



He Kaupare. He Manaaki. He Whakaora.  
Prevention. Care. Recovery.

08 April 2026

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Kia ora

**Your Official Information Act request, reference: GOV-046006**

Thank you for your email of 9 February 2026 requesting information on Injury Prevention investment performance and Return on Investment (ROI) since Andrew Milne was appointed Deputy Chief Executive responsible for Injury Prevention at ACC to the most recently completed reporting quarter, under the Official Information Act 1982 (the Act).

Andrew Milne commenced the Deputy Chief Executive, Strategy, Engagement & Planning on 17 October 2022. He held temporary responsibility for the Injury Prevention portfolio from 2 April 2024 and assumed permanent responsibility in September 2024.

Furthermore, between the period 28 July 2025 and 19 December 2025, Andrew Milne temporarily moved to the role of Executive Lead Scheme Sustainability to support delivery of the Turnaround Plan.

For the purposes of this request, we have included information since 1 January 2024.

ACC confirms Return on Investment (ROI) for Injury Prevention only at the end of June each year, in alignment with ACC's financial year. This timing ensures the ROI calculation is consistent with the applicable discount rates. While indicative figures and in-year estimates are produced for guidance, these are not finalised results. ROI figures reported to ACC's Executive and the Board during the year remain estimates due to uncertainties that arise throughout the period. This response therefore covers the financial years 2023/2024 and 2024/2025 (FY24 and FY25).

We are responding to each part of your request in turn below.

**1. Overall Injury Prevention ROI**

**- ACC's calculated return on investment (ROI) for all Injury Prevention programmes combined during this period.**

**- The methodology used to calculate this ROI,**

ACC calculates the number of claims prevented by a programme and applies a cost to those claims using the Statistical Case Estimate (SCE), which is linked to the Outstanding Claims Liability. This value is then divided by the relevant investment to determine the ROI. The SCE provides whole-of-life claim costs, which are used when assessing claims prevented. Discounting is applied to both retrospective and prospective costs and benefits to produce an ROI expressed in present-value terms. Each ACC Account (for example, the Motor Vehicle Account or the Earners' Account) has its own discount and

investment return assumptions. All ROI results are also re-run through a stochastic model, including Monte Carlo simulation, to test variability and uncertainty.

For further information on ACC's Injury Prevention programmes and their performance, please refer to our Financial Conditions Reports available on the ACC website at: [www.acc.co.nz/assets/corporate-documents/ACC8828-Financial-Condition-Report-2025.pdf](http://www.acc.co.nz/assets/corporate-documents/ACC8828-Financial-Condition-Report-2025.pdf) and [www.acc.co.nz/assets/corporate-documents/ACC8706-Financial-Condition-Report-2024.pdf](http://www.acc.co.nz/assets/corporate-documents/ACC8706-Financial-Condition-Report-2024.pdf))

***including:***

***- How "investment" is defined.***

Investments include specific programme spend, as well as internal overhead costs. This represents the total amount drawn from each relevant ACC Account; for example, funding for road-related injury prevention initiatives is taken from the Motor Vehicle Account.

We note that not all programmes have an ROI. Early-stage programmes are considered in the 'Design' phase and don't receive an ROI until a business case is formally approved, and the programme moves into delivery. At that point, all Design costs are carried into the business case.

The Design phase is excluded from ROI to give Injury Prevention space to trial, test, and innovate, and to help ACC build its knowledge base. To prevent programmes remaining in Design indefinitely, a two-year limit applies. Once Design costs are older than two years, they are added into the ROI calculation each quarter.

***- How "injury prevention benefit" or "injury cost avoided" is measured.***

This is measured by the number of claims we would likely to have received without an intervention. Two approaches are used to account for counterfactual outcomes. Where participant-level information is available, a quasi-experimental design is applied. Where such data is not available, a time-series interruption method (a peer-group approach using linear regression) is used. The choice of method depends on the programme's intervention logic and the way the initiative was originally designed.

***- Any assumptions or discounting applied.***

To avoid potential selection bias, adjustments are made for claim history where this is applicable, recognising it as a relevant risk factor. Injury Prevention programmes are designed with the intention of reducing the number of ACC claims and not increasing claims.

***2. 'Programme-level ROI' for each individual Injury Prevention programme operating at any point during this period***

***[...]***

***Please note: I am not seeking whole-of-life or lifetime ROI figures for programmes where those extend beyond the requested period, as these can mask recent performance and obscure current value for money.***

ACC does not calculate ROI in the manner you have requested. As mentioned above, the ROI is based on whole-of-life (lifetime) cost estimates. Programmes typically incur establishment and start-up costs, meaning that calculating ROI based on a single year of results would misrepresent programme

performance. In Table 1 of Appendix 1, for example, some claim-savings relate to investments made and completed several years earlier, with benefits emerging in FY24 and FY25.

