



RELEASED UNDER THE  
OFFICIAL INFORMATION ACT

# Integrity Services

## Proposal for consultation

**SENSITIVE  
INTERNAL**

**EMBARGOED until**

2pm 26 June 2018



# Background



In July 2016 the Integrity Services Leadership Team launched a new vision and purpose to support our Business Plan objectives.

Our vision is:

***To be at the forefront of leading professional practice in improving integrity maturity across ACC.***

Our purpose is:

***To protect the integrity of the scheme by minimising the effect of fraud, waste and abuse.***

As part of this, we saw the development of the Integrity Service Framework, which is a four pillar, risk based model through which fraud, waste and abuse is managed consistently for the business. It is based on a methodical prevention led cycle, enabled through data insights, which inform the appropriate corrective response and business improvement actions.

In April 2017 the Integrity Insights function was established to strengthen the Detect Pillar of the Framework, which was seen as a key foundational element.

We are now proposing further changes to fully embed the Framework.

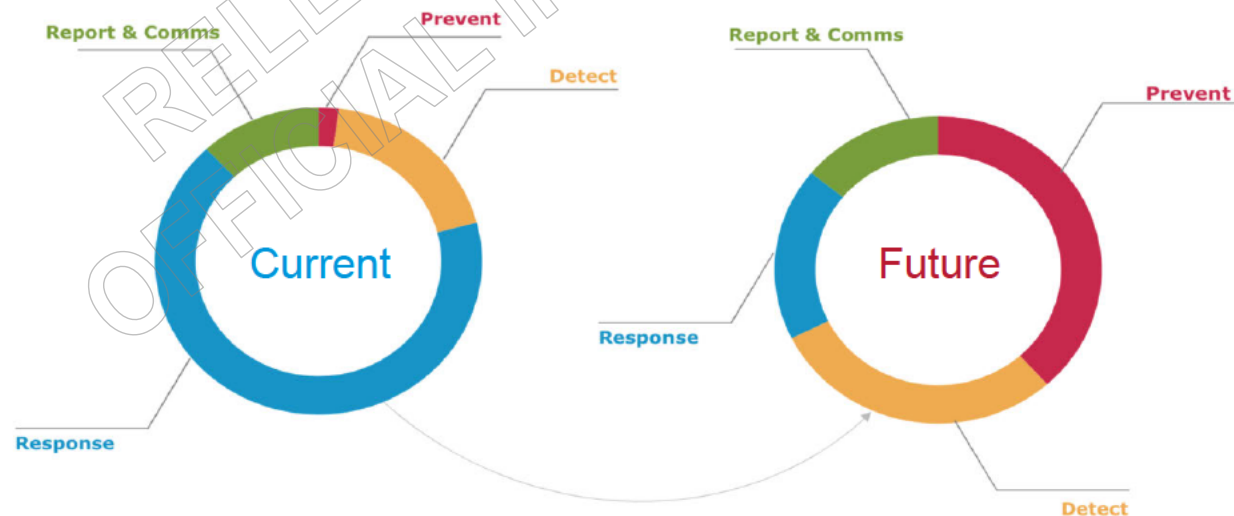


## The future we're aiming for

### We aim to:

- Shift focus from reactive individual investigations at the client/case owner level to proactive prevention, risk advisory, communication and education activity at the organisation and leadership level
- Ensure internal and external customers receive consistent and fit for purpose services that inform and equip them to minimise the impact of fraud, waste and abuse on the Scheme
- Align locations to relevant customer relationships and activity
- Enable effective management and deployment of a distributed team
- Foster the delivery of prevention activity and enable further optimisation of 'light touch' response

### Integrity Services effort



## Transitioning to a Prevention led Integrity Services

Prevention incorporates emerging practices delivering integrity risk advisory and strategic communication and enablement services to internal and selected external customers.

All elements require significant functional leadership, hence we are proposing a strengthened practice leadership approach.

### Integrity Risk Advisory

- Systemic risk identification (e.g. control weakness, lack of knowledge, misalignment of policy and practice)
- Insightful assessment
- Trusted Advice
- Strong links with Enterprise and Operational Risk functions
- Guidance on governance and policy development

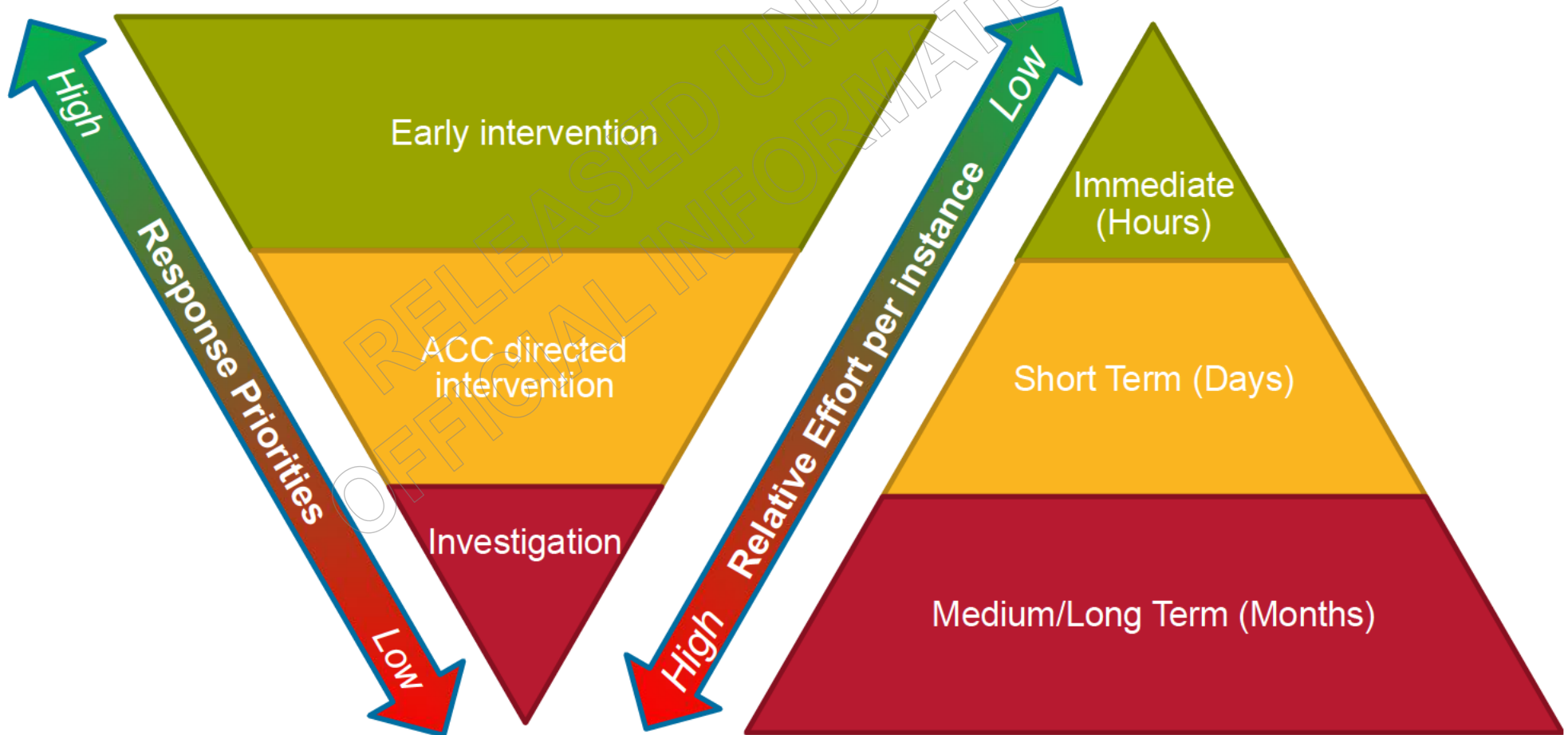
### Strategic Enablement and Communication

