

Engage
Empower
Safeguard

Australian Government
Aged Care Quality and Safety Commission

Corporate Plan
2024–25

In the spirit of reconciliation, the Aged Care Quality and Safety Commission acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, water and community. We pay our respect to Elders past, present and emerging, and extend that respect to all Aboriginal and Torres Strait Islander peoples.



Australian Government

Aged Care Quality and Safety Commission

Corporate Plan
2024–25

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Note on terminology

Aged care is provided through programs ranging from low-level support to more intensive services. This can include:

- accommodation
- help with everyday living (such as cleaning and social participation)
- equipment and home modifications (such as handrails)
- health care
- help with personal care (such as eating and toileting)
- respite (short-term support and care).

Aged care can be provided in people's homes, in the community or in residential settings. More than two-thirds of people who use aged care do so from their home.

Older people who receive (or use) aged care services are those people receiving care and support provided by the aged care sector. They reflect the diversity of the Australian population. For example, approximately one-third of older Australians receiving aged care were born overseas. Of these, two-thirds were born in non–English speaking countries. They have a diverse range of beliefs, values, preferences, experiences, and socioeconomic and educational backgrounds.

An **older person** is an individual accessing aged care services as referred to in legislation, other legal instruments and Portfolio Budget Statements. Reference to an older person includes reference to a representative of the older person, so far as the provision can apply to a representative.

A **provider** is an entity that has been approved to provide aged care and receives government subsidies to do so. A provider can deliver residential or respite care, home care, Commonwealth Home Support Programme services or flexible care. As at 30 June 2024, there were 4,727 aged care services, of which 2,617 provided residential care and 2,110 provided home care (through both the Commonwealth Home Support Program and Home Care Packages).

Like the people who access their services, providers are diverse – sizes, locations, business models and workforces vary. In addition, an increasing number of providers offer specialist services in response to community demand. This includes services catering for people who are living with dementia; those with particular faiths or nationalities; those who are members of the LGBTIQA+ community; veterans; and Aboriginal and Torres Strait Islander peoples.

Message from the Commissioner

Everyone has the right to be treated with dignity and respect, to exercise choice, to be free from harm, and to have confidence in the safety and quality of their care. Protecting these rights for almost 1.3 million people receiving aged care is at the core of what the Aged Care Quality and Safety Commission does.

As the national aged care regulator, our first consideration is the needs and expectations of the older people receiving aged care. We listen to them to better understand what is important to them and what they need from the Commission. We use their insights to inform our approach to fair, sensible and proportionate regulation, to ensure that the care provided safeguards their wellbeing and quality of life.

In 2024–25, we will continue our journey to becoming a world-class regulator as we maintain our focus on building capabilities while also preparing for the introduction of a new Aged Care Act (Act).

We expect to finalise implementation of all recommendations of the Independent Capability Review of the Aged Care Quality and Safety Commission (Capability Review) in 2024–25. We are already deriving benefits from the substantial progress made on strengthening our capabilities across functions, including regulatory operations, regulatory policy and strategy, data and analytics, engagement, communication and education, governance and risk management, and the full suite of corporate services.

This increased capability is also vital in underpinning our efforts to prepare ourselves and the sector for the significant reforms to be introduced under the new legislation. The Commission's Reform for Better Aged Care program will continue to develop resources that support the implementation of the new Act, the strengthened Aged Care Quality Standards (Quality Standards) and a new regulatory framework.

Our Regulatory Strategy 2024–25 outlines how we are changing our regulatory practices, policies and operations to ensure that we are ready to deliver on the intent of the new Act and the once-in-a-generation change it will bring about. Successful implementation of the strategy is premised on the implementation of a new Regulatory Operating Model (ROM) across the Commission. The strategy details our approach to holding providers and workers accountable through risk surveillance, risk analysis, provider supervision and enforcement. It also outlines how we support providers and workers to consistently aim to deliver high-quality care.

In 2024–25, we will continue our journey to becoming a world-class regulator

The strategy also empowers older people to be active partners in their care and have the confidence to speak up when things are not right. In this context, restorative engagement will increasingly guide our approach to complaints management. We will encourage and facilitate communication between affected parties and assist in restoring trust and confidence in the quality and safety of the services being delivered. If we find that there was an avoidable problem in the delivery of care, we will require the provider to minimise the risk of it happening again.

A key measure of our success as a regulator is the extent to which older people, providers and workers trust our capabilities. To be a trusted and effective regulator, we must understand and cater for the diversity that characterises aged care recipients, providers and workers. In this regard, we are continuing to consult on and co-design a communication strategy and resources for First Nations and culturally and linguistically diverse older people and communities, as well as their providers and workers.

We know that in the next 2 decades, the number of people accessing aged care is likely to double. This will significantly increase the number of people whose safety, health and quality of life we work to safeguard. We are committed to continuously improving our practices to meet this challenge and earn the trust of older people, providers and the wider community.

This is an exciting time to be at the Commission. The substantial sector-wide changes being introduced are also propelling us forward on our journey to becoming a contemporary, high-performing and best practice regulator of aged care services.

During this time, we will continue to seek feedback and respond to opportunities to improve the effectiveness of our regulatory activities in both holding providers and workers to account for their performance, and incentivising best practice care.

As the accountable authority, I am pleased to present the Corporate Plan for the Aged Care Quality and Safety Commission for 2024–25 to 2027–28, as required under section 35(1) (b) of the P*ublic Governance, Performance and Accountability Act 2013* (PGPA Act) and in accordance with section 16E of the Public Governance, Performance and Accountability Rule 2014 (PGPA Rule). This Corporate Plan outlines our purpose and priorities, and how we will measure our performance over the next 4 years.

Also presented in this document is the Commission's Annual Operational Plan 2024–25, as required under sections 54(1) and (2) of the *Aged Care Quality and Safety Commission Act 2018* (Commission Act).

This Corporate Plan is a key element of our annual planning and performance framework, consistent with the requirements of the Commonwealth Performance Framework. The framework connects our strategic direction and priorities, key activities and performance. We ensure that our objectives, strategies and key activities support our obligations and meet government and community expectations.

J. M. Anderson

Janet Anderson PSM
Commissioner



Message from the Advisory Council

The Aged Care Quality and Safety Advisory Council (Advisory Council) was established under the Commission Act to advise the Commission on the performance of its statutory functions, and to advise the Minister on these matters on request.

The Minister appoints members with diverse experience and expertise to the Advisory Council. He also appoints ex-officio members from the Commission and the Department of Health and Aged Care. Four new members joined us in 2024, further enhancing our expertise.

We meet formally 6 times a year, and hold additional out-of-session meetings with ministerially appointed members to ensure we can provide timely advice and drive our workplan. The Advisory Council considers a range of data and reports, and undertakes 'deep dives' into areas such as complaints handling and quality and safety monitoring. We also discuss findings from the Commission's surveillance, risk assessment and regulatory processes.

Members contribute to planning and review exercises linked to the development and publication of the Commission's corporate and operational plans and reports. In 2024–25, we will hold a range of stakeholder meetings to explore people's experience of the Commission's functions.

The Advisory Council brings an independent perspective to the work of the Commission and complements its significant direct engagement with the aged care sector.

In 2024–25, these functions will evolve further as we respond to recommendation 6.2 of the Capability Review's final report: *'The Aged Care Quality and Safety Advisory Council to be strengthened to provide stronger independence, accountability and oversight'.*

We have already taken important steps in this direction, with a newly established dedicated secretariat reporting directly to our Chair. This will help to strengthen our independence, support our operating arrangements and forward planning, and facilitate direct engagement with stakeholders.

The rights and wellbeing of older people are at the heart of our advice

Our Workplan 2024–25 documents our priorities for the year ahead. These include increasing our focus on ensuring the Commission has the capabilities needed to deliver on the strategic priorities and performance measures outlined in the workplan. We will regularly review the Commission's progress against these indicators and broaden our engagement with stakeholders, supported by a stakeholder engagement protocol.

Advisory Council priorities

Provide advice to the Commissioner in relation to the Commission's functions, focusing on capability as the key determinant for achieving its priorities

On request, provide advice to the Minister on matters relating to the performance of the Commission's functions

Prepare for the proposed changes to the role and functions of the Advisory Council expected to be introduced in the new Aged Care Act

Continue to take steps to strengthen our independence as an advisory body

We also plan to enhance our own role and functions proposed under the new Aged Care Act, and support the Commission in its vital work to prepare for this significant legislative reform.

We will report on progress against our workplan and priorities in the Commission's 2024–25 annual report.

The Advisory Council is committed to providing well-informed, independent advice and guidance to the Commissioner and the Minister, to support the Commission to be a world-class regulator.

The rights and wellbeing of older people are at the heart of our advice as we contribute to driving continuous improvement across the aged care sector and fulfilling the intentions of the aged care reforms.



Maree McCabe AM
Chair, Aged Care Quality and Safety Advisory Council

About the Commission

Purpose

The Commission's purpose is to protect and enhance the safety, health, wellbeing and quality of life of older people receiving aged care. We achieve this by regulating aged care providers to ensure that they uphold their obligations to provide safe, quality care, and treat the people using their services with dignity and respect.

The Commission is the national regulator of Commonwealth-funded aged care services. It works with stakeholders to foster a world-class sector that safeguards the wellbeing and rights of older Australians. The Commission is responsible for:

- approving providers to deliver (Commonwealth-subsidised) aged care services
- engaging with and educating key stakeholders in the aged care sector about the Commission's functions
- resolving complaints about aged care services
- accrediting residential aged care services
- monitoring providers' compliance with the Aged Care Quality Standards and other obligations
- administering the Serious Incident Response Scheme
- regulating aged care workers, volunteers and governing persons under the Code of Conduct
- undertaking compliance and enforcement actions
- revoking the approval of an organisation to deliver (Commonwealth-subsidised) aged care services.

The Commission is a non-corporate Commonwealth entity under the PGPA Act.

We operate independently and objectively in performing our functions and exercising our powers as set out in the Commission Act and the Aged Care Quality and Safety Commission Rules 2018 (Commission Rules).

The Aged Care Quality and Safety Advisory Council – established under section 37 of the Commission Act – advises the Commissioner in relation to the Commission's functions and, on request, may advise the Minister in relation to these functions. The Minister appoints Advisory Council members, with the Commissioner, Chief Clinical Advisor, a staff representative and a Department of Health and Aged Care (department) representative serving as ex-officio members.

Our goal is for Australia to have a thriving aged care sector that meets the needs and preferences of the older people who use it

We are accountable to the government for our performance as a regulator, and we operate according to the requirements and best practice principles outlined in the Resource Management Guide 128 – Regulator Performance (RMG 128).

Our goal is for Australia to have a thriving aged care sector that meets the needs and preferences of the older people who use it. The Commission focuses on making aged care providers accountable for providing safe and quality care to older people, and on delivering a sector that safeguards the wellbeing and rights of older Australians.

We aim to engage with and educate the aged care sector on best practices. This supports providers to deliver high-quality care, and empowers older people to speak out when they receive below-standard care. In anticipation of the new Aged Care Act, we are also engaging in education and consultation activities to help providers transition to a rights-based, person-centred model of care.

In the context of the government's acceptance of all 32 recommendations in *Report of the Independent Capability Review of the Aged Care Quality and Safety Commission*, delivered by Mr David Tune AO PSM, we are further strengthening our capabilities, including our corporate enabling functions, to ensure that we are best placed to meet our role and responsibilities as the national aged care regulator.

Functions and powers

The Commission's functions and powers are set out in the Commission Act, the Commission Rules and the *Aged Care Act 1997.*

These functions and powers enable the Commission to help manage risks in the aged care sector and respond appropriately to incidents and departures from expected performance or outcomes. They are aligned to the Commission's 4 legislative key pillars: engagement with older Australians, education, complaints resolution and regulation.

Engaging with people accessing services helps the Commission to understand their experiences. It also helps to shape communications with providers about the importance of working with the people they care for to design and deliver best practice care. The Commission uses education, information and targeted communications to promote best practice and as key preventative tools

Values

We undertake our work in a way that is consistent with the Australian Public Service (APS) values, outlined in the *Public Service Act 1999*.



Impartial

We are apolitical and provide the government with advice that is frank, honest, timely and based on the best available evidence.



Committed to service

We are professional, objective, innovative and efficient, and work collaboratively to achieve the best results for the Australian community and the government.



Accountable

We are open and accountable to the Australian community under the law and within the framework of ministerial responsibility.



Respectful

We respect all people, including their rights and their heritage.



Ethical

We demonstrate leadership, are trustworthy, and act with integrity in all that we do.



Stewardship

We build our capability and institutional knowledge, and support the public interest now and into the future by understanding the long-term impacts of what we do.

Ministers and portfolio

The Commission supports the Minister for Health and Aged Care, the Hon Mark Butler MP; the Minister for Aged Care, the Hon Anika Wells MP; the Assistant Minister for Health and Aged Care, the Hon Ged Kearney MP; and the Assistant Minister for Ageing, the Hon Kate Thwaites MP.

As part of the Health and Aged Care portfolio, and through our memorandum of understanding, the Commission will continue to work closely with the department to develop and implement the government's policy and reform initiatives relating to aged care. Importantly, this will include addressing the recommendations of the Capability Review.

The Commissioner is responsible for informing the Secretary of the department of relevant issues and providing information, including about concerns or clarifications relating to legislative requirements, resourcing and policy.

The Commission collaborates with the department to deliver on a wide range of aged care reforms.

Advisory Council

Under the Commission Act, the Advisory Council advises the Commissioner on the performance of statutory functions. It may also, on request, provide advice to the Minister in relation to these functions. The Advisory Council will continue to work with the Commission and the department to action the Capability Review's recommendation to strengthen the role of the Advisory Council with the aim of facilitating greater accountability, oversight and scrutiny of the Commission. This includes preparing for the proposed changes to the Advisory Council's role and functions expected to be introduced with the new Aged Care Act.

Additionally, the Advisory Council Chair is a member of the Implementation Steering Group that oversees the Commission's implementation of the Capability Review's recommendations.



