026–27	2027–28
2024–25	2025–26	2026–27	2027–28					
✓	✓	✓	✓					




Delivering client-centric services

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.

Key activity	Focus areas	Strategic risk statement
Uplift our organisational capability to co-design and deliver services that anticipate and meet client needs and adapt to changing circumstances	<ul style="list-style-type: none"> Improve services through client insight Deliver platforms for the future Develop and embed service design approach 	Our services are not appropriately designed and delivered to meet the changing needs of our clients leading to client dissatisfaction and immaturity of our service delivery capability.

Performance summary													
Intended result	Performance measure	Targets	Rationale	Measure type, methodology and data source									
Our clients are satisfied with our services.	12. % overall client satisfaction with services.	a. Employer satisfaction rating of 75%. b. Design a new mechanism for measuring employee satisfaction.	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 Employer survey has been used to measure client satisfaction for over 5 years. We are expanding our methodology to capture satisfaction of employees in the coming years, so we have an expanded view of client satisfaction from our key client groups.	Type: Quantitative, effectiveness. Methodology: a. Result to question in Comcare's 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?' b. Assessment of deliverables at the end of the reporting period against deliverables endorsed in planning documentation. Data Source: Annual Employer Survey Results and internal planning and governance documentation.									
		Regulatory best practice principle link: 3 			<table border="1"> <thead> <tr> <th>2024-25</th> <th>2025-26</th> <th>2026-27</th> <th>2027-28</th> </tr> </thead> <tbody> <tr> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> </tr> <tr> <td>✓</td> <td>TBC</td> <td>TBC</td> <td>TBC</td> </tr> </tbody> </table>	2024-25	2025-26	2026-27	2027-28	✓	✓	✓	✓
2024-25	2025-26	2026-27	2027-28										
✓	✓	✓	✓										
✓	TBC	TBC	TBC										
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.	Service design and delivery maturity demonstrates our commitment to uplifting our organisational capability to delivery client-centric services.	Type: Qualitative, output and effectiveness. Methodology: Research and 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 and maturity assessment results of the selected tool.									
		<table border="1"> <thead> <tr> <th>2024-25</th> <th>2025-26</th> <th>2026-27</th> <th>2027-28</th> </tr> </thead> <tbody> <tr> <td>✓</td> <td>TBC</td> <td>TBC</td> <td>TBC</td> </tr> </tbody> </table>	2024-25	2025-26	2026-27	2027-28	✓	TBC	TBC	TBC			
2024-25	2025-26	2026-27	2027-28										
✓	TBC	TBC	TBC										

Capability

Our workforce, infrastructure and ICT arrangements play a key role in enabling us to deliver our strategy.

Workforce capability

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

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

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

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

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 Comcare values are to achieving our purpose.

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



Figure 6: Comcare People Strategy Vision, Target Outcomes and Employee Experience

APS Strategic Commissioning Framework

The core work of the APS must be done by our core workforce – APS employees. This expectation will wind back excessive outsourcing and its impacts on the skills held and used in APS agencies.

All agencies must move away from outsourcing work that is the core role of the APS or the agency. Agency heads are accountable for rebalancing their workforce to prioritise direct employment, strengthen capability, and ensure any use of external expertise enhances the work and knowledge of the APS. The Strategic Commissioning Framework sets this policy direction for the APS and provides the advice and tools required for agencies to make this change.

This framework sets a clear expectation that most roles and functions will be delivered by APS employees, outlines limited circumstances in which external workforces could be appropriate, and ensures the APS maximises the benefit of any external arrangements.

In 2024–25, Comcare will reduce outsourcing of core work in line with the APS Strategic Commissioning Framework. Our targets for 2024–25 focus on reduced outsourcing of Job Family Accounting and Finance and Job Family ICT and Digital Solutions, with an expected reduction of \$350,000 in outsourcing expenditure.

Infrastructure capability

Our ways of working and how we interact with our stakeholders has changed immensely in recent years. Changing from largely office-based culture to embracing hybrid working, it is now imperative that we manage our property portfolio in a cost-effective way.

Our developing Future Workplace Strategy supports decisions about our workplaces to best support the safety and wellbeing of staff in their ways of working and delivering against our purpose, now and into the future. Our future workplace vision is 'Contemporary, cost effective, safe and efficient workplaces that connect people, support collaboration, learning and service excellence'.

Our future workplace concepts will be iteratively designed and updated with sharing, flexibility and resilience in mind. The office will be made for working, collaborating and connecting in person whilst still allowing space for focussed and solo work. Safety, accessibility and ergonomics will be key in every setting.