- Strategic Insights and Communication
- Support for trusted Stakeholder partnerships (e.g. Health Sector Strategy)
- Collaboration with key internal and external partners
- Public awareness and expectation
- Targeted Integrity education, training and support services

## Continuing to optimise Response management

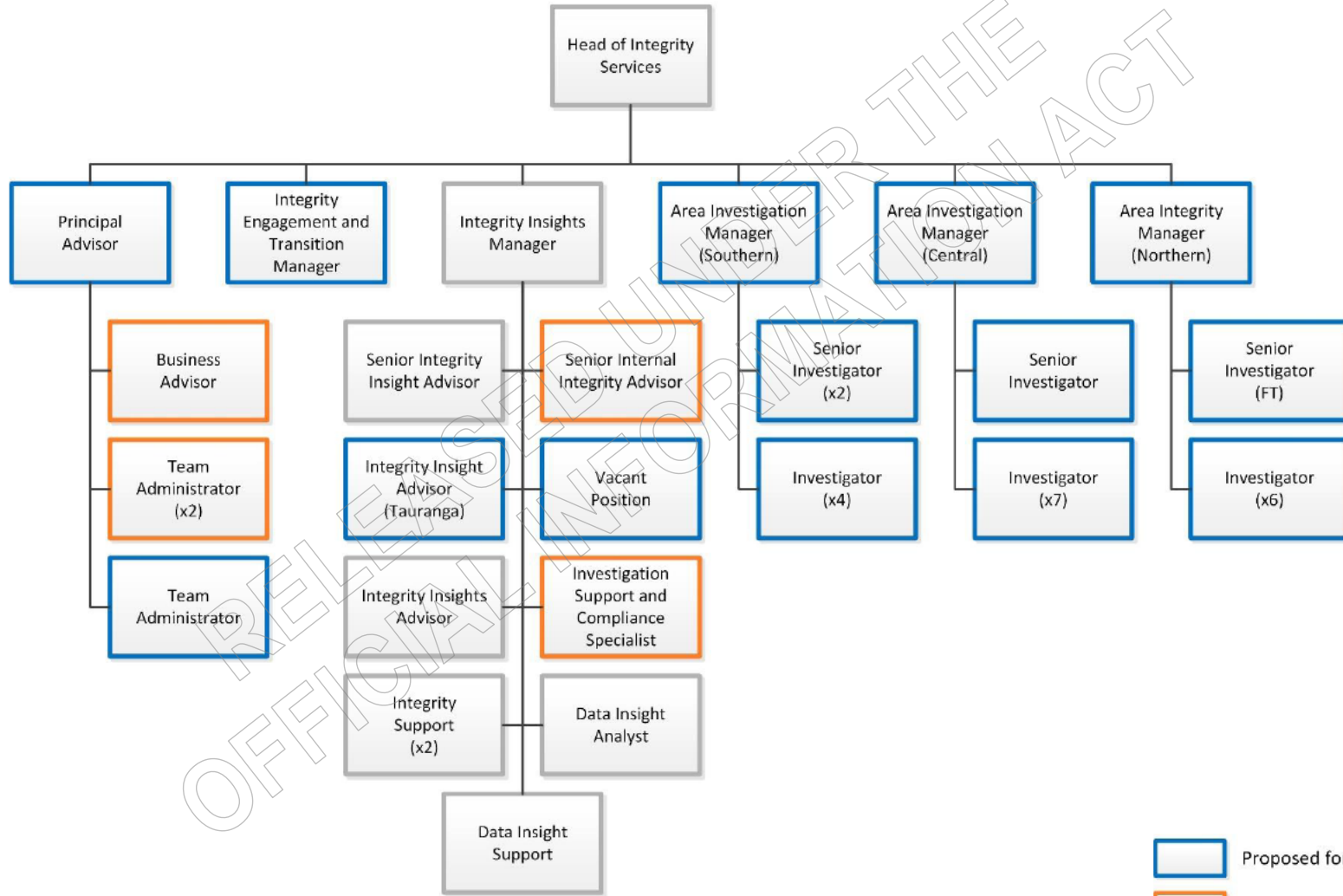
Our Response management approach reflects the conscious shift to move away from 'high-touch, reactive, prosecution' activity to a 'low-touch, proactive, early intervention' approach.