The Commission will continue to work closely with the department to develop and implement the government's policy and reform initiatives relating to aged care

Corporate structure and governance

The Commission has fit-for-purpose corporate structures and governance arrangements that support the effective and efficient delivery of Australian Government priorities and operational program objectives.

The Commission is led by an independent Aged Care Quality and Safety Commissioner who reports to the Cabinet Minister for Health and Aged Care through the Minister for Aged Care.

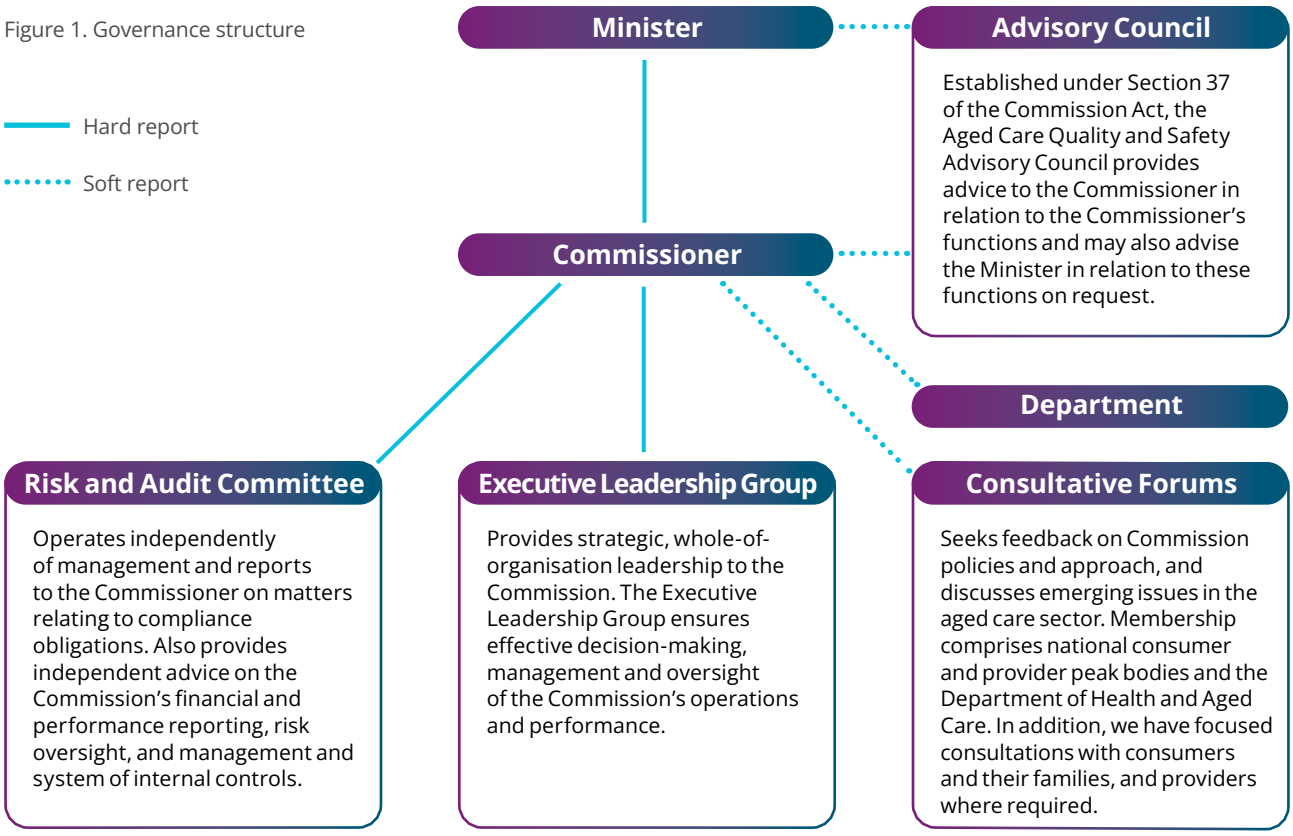
The Commissioner is the Commission's accountable authority and is accountable for all the Commission's corporate and operational activities as a regulator, including ensuring compliance with relevant legislative and regulatory requirements as well as whole-of-government policies and standards.

The Commission's governance arrangements address the Capability Review recommendation that the Commission implement a robust, comprehensive and transparent corporate governance framework.

Refreshed and tailored governance structures, resources and processes support staff at all levels within the Commission to fulfil their roles with integrity and accountability, and promote transparency in planning, operations, decisions, and performance assessment and reporting.

The Commission's corporate governance structure is shown in Figure 1.

Figure 1. Governance structure



Strategic priorities

The Commission's strategic priorities shape our choices and behaviour, and underpin our decision making and actions



We ensure that older people receiving aged care are at the centre of all that we do

- We listen to and support older people to understand what is important to them and what they need from the Commission.
- We ensure older people receiving funded aged care services and the community know what to expect, and that providers uphold their obligations.
- We ensure older people are engaged and empowered to easily make complaints or provide information about their experience.
- We make sure the experiences of older people accessing aged care informs our regulatory activities.



We are a capable and accountable regulator

- Our capability and accountability are strengthened through the implementation and publication of our Regulatory Strategy.
- We measure and publish relevant information about our performance.
- We are building a resilient, flexible and future-fit workforce, whose wellbeing is one of our core priorities.
- We invest in our people and systems to support our operations, and prioritise meaningful collaboration and engagement.

During the planning period, these strategic priorities will inform the Commission's work to deliver better outcomes for older Australians through regulatory change and ongoing reform, and as it develops stronger corporate capabilities. The strategic priorities are embedded in this Corporate Plan and the Annual Operational Plan, on pages 52–71.



We advance intelligence-led, risk-based proportionate regulation

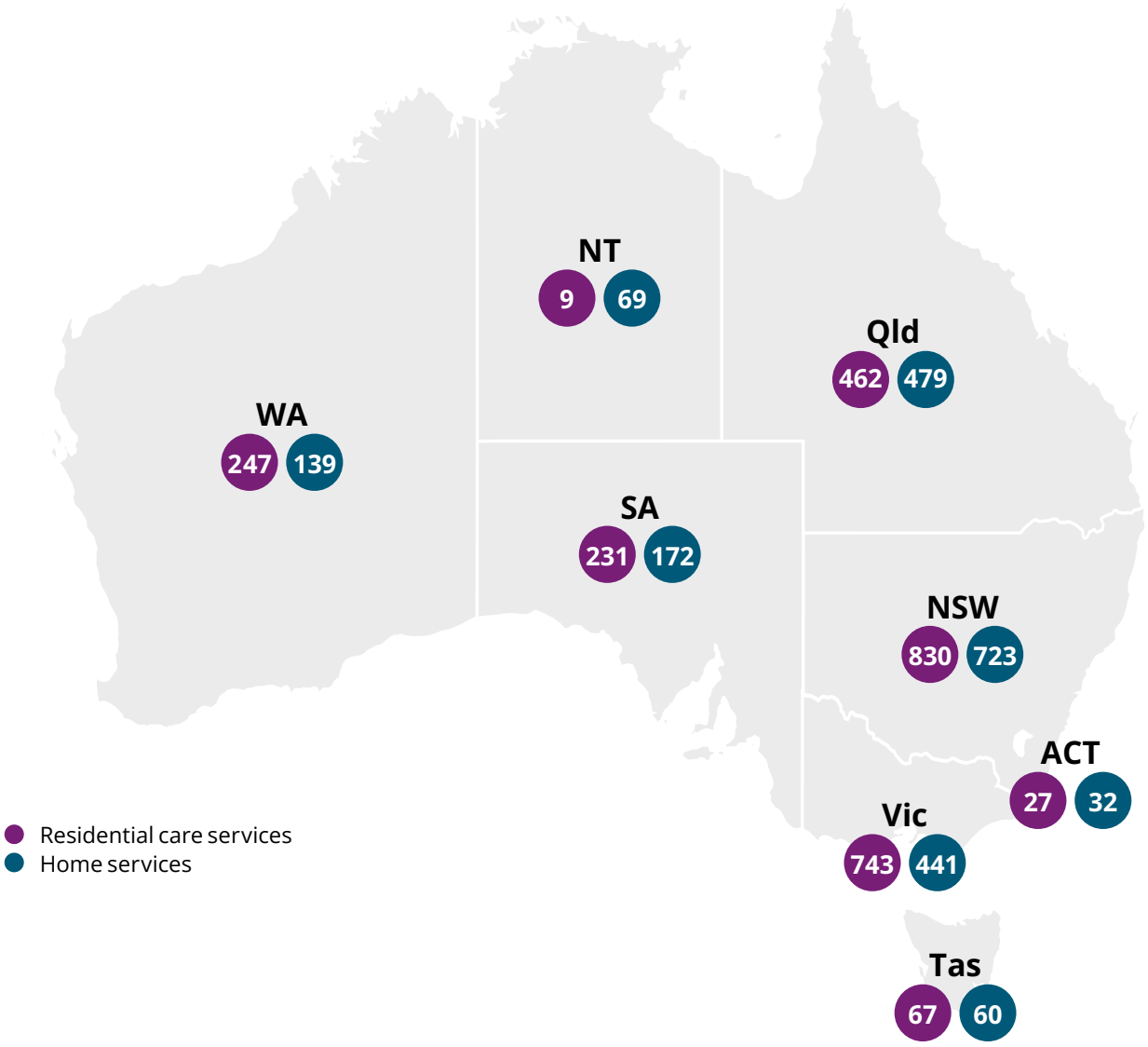
- We use the full range of powers and tools available to strengthen our regulatory effectiveness.
- We collect, analyse and publish information that improves the transparency and understanding of provider risks and sector trends.
- We use this information to guide our regulatory activities, ensuring that our decisions and actions are proportionate to the risks facing older people who are receiving funded aged care.



We improve the quality and safety of aged care, and the experiences of care for older people

- We respond to government priorities.
- We prioritise and target our activities to deliver aged care reforms and lift sector performance.
- Working with stakeholders, we help to rebuild trust and confidence in the safety and quality of aged care and its ability to deliver a better quality of life for older people.

Operating context



Environment

The nature and landscape of aged care in Australia is changing. Factors such as the population (the increase in the number of people aged 65 and over), legislation (the proposed introduction of a new Aged Care Act), the environment (increased extreme weather events) and judicial scrutiny (the Royal Commission) are affecting the way aged care is delivered.

Figure 2. Number of aged care services by state and territory (State is based on the state of the service, not that of the provider.)

Most importantly, older people are finding their rightful place at the heart of aged care, with their needs and preferences being recognised as the priority in service delivery.



1,285,504

More than 1.28 million people use aged care services

- **197,425*** **Residential care**
- **271,947**** **Home Care Packages (HCP)**
- **816,132**** **Commonwealth Home Support Programme (CHSP)**

Figure 3. Number of people receiving aged care in residential care, HCP and CHSP

* Number of people receiving residential care, distinct count of people receiving care, extracted from the Department of Health and Aged Care data warehouse, as of 31 March 2024 on 12 April 2024.

** HCP Consumer Data extracted from Department of Health and Aged Care data warehouse on 12 April 2024. CHSP Consumer Data extracted on 2 April 2024 (numbers derived from 2022–23 financial year).

Currently, nearly 1.3 million people receive aged care services, and this number is expected to increase significantly over the next 20 years.

Older people's clear preference to be supported to live as independently as possible in local communities is expected to continue driving the stronger demand for aged care services in the home.

However, this trend may be moderated by the projected growth in the number of people with some degree of cognitive impairment associated with dementia who require higher levels of care.

Government decisions on funding models for aged care are also likely to be influential as a factor shaping future demand.

The introduction of the new Aged Care Act will require everyone in the aged care sector to adapt to new expectations and obligations arising from this rights-based legislation.

The new Act is expected to:

- outline the rights of older people who are seeking and accessing aged care services
- create a single entry point for older people, with clear eligibility requirements
- include a fair, culturally safe, single assessment framework
- support the delivery of quality aged care services
- establish new system oversight and accountability arrangements
- increase provider accountability through a new regulatory model
- strengthen the aged care regulator.

With change comes the opportunity for innovation and excellence

The proposed new Aged Care Act is a once-in-a-generation opportunity to improve the way services are delivered to older people by putting them and their rights at the centre of the system. It will impact everyone in the aged care sector. A lot of work is needed during 2024–25 to realise the benefits of the changes.

In the lead-up to the introduction of the new Act, we are working to understand and prepare for the reforms and we expect aged care providers to be doing the same.

For the Commission, the Act will have significant regulatory impacts. These include:

- a new process for providers to enter and retain authorisation to operate in the sector, through provider registration and renewal of registration
- establishment of different categories of providers, and the application of different obligations to different provider categories
- the ability to apply conditions of registration to specific providers
- new governance obligations for providers
- strengthened Quality Standards and a new audit methodology, including graded assessment of conformance
- an explicit restorative engagement or justice pathway within the complaints resolution process
- new compliance powers.

The Commission's Regulatory Strategy 2024–25 is a transitional strategy that provides a bridge to the new Act. Its implementation involves the introduction of different ways of working within the Commission, and changes in our engagement with providers, workers and older people. Clear communication with each of these stakeholder groups will be an important component of our work program.

- For older people, this will involve helping them understand what to expect from their aged care service and providing guidance on how we can help when their aged care experience falls short.
- For providers, it means helping them to understand their obligations, what we expect to see in the delivery of care, how we will assess performance and how we will regulate.
- For workers, it means helping them to understand their obligations, what is important in delivering quality care and how the Commission can help them to raise concerns.

Workforce supply in aged care remains constrained, particularly for providers operating outside urban areas. While acknowledging this constraint, we will continue to work with providers to ensure continuity of services and delivery of quality care. We will also focus on developing resources and supports for aged care workers, helping them to realise their potential in their vitally important roles.

Our support activities include co-designing communication, engagement and education products for First Nations and culturally and linguistically diverse older people and communities, providers and workers. Fostering these partnerships and developing culturally appropriate resources will enhance the quality of care for older people, and support aged care workers and older people to feel valued and heard.

Change has been a constant in the sector since the Royal Commission, and the quality of aged care has improved as a result. We see this next period – with the anticipated introduction of the new Aged Care Act – as another chance to embrace opportunities and improve care for all older people.



