



NSW Police Force
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OFFICE OF THE COMMISSIONER

The Hon. Grant McBride
Vice Chair, Public Accounts Committee
Legislative Assembly
Parliament of NSW
Macquarie Street
SYDNEY NSW 2000

Dear Mr McBride,

I refer to a letter from the former Chair of the Public Accounts Committee, Paul McLeay MP, regarding the NSW Police Force response to Recommendations arising from the Auditor-General's Report No 184 *Managing Injured Police*, tabled 10 December 2008 (your Ref: PAC296-04).

Please find attached a completed table outlining the NSW Police Force response to each of the Recommendations. Supporting documentation cannot be provided for confidentiality reasons. I note that the *2009 Police Award* is a public document and is available on-line.

The audit process was beneficial as it provided independent confirmation and endorsement of procedures that had been identified locally to achieve best practice. The on-line case management system and the introduction of quality assurance practices are two examples which will benefit the NSW Police Force.

The time spent by staff on the audit equated to approximately 3-5 hours of senior management time per person per week for the entire audit period. The other costs relate to capital infrastructure, for example an electronic case management system. It is suggested that the audit process could be improved if the individual auditors' knowledge of injury management could be enhanced prior to the audit taking place, as a significant amount of time was spent explaining the injury management process.

Should you have any further questions, please contact Chief Superintendent Mark Jenkins, Director, Corporate Human Resources, directly on (02) 8263-6448 or email jenk1mar@police.nsw.gov.au.

Yours sincerely,

D J Owens APM
A/Commissioner of Police

PROGRESS TOWARDS IMPLEMENTATION OF AUDITOR-GENERAL'S RECOMMENDATIONS

<i>Recommendation</i>	<i>Outcome</i>	<i>NSWPF Accept/Reject</i>	<i>Action to be taken</i>	<i>Target completion date</i>	<i>Status Completed, Delayed or On Track? Additional comments</i>	<i>Responsibility</i>
List each recommendation	What will be overall result of implementing this recommendation?		What steps will be taken to implement the recommendation?	When will each step be completed?	What is the current status of each step? Further comments can be added here to help explain progress to this point.	Which section of the agency is responsible for implementation?
1.	Establish systems to collect sufficient data to judge the efficiency and effectiveness of injury management practices in respect to NSW Police Force (NSWPF) officers by June 2010 (p 16)	Accept	Manual systems exist that provide NSWPF with data regarding agreed Key Performance Indicators (KPIs). To fulfil the requirements of Recommendation 1, an electronic solution needs to be developed.	Ongoing from 2010/2011 financial year.	DELAYED Meeting the Audit Office's timeframe is subject to available funding. Business case approved but funding approved to begin in 2010/2011 financial year.	Safety Command
2.	Develop injury management guidelines to help commands consistently implement policies by March 2009 (p 17)	Accept	Standard Operating Procedures (SOPs) to be developed to assist Commands to implement Injury Management practices.	Draft SOPs developed in May 2009.	DELAYED To be sent to Police Association of NSW (PANSW) for consultation by March 2010 pending final changes to Injury Management as a result of recent wage negotiation outcomes.	Safety Command

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3.	Introduce quality assurance practices as part of its routine audits of commands to test compliance with injury management policies and procedures by March 2009 (p 17)	Accept	The HR Support Team already does this to an extent. The content of this will be reviewed in light of this recommendation. Audit tool to be developed to ensure compliance with Injury Management Policy at Commands.	March 2009	COMPLETED Finalised in April 2009. One Local Area Command (LAC) / Organisational Unit (Org Unit) per Injury Management Advisor (IMA) audited each month to ensure compliance.	Safety Command
4.	Develop standards for investigating incidents based on the severity and type of incident by June 2009 (p19)	Accept	The Safety Command has been working on this project during 2008 and the deliverable involves an electronic solution in SAP.	June 2009	COMPLETED P901 released 15 June 2009.	Safety Command
5.	As part of the quality assurance program for injury management, test compliance of injury management plans and return to	Accept	Senior IMA (SIMA) audit tool to reflect check on Injury Management Plans and Return to Work Plans. Return To Work Plan template updated to reflect all parties required for	March 2009	COMPLETED Incorporated into Return To Work Program template and SIMA audit tools in March 2009. Dip sample of audits taking place each	Safety Command

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	work plans with policy by March 2009 (p 21)		dissemination.		month to ensure ongoing compliance.	
6.	Monitor performance against its one week standard for the placement of injured officers in suitable positions by March 2009 (p 21)	Accept	SIMA monitor compliance with the standard but not time taken to place beyond the 1 week compliance standard. The reporting of this standard will be reviewed.	March 2009	COMPLETED P902 collection data altered in April 2009 to report on this timeframe on a monthly basis.	Safety Command
7.	Investigate and develop strategies to address psychological injuries in order to encourage early return to work by June 2009 (p 28)	Accept	The Safety Command has been working in collaboration with the PANSW during 2008 on an independent research project to identify barriers to return to work.	June 2009	COMPLETED Template developed in June 2009 for IMAs to take to initial GP appointments for officers with psychological injuries. All new claims reviewed by SIMA / IMA within 1 month of referral to determine when IMA visits GP with officer.	Safety Command