Priority would continue to be placed on early intervention, with a small percentage of cases progressing to formal investigation and (possible) prosecution.





# Current structure



- Proposed for disestablishment
- Proposed for minor change
- No proposed change

\* The vacant role in Integrity Insights is due to the consolidation of the Integrity Insights Manager and Internal Integrity Manager roles late last year

## Reasons for proposed structure

We believe the proposed structure would best enable our future model and achieve the desired benefits for the following reasons:



### Alignment

We believe the structure would most effectively enable the continued implementation of the Integrity Services Framework through the introduction of Risk Advisory, Response, Enablement and Performance practice leadership alongside the existing Insights leadership function. The introduction of an Integrity Advisor role would reflect the shift from reactive investigations to proactive advice and guidance.



### Flexibility

With delivery of services as well as enabling functions centralised this would allow redistribution of effort and resources to meet changing demands. The introduction of specialist Team Management roles would enable effective deployment of Integrity Services effort across each pillar of the Integrity Services Framework.

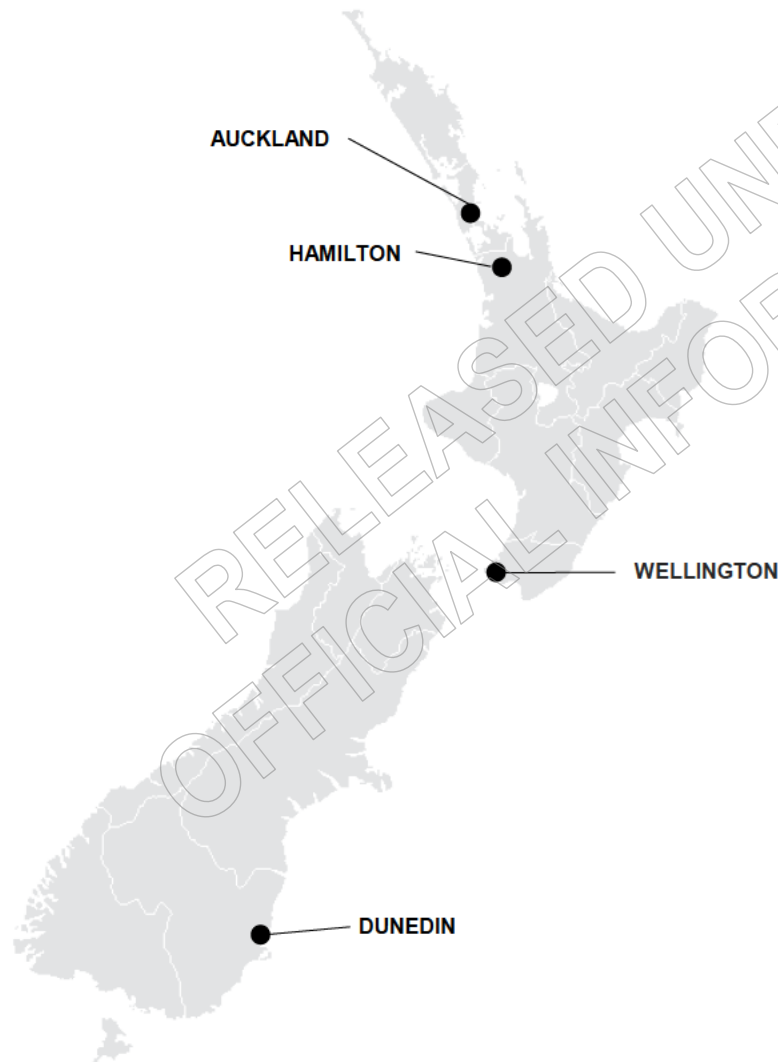


### Co-location

We believe the continued development of Integrity Services practice is best supported through the co-location of teams in recognised ACC core locations. This would facilitate access to senior and specialist personnel as well as establishing Integrity Services centres of excellence

## Proposed locations

Based on key customer relationships and activity we are proposing that Integrity Services would have a presence in the following locations:

