



Australian Government
Aged Care Quality and Safety Commission

Engage
Empower
Safeguard

Corporate Plan 2021–22

COVERING REPORTING PERIOD 2021–22 TO 2024–25

Aged Care Quality and Safety Commission

GPO Box 9819 ACT 2601

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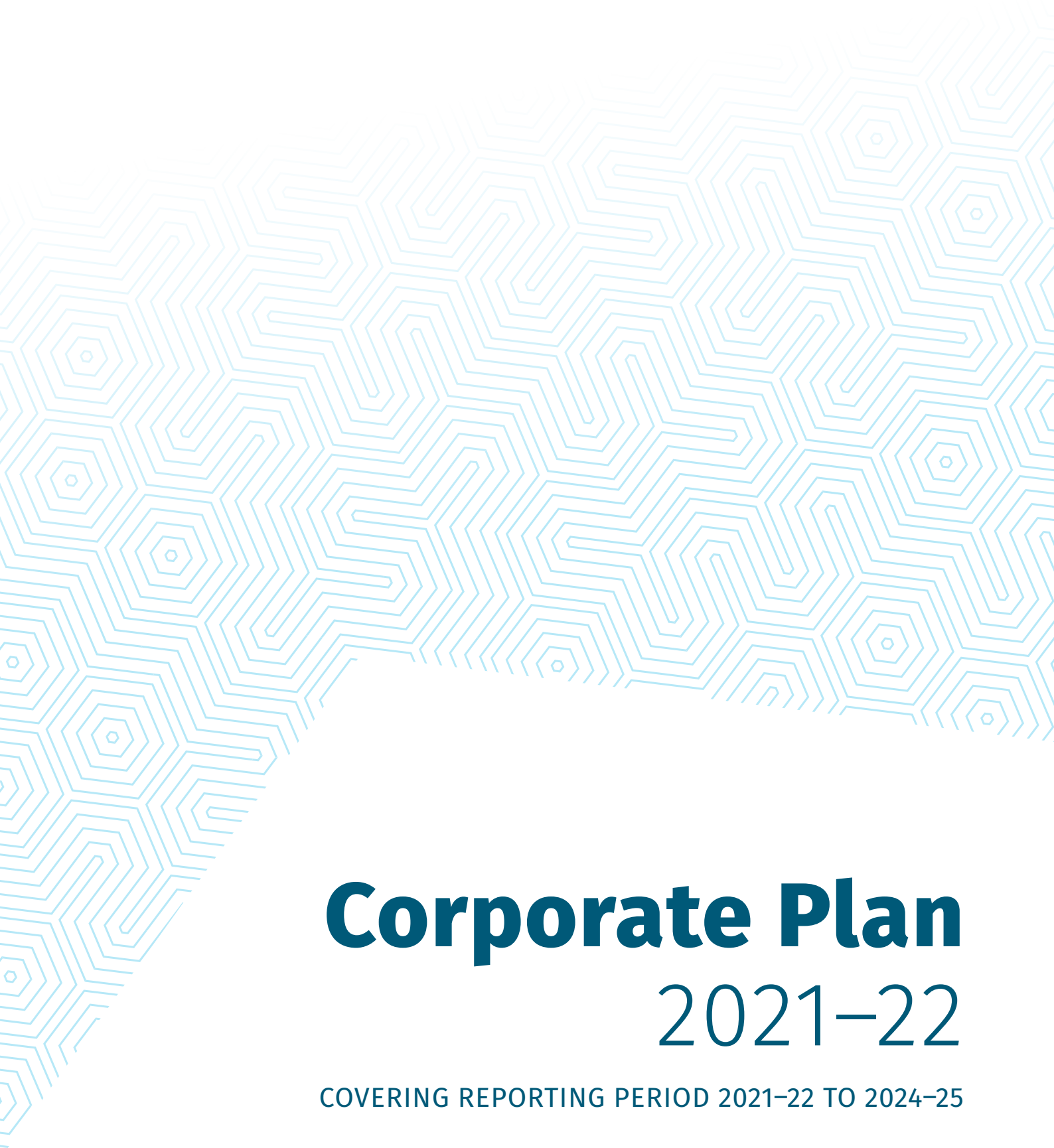
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Corporate Plan 2021–22

COVERING REPORTING PERIOD 2021–22 TO 2024–25

**The Commission acknowledges the
Traditional Owners of Country
throughout Australia and
recognises their continuing connection
to land, sea, culture and community.**

**We pay our respects to their Elders
past, present and emerging.**



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Message from the Commissioner



As the accountable authority of the Commission, it is my pleasure to present the Aged Care Quality and Safety Commission's 2021–22 Corporate and Operational Plans.

Our Corporate Plan communicates our purpose, how we will achieve this purpose and how the Australian Government, our stakeholders and the community will know what we have achieved as we play our part in a transformational period for aged care in Australia.

The Operational Plan supports and complements our Corporate Plan by setting out the key actions and accountabilities that will deliver on our priorities in the coming year.

Commission staff have participated in the development of both Plans through cross-organisation and team forums aimed at providing an opportunity for everyone to help shape our future.

As the national regulator of Australian Government-funded aged care services, our role has never been more important. Public expectations regarding the Commission and our performance remain high, and our resolve and commitment to delivering best practice regulation with the goal of protecting and improving the safety, health, wellbeing and quality of life of aged care consumers is unwavering.

In its 2021–22 Budget, the Government responded to the Royal Commission into Aged Care Quality and Safety by committing to significant reform for home care, residential aged care services and sustainability, residential aged care quality and safety, workforce, and governance. The Government's 5-year plan, built around 5 pillars and underpinned by additional investment of over \$17.7 billion, provides a clear roadmap for improvements in aged care to restore trust and confidence in the aged care sector.

This is a once in a generation opportunity to deliver transformational change. The next reporting period will see a significant shift and uplift across the aged care sector, as well as within the Commission. Our Corporate Plan reflects this ambitious program.

The COVID-19 pandemic continues to present significant challenges for the aged care sector, for all older Australians and for the Commission. The Commission has used the full range of its regulatory powers in responding to the pandemic, monitoring and supporting the sector to proactively manage risks to consumers, holding providers to account where significant risks to consumers were identified, and working alongside health authorities with those aged care services directly affected by an outbreak.

Achieving our purpose to protect and enhance consumer wellbeing is vital. The community is looking for assurance that older people receiving aged care will be well looked after, kept safe and treated with compassion and dignity. The Commission and aged care providers have important roles to play in promoting public confidence and trust in the sector and delivering the improvements and reform that the community demands.

Our Corporate and Operational Plans are informed by the voice of the consumer and advice from the Aged Care Quality and Safety Advisory Council and the Minister for Senior Australians and Aged Care Services. I thank all who contribute to improving the effectiveness of the Commission for their support and encouragement.

I also acknowledge the unstinting efforts of all staff in the Commission and thank them for their dedication, professionalism and compassion.

J. M. Anderson

Janet Anderson PSM
Commissioner

Introduction

I, Janet Anderson, as the accountable authority of the Aged Care Quality and Safety Commission, present the Commission's 2021–22 Corporate Plan, which covers the period 2021–22 to 2024–25, as required under section 35(1) (b) of the *Public Governance, Performance and Accountability Act 2013*, and the Commission's 2021–22 Operational Plan, as required under sections 54(1) and (2) of the *Aged Care Quality and Safety Commission Act 2018*.

Our Corporate and Operational Plans are part of our annual performance cycle, ending with our annual report and annual performance statement. The Commission's performance measures cascade through our corporate, operational, group, team and individual performance plans.



Our purpose

To protect and enhance the safety, health, wellbeing and quality of life of aged care consumers.

Our vision

Older Australians trust and have confidence that aged care services protect and enhance their safety, health, wellbeing and quality of life.