Capability

We will continue to invest in our capability and governance and, as a maturing regulator, the integrity of our processes. During 2024–25, the Commission will focus on 2 key priorities: our continuing organisation-wide program to uplift capability, and our preparation for the introduction of the new Aged Care Act.

Beginning in 2024–25, we are taking a coordinated approach to improving our governance capability, aligning it with our new governance arrangements. Staff will participate in a comprehensive learning and development program to improve governance and decision-making capabilities. The program includes tailored learning to ensure that those with specific roles in the new governance arrangements have the knowledge and capabilities to confidently and effectively contribute to these arrangements.

Our capability architecture enables us to assess our organisational capabilities and prioritise initiatives to enhance them. During 2024–25, we will update this architecture to reflect our maturing regulatory approach and further embed our model.

We also have work underway to achieve targets for uplifting capability across strategic, regulatory, engagement and enterprise-wide domains. This program reflects our efforts to improve and supports us to deliver on the Capability Review's recommendations.



Figure 4. The People Strategy key focus areas

People

We continue to invest in the capability of our people

To fulfil our purpose, navigate the upcoming period of growth and reform, and continually evolve and improve as an organisation, we must have a well-supported, highly capable and diverse workforce that works together effectively. The People Strategy 2024–26 sets the vision for our workforce and workplace, so that we are well positioned to fulfil our organisational purpose.

Our Strategic Workforce Plan forecasts our long-term organisational needs and identifies targeted initiatives to address our anticipated workforce size, composition and capability requirements. During 2024–25, we will embed our People Capability Framework, which outlines how we define, manage and develop people capability. The Commission will focus on enhancing staff capabilities in the areas of leadership, regulation, data, governance and diversity.

APS Strategic Commissioning Framework

For the first time, agencies will also be required to implement the APS Strategic Commissioning Framework, which is a principles-based APS policy that supports agencies to prioritise APS employment, strengthen APS capability and reduce reliance on consultants, contractors and labour hire. The framework limits outsourcing of core work.

Agency heads are accountable for implementing the framework. The principles-based approach allows agencies to operationalise the framework in a way that suits their circumstances.

Agencies will:

- define the core work of their agency
- set targets to reduce inappropriate outsourcing and report on progress
- ensure core work is delivered by APS employees
- ensure future contracts include arrangements to transfer knowledge and skills to the APS
- embed the framework in agency policies and procedures (e.g. budgeting, recruitment, HR metrics, procurement and contract management functions).

Successful implementation will support a fit-for-purpose, diverse, skilled and experienced APS workforce that fulfils their responsibilities with integrity. Results will take time and will require commitment from APS leaders. We will see reductions in the use of external labour and associated costs.

Over time, this approach will deepen system-wide capability and reduce the risks posed by excessive outsourcing regarding integrity, expertise and public trust.

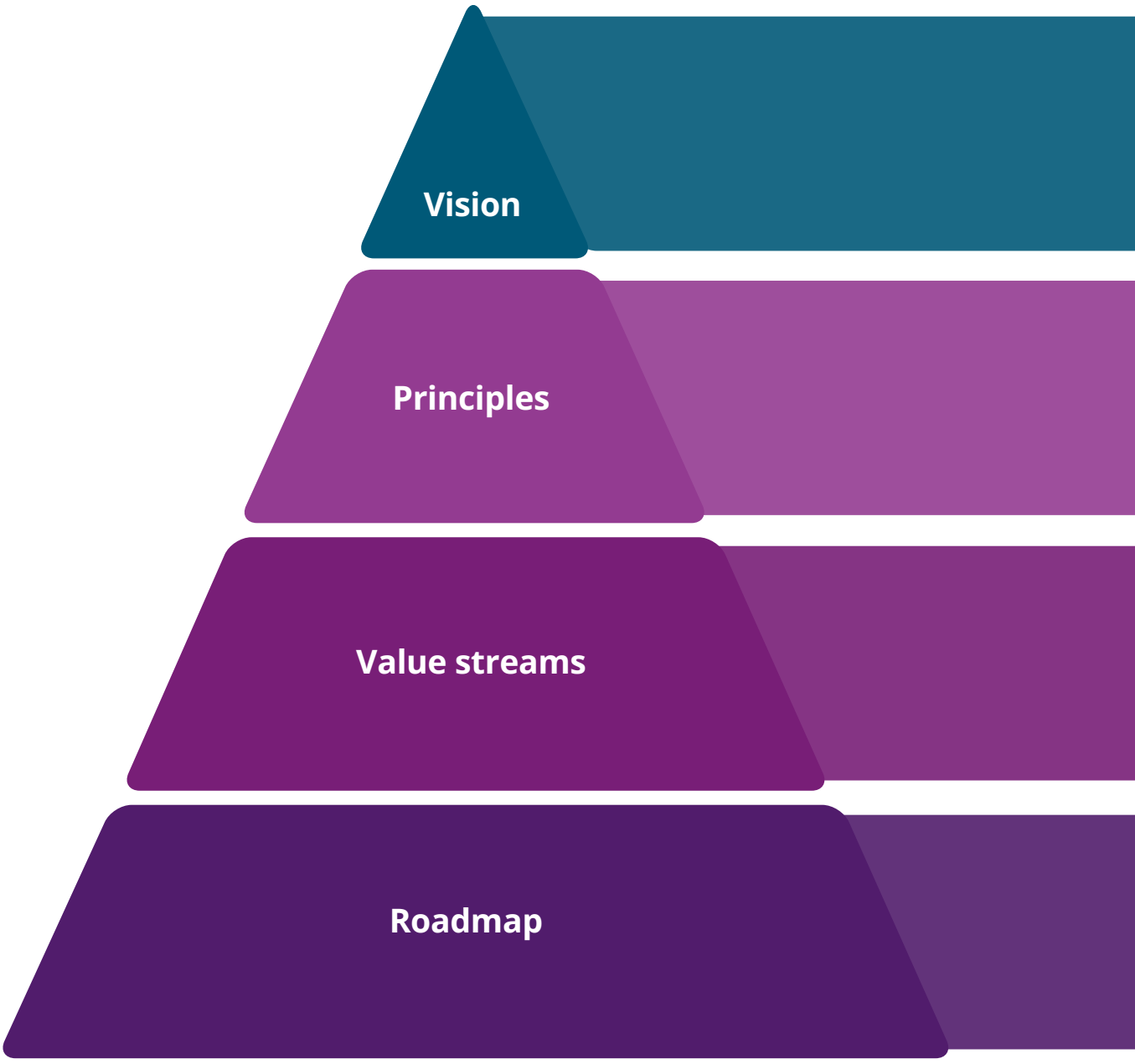
Targets

In 2024–25, the Commission will reduce outsourcing of core work in line with the APS Strategic Commissioning Framework. Our targets for 2024–25 focus on reduced outsourcing of legal, financial and accounting, and portfolio management work, with an expected reduction of $700,000 in 2024–25 in outsourcing expenditure.

The Commission has made a concerted effort over the past 2 years to reduce the use of labour hire staff within the Commission, taking it from a high of 37% to approximately 10%.

The planned changes to the Aged Care Act, and their implications for the operational activities of the Commission, require the use of external support (labour hire, consultancies or outsourced service providers) for particular elements of work for specific periods of time. The Commission conducts as much preparatory work as possible internally while managing our average staffing level allocation, legislative timelines and staff wellbeing.

Successful implementation will support a fit-for-purpose, diverse, skilled and experienced APS workforce that fulfils their responsibilities with integrity



Digital transformation

To fulfil our purpose in a fast-changing and complex environment, we look to technology as a key enabler of transformation.

The Digital Strategy 2022–25 provides a structured and holistic approach to transforming digital capability across the Commission. Details of the strategy's vision, principles, values and roadmap are outlined in Figure 5.

During 2024–25, we will continue to implement our Digital Strategy, which will enable us to operate effectively within the connected aged care digital infrastructure while leveraging emerging technology and cross-agency reforms. The strategy will also give us the digital capabilities we need to integrate regulatory functions and optimise our intelligence-led, risk-based approach.

Where are we going?

Our digital vision is to provide integrated, responsive, sustainable and secure services that support our regulatory activities and deliver a seamless service experience for external stakeholders and Commission staff.

What do we need to do to get there?

The strategy outlines the 6 principles and our high-level approach to building digital capabilities required to support the health, safety and wellbeing of older Australians:

1. business-driven
2. leverage government capability
3. human-centred
4. unified approach
5. secure by design
6. modern digital platforms.

What is supporting this?

Six streams of digital transformation initiatives provide the tangible outcomes required to achieve the strategy:

1. sustainable operations and delivery model
2. technology town planning
3. robust infrastructure and security
4. fit-for-purpose business applications
5. digitised workspace
6. ecosystem information exchange and analytics.

How are we going to do this?

Our digital roadmap outlines the initiatives across sequenced phases – from foundational to visionary capabilities – with each one bringing us to the next phase.



Figure 5. Digital Strategy 2022–25

Key initiatives during 2024–25 include:

- improving cybersecurity
- enhancing enterprise service management and digital operations
- consolidating core applications into a single fit-for-purpose case management solution (the Aged Care Case Management Information System)
- prioritising activities aligned with the government's Essential 8 cybersecurity requirements
- developing key data and case management systems to support the requirements of the new Aged Care Act
- building robust enterprise architecture for the Commission's connection to the aged care ecosystem.

Data and intelligence

Data and intelligence are essential to us fulfilling our role as a regulator in a way that is intelligence-led, risk-based and proportionate in our regulatory responses.

Using data and intelligence, the Commission can better identify emerging issues and intervene earlier to prevent non-compliance or harm to people receiving aged care services due to providers failing to meet their responsibilities or not providing safe, quality care.

It also allows the Commission to assess sector-wide trends to better understand the experience of older Australians, and enablers of and barriers to safe, quality care. This understanding informs actions taken by the Commission to guide and shape sector performance through education and information, facilitating behavioural change and encouraging providers to invest in activities that uplift capability.

The Commission receives and holds a large volume of information – on a daily, monthly, quarterly, annual and triannual basis – about provider performance, worker conduct and older people's experiences of care.

We gather information from:

- older people and their representatives, including through interviews, complaints and enquiries, consumer peak bodies, feedback and resident experience surveys
- workers who contact the Commission to make a complaint or give us information, or who are interviewed as part of our regulatory activities
- providers undertaking mandatory reporting, including relating to governance, workforce, finances, food services, quality indicators and serious incidents
- regulatory intelligence that we collect through our own activities, including managing complaints and serious incidents, site audits, risk-based monitoring, investigations and managing non-compliance.

Our risk-based targeting and information sharing tools bring together and analyse data to help us understand:

- the nature of potential or actual issues facing people accessing aged care services
- risks to the aged care sector, and the performance and characteristics of individual providers.

Risk models are one set of tools that allow the Commission to target specific issues of concern and/or identify services and providers at risk of failing to deliver safe, quality care. They also help us to understand the performance of the sector, detect risk, and assess the likelihood and consequence of those risks being realised.

During 2024–25, the Commission will implement new risk models to address specific and emerging risks. In preparation for upcoming reforms across the aged care sector, we are implementing and improving data and intelligence tools, technologies and processes that focus on harm to people receiving aged care services, as well as preventing non-compliance.

Using data and intelligence, the Commission can better identify emerging issues and intervene earlier to prevent non-compliance or harm to people receiving aged care services due to providers failing to meet their responsibilities

Risk management

The Commission operates in a dynamic and evolving risk environment. We rely on effective and integrated risk management practices embedded across the Commission to deliver on our outcomes and strategic priorities. These practices are underpinned by a positive risk culture and clear governance and accountability mechanisms.

The Commission's approach to risk management is consistent with section 16 of the PGPA Act and the Commonwealth Risk Management Policy, and is further informed by ISO 31000:2018 *Risk Management – Guidelines.*

In 2024–25, we will strengthen and mature our approach to risk management, focusing on integrating our activities across strategic, enterprise, operational and regulatory risks.

An integrated approach to risk management that reflects the relationships between strategic, enterprise, operational and regulatory risks is critical to embedding risk management in our culture and work practices. It is also vital to improving decision making in a way that maximises opportunities for innovation and better manages uncertainty.

As part of our work, we will review and update our Enterprise Risk Management Framework and align it with the Regulatory Risk Management Framework. We will integrate our approach to responding to developments in our operating environment and across the aged care sector. This includes reviewing risk terminology, key risks, and categories and subcategories of risk, as well as our risk appetite and risk tolerance. We will also review our critical controls and supporting frameworks to ensure that they remain fit for purpose and effective.

In 2024–25, the Commission will also conduct risk management capability benchmarking activities under the Comcover Risk Management Benchmarking Program, and will invest in resources for continual improvement.

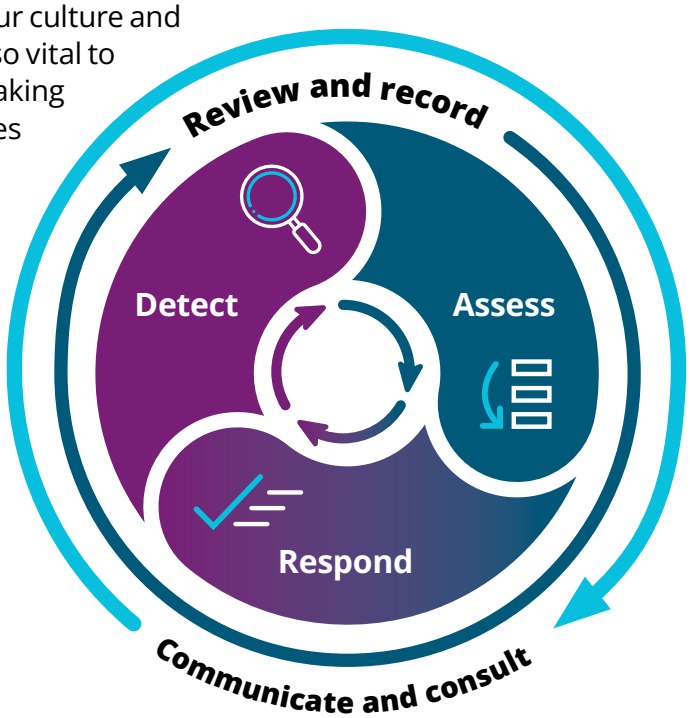


Figure 6. Risk management cycle

Oversight and governance

Our governance arrangements support risk oversight through a tiered committee structure. This structure enables efficient and effective decision making at the lowest appropriate level, while providing systems and processes to ensure that important matters reach the (Tier 1) Commission Management Committee for consideration.