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8.	Finalise the guidance material to assist medical practitioners make decisions regarding work restrictions on injured officers by June 2009 (p 30)	Accept	Job Dictionary released to PANSW for comment, then will be sent to the Commissioner's Executive Team (CET) for endorsement.	March 2010	DELAYED Document requires review and Injury Management are arranging a project team to develop a task analysis.	Safety Command
9.	Review the approach to determining the number of permanent restricted duty positions in a command as a proportion of actual strength on a case by case basis (p 30)	Reject	NSWPF would like to note that, there are no 'restricted duties positions'. Within NSWPF, there are 'restricted duties officers' undertaking roles which have been deemed 'suitable for restricted duties'. It is the officer who is classified as being Permanently Restricted, not the position. The determination of	N/A	N/A	HR

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			positions suitable for officers on restricted duties within a Command is already determined on a case by case basis and should at no stage be used within any negotiations for first response or operational policing. These officers should be counted in the actual strength of a command, but this number should not be a constant percentage or proportion. This is because the size of the command and local demands will impact on the number of positions deemed appropriate to maintain an operative function.			

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10.	Review the conditions in the Death and Disability scheme to improve the rate of redeployment of post'88 officers to suitable positions in the NSWPF or elsewhere in the public sector by June 2009 (p 31)	Accept	The NSWPF independent actuary (PricewaterhouseCoopers), was engaged to prepare a full review of the scheme, with the primary purpose being to develop structural options that will ensure its financial viability; bring costs back in line with Government funding parameters; and aligning benefits more closely with industry standards. NSWPF's priority is to ensure that officers are managed appropriately when off work and that the emphasis is on return to work as opposed to medical discharge. Redeployment into the broader public sector will ensure valuable staff are retained by government.	Ongoing	Discussions taking place with all of government to review the Death & Disability Scheme. NSWPF are participating in these discussions. Current practices explore all redeployment options for post'88 officers within NSWPF though communication between Injury Management and the Redeployment Unit. All options explored external to NSWPF through the use of external rehabilitation providers and Allianz. Clause 9 of the Police Wages MOU states: During the term of the [new Police Officers Salary] Award the parties will engage in negotiation on a revised Death and Disability Award for police	HR

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11.	Review the impact of the top-up pay to post'88 officers under the Police Award 2005 by June 2009 (p 31)	Accept	NSWPF is currently reviewing workers compensation top-up for post '88 officers and developing a proposal for reform.	COMPLETED	officers which will operate from 1 July 2011 (subcl 9.2). Where agreement is not reached by 30 June 2011 the NSWPF will seek the assistance of the NSW Industrial Relations Commission in the making of a revised Death and Disability Award (subcl 9.3).	HR
12.	Develop in consultation with the Police Superannuation Scheme (PSS) administrator, protocols including	Accept	It should be noted that an officer does not apply to PSS or PILLAR for a medical discharge. The officers are applying for access to a benefit under the PSS scheme.	ONGOING	Use of Section 72A of the Police Act 1990 is being explored in the current Award negotiations. Discussion with STC regarding NSWPF initiated	HR

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	time standards for processing medical discharge applications by March 2009 (p 35)		Upon a determination being made by PILLAR, NSWPF are informed of the determination, and then commence the process of medically discharging the officer under delegation.		applications for benefit. Presently with the assistance of DPC drafting an application for exemption under the <i>Privacy and Personal Information Protection Act 1998</i> . Propose to seek legislative changes to assist in first half of 2010.	
13.	Monitor the determination of hurt on duty claims by commands against its three month standard by March 2009 (p 35)	Accept	NSWPF acknowledges that it should investigate and determine claims in a timely manner. It notes that in the vast majority of cases, the claims are determined well within three months. Unfortunately, resolution of these types of cases takes longer due to the need for legal review. HR has identified some changes regarding notification processes that	ONGOING	Changes in processes have been implemented in the Hurt On Duty Unit which have improved efficiencies. All Hurt on Duty Claims are now monitored at 4, 8, 12, 16, 26 and 52 week review points in accordance with WorkCover Standards. All claims are able to be audited with agreed actions and standards at each review point with relevant time frames adhered to.	HR

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14.	Complete its review of the benefits and officers' contributions under the Death and Disability scheme with a view to either reducing benefits, increasing officers' contributions or ceasing the scheme as a matter of urgency (p 38).	Accept	PricewaterhouseCoopers, the NSWPF independent actuary was engaged to prepare a full review of the scheme, with the primary purpose to develop structural options that will ensure its financial viability; bring costs back in line with Government funding parameters; and aligning benefits more closely with industry standards. can be made to improve efficiency within this area.	ONGOING	Discussions currently taking place with all of government to review the Death & Disability Scheme. NSWPF are participating in these discussions. See Recommendation 10	HR