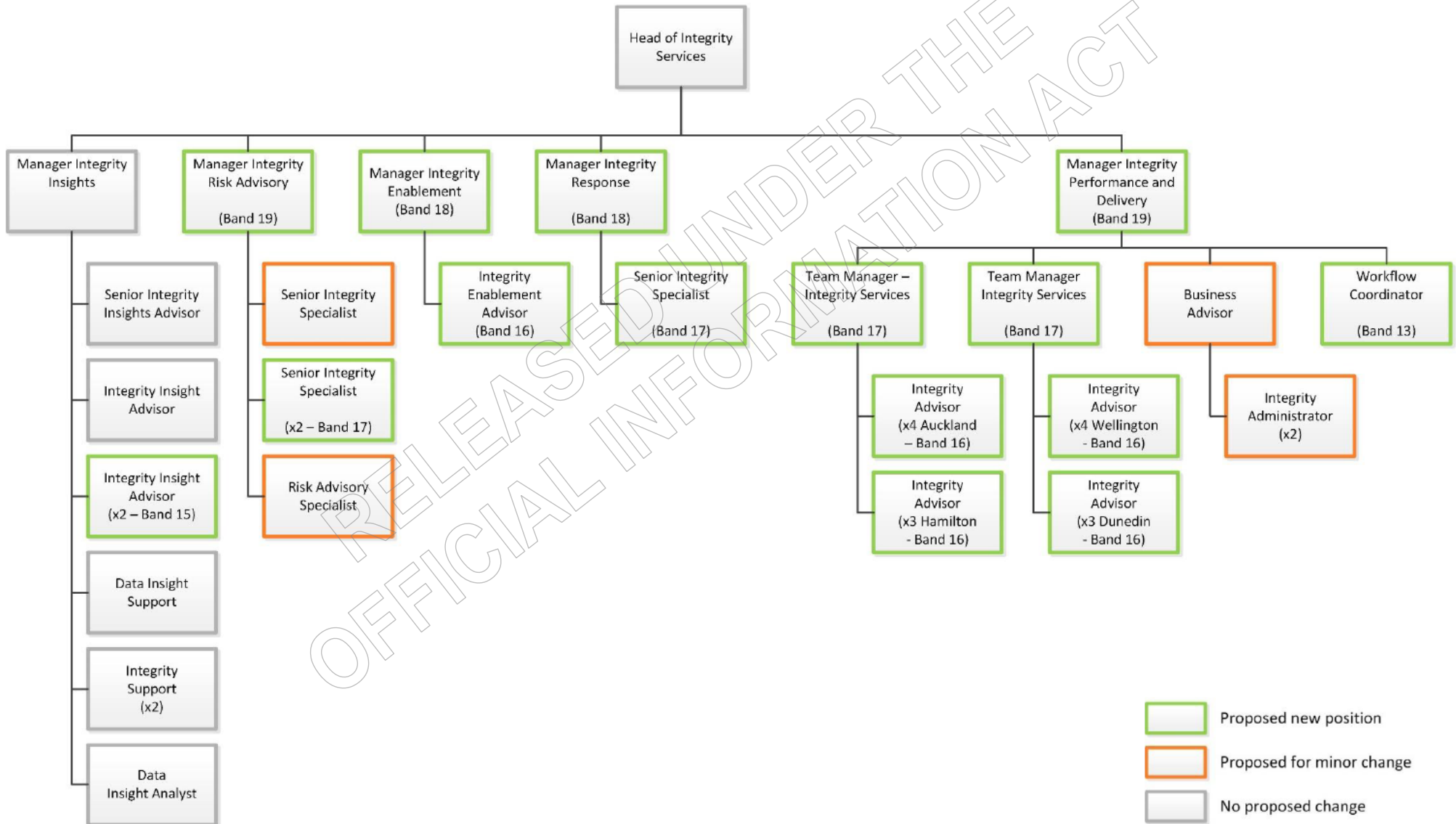


### Key Internal Relationships:

- Customer Group leadership, design and specialist teams
- Operations Group leadership, analytics and risk management teams
- Provider Services Group leadership, design and performance management teams
- Business Customer Group leadership, design and performance management teams
- Client Group leadership, design, delivery and performance management teams across Supported, Partnered and Assisted Recovery functions
- Finance
- Risk & Assurance
- Programme Office
- IT&A



# Proposed structure



## Summary of proposed changes

### Proposed for disestablishment (29 positions):

- Principal Advisor
- Team Administrator x1 (vacant)
- Integrity Engagement and Transition Manager
- Integrity Insights Advisor (in Tauranga)
- Internal Integrity Manager
- Area Investigation Manager x2
- Area Integrity Manager
- Senior Investigator x4 (3x permanent and 1x fixed term)
- Investigator x 17 (1x fixed term, 2x vacant)

### Proposed for minor change:

- Business Advisor (change in reporting lines)
- Team Administrator x2 (change in reporting lines, renaming position for organisational clarity)
- Senior Internal Integrity Advisor (renaming position to align with other senior roles, change in reporting line)
- Investigation Support and Compliance Specialist (renaming position and change in reporting line)

# Summary of proposed changes

## Proposed new positions (27 positions):

- Integrity Insight Advisor x2
- Manager Integrity Risk Advisory
- Manager Integrity Enablement
- Manager Integrity Response
- Senior Integrity Specialist x3
- Integrity Enablement Advisor
- Manager Integrity Performance and Delivery
- Team Manager – Integrity Services x2
- Workflow Coordinator
- Integrity Advisor x14

## Proposed location implications for potentially affected roles:

Auckland	Hamilton	Wellington	Dunedin
<ul style="list-style-type: none"> <li>• Integrity Advisor (x4)</li> </ul>	<ul style="list-style-type: none"> <li>• Integrity Advisor (x3)</li> </ul>	<ul style="list-style-type: none"> <li>• Integrity Insight Advisor (x2)</li> <li>• Manager Integrity Enablement</li> <li>• Integrity Enablement Advisor</li> <li>• Manager Integrity Performance and Delivery</li> <li>• Workflow Coordinator</li> <li>• Integrity Advisor (x4)</li> </ul>	<ul style="list-style-type: none"> <li>• Integrity Advisor (x3)</li> </ul>
<ul style="list-style-type: none"> <li>• Team Manager - Integrity Services (x1) <i>Auckland or Hamilton</i></li> </ul>		<ul style="list-style-type: none"> <li>• Team Manager - Integrity Services (x1) <i>Wellington or Dunedin</i></li> </ul>	
<ul style="list-style-type: none"> <li>• Manager Integrity Risk Advisory</li> <li>• Manager Integrity Response</li> <li>• Senior Integrity Specialist (x3) <i>Auckland or Hamilton or Wellington or Dunedin</i></li> </ul>			

## Vehicles



ACC provides access to vehicles for employees who are required to travel for work related activities.

Currently the use of these vehicles within Integrity Services is inconsistent and not always in line with ACC policy.

Under the proposed new model all vehicles will be accessed via the ACC pool vehicle booking system. This will ensure greater access for all employees when vehicles are required for work purposes. It will also allow for greater visibility of ACC's vehicle utilisation and therefore more effective management of the fleet.

If the new structure is implemented, it is proposed, all vehicles would be housed at the local ACC site. All existing arrangements in relation to garaging agreements, and current practices in relation to personal use, are proposed to cease effective from the date of the new structure.

It is proposed that overnight use would be provided on a case by case basis, in line with ACC's Fleet Vehicle policy. This would be approved by line management and booked through the usual booking system.