About us

The Government announced the establishment of the Aged Care Quality and Safety Commission as a response to the Review of National Aged Care Quality Regulatory Processes. The *Aged Care Quality and Safety Commission Act 2018* (the ACQSC Act) was passed on 24 November 2018 and the Commission commenced operations on 1 January 2019.

The Commission replaced the Australian Aged Care Quality Agency and the Aged Care Complaints Commissioner, and additional aged care regulatory functions were transferred to the Commission from the Department of Health on 1 January 2020. The Aged Care Quality and Safety Commission is a non-corporate Commonwealth entity under the *Public Governance, Performance and Accountability Act 2013* (PGPA Act).

The Commission operates independently and objectively in performing its functions and exercising its powers as set out in the ACQSC Act and the *Aged Care Quality and Safety Commission Rules 2018* (the ACQSC Rules).

To achieve our purpose and vision in a rapidly changing environment, we focus on continuously improving to ensure we are a high-performing organisation and achieve our aim of being a world-class aged care regulator.

Our role

As the national regulator of aged care services, our role is to approve providers' entry to the aged care system, to accredit, assess, investigate and monitor aged care services against requirements, and to hold services to account for meeting their obligations.

We seek to resolve complaints about aged care services and provide education and information about our functions. We also engage with consumers to understand their experiences and to advise providers about working with consumers in designing and delivering best practice care.

We deliver regulation that is proportionate, risk-based, responsive and intelligence-led. Our regulatory approach enables us to focus activities on the areas of greatest risk to the safety, health and wellbeing of aged care consumers, and on those providers providing care and services that fall short of legislated standards.

We use education, information and targeted communications to support our regulatory objectives, including publishing outcomes of our regulatory activities to promote greater transparency and accountability, and highlighting best practice.

Our values



Ethical

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



Accountable

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



Impartial

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



Respectful

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



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.

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

Our functions

Our functions are set out in the ACQSC Act and Rules:

- protecting and enhancing the safety, health, wellbeing and quality of life of aged care consumers
- promoting the provision of quality care and services by approved providers of aged care services, and service providers of Commonwealth-funded aged care services
- approving providers of aged care
- developing, in consultation with aged care consumers and their representatives, best practice models for the engagement of providers with their aged care consumers and promoting those models to providers
- regulating aged care services according to the Rules by accrediting, conducting quality reviews, monitoring the quality of care and services, and registering quality assessors
- ensuring compliance by approved providers with their aged care responsibilities
- dealing with complaints made, or information given to the Commissioner in accordance with the Rules about an approved provider's responsibilities under the *Aged Care Act 1997* or funding agreement
- imposing sanctions on approved providers and lifting sanctions
- providing education and information about matters relating to one or more of the Commissioner's functions to consumers and their representatives, providers of aged care services and the public

Our Corporate Plan is a plan for reform

The Government's response to the Royal Commission is a 5-year plan, built around 5 pillars. The plan provides a clear roadmap for improvements in aged care to restore trust and confidence in the aged care sector.

The reforms commencing in 2021–22 and extending over the next 4 years have a significant impact on our operating context with a substantial increase in our powers, responsibilities and resources. A focus on delivering these reforms is critical for the Commission alongside our ongoing work to regulate the aged care sector.

In the 2021–22 budget, the Commission received an additional \$344 million over four years, which will bring the total estimated budget over the period of the plan to \$731 million. This funding has been provided to enable the Commission to deliver key components of the Government's aged care sector reform agenda. Further details of our contribution to this agenda are provided under Key Activities.

Central to our effective performance will be an increase in our front line and support staff to deliver reform activities and continue our core regulatory functions. Increasing the size and building the capability of our workforce will enable us to play a pivotal role in sector reform and support our aim to be a world-class aged care regulator.

Strategic priorities

In an environment characterised by ongoing reforms, the challenges of the COVID-19 pandemic and new regulatory responsibilities, we are proactive in addressing challenges and capitalising on opportunities as they arise. We set our priorities within an operating context that is dynamic and fast-changing, requiring us to be resourceful, agile and flexible in the way we think and work for the benefit of consumers.

We deliver our mission and purpose through our strategic priorities. These priorities shape our behaviour, underpin our decision making and actions, and ensure we place the wellbeing of consumers of aged care services at the centre of everything we do.

We place consumers at the centre at all times	<p>Consumers and providers of aged care services and the public are aware of what should be expected of quality care and services.</p> <p>Consumers are engaged and empowered in their care and can easily make complaints or provide information about their experience.</p> <p>The experience of consumers informs our regulatory activities.</p>
We continue to enhance our regulatory approach to strengthen aged care quality and safety	<p>We respond to Government priorities. Our processes and activities are targeted, efficient, effective and deliver high-quality outcomes.</p> <p>Our effective collaboration with the Department of Health and other agencies for the delivery of aged care quality reforms ensures desired outcomes are achieved.</p>
We advance proportionate, intelligence-led, risk-based regulation	<p>We apply robust standards, guidance, assessment, investigation, monitoring, compliance and enforcement practices to strengthen our regulatory effectiveness.</p> <p>The collection, analysis and publication of information improves transparency and understanding of provider risks and sector trends and in turn, guides our regulatory activities, ensuring the decisions we make are proportionate to risk.</p>
We are an effective, capable and accountable regulator	<p>Our capability and effectiveness are strengthened as an integrated regulator.</p> <p>We build a workforce fit for the future that can manage change and whose wellbeing is a core priority.</p> <p>We invest in our people and systems to support our operations and prioritise collaboration and engagement.</p>

Operating context

The aged care sector provides Australian Government subsidised care and support to older Australians; it is a large and complex system that touches the lives of many across our communities.

The aged care sector was significantly affected by the COVID-19 outbreaks in 2020, with the largest proportion of Australian deaths occurring among aged care residents. The impact of COVID-19 continues to be felt across the sector, and older Australians in residential aged care can still be vulnerable and isolated from family and loved ones when community outbreaks occur.

The Royal Commission into Aged Care Quality and Safety highlighted the prevalence of neglect, variability in older Australians' access to and experiences of aged care, and deficiencies in the overall quality and safety of aged care. In its final report, the Royal Commission pointed to a wide range of opportunities and imperatives to remedy these problems. Older Australians are owed respect, care and dignity, and the Government's response to the Royal Commission provides a clear roadmap for transformational change for the aged care sector.

The reforms announced by the Government have a significant impact on our operating context with a substantial increase in funding and expectations. A focus on delivering these reforms is critical for the Commission as we also concentrate on our ongoing work to regulate the aged care sector.

A significant investment in staff and an increase in regulatory reforms and activities is planned. This will ensure that the Commission is equipped to hold providers to account for the quality and safety of the care they provide, and the consumer experiences and outcomes they deliver.

We have additional powers and an enhanced capability to protect senior Australians through action to address provider failures in care, including by using compliance notices, infringement notices, civil penalties, enforceable undertakings and injunctions.

Through our education and engagement activities we will continue to raise sector and community awareness of the standard of care that aged care consumers should expect. We will also continue to respond to complaints about services and notifications of serious incidents, undertake more site audits and reviews, pursue cases of non-compliance, and conduct additional prudential and financial assessments and investigations.

The reforms announced by the Government have a significant impact on our operating context with a substantial increase in funding and expectations. A focus on delivering these reforms is critical for the Commission as we also concentrate on our ongoing work to regulate the aged care sector.

Our environment

Changing demographics

Australia's changing demographics significantly influence the demand for and provision of aged care. Australians are living longer than ever before, and the aged care sector is caring for an ageing population that is increasingly frail. Older people generally want to remain in their own homes for as long as possible. Together these factors contribute to a demand for a greater variety of care choices, an increase in care needs for people living at home or in residential care, and an impact on the length of time that people live in residential aged care.

Quality and safety of care

Whether aged care is provided in the home or in a residential care setting, Australians expect to be treated with dignity and respect, to be able to exercise control and choice, to have their important personal relationships and connections to community acknowledged and enabled, and to receive care that is safe and supports them to enjoy the best possible quality of life.