In 2024–25, our risk-related governance committees, supported by the Chief Risk Officer, will play an important role in ensuring we have effective risk management practices in place. By integrating these practices in our tiered committee structure, we can consistently and effectively identify and manage risk and make informed decisions.



Key risk oversight roles and governance committees include the following:

- The **Chief Risk Officer** oversees all risk-related activities, including the operation of the Enterprise Risk Management Framework, to ensure risks are managed within the stated risk appetite or measures are taken to bring risks back within appetite.
- The **Risk and Audit Committee** provides independent advice on the appropriateness of the Commission's system of risk oversight and the strategies in place to manage key risks.
- The **Enterprise Performance Committee** provides strategic control and assurance over the Commission's management. The committee focuses on ensuring that enterprise and operational strategies, capabilities and resources align with government policy, legislative requirements and Commission priorities.
- The **Sector Risk and Performance Committee, Provider Risk Committee** and **Worker Risk Committee** draw together data, intelligence and insights on provider performance and harms to older people receiving aged care. They are also a critical conduit between our strategic priorities and how we respond to risks.

Risk culture, appetite and tolerance

The Commission has a positive risk culture that aims to promote an open and proactive approach to risk. This fosters collaboration and enables us to manage and communicate on risk-related matters across all levels.

We have a low appetite for risks to the safety and wellbeing of older Australians accessing aged care services and of Commission staff. The Commission has a higher appetite for risks that support improvement and innovation, contributing to fulfilling our purpose.

Key risks

Strategic risks

Strategic risks are global or external risks that would significantly affect our ability to fulfil our purpose. In 2024–25, we have identified these as risks to:

1. priorities
– government priorities change or shift

2. our funding model
– our funding model and structure changes

3. the experience of older Australians
– people's ability to access aged care services is not in keeping with legislated obligations and standards

4. our workforce
– we cannot build a professional, engaged and flexible workforce that meets our operational requirements

5. service demand
– we experience a sudden change in demand for our services.

The strategies we use to manage and mitigate our strategic risks are proportionate to the threat or opportunity, and we continue to invest in and build our capabilities. For example, we:

- ensure resources and capabilities focus on delivering government priorities
- implement regulatory responsibilities and programs to protect the safety, health, wellbeing and quality of life of people accessing care
- use expertise and meaningful stakeholder relationships to enhance confidence and trust in the aged care system
- empower older Australians to make informed choices by providing education and information about matters relating to our functions and promoting our best practice service provision
- create greater awareness and understanding in the community, and with providers and other stakeholders, about our role as a regulator.

Enterprise risks

Our enterprise risks are external or internal events that affect our ability to fulfil our purpose. In 2024–25, we have identified these as risks to:

1. workplace and people
– members of our workforce experience an incident that threatens their health, safety and wellbeing

2. decision making
– members of our workforce operate outside their delegated authority or make uninformed decisions

3. delivery
– we deliver a program, project or service that is late, ineffective, poor quality or not fit for purpose

4. stakeholder engagement
– we provide incorrect, incomplete or untimely information to a vital stakeholder

5. business resilience
– one of our critical business functions is disrupted for longer than the specified maximum acceptable outage

6. integrity
– a member of staff or a third party is involved in fraud or corruption

7. information governance and security
– our corporate or confidential information is lost, or is released, amended or used without authorisation.

Our corporate, administrative and operational policy frameworks outline key mitigation strategies for these risks. These frameworks ensure that we:

- provide programs, projects and activities that are in line with the proper use of public resources
- undertake appropriate financial management, compliance and oversight
- develop our people and protect them from harm
- have collaborative relationships with ministers
- support the aged care sector and the broader APS
- have suitable IT and digital services, and we protect information
- provide effective policy guidance, enabling understanding of processes for operational activities.

Regulatory risk

The Regulatory Strategy 2024–25 details how we respond to the risk of harm, or to actual harm, to older people receiving funded aged care services. We manage risk through preventative and responsive measures.

Our preventative measures include providing targeted education to providers and monitoring them to confirm they are managing a suspected risk, to prevent the risk event from occurring.

If we have identified a risk that requires a response, we look at how providers can reduce the impact of the risk event, and engage with and support older people to restore their trust and confidence in their care. Both approaches aim to prevent harm from occurring or reoccurring.

The Commission manages regulatory risks using intelligence-led, risk-based and proportionate responses built into our model for supervising providers.

We focus on areas of greatest risk to the safety, health, wellbeing and quality of life of older people receiving funded aged care services, where providers are failing to meet their obligations to deliver safe, quality care.

To consolidate and strengthen our risk management approach, we will further align strategic and enterprise risks with data and intelligence-based regulatory activities in 2024–25. A key element of this will be aligning performance measures and annual operational plan actions with the regulatory best practice principles outlined in the Department of Finance's RMG 128.

Regulatory approach

We take a preventative and responsive regulatory approach. By analysing data (preventative) and engaging with providers through scheduled contacts and events (responsive), we:

- prevent (where possible) future failures in care
- improve sector performance for targeted issues such as food, nutrition and dining
- reduce risks and manage non-compliance
- deter future non-compliance.

To prepare for regulation under the new Aged Care Act, we revised our Regulatory Strategy to increase the focus on empowering older people, building sector capability and holding providers and workers accountable.

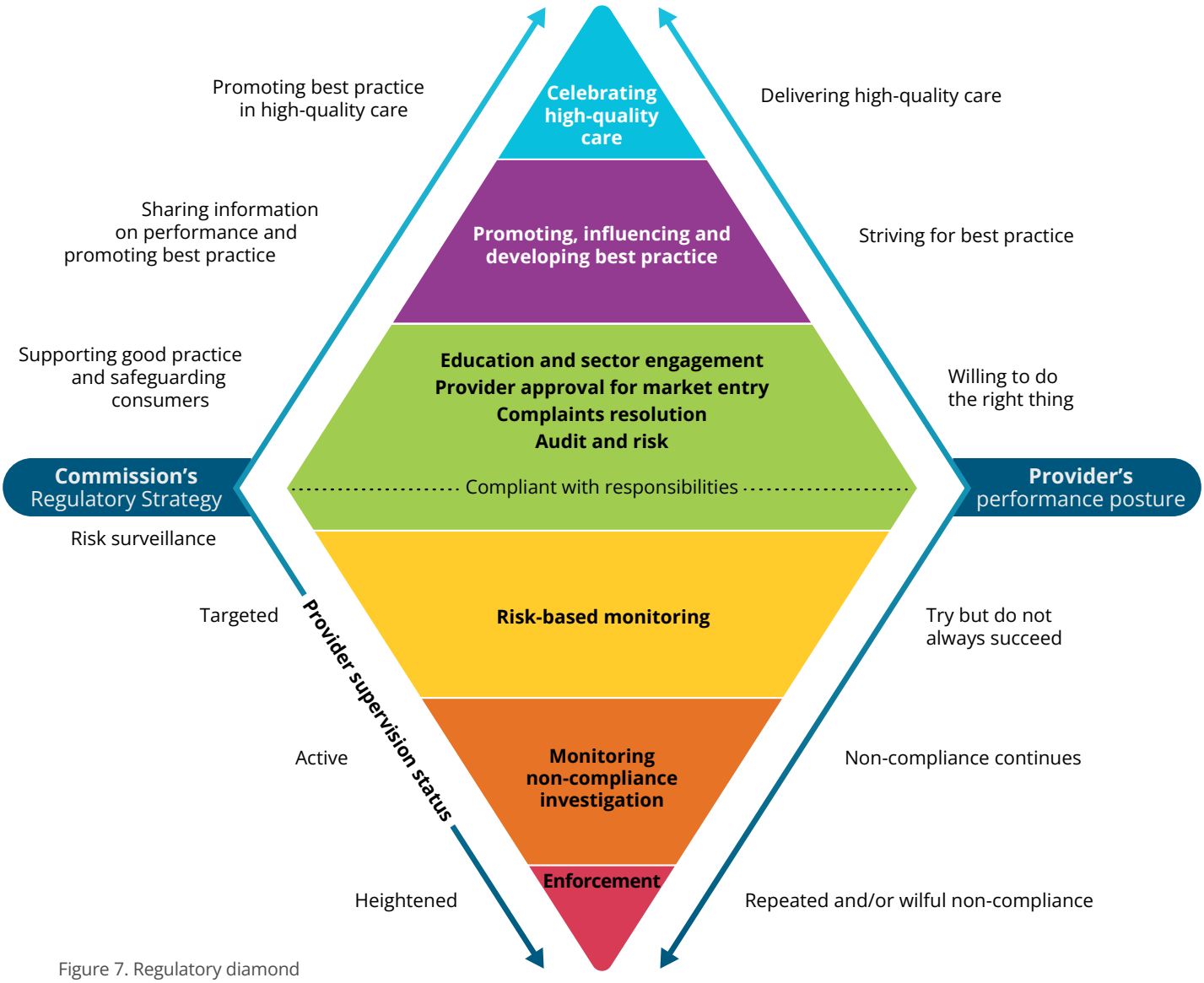


Figure 7. Regulatory diamond



Figure 8. The Commission's risk surveillance model

Our Regulatory Strategy 2024–25 outlines our proportionate approach to regulating providers and workers, how we respond to risk and harm, and how we act to prevent harm from occurring or reoccurring. The strategy describes our approach to risk reduction and surveillance, supervision and enforcement to protect the rights of older people.

We aim to be fair, balanced and effective in our approach to regulation, to ensure better outcomes for people receiving aged care. Older people are at the centre of what we do, and we strive to improve their experience of aged care by intervening in the right way at the right time.

Our approach is outlined in Figure 8. It illustrates our proportionate, fair and balanced response to risk. Under this model, we work with all providers at all times to detect, assess and respond to risk.

Provider supervision

We are refining our operating model to support a provider supervision approach, which will place all providers in one of 4 levels of supervision. Providers assessed as being high risk will experience greater supervision and engagement with the Commission in response to the risk identified.

We use our risk surveillance model to determine a provider's supervision status. Due to ongoing information collection and related risk analysis, a provider's supervision status can change as new information becomes available.

We may learn about risks through surveillance, a complaint, a notification, a tip-off or a referral from another agency, or through our data analysis and risk detection tools. Risks we become aware of could relate to:

- harms that have occurred or concerns of a high likelihood of something causing serious harm
- specific individuals or groups of individuals, including older people or workers
- one or more of a provider's services, including a pattern across a provider's operations and over time.

A provider's supervision status reflects the intensity and extent of the Commission's case management activities for that provider. At any time, we expect to have a significant number of providers at the risk surveillance level and relatively few at the heightened supervision level.

Where we identify a risk, we expect providers to remedy the problem, restore a person's trust in their care and prevent the problem from happening again.

The Provider Risk Committee, made up primarily of members of the Executive Leadership Group (ELG), oversees the supervision response. The Provider Risk Committee gives assurance over operational decisions and ensures they are risk-based, consistent, proportionate and transparent.

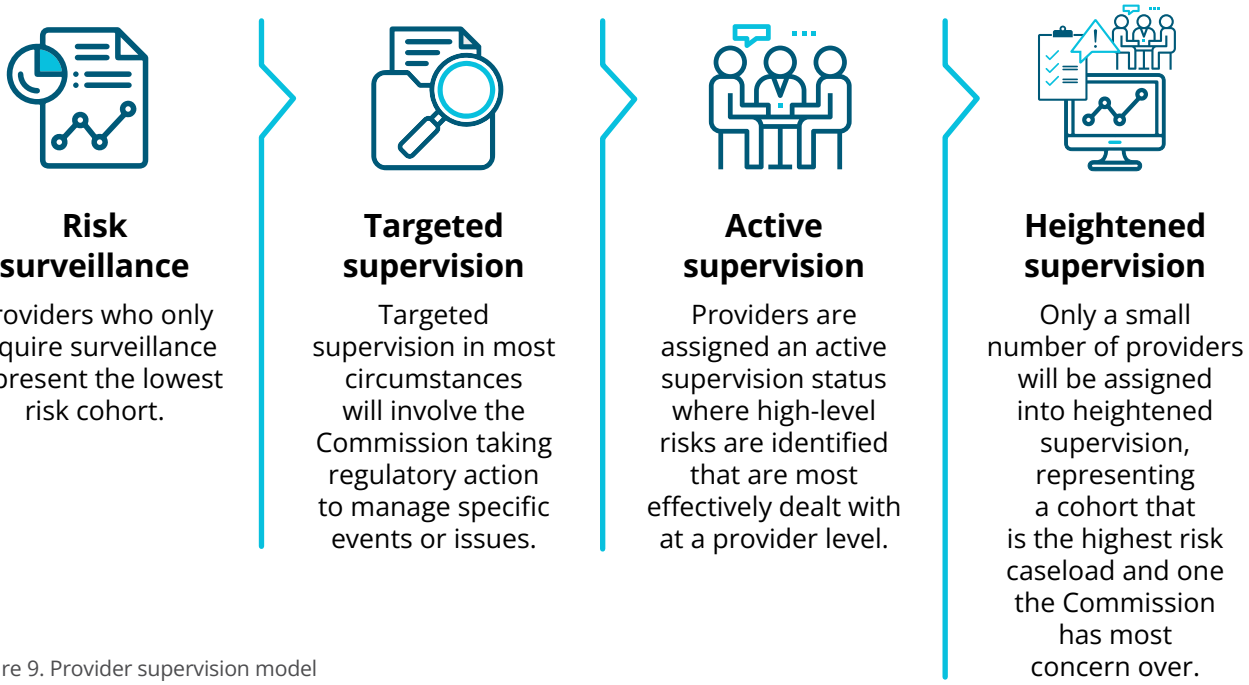


Figure 9. Provider supervision model

The Aged Care Quality Standards

The Quality Standards tell providers the core requirements they must meet on an ongoing basis to ensure that the care they deliver is safe and high quality, and that it meets people's needs and preferences. The Quality Standards focus on outcomes for older people and reflect the level of care and services the community can expect from providers.