This proposal would ensure:

- The vehicle fleet is managed consistently with ACC policy
- There is an equitable and consistent approach to access and use of vehicles
- Better utilisation across Integrity Services and ACC
- We are being Responsible Stewards with ACC assets given the costs associated with Fringe Benefit Tax (FBT), insurance and operating costs through garaging vehicles at home

## Relocation guidelines

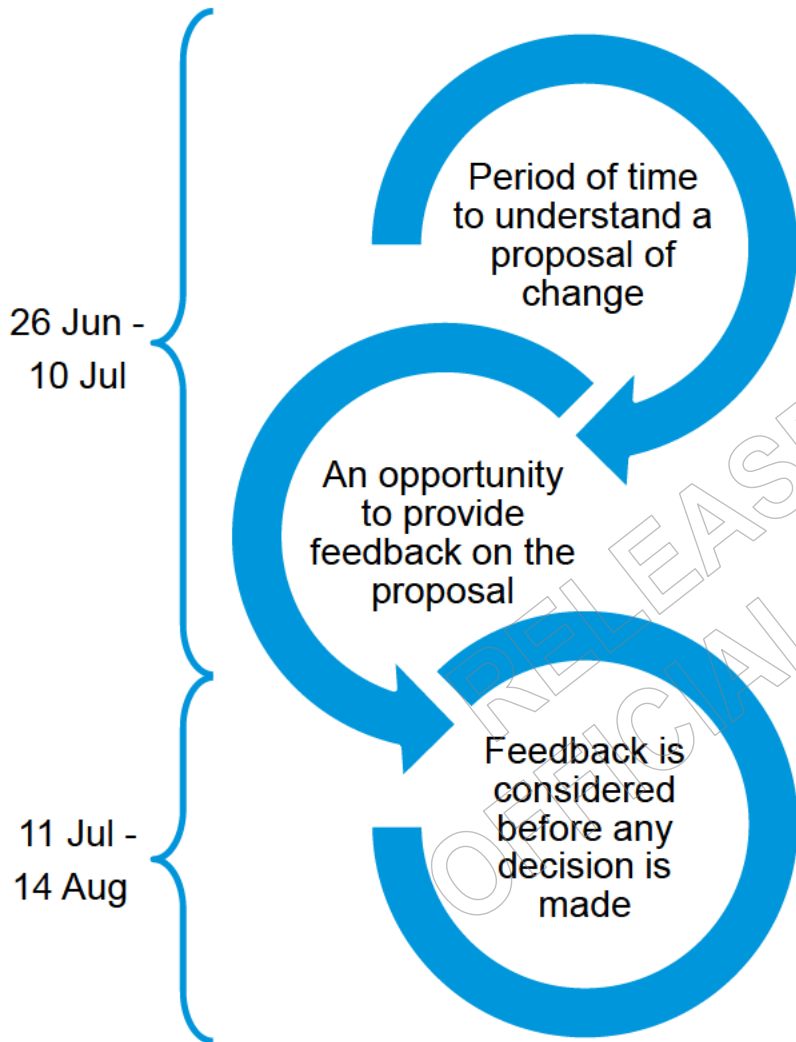


In the event an employee's substantive position is disestablished and that employee is redeployed to a position in a new location, we will support that employee with actual and reasonable relocation costs.

- Relocation support may be considered for employees affected by organisational change on a fair and reasonable basis.
- Any financial support provided will be up to a maximum of \$15,000 per employee – where applicable this includes partners and dependants.
- Relocation support is intended to be used for relocation purposes only so no employee should profit from payment of expenses relating to relocation.
- Relocation 'up to' amounts for each support category are maximum amounts and based on actual and reasonable costs incurred by the employee.
- The level of relocation support available, and the potential options will be agreed in writing between the employee and ACC.



# Consultation process



- A copy of this proposal along with some initial questions and answers and draft position descriptions for proposed new positions will be available on the Organisational Change section of the Sauce from 26 June 2018.
- A Question and Answer session is scheduled later this week to respond to points needing clarification.
- You will also be able to send questions or queries throughout the change process to [IntegrityServicesConsultation@acc.co.nz](mailto:IntegrityServicesConsultation@acc.co.nz)

- Later today, you will be sent a feedback template link to help you to provide your feedback on the proposed structure and proposed selection process
- Please note that your feedback needs to be submitted **by 5pm on 10 Jul 2018.**

- Your feedback will be carefully considered – it's important we hear what you think to help ensure we design the best possible structure to meet ACC's needs in the future.
- We will consider your feedback and discuss with our Executive before making final decisions.
- A decision is expected indicatively on **15 Aug 2018.**

## Support



We acknowledge and understand that for many people this proposal may represent a significant change and may be an unsettling time for you.

### Online Resources

- The [Get help during ACC change](#) page on the Sauce outlines the different stages of organisational change, provides answers to commonly asked questions and access to EOI, career development and career coaching resources.
- The [Organisational Change Policy](#) provides you with a simple and concise explanation of the policy principles and standards that apply to organisational change.

### Wellbeing

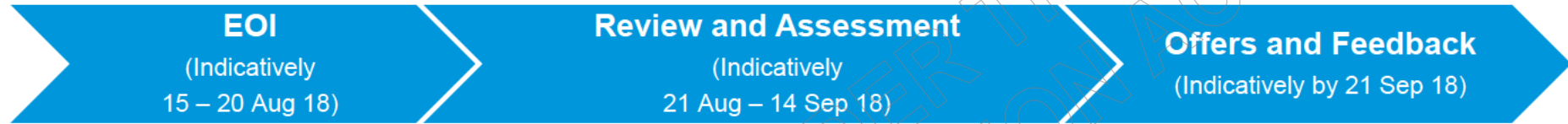
- Thrive workshops provide tools, knowledge and techniques to help maximise your potential at work and in your personal life, and provide you with access to techniques to self manage stress, anxiety and positively adjust to change. Register via Lime, search keywords: thrive, thriving.
- [ACCtivate](#), ACC's workplace wellness programme, provides you with resources, tips and advice to support your wellbeing.

### Support

- Support is available from myself, your manager, Talent and EAP Services (0800 327 669).
- If you are a PSA member, your PSA representative is also available.
- Questions can also be emailed to [IntegrityServicesConsultation@acc.co.nz](mailto:IntegrityServicesConsultation@acc.co.nz)

# Proposed selection process

Depending on feedback, if roles are disestablished and new roles created, an Expression of Interest (EOI) process would be initiated.



- All employees whose substantive positions are disestablished would be asked to complete an EOI form indicating their preference for available positions along with some supporting rationale against the confirmed selection criteria or confirmation they do not want to express interest. Those currently in ACC's redeployment pool would also be eligible to be considered for available positions at the same time.