Provision of safe, quality care is a core responsibility of aged care services and providers. Providers have responsibilities to set a culture of ongoing learning and improvement, put in place systems to ensure quality and manage risk, and proactively support consumers to be engaged in their care.

Access to services

As the number of people receiving aged care increases and the range of service offerings continues to expand, it is critical that people can make informed choices regarding aged care services. Funded reforms announced by Government are aimed at addressing problems reported by some people in getting the right information at the right time, and engaging effectively with the aged care sector.

Funding

Government spending on aged care will grow significantly faster than other Government spending. The Parliamentary Budget Office predicts that by 2030–31 aged care will account for 5.0% of all Australian government spending; an increase from the current spending of 4.2%.

Structural change in the market

Most aged care providers are organisations owned by community, charity or religious organisations (collectively referred to as “non-government” providers) or private-for-profit organisations. A small proportion of aged care services are operated by state, territory and local governments.

Over recent years there has been a shift towards consolidation of the aged care sector. In 2009–10, there were two very large providers or groups in residential care operating 16% of all aged care places, with the balance of places shared among a large number of smaller providers. By 2018–19, 39% of all residential places were operated by 10 very large providers or groups.

Financial pressures on the sector

Information from the former Aged Care Financing Authority indicates that a proportion of residential and home care providers have been operating under financial pressure which, for some, has increased during the COVID-19 pandemic. Providers experiencing sustained difficulties with financial viability can present quality and safety risks for consumers. This has been recognised in the reforms and investment announced by Government that deliver a financial uplift to the sector.



Our capability

To achieve our purpose, we need to build on and enhance the capability of our staff and our technology and develop and integrate new ways of working to meet emerging needs.

People

We will continue to attract and retain highly skilled, capable and technically expert staff to deliver our strategic goals and objectives.

In response to the Government's reform agenda, the Commission is expanding its front line and support staff — both APS employees and contractors — to deliver additional activities. Increasing the size of our workforce as well as building our capability will enable the Commission to play a pivotal role in sector reform.

We are developing our People Strategy which will support and strengthen our workforce to enable staff to bring their best to work, to thrive, and to ensure that we more effectively achieve our purpose. This Strategy will be an essential enabler for delivering the outcomes described in our corporate and other plans. The People Strategy will tie a range of programs and initiatives together, providing a coordinated approach to making significant and tangible improvements across the Commission.

Specific initiatives that are already underway and which will be reflected in the People Strategy include making improvements to our induction program, strengthening our regular communications channels to ensure staff have multiple ways to remain informed and engaged, and putting in place greater support for staff in front line roles.

Information, communication and technology (ICT)

We have continued to invest significantly in uplifting digital, ICT and business systems capability in line with the Government's Digital Transformation Strategy 2018–2025. We have delivered a substantial amount of work within a short period of time, focusing on building our core ICT environment, enabling all staff to work remotely from the beginning of the COVID-19 pandemic in 2020, adopting around the clock cyber protection, and progressing the implementation of the Essential Eight Government cyber security requirements.

Over the coming reporting period, we will develop a new three-year ICT Strategy and implementation plan to equip the Commission with the digital capability it requires to integrate regulatory functions and optimise its intelligence-led risk-based approach. We will consolidate our core applications into a single fit-for-purpose case management solution, Aged Care Case Management Information System (ACCMIS), and implement a modern electronic document and records management solution (EDRMS). We will also enhance our capabilities by further embedding 'Security as a Service' arrangements.

The Commission's ICT strategy will focus on three key elements:

- digitisation for more extensive, relevant and faster information sharing across the Commission to provide improved and consistent services to Government and the community
- cloud computing and shared services to help ensure more effective and timely delivery of services
- strengthening internal and inter agency security in line with the protective security policy framework.

Corporate governance arrangements

Our corporate governance arrangements play a crucial role in ensuring that the Government's priorities and program objectives are delivered efficiently and effectively. The Commission's governance structure and practices support the Commissioner in the oversight of the organisation, management of its resources and in meeting its purpose.

Commissioner	The Commission is led by an independent Commissioner who reports directly to the Minister for Senior Australians and Aged Care Services.
Executive Leadership Group	The Executive Leadership Group provides strategic direction and leadership to ensure the outcomes documented in the Commission's Corporate Plan and Portfolio Budget Statements are achieved.
Risk and Audit Committee	<p>The Risk and Audit Committee plays an important role in supporting the governance of the Commission, providing independent advice to the Commissioner, assisting the Commissioner to meet her duties and obligations under the PGPA Act and supporting the development of key practice and capacity within the Commission.</p> <p>The Risk and Audit Committee is constituted as required under the PGPA Act (subsection 45(1)) and performs functions in accordance with any requirements prescribed by the associated rules (subsection 45(2)).</p>
Advisory Council	<p>The Aged Care Quality and Safety Advisory Council is established under Section 37 of the <i>Aged Care Quality and Safety Commission Act 2018</i>.</p> <p>The Advisory Council provides advice to the Commissioner in relation to the Commissioner's functions and may also advise the Minister in relation to these functions on request.</p>
Commission	<p>The Commission comprises the following Groups:</p> <ul style="list-style-type: none"> • Approvals, Compliance and Investigations Group • Quality Assessment and Monitoring Group • Intake and Complaints Resolution Group • Chief Clinical Advisor • Regulatory Policy and Intelligence Group • Engagement and Education Group • Organisational and Workforce Development Group • Corporate Services Group

We will continue to review and refine our corporate governance arrangements in 2021–22 to ensure these are optimal to meet the changing organisational environment and rapid period of growth.

Risk oversight and management

Risk influences every aspect of the Commission's operations. Understanding risks and managing them appropriately enhances our ability to make better decisions, deliver on objectives, improve performance and achieve our purpose. The Commission's Enterprise Risk Management Framework is based on ISO 31000:2018 Standards and the Commonwealth Risk Policy. It aims to embed risk management principles and practices into the Commission's organisational culture, governance and accountability arrangements, reporting and performance review processes, and business transformation and improvement processes.

The effective management of risks plays an important role in shaping our strategic direction, contributes to evidence-based decision-making and is critical to the successful delivery of our purpose — to protect and enhance the safety, health, wellbeing and quality of life of aged care consumers.

Effective risk management requires senior executives and staff to understand the business risks in their area and actively manage those risks as part of their day-to-day activities. All staff have a role in managing risk and it is important that everyone in the Commission is familiar with the Enterprise Risk Framework.

We accept that, on occasions, even with sound risk management practices, things may go wrong. On such occasions, we will take the opportunity to review the reasons for the failure and endeavour to further strengthen controls to reduce the likelihood of a reoccurrence.

Our goal is to ensure that enterprise risks are appropriately managed to protect the interests of the Commission, maintain our credibility as a regulator, assist in the decision-making process, and minimise disruption to critical business functions.

Building a positive risk culture

We are committed to effectively identifying and managing risk as required by Section 16E of the *Public Governance, Performance and Accountability Rule 2014*. We have a clear methodology that identifies potential adverse events, the likelihood of their occurrence, the impact of their occurrence, and mitigation strategies in the event of their occurrence. Our risk management approach also recognises the positive opportunity of engaging with risk to ensure we maintain our value to consumers and the aged care sector.

Risk is managed through a continued focus on strengthening rigour and consistency in our business processes, effective governance to ensure transparent decision making, and continuous improvement in financial management to ensure efficient use of resources.

Risk appetite

We have a low appetite for risks regarding the safety and wellbeing of older Australians accessing aged care services, and for risks to the safety and wellbeing of our staff and those on Commission business.

We have a higher appetite for those risks that support improvement and innovation and contribute to the delivery of our mandate within a range of well understood and appropriately mitigated consequences.