We lease 9 office locations in all capital cities across Australia. Our Future Workplace Strategy will prioritise workplace change based on lease timeframes, growth, team needs and other factors. Our Perth and Newcastle Offices were the first offices to commence a change process in 2023–24 that will be finalised in 2024–25. Planning the future of our remaining workplaces continues in 2024–25 with some further changes expected in 2025–26.



Figure 7: Comcare office location

ICT Capability

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

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

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

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

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

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

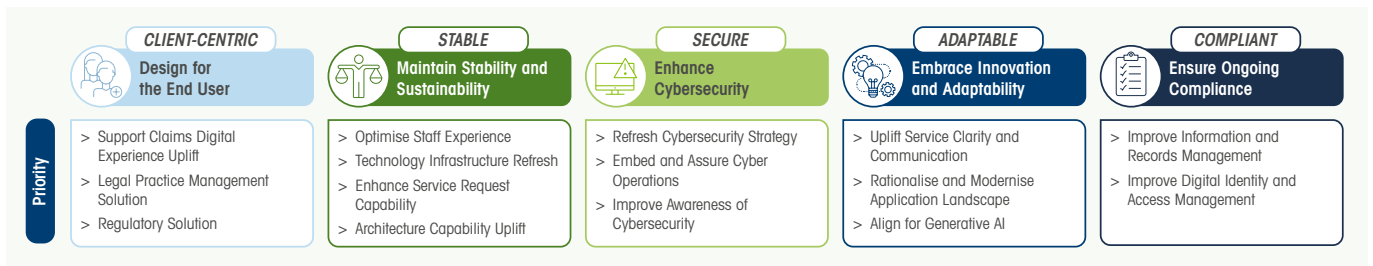


Figure 8: Comcare ICT and Digital Strategy Guiding Principles and Priorities





Appendix A – Corporate plan content requirements

We have summarised the PGPA Rule content requirements for Corporate Plans and mapped their location in the document for ease of reference in the table below.

We considered the guidance provided in [RMG132 – Corporate Plans for Commonwealth Entities](#) when preparing our Corporate Plan 2024–25.

Table 4: List of Corporate Plan Requirements

Requirement	Location in document	Page
Introduction	Introduction	1
Purpose	Introduction	1
	About Comcare	3
	Comcare Strategy 2024–2028	7
Subsidiaries	Subsidiaries and supporting entities	3
Operating context		
– Environment	Environment	5
– Cooperation	Cooperation	6
– Capability	Workforce Capability	17
	Infrastructure capability	18
	ICT Capability	19
– Risk oversight	Risk oversight and management	9
Performance	Comcare Strategy 2024–2028, Strategic Priority Features	10
Key activities	Comcare Strategy 2024–2028, Strategic Priority Features	11



Appendix B – Stakeholder acronyms

The following acronyms are used in Figure 3: Comcare external stakeholders.

Table 5: Stakeholder Acronyms

AAT	Administrative Appeals Tribunal
ACCI	Australian Chamber of Commerce and Industry
ACTU	Australian Council of Trade Unions
AIG	Australian Industry Group
AMA	Australian Medical Association
CDPP	Commonwealth Director of Public Prosecutions
DEWR	Department of Employment and Workplace Relations
FCC	Federal Circuit Court
HR	Human Resources
HSR	Health and Safety Representatives
HWCA	Heads of Workers' Compensation Authorities
HWSA	Heads of Workplace Safety Authorities
ICA	Insurance Council of Australia
IME	Independent Medical Examiners
NHMRC	National Health and Medical Research Council
OAIC	Office of the Australian Information Commissioner
PCBU	Person Conducting a Business or Undertaking
RACGP	Royal Australian College of General Practitioners
SES	Senior Executive Service (in the context of Australian Public Service Leadership)
SRCC	Safety, Rehabilitation and Compensation Commission

Appendix C – Changes to 2023–24 performance measures

This table summarises Comcare’s 2023–24 performance measures and targets and those that are continuing in 2024–25 against our refocused strategy, and those that remain important, though will be monitored internally from 2024–25 onwards.