The Royal Commission highlighted that the current Quality Standards needed to be reviewed, especially in the specific areas of food and nutrition, diversity, dementia, governance and clinical care. The draft new Quality Standards have been strengthened to lift the standard of care for older people by increasing protections and empowering them to exercise their rights. The draft new Quality Standards also expect providers to continuously improve their level of care.

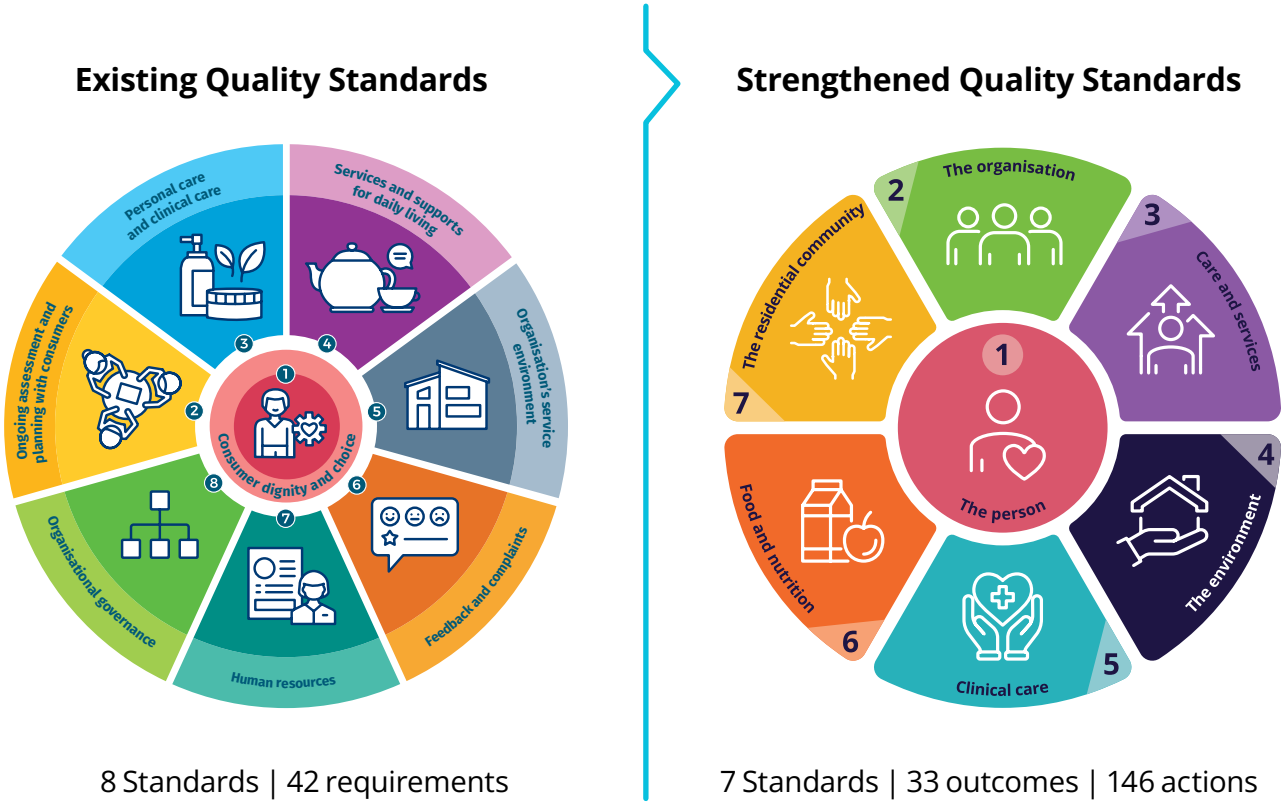


Figure 10. Existing and proposed Aged Care Quality Standards

Aged Care Code of Conduct

The Code of Conduct prescribes how providers and their workers must behave and treat people receiving aged care. The care they provide must be free of all forms of violence, discrimination, exploitation, neglect and sexual misconduct, and providers must take reasonable steps to prevent and respond to such behaviours.

Financial and Prudential Standards

The link between the financial health of providers and the delivery of safe, high-quality care is well known. Residential aged care providers that hold refundable accommodation deposits must meet the requirements of the financial and prudential standards and fulfil their financial and prudential reporting responsibilities. This ensures that providers safeguard older people by being transparent about their finances and managing their refundable deposits lawfully.

Financial and Prudential Standards



Figure 11. Financial and Prudential Standards



Complaints handling

The Commission is working with providers to lift their complaints handling abilities and systems. We are also working to help older people receiving care feel more confident about raising concerns or complaints with providers, directly or with our help.

Each complaint is triaged and a plan is developed for managing the complaint. Resolution of the complaint may involve:

- talking with the complainant (and the older person if someone is complaining on their behalf)
- seeking information from the provider via phone discussions or requests for information or documents
- requiring the provider to resolve the issue/s and report back to the Commission
- holding mediation or conciliation meetings
- visiting the service location if it is part of an investigation.

Restorative engagement will increasingly underpin our approach to complaints. When something goes wrong, the Commission will encourage and facilitate communication between affected parties so that the complainant, their family and carers feel heard and respected. This will be achieved by ensuring the provider is accountable for fixing the problem (remedy), restoring trust and confidence in the quality and safety of the services being delivered (restore), and taking steps to ensure it does not happen again (prevent).

Looking across the many thousands of complaints received by the Commission, we can also identify trends and areas where enhanced provider education, targeted campaigns or regulatory effort is needed. We share our insights with providers and the public through our Complaints reports and Sector performance reports.

We will also be implementing a new Service Delivery, Integrity and Employee Complaints Framework, policy and procedures for handling complaints and feedback about us and our staff.

The Commission will encourage and facilitate communication between affected parties so that the complainant, their family and carers feel heard and respected

Listening to older people

Older people are at the centre of all that we do. We listen to them to understand what is important to them and what they need from the Commission. Older people's insights have significantly informed our Regulatory Strategy.

We hear from older people through our Consumers and Families Panel. The 300-member panel helps the Commission understand older people's concerns and how we can support their right to quality aged care, including by providing clear and accessible information.

We routinely work with older people to design our communication products and engagement strategies. We listen to older people who provide feedback about how we manage complaints, and we conduct interviews as part of our audit, monitoring and enforcement activities. We undertake research, surveys and focus groups with older people and their supporters, and we listen to and consult with groups (such as the Older Persons Advocacy Network and Council on the Ageing) that represent older people receiving aged care services.



Engaging with providers

This includes promoting best practice models for high-quality and safe care, and explaining provider responsibilities in clear and straightforward ways.

We build relationships with aged care providers to encourage them to invest in their capabilities to deliver the quality services that older people expect. We do this by:

- building relationships with senior leaders to inform our understanding of the sector and shaping our efforts to promote a better aged care sector
- working across the sector to champion innovation and continuous improvement
- delivering targeted communication and education to support the sector to understand the new opportunities and requirements of aged care reforms
- publishing insights and data to show the sector how we judge performance, and to enable providers to compare themselves with others
- providing information and education to providers to help them understand their statutory obligations as aged care providers.

Cooperation

We work closely with stakeholders in the aged care system, including the department; the Advisory Council; peak consumer and provider bodies; the Commission Consultative Forum; aged care workers and industrial associations; state and territory public health authorities; and researchers and universities.

The Commission works directly with older people and their families through the Consumers and Families Panel. This panel helps us improve the way we regulate aged care services. It also helps us make sure that the information we provide is useful and easy to understand, by providing feedback about what is important to the people receiving care.

We have also established an aged care providers and workers panel. Members of this panel are helping us prepare for the aged care reforms by sharing their insights and expertise as we develop activities and resources for the sector.

Our Stakeholder Engagement Strategy outlines how we will identify opportunities to plan, deliver and evaluate engagement activities with external stakeholders. The strategy aims to:

- ensure that older Australians accessing aged care are at the centre at all times
- improve our engagement capability
- respect stakeholders' knowledge and needs
- improve engagement governance.

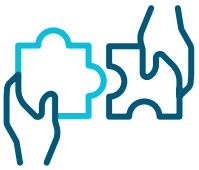


Commission stakeholders

- Older Australians accessing aged care services and their family, friends and supporters
- Aged care providers
- Aged care workforce and unions
- Advisory Council and Consultative Forum
- Government and ministers
- Department of Health and Aged Care
- Primary/public health networks
- Allied health
- Peak bodies
- Other regulators and government agencies
- University and research bodies
- Inspector-General of Aged Care



Four key actions underpin our stakeholder engagement



Collaborate

Partnering with stakeholders to produce resources, and designing and developing processes with stakeholders



Consult

Seeking advice from stakeholders, holding roundtable discussions and asking for regular feedback



Inform

Providing information via emails, letters, webinars and the Commission website; talking with people at events and leading education activities



Inquire

Gathering information via workshops, interactive webinars and surveys, and having conversations and listening

Performance

Our annual planning, performance and reporting framework – of which this Corporate Plan is a key component – connects our strategic direction and priorities, key activities, risk management, resource allocation, and performance measurement and monitoring.

This complies with the requirements of the Commonwealth Performance Framework.

The Health Portfolio Budget Statements (PBS) set out our outcomes, programs and performance indicators used to monitor progress against the stated deliverables. They also outline annual appropriations and how we are to spend these funds to fulfil our purpose.

The Corporate Plan and Annual Operational Plan are developed considering the information in the PBS. Priorities flow from these plans to group and section plans, then to individual performance and development agreements. This provides a clear line of sight from our purpose to the work of individual staff members.

Annual Performance Statements report on actual performance against the anticipated results articulated in the PBS and Corporate Plan.

The Annual Performance Statements are included in our annual report, which is prepared at the end of each reporting cycle.

(See Figure 12 on page 39).

Expectations and intent

The Hon Mark Butler MP, Minister for Health and Aged Care and the Hon Anika Wells MP, Minister for Aged Care jointly issued the Commission with a Statement of Expectations, on 11 October 2022.

The Statement outlines the Australian Government's expectations of the Commission in carrying out its role and functions in the context of the government's policy agenda. It also outlines expectations of how the Commission manages relationships with the government, people accessing aged care and other key stakeholders, and issues of transparency and accountability.

The Commission issued a Statement of Intent in response.

The current Statements are available on the Commission's website.

The Commission's planning, performance and reporting activities are developed within the context of issues covered in both documents.

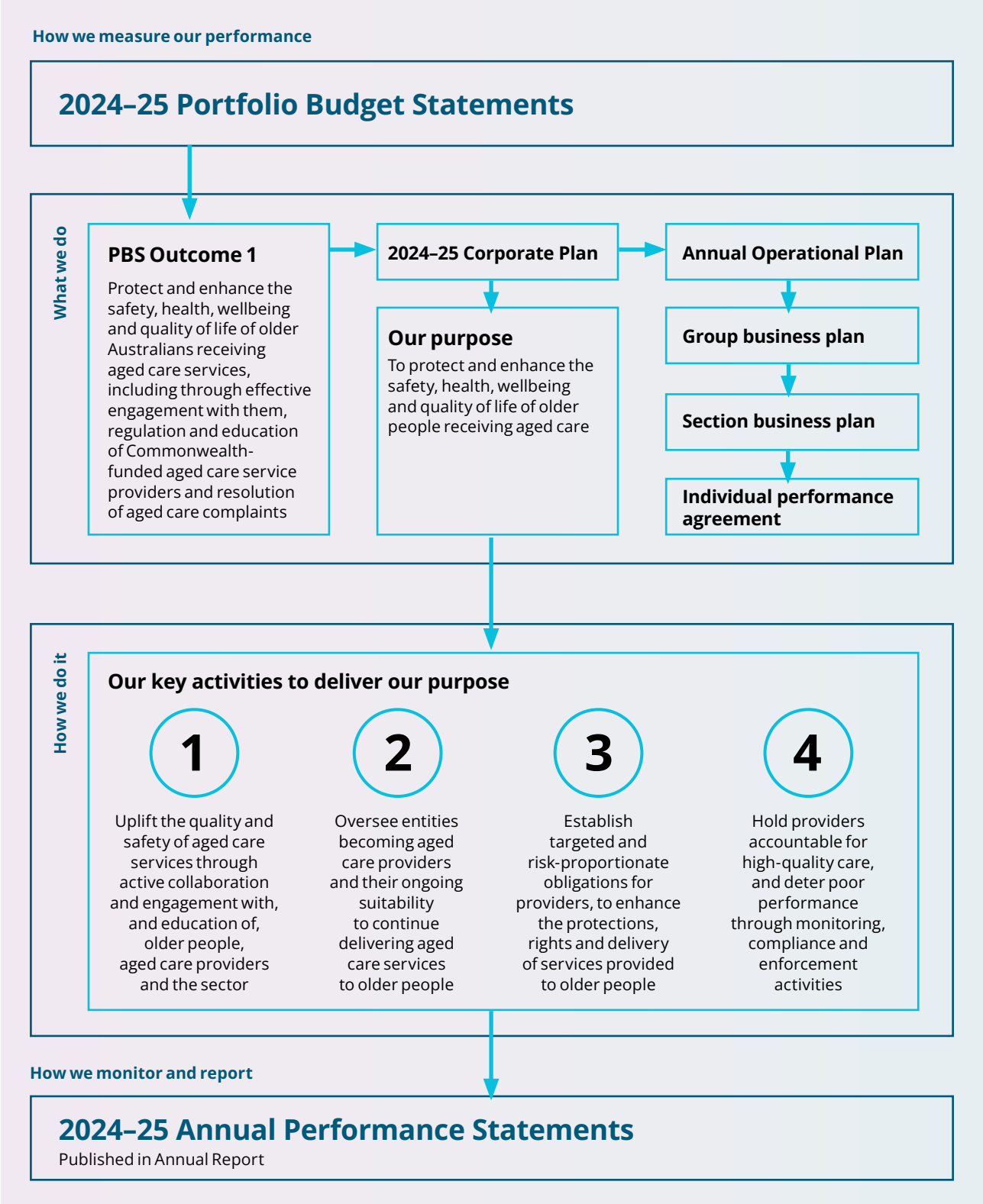


Figure 12. Planning, performance and reporting framework

New key activities and performance measures

We have reviewed and refreshed our key activities and performance measures in anticipation of the new Aged Care Act.