- Further information may be requested for shortlisting purposes. Shortlisted employees would then be interviewed by a panel comprised of representatives of the leadership team and asked to complete a short scenario exercise. Selection would be based on those best able to demonstrate they meet the proposed selection criteria as per the ratings outlined below. These criteria are outlined in appendix 3. Reference checking would be utilised if required.

- Verbal and written offers for successful candidates, and feedback for unsuccessful candidates, would be provided as soon as practicable after selection decisions are made.
- Any remaining vacancies would then be advertised internally and externally.

**Note: If the proposal goes ahead the indicative date for implementation of the new structure would be 5 November 2018**

Rating	Definition
5	Significantly exceeds criteria for the position
4	Exceeds criteria for the position
3	Meets criteria for the position
2	With appropriate training and support, could meet criteria for the position
1	Does not meet criteria for the position

## Appendix 1 – Potential impacts of proposal



Proposed Impact	FTE	Position	Comments
Disestablish	1	Principal Advisor	Proposed for disestablishment due to core accountabilities proposed to move to proposed new position of Integrity Performance and Delivery Manager which would be a higher band with a significantly broader scope
	1	Team Administrator (vacant)	Proposed for disestablishment due to core accountabilities proposed to move to proposed new position of Workflow Coordinator which would be a higher band and capability requirement due to new functional requirements to support proposed new model and structure
	1	Integrity Engagement and Transition Manager (vacant)	Proposed for disestablishment due to core accountabilities proposed to move to proposed new position of Integrity Enablement Manager which would be a higher band with a significantly broader scope
	1	Integrity Insights Advisor (in Tauranga)	Proposed for disestablishment due to proposed move to four core locations not including Tauranga
	1	Internal Integrity Manager	Proposed for disestablishment due to consolidation with the Integrity Insights Manager role
	2	Area Investigation Manager	Proposed for disestablishment due to core accountabilities proposed to be redistributed to proposed new positions of Team Manager – Integrity Services, Integrity Risk Advisory Manager and Integrity Response Manager
	1	Area Integrity Manager	
	4	Senior Investigator	Proposed for disestablishment due to core accountabilities proposed to move to proposed new position of Senior Integrity Specialist which would also have significantly different scope, focus and capability requirements
	17	Investigator	Proposed for disestablishment due to core accountabilities proposed to move to proposed new position of Integrity Advisor which would also have significantly different scope, focus, ways of working and capability requirements
<b>Total</b>	<b>29</b>		



## Appendix 1 – Potential impacts of proposal



Proposed Impact	FTE	Position	Indicative Banding
New Positions	2	Integrity Insight Advisor	Band 15
	1	Manager Integrity Risk Advisory	Band 19
	1	Manager Integrity Enablement	Band 18
	1	Manager Integrity Response	Band 18
	3	Senior Integrity Specialist	Band 17
	1	Integrity Enablement Advisor	Band 16
	1	Manager Integrity Performance and Delivery	Band 19
	2	Team Manager – Integrity Services	Band 17
	1	Workflow Coordinator	Band 13
	14	Integrity Advisor	Band 16
<b>Total</b>	<b>27</b>		

Proposed Impact	FTE	Position	Proposed Change/s
Minor Change	1	Business Advisor	Reporting line change to Integrity Performance and Delivery Manager, functional responsibility and line management of Integrity Administration
	2	Team Administrator x2	Title change to Integrity Administrator, reporting line change to Business Advisor
	1	Senior Internal Integrity Advisor	Reporting line change to Integrity Risk Advisory Manager and title change to Senior Integrity Specialist
	1	Investigation Support and Compliance Specialist	Reporting line change to Integrity Risk Advisory Manager and title change to Risk Advisory Specialist
<b>Total</b>	<b>5</b>		



# Appendix 2 – EOI form example



## Expression of Interest Form



Name: \_\_\_\_\_  
Current Position: \_\_\_\_\_

Employee Number: \_\_\_\_\_  
Date: \_\_\_\_\_

I wish to submit an expression of interest in the following positions:

Position	Number available	Salary Band	Preference
[EXAMPLE] Head Coach	1	12	1
Manager External Engagement and Solutions	1	20	
<i>[Other new confirmed positions...]</i>	<i>[FTE]</i>	<i>[Band]</i>	

I do not wish to express a preference

Please note as per ACC's Organisational Change Policy, you can still be considered for new positions in the structure if you elect not to indicate your preference/s.

**Note:** if further information was required it may be requested in the format to the right

Position Title	Selection Criteria	Weighting	Response to Criteria
[EXAMPLE] Head Coach	Proven experience coaching a high performing team at a national level	High	I have been coaching the Wellington Hurricanes team since 2012, and their improvements over this time under my management have been significant - winning 2 of the 3 championships despite challenges such as player retention
	Ability to make sound judgement calls	Medium	During my term as Head coach for the Hurricanes, I have had to make some hard and sometimes unpopular decisions during team selection. I have used the evidence in front of me to inform these decisions, and backed myself to make the call and stick by it. A good example which illustrates this is...
	Experience managing media enquiries	Medium	Generally most media enquires have been managed by my publicity team, however on occasion I am required to attend media briefings where I respond directly and articulately to the questions raised.
	High knowledge of industry standards and how to apply them	Medium	I have been coaching Rugby for the last 20 years, and am actively maintaining my knowledge of the standards - both as they are enforced now and those being proposed for change.
	Relevant qualification in sports management	Low	I don't have a qualification in sports management, however I do have a diploma in Business Management achieved in 2003.
	<p><b>I am accountable:</b> I make considered decisions; I'm responsible for my actions, and I take practical steps to overcome challenges.</p> <p><b>I am inclusive:</b> I encourage others; I respect different perspectives, collaborate and make it easy for ideas to be shared.</p> <p><b>I am curious:</b> I am open to new ideas; I welcome feedback and seek opportunities to improve.</p> <p><b>I am customer focused:</b> I enable my customers to achieve the right outcomes, by being responsive, clear and transparent.</p>		<p>I am highly motivated to overcome challenges to achieve results which was illustrated when the team reached the championship final with the following setbacks... My actions which contributed to this was...</p> <p>As Head Coach, there is a lot of pressure on the decisions I make and direction I choose for the team. As a leader I make these decisions in an inclusive and considerate way to ensure those who aren't selected to start continue to strive to achieve and encourage the team in other ways. An example of this was...</p> <p>Along with the team members, I am constantly seeking new ways to improve our scores, I ask for suggestions from the team. An example of this was...</p> <p>I consider my customers to be our supporters, and therefore as a coach I am dedicated to getting the best out of my players to ensure our supporters are proud of their team. I have received feedback from supporters on a number of occasions around what a good job I am doing. An example of this was when...</p>