Risk oversight and management

Our strategic risks are those that, if realised, would materially affect our ability to deliver our purpose and objective. Our enterprise risks are the events external or internal to the Commission that impact on achieving our current strategy. Broadly speaking, we have identified the following risks.

1 Government priorities	<p>There is a risk that the Commission fails to deliver its activities in a well-governed, timely manner, including failing to support the Government's agenda to reform the aged care sector.</p> <p>This includes unanticipated events and a changing external environment (such as technological changes, sector capability and the needs of the Australian community) and the impact on how priorities will be implemented.</p>
2 Government changes the Commission's funding model	<p>There is a risk that the Commission fails to anticipate and/or is not responsive to fiscal and economic changes impacting the Commission's budgets including the short, medium and long-term sustainability of the aged care system, programs and initiatives.</p>
3 Consumer experience	<p>There is a risk that the Commission is not an effective regulator, our role is misunderstood or externally imposed upon, trust is lost in our regulatory response, or organisational changes affect how we regulate the aged care sector.</p>
4 Providing a professional, engaged and flexible workforce to meet operational requirements	<p>There is a risk that the Commission will not be able to meet the increased demand in provider approvals, complaints handling, education and information to providers and consumers, and to undertake its quality assessment and monitoring and related regulatory functions.</p> <p>There is also a risk the Commission will not have sufficient flexibility in our regulatory approach to address emerging issues, the regulatory intelligence and data analytics to effectively monitor risk and performance of aged care services, or sufficient resources and capability to support transformational change.</p>

To manage these risks, the Commission employs a range of strategies, in proportion to the threat and opportunity:

- ensure our resources and capabilities are focused on delivering the Government's priorities of home care, residential aged care services and sustainability, residential aged care quality and safety, workforce, and governance
- implement our regulatory responsibilities and our programs to deliver on our key activities and protect the safety, wellbeing, and interests of aged care consumers
- use expertise and meaningful stakeholder relationships to contribute to enhanced confidence and trust in the aged care system, empower consumers to make informed choices, provide education and information about matters relating to our functions, and promote best practice service provision
- promulgate a greater understanding of our role as a regulator with consumers, providers and other stakeholder
- continue to invest and build our capability, ensuring a high impact Commission now and into the future.

By embedding a continuous improvement culture and maintaining a firm focus on our purpose, we will continue to evolve and adapt to deliver for Government and the community.

Our regulatory approach

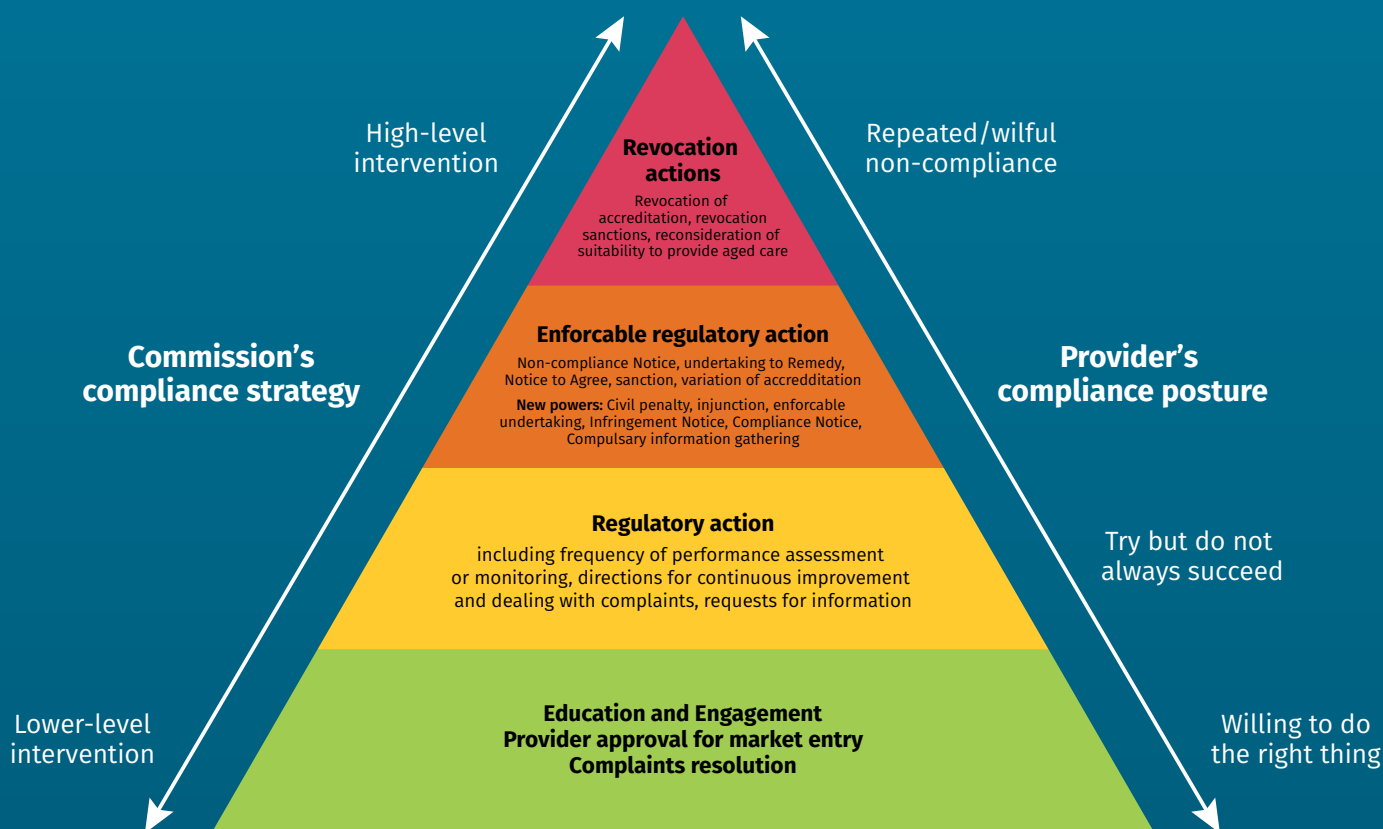
We use a proportionate, risk-based approach in delivering our regulatory functions. This means that the focus of our activities is on the areas of greatest risk to the safety, health and wellbeing of aged care consumers, and on those providers providing care and services that fall short of legislated standards.

We also look at evidence of what works in aged care practice and draw the sector's attention to this as appropriate. We use education, information and targeted communications to support our regulatory objectives. This includes publishing outcomes of our regulatory activities to promote greater transparency and accountability.

In regulating the sector, the action we may take if a provider of a service demonstrates they are willing and able to comply and to take all reasonable steps to do so will be different from action taken for a provider that cuts corners on quality and safety or deliberately avoids compliance obligations and, perhaps, places consumers at risk of harm.

This approach is represented in the regulatory pyramid in the figure below which shows cooperative and persuasive approaches at its base and more targeted and interventionist regulatory tools towards the top. It is also consistent with the Department of Health's Regulatory Policy Framework which we draw upon as a Portfolio agency.