This includes creating baselines for new performance measures, targets and supporting documentation. We did this after consulting extensively with key members of the ELG; staff who will be responsible for reporting on performance measures; our Intelligence and Analysis business unit; and the Risk and Audit Committee.

Under our new approach, we will transition from 3 to 4 key activities and from the current 13 performance measures to a suite of 6 new performance measures mapped to our new ROM.

The new key activities cover the same functional roles, but acknowledge the entry, ongoing suitability and accountability of providers and workers, consistent with changes expected under the new Aged Care Act.

Unlike our previous performance measures, which usually had one target per measure, our revised approach allows for multiple discrete targets under each performance measure. These can be removed, amended or added to, depending on our priorities or as new functions come online.

This makes the performance measures more consistent over time (a requirement of the PGPA Rule) and allows greater flexibility to accommodate changes to targets under those performance measures, without impacting other performance measures, targets or the broader Enterprise Performance Management Framework.

Key activities

Key activity 1	Uplift the quality and safety of aged care service through active collaboration and engagement with, and education of, older people, aged care providers and the sector
Key activity 2	Oversee entities becoming aged care providers and their ongoing suitability to continue delivering aged care services to older people
Key activity 3	Establish targeted and risk-proportionate obligations for providers, to enhance the protections, rights and delivery of services provided to older people
Key activity 4	Hold providers accountable for high-quality care, and deter poor performance through monitoring, compliance and enforcement activities

The new performance measures align to one or more key activities. Each performance measure has a number of targets so that progress can be monitored, measured and reported on in the Commission's Annual Performance Statements.

The performance measures detailed in the PBS are included in this Corporate Plan, along with additional measures to provide a holistic view of how we will fulfil our purpose during 2024–25 and future years.

Performance measures

1

Enable older people to receive high-quality and safe care by regulating the entry, exit and ongoing suitability of providers and workers delivering government-subsidised aged care services

2

Protect and improve the quality, safety and experience of older people receiving care through an efficient and effective complaints handling service, management of serious incidents, and the processing of provider reporting and notifications

3

Undertake provider and worker supervision in response to risks in aged care service delivery, supporting provider compliance and taking enforcement actions where necessary

4

Deliver aged care regulation with transparency, trust and confidence that safeguards, protects and enhances outcomes for older people receiving care in Australia

5

Deliver targeted engagement and education initiatives and materials that support capability uplift and behavioural change across providers, workers, the sector and the Commission

6

Use risk profiling and detection to enable regulatory risk management that is appropriate and proportionate to the level of risk of harm to older people in Australia

Regulator performance

We are accountable to the government for our performance as a regulator. As part of our regulatory approach, we have aligned our performance measures to the 3 principles of regulator best practice outlined in the Department of Finance's RMG 128.

Consistent with these principles, we will continuously strive to build trust, working transparently and responsively with Australians accessing care and providers to ensure that our approach to regulation is intelligence-led and proportionate to risk.

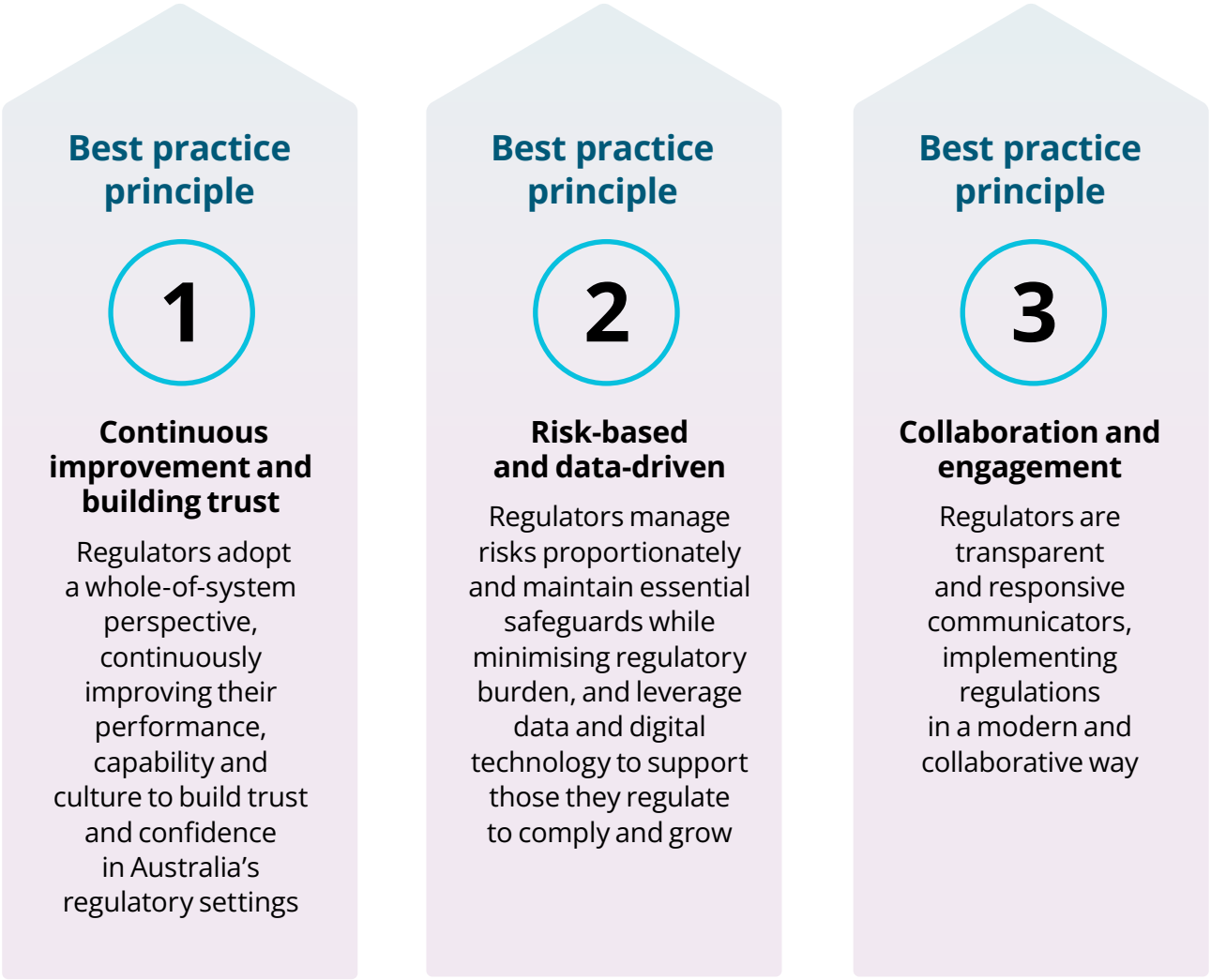


Figure 13. Principles of regulator best practice

What

How

Strategic layer

Purpose

To protect and enhance the safety, health, wellbeing and quality of life of older people receiving aged care

PBS Outcome Statement

Protect and enhance the safety, health, wellbeing and quality of life of older Australians receiving aged care services, including through effective engagement with them, regulation and education of Commonwealth-funded aged care service providers and resolution of aged care complaints

Key activity 1

Uplift the quality and safety of aged care services through active collaboration, education and engagement with older people, aged care providers, workers and the sector

Key activity 2

Oversee the entry of entities becoming aged care providers and their ongoing suitability to continue delivering aged care services to older people

How

Performance measurement layer

Becoming a provider and worker

Holding providers and workers accountable

Performance measure 1:

Enable older people to receive high-quality and safe care by regulating the entry, exit and ongoing suitability of providers and workers delivering government-subsidised aged care services

Performance measure 2:

Protect and improve the quality, safety and experience of older people receiving care through an efficient and effective complaints handling service, management of serious incidents and the processing of provider reporting and notifications

Performance measure 3:

Undertake provider and worker supervision to respond to risks in aged care service delivery, support provider compliance and take enforcement actions where necessary

Key activity 2

Best practice principles 1 and 2

Targets

1.1
Conduct 1,370 audits of aged care services comprising 730 site audits and 640 quality audits

1.2
100% of banned workers are included on the banning order register

Key activies 3 and 4

Best practice principles 1 and 2

Targets

2.1
80% of complaints about providers are finalised within published service standards

2.2
80% of enquiries to the Commission are responded to within published service standards

2.3
65% of complainant and provider survey responses have an overall rating of satisfied or higher with the complaints process in line with published service standards

2.4
80% of complaints finalised achieve a positive outcome for older people

2.5
80% of initial assessments of P1 SIRS notifications are completed by the Commission within 7 business days

Key activity 4

Best practice principles 1 and 2

Targets

3.1
Decrease in non-compliance by provider cohort

3.2
80% of decisions in response to escalated referrals are made within 7 days of receipt

3.3
80% of escalated referrals requiring active supervision are remediated within 4 months

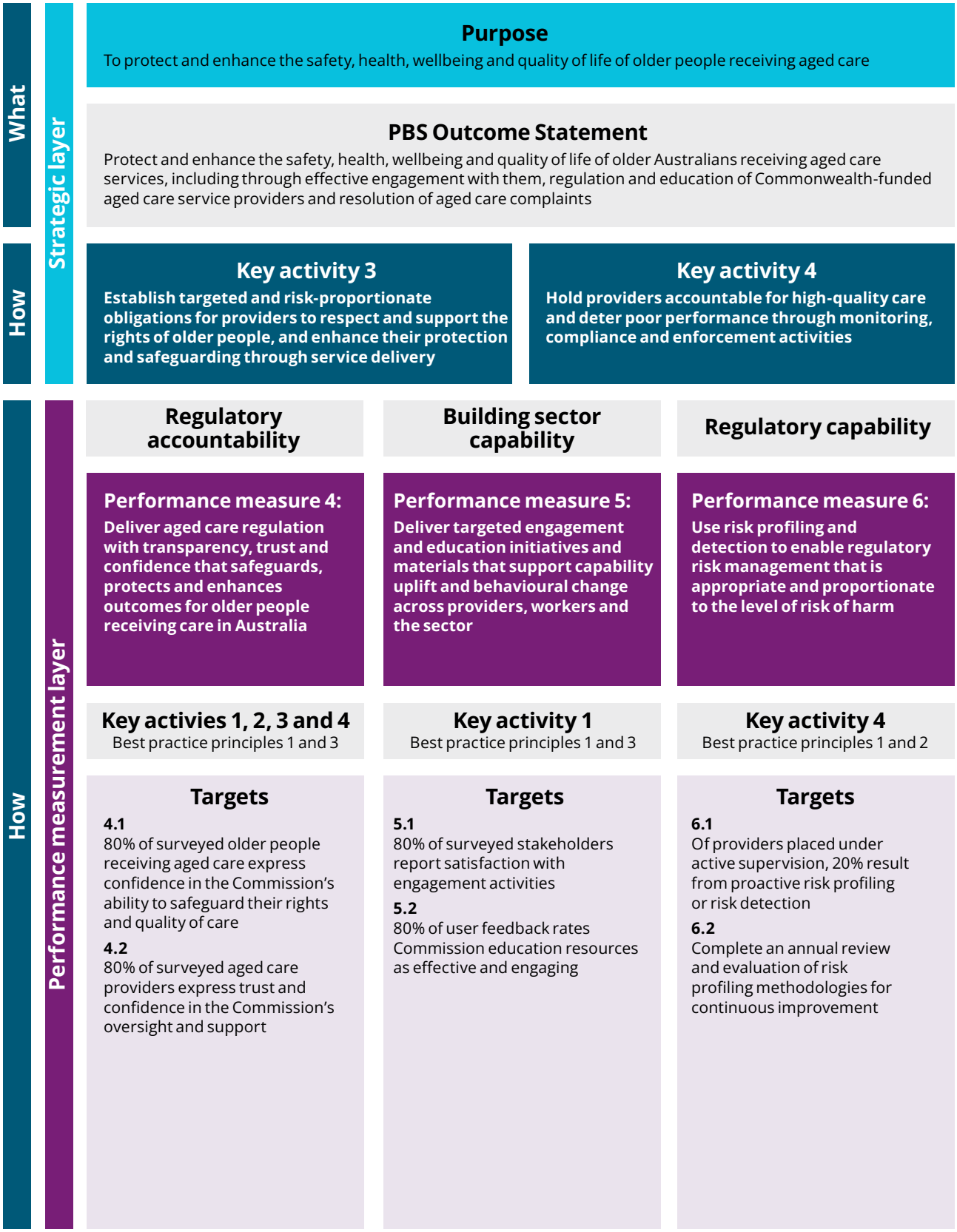


Figure 14. Key activities, performance measures and targets

Performance measure

1

Enable older people to receive high-quality and safe care by regulating the entry, exit and ongoing suitability of providers and workers delivering government-subsidised aged care services.

Relates to key activity 2

Targets

2024–25	2025–26	2026–27	2027–28
1.1 Conduct 1,370 audits of aged care services comprising 730 site audits and 640 quality audits	As for 2024–25	As for 2025–26	As for 2026–27
1.2 100% of banned workers are included on the banning order register	As for 2024–25	As for 2025–26	As for 2026–27

Performance measure

2

Protect and improve the quality, safety and experience of older people receiving care through an efficient and effective complaints handling service, management of serious incidents, and the processing of provider reporting and notifications.