Table 6: Changes to 2023–24 Performance Measures

2023–24 Performance Measure	2023–24 Target	Change for 2024–25
1.1 We provide quality services to all our stakeholders	1.1.1 Stakeholder satisfaction rating of 85% or more	Continue external reporting in 2024–25. Maps to performance measure 12 with new methodology.
	1.1.2 85% or more evaluated entities report improved work health and safety outcomes as a result of Comcare’s regulatory activities	Transitioned to internal reporting from 2024–25
	1.1.3 100% of activities are delivered within statutory timeframes, where applicable	Transitioned to internal reporting from 2024–25
	1.1.4 SRCC satisfaction of support provided by Comcare	Transitioned to internal reporting from 2024–25
	1.1.5 Seacare Authority satisfaction of support provided by Comcare	Transitioned to internal reporting from 2024–25
1.2 We consistently manage Commonwealth asbestos-related disease claims with more equitable and efficient outcomes	1.2.1 95% of resolution payments made within 10 days of receipt of relevant information	Transitioned to internal reporting from 2024–25
	1.2.2 Asbestos-related disease common law settlements are monitored to ensure consistency and equity	Transitioned to internal reporting from 2024–25
1.3 We build and embed better regulatory practice into our work health and safety regulatory activities	1.3.1 Our interactions with regulated entities and other stakeholders are open, transparent and consistent	Transitioned to internal reporting from 2024–25
	1.3.2 We ensure that regulatory activities are conducted in accordance with endorsed policies and procedures	Transitioned to internal reporting from 2024–25
2.1 Our AAT litigation program resolves disputes promptly and with integrity	2.1.1 Proportion of Comcare AAT litigation with a successful outcome is 70% or greater	Transitioned to internal reporting from 2024–25
	2.1.2 65% of Comcare AAT litigation matters are progressed to hearing or finalised within 12 months for Comcare managed claims	Transitioned to internal reporting from 2024–25
2.2 We deliver contemporary education and engagement services that promote and enable safe and healthy work	2.2.1 80% of attendees have their engagement, training and education needs met	Transitioned to internal reporting from 2024–25
	2.2.2 Annual increase in employer and customer reach and engagement with Comcare’s education services and Communication channels	Transitioned to internal reporting from 2024–25

2023–24 Performance Measure	2023–24 Target	Change for 2024–25
3.1 We design and deliver innovative and prevention focused initiatives that promote and enable safe and healthy work	3.1.1 Comcare delivers appropriate early intervention programs across the jurisdiction	Transitioned to internal reporting from 2024–25
3.2 Our proactive regulatory activity is targeted and prevention focused	3.2.1 Targeted and prevention focused compliance and enforcement activities are delivered on Comcare’s regulatory priorities	Transitioned to internal reporting from 2024–25
4.1 We drive national work health and safety compliance using a targeted, risk-based approach	4.1.1 100% of incident notifications involving the death of a person result in a monitoring compliance activity	Transitioned to internal reporting from 2024–25
	4.1.2 Comcare undertakes a follow up verification inspection in 95% of instances where an inspection has identified remedial actions to be undertaken to eliminate or minimise, as far as reasonably practicable, the risk of future incidents occurring	Transitioned to internal reporting from 2024–25
4.2 We undertake strategic and collaborative initiatives to promote and enable safe and healthy work	4.2.1 Strategic and collaborative initiatives deliver evidence-based insights and/or better practice	Transitioned to internal reporting from 2024–25
4.3 Our scheme identifies and adopts better practices which enable and promote safe and healthy work	4.3.1 Through engagement with our stakeholders and utilising an evidence-based approach, better practice initiatives are identified, our advice is adopted and assessed as enabling safe and healthy work	Transitioned to internal reporting from 2024–25
5.1 Our scheme is sustainable as evidenced through outcomes achieved by scheme participants (including financial and return to work outcomes)	5.1.1 Target administrative cost ratio 15 to 25%	Continue external reporting in 2024–25. Maps to performance measure 11 with the same methodology.
	5.1.2 Average Commonwealth premium rate = 1% of payroll or lower	Continue external reporting in 2024–25. Maps to performance measure 2 with the same methodology.
	5.1.3 Minimum funding ratio of 110%	Continue external reporting in 2024–25. Maps to performance measure 2 with the same methodology.
	5.1.4 Comcare scheme return to work rate of 85 to 95% for accepted claims initially determined within the previous 24 months	Continue external reporting in 2024–25. Maps to performance measure 5 with a simplified target of 85%.
	5.1.5 Comcare scheme notional premium rate = 0.90%	Transitioned to internal reporting from 2024–25
5.2 Our workforce is engaged, capable and supported in their mental health and wellbeing	5.2.1 Comcare’s employee engagement rating at the organisational level exceeds 70%	Transitioned to internal reporting from 2024–25
	5.2.2 Comcare’s wellbeing rating at the organisational level meets or exceeds 75%	Transitioned to internal reporting from 2024–25
	5.2.3 75% of Executive level employees consider that their workgroup has the appropriate skills, capabilities and knowledge to perform well	Transitioned to internal reporting from 2024–25