The Commission's regulatory pyramid

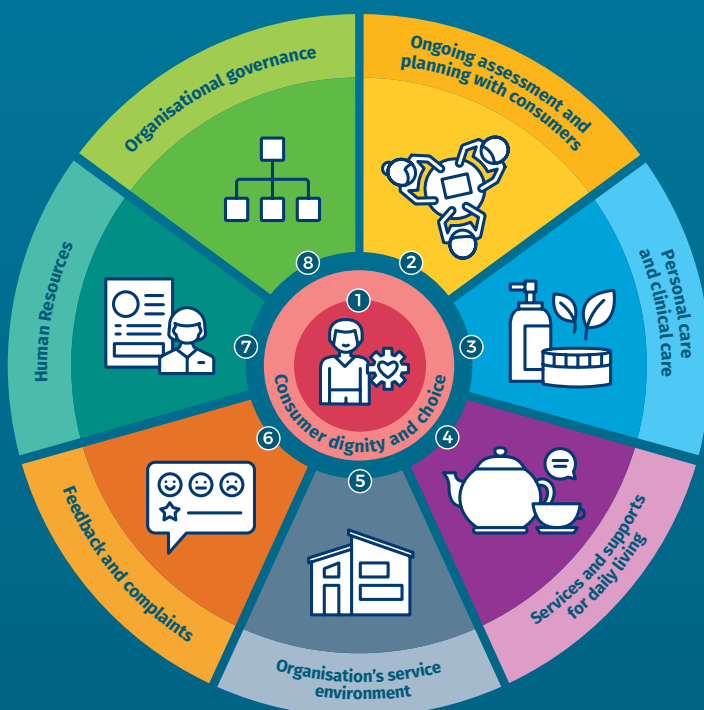


Aged Care Quality Standards

Approved providers of Commonwealth funded aged care services are required to comply with the Aged Care Quality Standards made under the *Aged Care Act 1997*, which came into effect on 1 July 2019.

The Quality Standards focus on outcomes for consumers and reflect the level of care and services the community can expect from aged care providers.

The eight Quality Standards which must be met by aged care residential and home services are shown below with consumer dignity and choice at the heart of all service delivery.



Prudential Standards

Approved providers of residential aged care are required to comply with prudential responsibilities set out in the *Aged Care Act 1997* and the Fees and Payments Principles 2014 (No.2) (the Principles). Approved providers must comply with the following:

- general responsibilities of approved providers (outlined in sections 56-1(a)(iii), section 56-1(c) (i) and section 56-1(n) of the *Aged Care Act*)
- requirements relating to managing refundable deposits, accommodation bonds and entry contributions (outlined in Part 3A.3 of Chapter 3A of the *Aged Care Act* and Parts 6 and 7 of the Principles), and the Prudential Standards (Part 5 of the Principles).

There are four Prudential Standards (the Standards) in the Principles:

- Liquidity Standard
- Records Standard
- Governance Standard
- Disclosure Standard

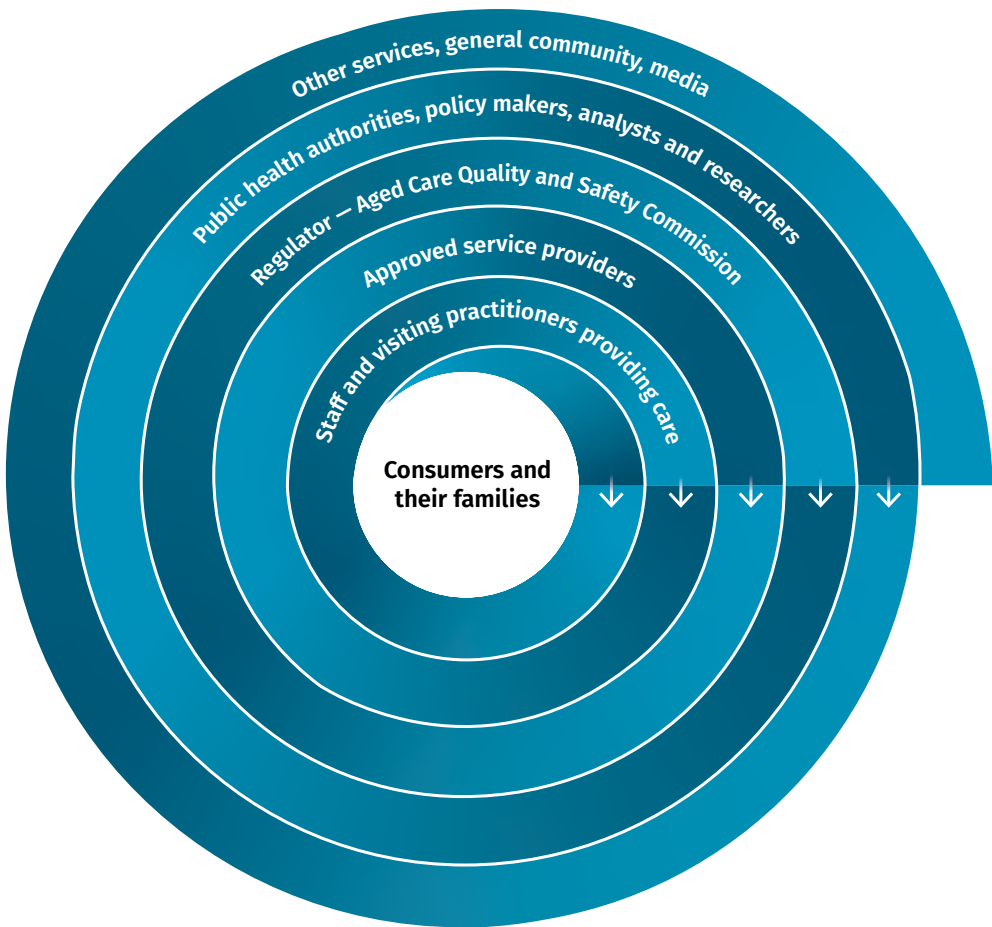


Co-operation

Consumers of aged care services and their wellbeing are at the centre of everything we do. Older Australians deserve to be heard in relation to their expectations and experiences of aged care. They also have a right to expect that their voice will be influential in driving and shaping improvements in the quality and safety of care that they and others receive, and to strengthen the work of the Commission.

We recognise that by cooperating with others we will realise our purpose and achieve the greatest benefit for individual consumers and the community.

Ensuring safe, quality aged care — everyone has a role to play



Collaborating for improvement

To optimise the ways in which we deliver improvements in quality and safety, we continually seek opportunities to collaborate with others. We learn from and share our experience and expertise with our partners and key stakeholders. In addition, we promote improvement and transparency by publishing and sharing our work with external stakeholders.

Our approach recognises that there are many other stakeholders who exercise significant influence on the quality and safety of aged care and services including:

- consumers who use services, supported by their representatives, families and carers
- care staff and visiting health practitioners who provide care for consumers
- peak consumer and provider representative bodies
- aged care providers, particularly at the board, executive and management levels who lead the way in setting the culture and environment for best practice
- the Australian Government Department of Health through its policy and funding responsibilities
- the state and territory public health authorities which have responsibility for delivering public hospital services and public health unit services
- researchers and universities
- the broader community and media

Over this reporting period, the Commission's key government partners will include the Department of Health, the Australian Commission on Safety and Quality in Health Care, the Department of Social Services, the NDIS Quality and Safeguards Commission, and the Department of Veterans' Affairs.

“The Commission has a vital role to play in the Government’s bold plan for transformational change in the aged care sector, and the Advisory Council is pleased to be providing advice and support at this time.”

Andrea Coote

Chairperson, Aged Care Quality and Safety Advisory Council



Key activities

Our key activities reflect our functions and our role in the Australian aged care sector.

Key Activity 1

Deliver on the Government's commitment to generational reform of quality and safety, workforce and governance in aged care

Key Activity 2

Contribute to enhancing confidence and trust in the aged care system, empowering consumers to make informed choices, and promoting best practice service provision

Key Activity 3

Provide information and education about quality care and services that is responsive, fit-for-purpose and targeted to providers, consumers and the public

Key Activity 4

Protect the safety, wellbeing, and interests of aged care consumers through our regulatory activities and decisions

Key Activity 5

Continue to build our capability, ensuring a high impact Commission now and into the future

Delivery against the Government's five pillars of reform

Of central importance for the Commission over the period of this Corporate Plan is our contribution to the Government's aged care reform agenda. These reforms have a significant impact on our work, involving development and implementation of specific reforms, undertaking new functions and increasing our ongoing regulatory work. The Commission will deliver outcomes across all five pillars of the Government's five-year plan. The table below summarises details of specific activities as they relate to each pillar.