Relates to key activities 3 and 4

Targets

2024–25	2025–26	2026–27	2027–28
2.1 80% of complaints about providers are finalised within published service standards	As for 2024–25	As for 2025–26	As for 2026–27
2.2 80% of enquiries to the Commission are responded to within published service standards	As for 2024–25	As for 2025–26	As for 2026–27
2.3 65% of complainant and provider survey responses have an overall rating of satisfied or higher with the complaints process in line with published service standards	As for 2024–25	As for 2025–26	As for 2026–27

2024–25	2025–26	2026–27	2027–28
2.4 80% of complaints finalised achieve a positive outcome for older people	As for 2024–25	As for 2025–26	As for 2026–27
2.5 80% of initial assessments of P1 SIRS notifications are completed by the Commission within 7 business days	As for 2024–25	As for 2025–26	As for 2026–27

Performance measure

3

Undertake provider and worker supervision in response to risks in aged care service delivery, supporting provider compliance and taking enforcement actions where necessary.

Relates to key activity 4

Targets

2024–25	2025–26	2026–27	2027–28
3.1 Decrease in non-compliance by provider cohort	As for 2024–25	As for 2025–26	As for 2026–27
3.2 80% of decisions in response to escalated referrals are made within 7 days of receipt	As for 2024–25	As for 2025–26	As for 2026–27
3.3 80% of escalated referrals requiring active supervision are remediated within 4 months	As for 2024–25	As for 2025–26	As for 2026–27

Performance measure

4

Deliver aged care regulation with transparency, trust and confidence that safeguards, protects and enhances outcomes for older people receiving care in Australia.

Relates to key activities 1, 2, 3 and 4

Targets

2024–25	2025–26	2026–27	2027–28
4.1 80% of surveyed older people receiving aged care express confidence in the Commission's ability to safeguard their rights and quality of care	As for 2024–25	As for 2025–26	As for 2026–27
4.2 80% of surveyed aged care providers express trust and confidence in the Commission's oversight and support	As for 2024–25	As for 2025–26	As for 2026–27

Performance measure

5

Deliver targeted engagement and education initiatives and materials that support capability uplift and behavioural change across providers, workers, the sector and the Commission.

Relates to key activity 1

Targets

2024–25	2025–26	2026–27	2027–28
5.1 80% of surveyed stakeholders report satisfaction with engagement activities	As for 2024–25	As for 2025–26	As for 2026–27
5.2 80% of user feedback rates Commission education resources as effective and engaging	As for 2024–25	As for 2025–26	As for 2026–27

Performance measure

6

Deliver aged care regulation with transparency, trust and confidence that safeguards, protects and enhances outcomes for older people receiving care in Australia.

Relates to key activity 4

Targets

2024–25	2025–26	2026–27	2027–28
6.1 Of providers placed under active supervision, 20% result from proactive risk profiling or risk detection	As for 2024–25	As for 2025–26	As for 2026–27
6.2 Complete an annual review and evaluation of risk profiling methodologies for continuous improvement	As for 2024–25	As for 2025–26	As for 2026–27

Note: Information relating to the methodology and data source/s used to determine the success of each performance measure will be available in our Annual Report 2024–25.

Annual Operational Plan 2024–25

As required under section 54 of the Commission Act, we must produce an Annual Operational Plan. This plan is informed by our Corporate Plan, which in turn informs group and section-level business plans, as well as individual performance agreements.

We report on our performance against the Annual Operational Plan in our Annual Report.

The Annual Operational Plan is developed considering the information in the PBS and performance measures in Figure 14, on pages 43-44.

The Annual Operational Plan 2024–25 comprises 28 actions with 53 deliverables. They align with the 6 performance measures derived from 4 key activities outlined in the Commission's 2024–25 Portfolio Budget Statements (Table 1).

This work is mapped to 7 focus areas and 4 capabilities (Table 2 and Table 3 on page 53), which are designed to deliver better outcomes for Australians accessing aged care services and stronger corporate capabilities for the Commission.

The focus areas cover initiatives, targeted projects, and the collective and valued efforts of Commission staff. All deliverables are subject to government support and financial considerations.

Key activities

Key activity 1	Uplift the quality and safety of aged care service through active collaboration and engagement with, and education of, older people, aged care providers and the sector
Key activity 2	Oversee entities becoming aged care providers and their ongoing suitability to continue delivering aged care services to older people
Key activity 3	Establish targeted and risk-proportionate obligations for providers, to enhance the protections, rights and delivery of services provided to older people
Key activity 4	Hold providers accountable for high-quality care, and deter poor performance through monitoring, compliance and enforcement activities

Table 1. Key activities

Focus areas

Better outcomes for Australians accessing aged care services	
Focus area 1	Improve quality, safety and choice in aged care through transformative regulatory reforms and sector capability uplift
Focus area 2	Provide a better regulatory service to the community by delivering matured regulatory and operational functions
Focus area 3	Better understand and respond to the risks to aged care consumers by strengthening the Commission's data and intelligence
Focus area 4	Increase understanding, trust and respect with stakeholders through enhanced engagement
Stronger corporate capabilities	
Focus area 5	Strengthen the Commission's governance and funding arrangements
Focus area 6	Maximise the potential of the Commission's workforce
Focus area 7	Evolve the Commission's ICT systems to be robust and user-focused

Table 2. Focus areas

Capabilities

Engagement	Ensures the Commission establishes and maintains effective stakeholder relationships and supports the delivery of person-centred outcomes including through sector capability uplift
Enterprise-wide	Ensures effective operations and supports the delivery of the Commission's primary function and mandate
Regulatory	Enables the delivery of the Commission's legislated functions and assures the safety and quality of care for older people
Strategic	Supports the achievement of the Commission's purpose, vision and priorities through strategic leadership and good governance

Table 3. Capabilities

Priorities

1. Maintaining business-as-usual operations and achieving our performance measures
2. Lifting our capability
3. Preparing for and successfully implementing major aged care reforms

Environment

Linked programs

- Health Portfolio Budget Statements 2024–25 Outcome 3: Ageing and Aged Care – improved wellbeing for older Australians through targeted support, access to appropriate, high-quality care and related information services.
- Program contributing to Outcome 3 – Program 3.3: Aged Care Quality. The Department of Health and Aged Care has policy responsibility for ageing and aged care, including the regulatory framework.

Legislative and regulatory drivers

- Sections 17–20 of the Commission Act, which provide for our legislative pillars (engagement, education, and regulatory and complaints) and Commission Rules.
- Section 35 of the PGPA Act and subsections 16EA(a)–(f) of the PGPA Rule, which establish the Performance Reporting Framework.
- Resource Management Guide 128 – Regulator performance, which outlines expectations and best practice for Commonwealth regulators.

Performance, regulatory and risk management frameworks

The Commission has current performance management, regulatory and risk management frameworks consistent with the Commonwealth Performance Framework, Resource Management Guide 211 – Implementing the Commonwealth Risk Management Policy, and Resource Management Guide 128 – Regulator performance.

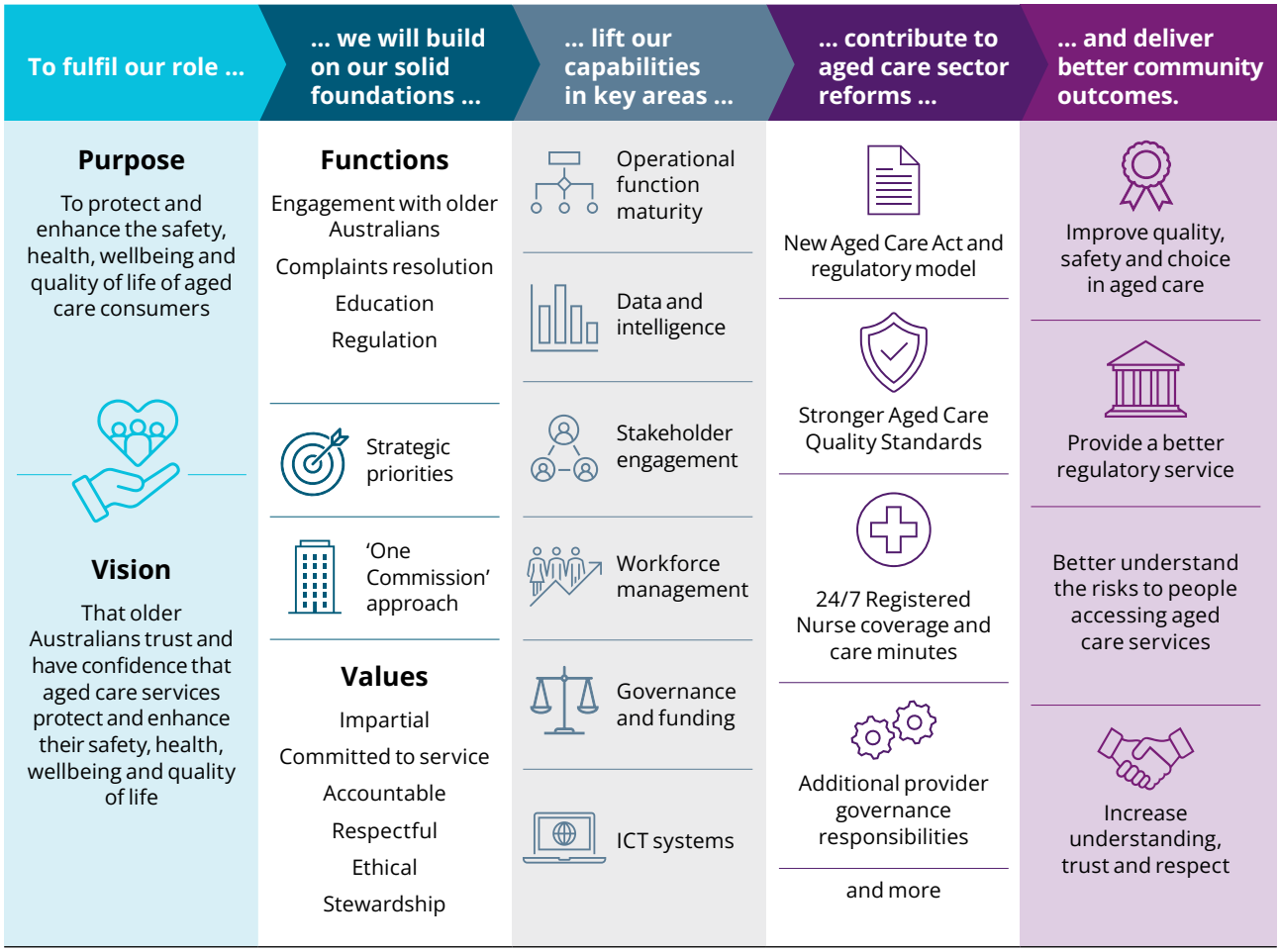


Figure 15. Blueprint for change

Better outcomes for Australians accessing aged care services

Focus area 1

Improve quality, safety and choice in aged care through transformative regulatory reforms and sector capability uplift

Action	Deliverable	Lead business area	Accountable officer	Time-frame	Key activity	Corporate Plan	Capability review recommen-dation	Capability
A1 Update Regulatory Strategy and worker regulation preparations	**D1.1** Regulatory strategy updated for 2025–26 and new Act implementation	Sector Capability and Regulatory Strategy Division	Executive Director, Regulatory Strategy and Policy	June 2025	KA4	PM4 RBPP2		Regulatory
	D1.2 National Care and Support Worker Regulation initiative delivered, including worker screening and registration	Sector Capability and Regulatory Strategy Division	Executive Director, Regulatory Strategy and Policy	June 2025	KA2	PM1 RBPP2		Strategic
A2 Apply new ROM with supporting policies and processes for achieving best practice regulation	**D2.1** Progress phased ROM implementation	Office of Commissioner	Commissioner Deputy Commissioner, Regulatory Strategy and Policy	October 2025	KA3	PM4 RBPP1		Regulatory
	D2.2 Operational policies and processes developed to support ROM	Sector Capability and Regulatory Strategy Division	Executive Director, Regulatory Strategy and Policy	June 2025	KA3	PM4 RBPP1		Regulatory
A3 Prepare for implementation of the new Aged Care Act (Reform for Better Aged Care Board)	**D3.1** All regulatory functions designed and ready for implementation	Sector Capability and Regulatory Strategy Division	Deputy Commissioner, Sector Capability and Regulatory Strategy	June 2025	KA3	PM4 RBPP1		Regulatory
	D3.2 Operational policies and processes in place to support the new Aged Care Act	Sector Capability and Regulatory Strategy Division	Executive Director, Regulatory Strategy and Policy	June 2025	KA3	PM4 RBPP1		Regulatory
	D3.3 ICT enhancements to support changed operations delivered	Sector Capability and Regulatory Strategy Division	Deputy Commissioner, Corporate Chief Digital Officer	June 2025	KA4	PM4 RBPP2		Enterprise-wide

KA – Key Activity | **RBPP** – Regulator Best Practice Principle | **PM** – Performance Measure | **CRR** – Capability Review Recommendation

Action	Deliverable	Lead business area	Accountable officer	Time-frame	Key activity	Corporate Plan	Capability review recommen-dation	Capability
	D3.4 New Case Management System implemented	Complaints Commissioner Division	Complaints Commissioner Deputy Commissioner, Corporate	June 2025	KA4	PM2 RBPP2		Enterprise-wide
	D3.5 Transition data, intelligence and reporting products to align with ROM and new Aged Care Act requirements	Sector Capability and Regulatory Strategy Division	Senior Director, Intelligence and Analysis	June 2025	KA4	PM4 RBPP2		Strategic
	D3.6 Develop a sector readiness framework to support preparation for the new regulatory framework	Sector Capability and Regulatory Strategy Division	Deputy Commissioner, Sector Capability and Regulatory Strategy	June 2025	KA1	PM4 RBPP3		Strategic
	D3.7 Commission workforce planning and capability uplift delivered to support staff readiness	Corporate Division	Executive Director, People and Culture	June 2025	KA1	PM4 RBPP3		Strategic
A4 Target initiatives at sector leaders to drive change, strengthen education and better support sector capability uplift	**D4.1** Contribute to development and implementation of the Government Provider Management System (GPMS)	Corporate Division	Deputy Commissioner, Corporate Chief Digital Officer	June 2025	KA1	PM5 RBPP1		Regulatory
	D4.2 Pharmacy outreach activities extended to more aged care services	Clinical Division	Chief Clinical Advisor	June 2025	KA1	PM5 RBPP3		Engagement
A5 Expand the regulation and monitoring of residential and home service providers	**D5.1** Aged Care Provider Financial Viability Monitoring Program delivered	Compliance Management Group	Executive Director, Compliance Management	June 2025	KA3	PM3 RBPP1		Regulatory