## Appendix 3 – Proposed selection criteria



Proposed New Position	Selection Criteria
Manager Integrity Risk Advisory	<ul style="list-style-type: none"> <li>• Extensive and proven knowledge and capability in integrity risk management and prevention, in particular relating to leadership of best practice initiatives to manage fraud, waste and abuse risks</li> <li>• Ability to rapidly and effectively identify key business and organisational drivers</li> <li>• Ability to interpret data to gain actionable insights including the identification of key risk indicators and trends</li> <li>• ACC Behaviours and Leadership Capabilities</li> </ul>
Manager Integrity Response	<ul style="list-style-type: none"> <li>• Extensive and proven knowledge and capability in integrity response management, in particular relating to leadership of best practice initiatives to manage incidence of fraud, waste and abuse</li> <li>• Ability to rapidly and effectively identify key business and organisational drivers</li> <li>• Ability to manage third party vendor activity and budget, optimising the utilisation of internal personnel and co-source partner capacity</li> <li>• ACC Behaviours and Leadership Capabilities</li> </ul>
Manager Integrity Performance and Delivery	<ul style="list-style-type: none"> <li>• Proven leadership experience at a senior level providing exceptional customer service delivered in large and complex environments</li> <li>• Proven delivery experience in programme and project management</li> <li>• Experience in strategy and policy development and implementation</li> <li>• Demonstrated financial management skills and experience in budget management and control</li> <li>• ACC Behaviours and Leadership Capabilities</li> </ul>
Manager Integrity Enablement	<ul style="list-style-type: none"> <li>• Extensive and proven knowledge and capability in leading behavioural change initiatives, positively influencing behaviours and mindsets</li> <li>• Proven delivery experience in programme and project management</li> <li>• Ability to rapidly and effectively develop and communicate initiatives (internally and externally) to support key business and organisational drivers</li> <li>• ACC Behaviours and Leadership Capabilities</li> </ul>

## Appendix 3 – Proposed selection criteria



Proposed New Position	Selection Criteria
Team Manager – Integrity Services	<ul style="list-style-type: none"> <li>• Ability to embed a culture of high performance and capability development</li> <li>• Ability to engage effectively and drive pragmatic solutions for mutual gain</li> <li>• Ability to drive operational teams to achieve ambitious results through team work</li> <li>• Ability to drive improvement</li> <li>• Experience in leading through change</li> <li>• ACC Behaviours and Leadership Capabilities</li> </ul>
Integrity Enablement Advisor	<ul style="list-style-type: none"> <li>• Knowledge and capability in the development of materials supporting behavioural change initiatives, in particular relating to best practice initiatives to manage fraud, waste and abuse risks</li> <li>• Proven experience of delivering change and strategic communication initiatives in complex environment</li> <li>• Experience in designing, developing, facilitating and managing both external and internal communications and relationships to achieve positive outcomes</li> <li>• ACC Behaviours</li> </ul>
Workflow Coordinator	<ul style="list-style-type: none"> <li>• Experience in an administrative or customer service role in a complex and dynamic environment</li> <li>• Ability to plan, coordinate and report on workload and workflow allocation</li> <li>• Ability to effectively support the design, maintenance and management technology tools and operational processes to enable effective workload management</li> <li>• Ability to influence and resolve issues constructively</li> <li>• High degree of attention to detail</li> <li>• ACC Behaviours</li> </ul>
Integrity Insight Advisor	<ul style="list-style-type: none"> <li>• Proven expertise in integrity risk management, in particular in identifying and analysing trends and associated root cause identification</li> <li>• Experience in risk management, including identification and articulation of systemic risks and organisational control weaknesses.</li> <li>• Ability to design and manage information collection processes and information management systems used within an integrity risk environment</li> <li>• ACC Behaviours</li> </ul>



## Appendix 3 – Proposed selection criteria



Proposed New Position	Selection Criteria
Integrity Advisor	<ul style="list-style-type: none"> <li>• Experience in integrity risk management disciplines of prevention, detection and response</li> <li>• Identification and articulation of systemic risks and organisational control weaknesses</li> <li>• Ability to effectively plan and manage varied workloads to meet service levels and desired outcomes</li> <li>• Ability to focus on business needs, issues and results, and strong business acumen</li> <li>• Ability to effectively advise and influence customers, including coaching and mentoring</li> <li>• ACC Behaviours</li> </ul>
Senior Integrity Specialist (Forensic and/or complex investigations)	<ul style="list-style-type: none"> <li>• Proven experience and/or relevant qualification in forensic accounting and/or complex investigations and associated prosecutions</li> <li>• Extensive and in-depth experience in integrity risk management disciplines of prevention, detection and response</li> <li>• Ability to support practice leaders to embed a culture of high performance and capability development, working effectively in a shared services environment</li> <li>• Identification and articulation of systemic risks and organisational control weaknesses</li> <li>• Ability to effectively advise and influence customers</li> <li>• ACC Behaviours</li> </ul>
Senior Integrity Specialist (Employment relations)	<ul style="list-style-type: none"> <li>• Proven experience and/or relevant qualification in employment relations law and practice</li> <li>• Extensive and in-depth experience in integrity risk management disciplines of prevention, detection and response</li> <li>• Ability to support practice leaders to embed a culture of high performance and capability development, working effectively in a shared services environment</li> <li>• Identification and articulation of systemic risks and organisational control weaknesses</li> <li>• Ability to effectively advise and influence customers</li> <li>• ACC Behaviours</li> </ul>
Senior Integrity Specialist (Risk management)	<ul style="list-style-type: none"> <li>• Proven experience and/or relevant qualification in risk or audit management</li> <li>• Proven experience in process and system design and review practices</li> <li>• Extensive and in-depth experience in integrity risk management disciplines of prevention, detection and response</li> <li>• Ability to support practice leaders to embed a culture of high performance and capability development, working effectively in a shared services environment</li> <li>• Identification and articulation of systemic risks and organisational control weaknesses</li> <li>• Ability to effectively advise and influence customers</li> <li>• ACC Behaviours</li> </ul>