Reform pillar	As part of this reform the Commission will:
Pillar 1: Home care Senior Australians want to remain independent and in control, living at home and connected to the community	Recruit more front line staff to undertake assessment contacts and quality audits in home services Continue our home services regulatory reform project and enhance our risk engine – strengthen our predictive risk profiling tool to help target our regulatory activities
Pillar 2: Residential aged care services and sustainability Improving choice for senior Australians through a more innovative, resilient and competitive market	Develop with the Department of Health and implement a new financial and prudential monitoring, compliance and intervention framework, with a phased introduction from July 2021
Pillar 3: Residential aged care quality and safety Reform activities will strengthen the Aged Care Quality and Safety Commission to further protect senior Australians	Expand front line and support staffing in the Commission to address growing demands for provider approvals, complaints resolution, quality assessment and monitoring, assessment and investigation of serious incident notifications, quality and prudential compliance Work with the Department of Health to expand the Serious Incident Response Scheme (SIRS) and quality indicator program into home services, with SIRS for home services commencing in July 2022 Regulate approved providers of residential aged care in relation to the stronger legal obligations regarding restrictive practices, and appoint a Senior Practitioner, Restrictive Practices in the Commission Extend the Pharmacy Outreach Project Participate in the review of the Commission in 2023 to inform the functions and resourcing of the future independent authority to regulate aged care services
Pillar 4: Workforce The aged care workforce will grow and upskill	Work with the Department of Health, NDIS Quality and Safeguards Commission and state and territory governments to introduce a single worker code of conduct, nationally consistent pre-employment screening process, and single register of workers across aged care, disability support and veteran's care sectors Plan for the implementation and enforcement of the code for aged care workers from July 2022
Pillar 5: Governance A new Aged Care Act will underpin these reforms. Aged care providers will be supported to improve their governance and meet stronger legislative obligations	Provide training for approved provider boards to lift leadership capability in the sector from late 2021 Appoint an Assistant Commissioner, Sector Capability Work with the Department of Health and key stakeholders to implement regulatory reforms through drafting of a new Aged Care Act Partner with the Department of Health to review and enhance the Aged Care Quality Standards

Performance

We continue to strengthen the performance information we provide to the Parliament and the broader community. This Corporate Plan further matures and embeds this commitment and features updates to the Commission's performance framework intended to provide a greater focus on outcomes and a stronger alignment with our key activities and purpose.

The Health Portfolio Budget Statements (PBS) for 2020–21 sets out the Commission's outcome, programs and the performance indicators used to monitor achievements against the deliverables. The performance indicators that will be reported in the PBS are included in this Corporate Plan and have been aligned to our purpose and activities to demonstrate how success will be measured.

Additional measures have been added in this plan to provide a holistic view of how success will be measured to achieve our purpose.

Performance framework

Our performance framework provides substantial detail regarding how our progress in achieving our purpose will be measured by identifying:

- key activities that we undertake
- goals for each performance measure so that our achievements can be assessed over time, including using performance targets where it is reasonably practicable
- performance measures which reflect the main outcomes we want these activities to achieve
- methodologies to monitor results and track overall progress

Our performance as a regulator

We are accountable to the Government for our performance as a regulator. The Commonwealth Regulator Performance Framework sets out the Government's expectations of Commonwealth regulators.

This Corporate Plan includes measures to demonstrate our performance against the three new principles of regulator best practice described in the Department of Prime Minister and Cabinet's Regulator Performance Guide (July 2021):

- continuous improvement and building trust: regulators adopt a whole-of-system perspective, continuously improving their performance, capability and culture, to build trust and confidence in Australia's regulatory settings
- risk-based and data-driven: regulators maintain essential safeguards, using data and digital technology to manage risks proportionately to minimise regulatory burden and to support those they regulate to comply and grow
- collaboration and engagement: regulators are transparent and responsive, implementing regulations in a modern and collaborative way

Performance measures

The presentation of key activities and performance measures has been updated to improve the clarity of our performance information, to reflect legislative requirements in relation to corporate plans, and to strengthen our ability to demonstrate a clear read across reporting documents and cycles.

We have a range of performance measures that assess all aspects of the Commission's performance. We use a range of qualitative and quantitative, output and effectiveness measures to provide a balanced and unbiased assessment of our achievements. In this Corporate Plan, we use timeliness measures as proxies to measure efficiency, as they can give an indication of efficiency over time.

Our measures reflect how we will deliver the government's reform agenda over the 2021–22 to 2024–25 reporting period. In 2021–22, the Commission will focus on establishing and planning for the delivery of significant reform activities, including setting targets for these activities, as well as delivering our already ambitious regulatory functions. Over the reporting period, we will continually refine and strengthen the delivery of reform initiatives as we learn and improve. This means our performance measures and targets will flex over the next twelve months and further efficiency measures will be determined for the 2022–23 PBS and Corporate Plan.

Key Activity 1: We deliver on the Government's commitment to generational reform quality and safety, workforce, and governance in aged care

Performance measure	Year			
	2021–22	2022–23	2023–24	2024–25
1 Expand the Serious Incident Response Scheme and quality indicator program into home care <i>Delivers against Pillar 3 Residential aged care quality and safety</i>	Plan and develop with the Department of Health	Commencement of expanded scheme		
2 Build organisational and clinical governance capability of leaders and governing bodies of residential and home care services through targeted training <i>Delivers against Pillar 5 Governance</i>	Develop plan and commence implementation 1 December 2021 Assistant Commissioner, Sector Capability appointed	Implement program	Evaluation of provider governance	Update and implement program as needed
3 Deliver a campaign on behaviour support including minimising inappropriate restrictive practices <i>Delivers against Pillar 3 Residential aged care quality and safety</i>	Establish Program and baseline Appoint Senior Practitioner, Restrictive Practices	Analysis and use of information to make changes as needed	Evaluate campaign	Update campaign as needed and implement changes
4 Implement the new National Care and Support Worker Regulation Reform <i>Delivers against Pillar 4 Workforce</i>	Plan and develop a framework for operational readiness	Implement new regulatory arrangements	Audit of measures implemented	Update and implement new framework

Our contribution to reform of aged care will deliver better experiences and outcomes for older Australians with care needs. Senior Australians will have improved access to high quality and safe care and services, be empowered to have more control and choice in their care arrangements and be treated with dignity and respect.

Our transformational change agenda, informed by regulatory intelligence, will build sector capability, improve the corporate and clinical governance capability of aged care leaders, and equip boards of aged care providers to drive improved outcomes for consumers of aged care services.

We will strengthen the regulation of restrictive practices and enhance behaviour support capability through appointing an expert senior practitioner and holding providers to account for complying with new legislative provisions regarding restrictive practices. We will strengthen our partnerships across government, with the aged care sector, and advisory bodies.

Methodology will include: Report on completion and success through tracking progress of recommendations, stakeholder engagement feedback through surveys, successful appointment of key positions, and quarterly performance reporting.

Key Activity 2: We contribute to enhanced confidence and trust in the aged care system, empower consumers to make informed choices, and promote best practice service provision

Performance measure	Year			
	2021–22	2022–23	2023–24	2024–25
5 Consumer feedback and engagement is used to inform the design and focus of our regulatory activities and provider performance information	Develop and establish approach and methodology	Evaluate 6 monthly feedback reports	Evaluate 6 monthly feedback reports	Evaluate 6 monthly feedback reports
6 Promote best practice and support quality use of medicines by extending pharmacy outreach activities to more aged care services <i>Delivers against Pillar 3 Residential aged care quality and safety</i>	Review program and approach	Evaluate 6 monthly feedback reports	Evaluate 6 monthly feedback reports	Evaluate 6 monthly feedback reports

Consumer experiences will continue to inform our regulatory approach, and contribute to improved risk profiling and regulatory oversight.

