

Response to Review:

Workers' Compensation Trends in WA Prisons

September 2025

Response Overview

On 13 December 2024, the Office of the Inspector of Custodial Services (OICS) announced the commencement of a review titled *Workers Compensation Trends in WA Prisons*, which would examine workers' compensation claims trends, its impact on prisoners and if there are any barriers to the timely resolution of workers' compensation claims and return-to-work outcomes.

To assist with the Review, the Department of Justice (the Department) provided a range of documentation and facilitated OICS' access to the necessary systems, custodial facilities, staff, or prisoners required for this Review.

On 28 July 2025, the Department received the draft report which raised one recommendation for review and comment, which was supported.

A detailed response to this recommendation can be found below.

Response to Recommendations

1 Review the effectiveness and efficiency of the current workers' compensation and injury management process to develop a model based on industry best practice. Consideration should be given to including:

- **Increasing resourcing within the Workers' Compensation Team.**
- **Introduce Key Performance Indicators for internal bench marking and process improvement within the Workers Compensation Team.**
- **Strengthen injury management support systems.**
- **Establishing a Human Resources Forum for broader strategic oversight of workers' compensation trends and claims positions.**
- **Strengthening support for regional sites through regular Injury Management Consultant engagement and contingency planning.**
- **Implementing an early intervention program to support employees.**

Level of Acceptance:	Supported
Responsible Division:	Corporate Services
Responsible Directorate:	Human Resources

Response:

The Department is legislatively required to have a documented injury management system (IMS) which outlines the steps taken to support injured workers' recovery and return to work.

The Department engaged a consultant in June 2025 to review the effectiveness and efficiency of current workers' compensation (WC) and injury management practices and make recommendations to improve the Departments IMS.

The review will:

- Examine current processes and procedures to ensure compliance with legislative requirements.
- Identify gaps in current policies, procedures and processes and propose how these can be addressed.
- Development of foundational pieces of the IMS, including:
 - A process map of the life cycle of the WC claims process.
 - A list of the required supporting standard operating procedures.
- Identify relevant policy, procedure and process changes required to promote early intervention and proactive injury management.
- Propose improvements to documentation, checklists and document control to ensure effective and efficient communication practices

The findings of this review will inform the further development of the Department's IMS inclusive of the following considerations:

- Increasing resourcing for the Workers' Compensation and Injury Management Team (WCIM).
- Introducing key performance indicators and other relevant measures for internal bench marking and process improvement within the WCIM Team.
- Strengthening injury management processes, information, templates, team induction/onboarding and systems.

- Strengthening support for all sites, including regional areas, through regular Injury Management Consultant engagement and contingency planning.
- Implementing early intervention actions and communication to support injured workers to understand the recovery at work process and actively engage in the process.

Corrective Services has also commenced implementing a number of initiatives at an operational level to address workers compensation claims across the custodial estate.

A taskforce to address workers compensation claims specifically at Banksia Hill Detention Centre (Banksia Hill) was established in February 2025 under the guidance of an external consultant to provide advice and guidance on improving workers compensation matters on site. A number of strategies have been identified and implemented, including but not limited to recommending alternative approaches for liaising with injured workers as well as the Insurance Commission of WA, and redefining the reasonable expectations for an injured worker transitioning back to duty.

As a result of these strategies, Banksia Hill has seen a noticeable reduction in the number of workers compensation claims. This has resulted in the number of return-to-work positions available, reserved for injured workers on transitional duties, to a total of six FTE. Corrective Services is now assessing the feasibility of rolling out the revised WC processes established at Banksia Hill to the wider custodial estate.

Furthermore, monitoring of the workers compensation rate at Hakea Prison (Hakea) has been ongoing by the Hakea Safer Custody Taskforce (HSCT), resulting in a number of improvement actions implemented on site. Actions include the introduction of a HR Coordinator and Injury Management Consultant positions on site to manage workers compensation claims, revisions to return-to-work structures and placements, and greater consultation with the WCIM Team and the Insurance Commission of WA. This has resulted in Hakea's workers compensation claims reducing by up to 20% since these actions were implemented by the HSCT.

Plans are also underway to increase the number of Work Health and Safety representatives at all custodial facilities across the estate to ensure work-related incidents and hazards can be identified and reported more frequently in order to provide a safer working environment for staff and the people in their care.