KA – Key Activity | **RBPP** – Regulator Best Practice Principle | **PM** – Performance Measure | **CRR** – Capability Review Recommendation

Focus area 2

Provide a better regulatory service to the community by delivering matured regulatory and operational functions

Action	Deliverable	Lead business area	Accountable officer	Time-frame	Key activity	Corporate Plan	Capability review recommen-dation	Capability
A6 Monitor aged care provider quality and safety performance against the Aged Care Quality Standards	**D6.1** 1,600 assessment contacts completed (forecast)	Quality Assessment and Monitoring Group	Executive Director, Quality Assessment and Monitoring	June 2025	KA4	PM1 RBPP3		Regulatory
A7 Undertake aged care audits of home service, residential and flexible care providers	**D7.1** More than 1,250 audits conducted	Quality Assessment and Monitoring Group	Executive Director, Quality Assessment and Monitoring	June 2025	KA4	PM1 RBPP2		Regulatory
	D7.2 Proportion of audits by Commission quality assessors increased	Quality Assessment and Monitoring Group	Executive Director, Quality Assessment and Monitoring	June 2025	KA2	PM1 RBPP2	CRR 5.1	Regulatory
A8 Effectively resolve complaints about aged care service providers within published service standards	**D8.1** 80% of complaints and enquiries with the Commission finalised within published service standards	Complaints Commissioner Division	Executive Director, Intake and Complaints Resolution	June 2025	KA3	PM2 RBPP2		Regulatory
	D8.2 65% of complainant and provider survey responses have an overall rating of satisfied or higher, in line with published service standards	Complaints Commissioner Division	Executive Director, Intake and Complaints Resolution	June 2025	KA3	PM2 RBPP2		Regulatory
	D8.3 80% of complaints finalised with a positive outcome	Complaints Commissioner Division	Executive Director, Intake and Complaints Resolution	June 2025	KA3	PM2 RBPP2		Regulatory
A9 Monitor and take appropriate action in response to individual providers and provider groups with potential or actual non-compliance and publish compliance rates	**D9.1** Prudential audits and reviews completed	Compliance Management Group	Executive Director, Compliance Management	June 2025	KA1	PM3 RBPP3		Regulatory
	D9.2 Educational products for the sector delivered	Compliance Management Group	Executive Director, Compliance Management	June 2025	KA1	PM5 RBPP3		Regulatory

KA – Key Activity | **RBPP** – Regulator Best Practice Principle | **PM** – Performance Measure | **CRR** – Capability Review Recommendation

Action	Deliverable	Lead business area	Accountable officer	Time-frame	Key activity	Corporate Plan	Capability review recommen-dation	Capability
	D9.3 Action taken to address non-compliance with approved provider responsibilities under the *Aged Care Act 1997*	Compliance Management Group	Executive Director, Compliance Management	June 2025	KA1	PM3 RBPP2		Regulatory
A10 Strengthen the operating model for receiving and actioning Serious Incident Response Scheme notifications	**D10.1** Implement recommendations from the SIRA Operating Model Review	Complaints Commissioner Division	Executive Director, Approvals and Serious Incident Notifications	June 2025	KA1	PM2 RBPP2	CRR 5.8	Regulatory
A11 Engage providers on sector performance uplift	**D11.1** Implement regulatory campaigns to improve sector performance	Sector Capability and Regulatory Strategy Division	Executive Director, Regulatory Strategy and Policy	June 2025	KA1	PM5 RBPP3		Engagement

Focus area 3

Better understand and respond to the risks to older people by strengthening the Commission's data and intelligence

Action	Deliverable	Lead business area	Accountable officer	Time-frame	Key activity	Corporate Plan	Capability review recommen-dation	Capability
A12 Improve the Commission's data intelligence and analytical capabilities to support risk-based tactical, operational and strategic decisions and targeted regulatory activities. Improve understanding and connection with key stakeholders	**D12.1** Use of risk profiling expanded, and risk assessment enhanced, to effectively target regulatory responses	Sector Capability and Regulatory Strategy Division	Senior Director, Intelligence and Analysis	Ongoing	KA4	PM6 RBPP2		Regulatory

KA – Key Activity | **RBPP** – Regulator Best Practice Principle | **PM** – Performance Measure | **CRR** – Capability Review Recommendation

Focus area 4

Increase understanding, trust and respect with stakeholders through enhanced engagement

Action	Deliverable	Lead business area	Accountable officer	Time-frame	Key activity	Corporate Plan	Capability review recommen-dation	Capability
A13 Improve understanding and connection with key stakeholders	**D13.1** The effectiveness of communication, and education channels and activities is measured using an evaluation framework	Sector Capability and Regulatory Strategy Division	Executive Director, Engagement, Education and Communication	June 2025	KA1	PM5 RBPP3		Engagement
	D13.2 Improved mechanisms and processes for engagement and communications with culturally and linguistically diverse and First Nations key stakeholders	Sector Capability and Regulatory Strategy Division	Executive Director, Engagement, Education and Communication	June 2025	KA1	PM5 RBPP3	CRR 4.17	Engagement

KA – Key Activity | **RBPP** – Regulator Best Practice Principle | **PM** – Performance Measure | **CRR** – Capability Review Recommendation

Stronger enterprise capabilities

Focus area **5** Strengthen the Commission's governance and funding arrangements

Action	Deliverable	Lead business area	Accountable officer	Time-frame	Key activity	Corporate Plan	Capability review recommen-dation	Capability
A14 Implement robust, comprehensive and transparent governance, integrity, policy and quality assurance arrangements	**D14.1** New governance structure and processes embedded	Corporate Division	Executive Director, Enterprise Governance and Strategy	November 2024	KA4	RBPP1	CRR 4.4	Strategic
	D14.2 Implement integrated policy mechanism for Commission-wide policy development	Corporate Division	Executive Director, Enterprise Governance and Strategy	November 2024	KA3	RBPP1		
	D14.3 Implement streamlined, efficient and effective digital governance (Phase 2)	Corporate Division	Chief Digital Officer	October 2024	KA4	RBPP2	CRR 4.9	Enterprise-wide
	D14.4 Develop a new Integrity Framework	Corporate Division	Executive Director, Enterprise Governance and Strategy	March 2025	KA3	RBPP3		Strategic
	D14.5 Quality Assurance Framework integrated across Commission operations, and public reporting commenced	Corporate Division	Executive Director, Enterprise Governance and Strategy	April 2025	KA4	RBPP1	CRR 5.2	Strategic
A15 Strengthen business resilience and risk management arrangements	**D15.1** Business Resilience Management Framework embedded across Commission operations	Corporate Division	Executive Director, Enterprise Governance and Strategy	December 2024	KA4	RBPP2		Strategic
	D15.2 Review and update the Commission's Enterprise Risk Management Framework and resources, delivering an integrated approach to risk management with the Regulatory Risk Management Framework	Corporate Division	Executive Director, Enterprise Governance and Strategy	December 2024	KA4	RBPP2		Enterprise-wide

KA – Key Activity | **RBPP** – Regulator Best Practice Principle | **PM** – Performance Measure | **CRR** – Capability Review Recommendation

Action	Deliverable	Lead business area	Accountable officer	Time-frame	Key activity	Corporate Plan	Capability review recommen-dation	Capability
A16 Strengthen the Commission's handling of complaints about its performance	**D16.1** Implement new Service Delivery, Integrity and Employee (SDIE) Complaints Handling Framework	Corporate Division	Deputy Commissioner, Corporate	November 2024	KA3	RBPP3		Strategic
	D16.2 Develop new Commission Service Charter	Sector Capability and Regulatory Strategy Division	Executive Director, Regulatory Strategy and Policy	October 2024	KA3	RBPP3		Enterprise-wide
A17 Deliver an integrated approach to Information, Records and Data Management	**D17.1** Information and Records Management Framework developed, aligned with Data and Privacy Management Frameworks	Corporate Division	Executive Director, Enterprise Governance and Strategy	June 2025	KA4	RBPP2		Enterprise-wide
	D17.2 Information and Records Management Strategy developed	Corporate Division	Executive Director, Enterprise Governance and Strategy	June 2025	KA4	RBPP2		Strategic
A18 Strengthen FOI and privacy management practices	**D18.1** Plan for Information Publication Scheme (IPS) reviewed	Corporate Division	Executive Director, Enterprise Governance and Strategy	March 2025				
	D18.2 Privacy Management Framework developed, aligned to the Information, Records and Data Management Framework(s)	Corporate Division	Executive Director, Enterprise Governance and Strategy	December 2024	KA4	RBPP2		Strategic
	D18.3 New Privacy Management Strategy and roadmap to uplift the Commission's privacy management practices developed, aligned with reformed Privacy Act	Corporate Division	Executive Director, Enterprise Governance and Strategy	June 2025	KA4	RBPP2		Strategic
A19 Strengthen processes for managing legal matters within the Commission	**D19.1** New legal matter tracking and storage system implemented	Corporate Division	Executive Director, Enterprise Governance and Strategy	June 2025	KA4	RBPP1		Enterprise-wide
A20 Develop robust, validated funding model to underpin annual budget allocations	**D20.1** Appropriate and ongoing funding and resource model finalised and implemented (with the Department of Health and Aged Care and Department of Finance)	Corporate Division	Deputy Commissioner, Corporate	November 2024	KA2	RBPP3		Enterprise-wide

KA – Key Activity | **RBPP** – Regulator Best Practice Principle | **PM** – Performance Measure | **CRR** – Capability Review Recommendation

Action	Deliverable	Lead business area	Accountable officer	Time-frame	Key activity	Corporate Plan	Capability review recommen-dation	Capability
A21 Uplift organisational capability	**D21.1** Commission-wide change and capability uplift program implemented, including strengthened Commission leadership and effectiveness through realignment of organisation structure	Office of the Commissioner	Commissioner Executive Director, Enterprise Governance and Strategy	June 2025	KA1	RBPP1	CRR 4.3	Enterprise-wide

Focus area 6

Maximise the potential of the Commission's workforce

Action	Deliverable	Lead business area	Accountable officer	Time-frame	Key activity	Corporate Plan	Capability review recommen-dation	Capability
A22 Develop a knowledge management strategy	**D22.1** Commission has a knowledge management framework and supporting capability	Sector Capability and Regulatory Strategy Division	Executive Director, Regulatory Strategy and Policy	June 2025	KA4	RBPP2		
A23 Develop a Clinical Governance Framework	**D23.1** Deliver a Clinical Governance Framework	Clinical Division	Chief Clinical Advisor	July 2025	KA1	RBPP1	CRR 5.10	Regulatory
A24 Deliver improved workforce management capabilities, organisational culture and employee experience	**D24.1** Implementation of 2024–26 People Strategy well progressed	Corporate Division	Executive Director, People and Culture	June 2025	KA4	RBPP1	CRR 4.3	Enterprise-wide
	D24.2 People Capability Framework implemented	Corporate Division	Executive Director, People and Culture	June 2025	KA4	RBPP1	CRR 4.7	Enterprise-wide
	D24.3 Strategic Workforce Plan implemented	Corporate Division	Executive Director, People and Culture	June 2025	KA4	RBPP1	CRR 4.8	Enterprise-wide
A25 Strengthen digital capability	**D25.1** Digital workforce strategy and skills uplift delivered	Corporate Division	Chief Digital Officer	June 2025	KA4	RBPP1	CRR 4.8	Enterprise-wide

KA – Key Activity | **RBPP** – Regulator Best Practice Principle | **PM** – Performance Measure | **CRR** – Capability Review Recommendation

Focus area 7

Evolve the Commission's ICT systems to be robust and user-focused

Action	Deliverable	Lead business area	Accountable officer	Time-frame	Key activity	Corporate Plan	Capability review recommen-dation	Capability
A26 Update the Commission's Digital Strategy	**D26.1** Digital strategy reviewed and key initiatives delivered	Corporate Division	Chief Digital Officer	June 2025	KA4	RBPP2	CRR 4.9	Enterprise-wide
A27 Continue the cyber security uplift program	**D27.1** Maturity against the Essential 8 enhanced	Corporate Division	Chief Digital Officer	June 2025	KA4	RBPP2	CRR 4.10	Enterprise-wide
A28 Deliver the Data Management and Analytics Platform	**D28.1** The Commission's Data Architecture, including a database layer and integration layer implemented and operationalised	Corporate Division	Chief Digital Officer	June 2025	KA4	RBPP2		Enterprise-wide

KA – Key Activity | **RBPP** – Regulator Best Practice Principle | **PM** – Performance Measure | **CRR** – Capability Review Recommendation

Appendix 1
List of requirements

Corporate Plan

The Corporate Plan has been prepared in accordance with the requirements of subsection 35(1) of the PGPA Act and the PGPA Rule 2014.

Table 4 details the requirements met by our Corporate Plan and the page reference(s) for each requirement.

Requirement	Page(s)
Introduction	
• Statement of preparation	
• Reporting period for which the plan is prepared	
• Reporting periods covered by the plan	7
Purpose	9
Key activities	40
Operating context	16–37
• Environment	16–18
• Capability	19–24
• Risk management	25
• Cooperation	36
• Subsidiaries (where applicable)	na
Performance	38–51

Table 4.

Annual Operational Plan

The Operational Plan has been prepared in accordance with sections 54(1) and (2) of the Commission Act.

Table 5 details the requirements met by our Operational Plan and the page reference(s) for each requirement.

Requirement	Page(s)
Set out the action the Commissioner intends to take during the period to give effect to, or further, the objectives set out in the plan	52–55
Set out the Commissioner's priorities for work to be undertaken during the period:	
• Commissioner's strategic priorities	14–15, 54
• Commissioner's focus areas for the year	53
Set out how the Commissioner will apply the resources of the Commission to achieve those objectives	18–37 52–71
An assessment of risks faced by the Commission for the period together with a plan to manage those risks	25–28
Performance indicators the Commissioner considers appropriate for assessing the performance of the Commission during the period	52–71 38–51

Table 5.

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