Consumers' views and concerns are captured through complaints resolution, quality assessment and monitoring, and compliance activities. Consumers, their family, friends, and carers are encouraged and supported to provide feedback.

Behavioural change by providers is realised.

Methodology will include: Report on completion and success, evaluation, and stakeholder engagement feedback through surveys.

Key Activity 3: We provide information and education about quality care and services that is responsive, fit-for-purpose and targeted to providers, consumers and the public

Performance measure	Year			
	2021–22	2022–23	2023–24	2024–25
7 Deliver information and education programs to providers and consumers	85% of participants are satisfied	Increase of 1% on previous year result	Increase of 1% on previous year result	Increase of 1% on previous year result
8 Underpin the Commission's regulatory campaigns with focused communications and information to support behavioural change in the sector	Establish program	Analyse feedback and adjust campaign approach as needed	Evaluate program(s)	Update and implement program(s)

We will continue to educate, engage with and provide information for each stakeholder group on provider obligations and our functions, processes, activities, findings and decisions, with a view to informing stakeholders and, where appropriate, shaping behaviour change by providers.

We will highlight the need for and facilitate access to relevant information and expert guidance to enable aged care providers to improve their standard of care and governance arrangements, and meet strengthened legislative obligations.

Methodology will include: Documented feedback and review, online survey of each stakeholder group and evaluation of information and education programs.

Key Activity 4: We protect the safety, wellbeing, and interests of aged care consumers through our regulatory activities and decisions

Performance measure	Year			
	2021–22	2022–23	2023–24	2024–25
9 Resolve complaints about aged care service providers within 60 days <i>2021–22 ACQSC Portfolio Budget Statements, p140</i>	80%	Increase of 1% on previous year result	Increase of 1% on previous year result	Increase of 1% on previous year result
10 Monitor aged care provider quality and safety performance (against the Aged Care Quality Standards) <i>2021–22 ACQSC Portfolio Budget Statements, p140</i>	2257 assessment contacts conducted (all providers)	Target to be set at 2021–22 activity level + growth	Target to be set at 2022–23 activity level + growth	Target to be set at 2023–24 activity level + growth
11 Increase the number of residential aged care reaccréditation site audits conducted against 2020/21 baseline of 543 <i>Delivers against Pillar 3 Residential aged care quality and safety</i>	2151 reaccréditation site audits conducted	Target to be set based on accreditation expiry schedule and evaluation of delivery program		
12 Undertake home services quality audits and assessment contacts <i>Delivers against Pillar 1 Home Care</i>	987 quality audits and assessment contacts conducted	Target to be set based on evaluation of delivery program	Target to be set at 2022–23 activity level + growth	Target to be set at 2023–24 activity level + growth
13 Monitor and take appropriate action in response to providers with potential or actual non-compliance with financial and prudential responsibilities including the Prudential Standards <i>Delivers against Pillar 2 Residential aged care services and sustainability</i>	Establish enhanced regulatory framework and design additional regulatory measures	Implement additional regulatory measures		

continues page 30 >

Key Activity 4: We protect the safety, wellbeing, and interests of aged care consumers through our regulatory activities and decisions

Performance measure	Year			
	2021–22	2022–23	2023–24	2024–25
14 Improve the use of tactical intelligence and enhance our risk profiling tools to effectively target our regulatory activities <i>Delivers against Pillar 1 Home care</i>	Risk profile information is used to drive regulatory response for all residential aged care providers who are subject to case co-ordination approach	Expand the use of risk profile information to drive regulatory response for all providers who are subject to case co-ordination approach	Expand the use of risk profile information to drive all regulatory activities	

Aged care consumers will be further protected and will benefit from improved, safer care and better outcomes through the Commission's strengthened capability.

Providers will benefit from risk-based proportionate regulation and greater harmonisation of standards across sectors, including clearer standards relating to clinical care delivered to aged care consumers.

We use the full range of regulatory tools available to the Commission to optimise our impact on individual providers and the sector.

Methodology will include: Intelligence and data analytics, surveys and feedback (consumer satisfaction with complaints process), audit of service providers (trend analysis), evaluation and case studies, quality assurance and audit.

Key Activity 5: We continue to build our capability, ensuring a high impact Commission now and into the future

Performance measure	Year			
	2021–22	2022–23	2023–24	2024–25
15 Staff engagement and wellbeing improves	Baseline 2021 APS Employee Census wellbeing and engagement scores	Increase of 1% on previous year result	Increase of 1% on previous year result	Increase of 1% on previous year result
16 A skilled, flexible, diverse, systems and technology enabled workforce will deliver the activities of the Commission <i>Delivers against Pillar 3 Residential aged care quality and safety</i>	a. Undertake internal Optimising Capability Project b. Develop People Strategy c. Recruit and retain an increased number and proportion of APS staff to the Commission	Continue implementation of workforce enhancement initiatives		

We will increase the number and proportion of APS staff in the Commission.

We will work in partnership with our staff to focus on engagement and wellbeing initiatives and implementing our People Strategy.

We will continue our organisational and cultural journey of becoming 'One Commission.'

We will continue to integrate and strengthen our business systems and processes to better support our people and build greater enterprise efficiencies and resilience.

We will support our staff with training and professional development to enhance our regulatory functions.

We will review and take action to strengthen our capabilities now and into the future.

We will participate fully in a capability review of the Commission to be initiated by Government in 2023.

Methodology will include: Documented feedback Indication of the level of staff engagement, staff surveys and delivery of projects on time as agreed.

Summary of changes to performance measures

The Commission's performance framework provides substantial detail regarding how our progress in achieving our purpose will be measured. In this Corporate Plan, we identify five key activities with 16 performance measures for the reporting period 2021–22 to 2024–25, a change from 24 performance measures identified in the 2020–21 Corporate Plan.

The change in approach reflects our efforts to align our performance measures to our key activities which address the Government's reform agenda.

The performance measures reflect our approach to using data and intelligence to continue to improve our ability to make informed, risk-based and proportionate decisions, to build our capability and capacity, to inform and educate, and to help drive increased trust in the aged care system.



Aged Care Quality and Safety Commission

Operational Plan 2021–2022

As required under section 54(1) and (2) of the *Aged Care Quality and Safety Commission Act 2018*, the Commission must produce an annual Operational Plan and provide a report on performance in its Annual Report. The Commission's Corporate Plan informs the annual Operational Plan which in turn informs and flows through to group level business, team and individual performance plans.

Purpose	Outcome
To protect and enhance the safety, health, wellbeing and quality of life of aged care consumers	Protect and enhance the safety, health, wellbeing and quality of life of aged care consumers, including through effective engagement with them, regulation and education of Commonwealth-funded aged care service providers and resolution of aged care complaints

Strategic priorities of the Aged Care Quality and Safety Commission

Strategic Priority 1 We place consumers at the centre at all times	Consumers and providers of aged care services and the public are aware of what should be expected of quality care and services. Consumers are engaged and empowered in their care and can easily make complaints or provide information about their experience. The experience of consumers informs our regulatory activities.
Strategic Priority 2 We continue to enhance our regulatory approach to strengthen aged care quality and safety	We respond to Government priorities. Our processes and activities are targeted, efficient, effective and deliver high-quality outcomes. Our effective collaboration with the Department of Health and other agencies for the delivery of aged care quality reforms ensures desired outcomes are achieved.
Strategic Priority 3 We advance proportionate, intelligence-led, risk-based regulation	We apply robust standards, guidance, assessment, investigation, monitoring, compliance and enforcement practices to strengthen our regulatory effectiveness. The collection, analysis and publication of information improves transparency and understanding of provider risks and sector trends and in turn, guides our regulatory activities, ensuring the decisions we make are proportionate to risk.
Strategic Priority 4 We are an effective, capable and accountable regulator	Our capability and effectiveness are strengthened as an integrated regulator. We build a workforce fit for the future that can manage change and whose wellbeing is a core priority. We invest in our people and systems to support our operations and prioritise collaboration and engagement.