## Appendix 4 – Proposed ways of working: Prevention



Component	Current State	Future State
<b>Strategic Communication</b>	<ul style="list-style-type: none"> <li>Reactive and limited in scope</li> </ul>	<ul style="list-style-type: none"> <li>Targeted delivery of Integrity insights, trends and success stories</li> <li>Strategic stakeholder engagement planned and scheduled</li> </ul>
<b>Integrity Awareness &amp; Education</b>	<ul style="list-style-type: none"> <li>Limited opportunity to speak with Provider segments and some national and international forums</li> </ul>	<ul style="list-style-type: none"> <li>Focussed and targeted public awareness campaigns</li> <li>Focussed and targeted stakeholder engagement (internal &amp; external)</li> </ul>
<b>Integrity Risk Advisory (ID, assessment &amp; advice)</b>	<ul style="list-style-type: none"> <li>Not currently practiced</li> </ul>	<ul style="list-style-type: none"> <li>Trusted Integrity advice delivered in partnership with customer groups</li> <li>Mature Integrity risk identification and assessment</li> <li>Considered and strategic advice addressing systemic Integrity risk</li> </ul>
<b>Process &amp; Control improvements (including operational efficiency)</b>	<ul style="list-style-type: none"> <li>Ad hoc engagement, typically after an internal breach or control breakdown</li> </ul>	<ul style="list-style-type: none"> <li>Proactive engagement in process, control and form design (application of Behavioural Economics)</li> <li>Practical Integrity Risk advisory to increase or decrease controls based on a professional risk assessment</li> </ul>
<b>Frontline Support/ Development</b>	<ul style="list-style-type: none"> <li>Basic Induction training</li> <li>Ad hoc support on request – typically prior to generating a referral</li> <li>One on one assistance with compliance advise &amp; assistance</li> </ul>	<ul style="list-style-type: none"> <li>Proactive, targeted support to increase Integrity Risk practice throughout the business</li> <li>Coaching and mentoring to support network personnel development</li> </ul>



## Appendix 4 – Proposed ways of working: Response



Component	Current State	Future State
<b>Referral Management (Internal and External)</b>	<ul style="list-style-type: none"> <li>• Poor quality external referrals</li> <li>• Tendency for internal referrals to request surveillance</li> <li>• A significant number of referrals related to general case management practice</li> </ul>	<ul style="list-style-type: none"> <li>• Poor quality referrals eliminated prior to Insights activity</li> <li>• Internal referrals aligned with 'light tough', early intervention methods</li> <li>• Case owners perform core Integrity duties themselves (coached where required)</li> </ul>
<b>Early Intervention (automated and/or human interaction)</b>	<ul style="list-style-type: none"> <li>• All activity starts with an exploratory conversation</li> <li>• All intervention is currently manual – i.e. performed by an Investigator</li> </ul>	<ul style="list-style-type: none"> <li>• Streamlined exploratory conversation and early intervention activity</li> <li>• Increasing case owner/relationship manager capacity to address Integrity issues</li> <li>• Automated intervention applying Behavioural Economics techniques</li> </ul>
<b>ACC-directed Intervention</b>	<ul style="list-style-type: none"> <li>• Led by Investigator; frequently executed by Investigator on behalf of a case owner</li> <li>• Significant effort in aligning case owner practice regarding compliance advice</li> </ul>	<ul style="list-style-type: none"> <li>• Increasing case owner/relationship manager capacity to address Integrity issues</li> <li>• Proactive identification of network coaching and training needs</li> <li>• Standardised toolset and templates employed</li> </ul>
<b>Formal Investigation &amp; Remedy</b>	<ul style="list-style-type: none"> <li>• High profile protocols in place and operating</li> <li>• Cases overseen by AIMs and executed primarily by Investigators</li> <li>• Limited surveillance via PI panel</li> <li>• Limited use of other services available via the Panel</li> </ul>	<ul style="list-style-type: none"> <li>• Shift to planning and management aspects of investigation rather than labour-intensive execution</li> <li>• Increased utilisation of contingent resource pools to deliver intensive/specialised activity</li> </ul>

## Proposal to establish three Integrity Advisors in Christchurch rather than Dunedin

Consultation on a proposed new model and structure for Integrity Services began on 26 June 2018. One of the changes proposed was to establish three new Integrity Advisor positions in Dunedin based on alignment with key customers. We are now proposing that the three positions originally proposed in Dunedin would be in Christchurch.

Feedback has been provided from a number of parties including key customers themselves that they believe there is a stronger alignment having resources in Christchurch rather than Dunedin. This is based on Provider Service Delivery and Business Customer Service Delivery having a significantly larger presence in Christchurch than Dunedin which are two key functions where we believe we should focus more effort in the future. In addition, feedback has been provided around Christchurch being a more convenient location to access the majority of Client sites in the event we do need to conduct investigations and the fact that the pool of potential future external candidates in Christchurch is much stronger. We believe that although many Client functions are currently in Dunedin as well as Operations Services teams we can influence these functions systemically via leadership and design functions which are predominately located in Wellington. We believe that three is the minimum presence we believe to embed new ways of working and ensure appropriate collegial support.

Consequently, we would like to consult with you on this change prior to confirming a decision. We are consulting with you through this document, and would appreciate your feedback on this proposal emailed to IntegrityServicesConsultation@acc.co.nz by Thursday 9 August 2017 at 12:00pm.

Regards

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Head of Integrity Services

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