Key actions 2021–22	Key deliverables
1 Plan for the expansion of Serious Incident Response Scheme (SIRS) and quality indicator program into home care on 1 July 2022	Operational readiness by June 2022
2 Build organisational and clinical governance capability of leaders and governing bodies of residential and home care services through targeted training	Program developed and Assistant Commissioner, Sector Capability appointed
3 Deliver a campaign on behaviour support including minimising the inappropriate use of restrictive practices	Program established and Senior Practitioner, Restrictive Practices appointed
4 Plan for the implementation of the new National Care and Support Worker Regulation Reforms	Operational readiness by June 2022
5 Consumer feedback and engagement is used to inform the design and focus of our regulatory activities and provider performance information	Pilot survey to test approach established
6 Promote best practice and support quality use of medicines by extending pharmacy outreach activities to more aged care services	Program reviewed and further developed
7 Deliver information and education programs to providers and consumers	85% of participants are satisfied with the education programs delivered
8 Underpin the Commission's regulatory campaigns with focused communications and information to support behavioural change in the sector	Program established
9 Resolve complaints about aged care service providers within 60 days	80% of complaints are resolved within 60 days
10 Monitor aged care provider quality and safety performance (against the Aged Care Quality Standards)	2257 assessment contacts conducted (all providers)
11 Undertake residential aged care reaccreditation site audits	2151 reaccreditation site audits conducted
12 Undertake home services quality audits and assessment contacts	987 quality audits and assessment contacts conducted
13 Monitor and take appropriate action in response to providers with potential or actual non-compliance with financial and prudential responsibilities including the Prudential Standards	Establish enhanced regulatory framework and design additional regulatory measures
14 Improve the use of tactical intelligence and enhance our risk profiling tools to effectively target our regulatory activities	Risk profile information is used to drive regulatory response for all residential aged care providers who are subject to case co-ordination approach
15 Staff engagement and wellbeing improves	Develop and implement key initiatives

*Link to Corporate Plan performance measure

Accountable officer	Timeframe	Key activity	Link*	Strategic priority
Executive Director, Approvals, Compliance and Investigations	June 2022	KA1	PM1	SP1, SP3
Executive Director, Strategic Capability / Assistant Commissioner, Sector Capability (following appointment)	December 2021	KA1	PM2	SP1, SP2
Chief Clinical Advisor	March 2022	KA1	PM2	SP1, SP3
Executive Director, Intake and Complaints Resolution	June 2022	KA1	PM3	SP2
Executive Director, Regulatory Policy and Intelligence	December 2021 then ongoing	KA2	PM5	SP1, SP3
Chief Clinical Advisor	December 2021	KA2	PM6	SP1, SP2
Assistant Commissioner, Sector Capability	Ongoing	KA3	PM7	SP1
Assistant Commissioner, Sector Capability	March 2022	KA3	PM8	SP1
Executive Director, Intake and Complaints Resolution	Ongoing	KA4	PM9	SP1, SP3
Executive Director, Quality Assessment and Monitoring	Ongoing	KA4	PM10	SP1, SP3
Executive Director, Quality Assessment and Monitoring	June 2022	KA4	PM11	SP1, SP3
Executive Director, Quality Assessment and Monitoring	Ongoing	KA4	PM12	SP1, SP3
Executive Director, Approvals, Compliance and Investigations	Ongoing	KA4	PM13	SP3
Executive Director, Regulatory Policy and Intelligence	December 2021	KA4	PM14	SP1, SP3
Executive Director, Organisational and Workforce Development	June 2022 then ongoing	KA5	PM15	SP4

Key actions 2021–22	Key deliverables
16 A skilled, flexible, diverse, systems and technology enabled workforce will deliver the activities of the Commission	Undertake internal Optimising Capability Project Develop People Strategy Recruit and retain an increased number and proportion of APS staff to the Commission
17 Support revision of the Aged Care Quality Standards	Demonstrable progress on review of Standards
18 Develop the home care regulatory strategy	Agreed regulatory home care strategy published
19 Embed regulatory risk framework	Deliver ongoing training
20 Develop data management strategy	Data management strategy developed
21 Establish quality assurance framework	Quality Assurance framework developed
22 Implement Risk Based Targeting and Information Sharing (RBTIS) Phase 3	Implement and operationalise RBTIS Phase 3
23 Implement 2021–22 Reconciliation Action Plan deliverables	Develop and implement initiatives
24 Establish Reform and Transform Program Office (RTPO)	RTPO established and fully operational
25 Implement Electronic Document and Records Management System (EDRMS)	EDRMS fully implemented
26 Deliver Aged Care Case Management Information System (ACCMIS)	ACCMIS operationalised
27 Relocate the National Complaints and Compliance Information Management System (NCCIMS)	NCCIMS to Cloud delivered
28 Implement new financial management system	Transition to new financial management system complete
29 Establish Commission Contact Centre	Operating model designed and established
30 Implement home care regulation program	Program operationalised
31 Enhance Quality Indicator Program (QIP)	Program operationalised
32 Develop and implement core clinical competencies for front line staff	Competencies identified, resources developed, and training provided

*Link to Corporate Plan performance measure

Accountable officer	Timeframe	Key activity	Link*	Strategic priority
Executive Director, Organisational and Workforce Development	June 2022	KA5	PM16	SP4
Executive Director, Regulatory Policy and Intelligence	June 2022	KA4		SP2, SP4
Executive Director, Regulatory Policy and Intelligence	March 2022	KA4		SP1, SP3
Executive Director, Regulatory Policy and Intelligence	Ongoing	KA4		SP3
Chief Operating Officer	May 2022	KA5		SP3
Chief Operating Officer	January 2022	KA5		SP1, SP4
Executive Director, Regulatory Policy and Intelligence	June 2022	KA2		SP3
Executive Director, Quality Assessment and Monitoring	June 2022	KA5		SP4
Chief Operating Officer	September 2021	KA5		SP4
Chief Operating Officer	March 2021	KA5		SP4
Chief Operating Officer	February 2022	KA5		SP1, SP4
Chief Operating Officer	November 2021	KA5		SP1, SP4
Chief Operating Officer	January 2022	KA5		SP4
Executive Director, Intake and Complaints Resolution	June 2022	KA2		SP1, SP4
Executive Director, Regulatory Policy and Intelligence	June 2022	KA4		SP1, SP3
Executive Director, Regulatory Policy and Intelligence	June 2022	KA4		SP3
Executive Director, Organisational and Workforce Development	May 2022	KA5		SP4

Appendix 1: list of requirements

The Corporate Plan has been prepared in accordance with the requirements of:

- subsection 35(1) of the PGPA Act; and
- the PGPA Rule 2014.

The following table details the requirements met by the Commission's Corporate Plan and the page reference(s) for each requirement.

Requirement	Page(s)
Introduction	
<ul style="list-style-type: none"> • Statement of preparation • the reporting period for which the plan is prepared • the reporting periods covered by the plan 	5
Purposes	6
Key activities	22
Operating context	11
<ul style="list-style-type: none"> • Environment • Capability • Risk oversight and management • Cooperation • Subsidiaries (where applicable) 	12–13 14–15 16–17 20–21 N/A
Performance	24–31

The Operational Plan has been prepared in accordance with:

- section 54(1) and (2) of the ACQSC Act.

The following table details the requirements met by the Commission's 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	33–37 Refer also to key activities at page 22
Set out the Commissioner's priorities for work to be undertaken during the period	23, 33 Commissioner's strategic priorities at page 10
Set out how the Commissioner will apply the resources of the Commission to achieve those objectives	14–15, refer also to pages 33–37
An assessment of risks faced by the Commission for the period together with a plan to manage those risks	16–17
Performance indicators the Commissioner considers appropriate for assessing the performance of the Commission during the period	33–37