Noting this, we are refusing the specific breakdown you have requested as the information is not held. This decision is made under section 18(g) of the Act.

However, Appendix 1 contains data as at 30 June 2024 and data as at 30 June 2025, covering FY24 and FY25. Data for the period ending 30 June 2026 is not finalised until after the end of the reporting year, so is not available. All information reflects the position as at 30 June 2025, with the relevant discounting and investment return assumptions applied at that time. We are supplying data where investment occurred, or benefits were realised during this period.

***- Programme name.***

Please refer to columns A and B in Appendix 1. Also included is the status of the programme. Only programmes in Delivery or Exit will have an assessment.

***- Dates active during the period.***

We have interpreted this as either investment or financial benefits in the period of 1 July 2023 to 30 June 2025 (i.e. FY24 and FY25). This covers the time period when Andy Milne was responsible for Injury Prevention.

***- Total investment during the period (actual spend incurred during the period, not lifetime spend).***

***- Total quantified injury cost avoided during the same period.***

Please refer to columns E and F, in conjunction with column D in Appendix 1.

***- Resulting ROI for the period.***

As advised earlier in this response, this information is not held by ACC and is therefore refused under section 18(g) of the Act.

***- The methodology used to attribute injury prevention benefits to the programme.***

Please refer to column G in Appendix 1. Some exited programmes do not have an ROI, as their design indicated that measurable benefits were unlikely and the initiatives were therefore concluded without an ROI calculation.

***3. Negative or underperforming programmes***

***- A list of all Injury Prevention programmes during this period that:***

***- Delivered a negative ROI, or***

***- Delivered an ROI below ACC's internal investment thresholds (if such thresholds exist).***

***- For each such programme, please provide:***

***- The ROI achieved during the period.***

***- Any internal assessment, review, or recommendation relating to continuation, modification, or cessation of the programme.***

As noted above, ACC calculates ROI on a whole-of-life basis. All programmes are reviewed annually, regardless of performance, to determine whether expected benefits and corresponding ROI assumptions should be updated.

The following documents are provided in Appendix 2:

- *Prevention Portfolio Governance Group Cover Page – Claims Trends, Performance and DRAFT Revaluation paper* (4 June 2024) – Document 1
- *2023/2024 Memorandum - Annual revaluation of IP programmes* (5 August 2024) – Document 2
- *Draft Revaluation FY25* (April 2025) – Document 3
- *2024/2025 Memorandum - Annual revaluation of IP programmes* (18 June 2025) – Document 4

These papers record decisions made when programmes seek additional investment during the year and whether they are continued, modified, or ceased. Each paper includes, for FY24 and FY25 respectively, a list of programmes that were underperforming or performing above expectations at the time of review.

The papers are prepared in advance of the financial year to support decision-making. As a result, the values presented reflect the position at that point in time and precede the final end-of-June calculations. Accordingly, figures may differ from those in Appendix 1, as they are drawn from different points in the year.

Additionally, we have identified the following documents in scope of your request which are attached in Appendix 3:

- *IP frameworks, implementation* (4 December 2025) – Document 1
- *Injury Prevention workflows - new ideas - initiatives - insights* (December 2025) – Document 2
- *Injury Prevention - Investment Framework - Framework to application* (10 December 2025) – Document 3
- *Board Paper – Proposal to Cease WorkSafe Funding* (22 September 2023) – Document 4
- *Phase 2 drawdown for Ririki Haumarua Safekids Aotearoa ‘Safekids’* (15 October 2025) – Document 5
- *Water Safety NZ Partnership* (10 September 2025) – Document 6
- *Future funding options for Ngā Tini Whetū* (14 February 2025) – Document 7

#### **4. Decision-making and assurance**

**- Any internal papers, dashboards, or reports provided to the Executive Leadership Team or Board during this period that summarise Injury Prevention performance, ROI, or value-for-money assessments.**

**- Any changes to Injury Prevention investment frameworks, ROI methodologies, or performance thresholds introduced during this period.**

Please find the following documents attached:

- *Executive Performance Reports for FY2023/2024* (Appendix 4)
- *Executive Performance Reports for FY2024/2025* (Appendix 5)
- *Executive Performance Reports for FY2025/2026* (Appendix 6)
- *Quarterly Reports for the period September 2023 to December 2025* (Appendix 7)

**- Any changes to Injury Prevention investment frameworks, ROI methodologies, or performance thresholds introduced during this period.**

Changes to the Injury Prevention investment framework were approved in December 2025 and are included in Appendix 3.

There have been no changes to the ROI methodologies over this period. Variables such as SCE, investment returns, and discount ratios continue to fluctuate regularly.

As you can see from the information provided, the Injury Prevention portfolio has consistently achieved its service level agreement target in the nine of the last ten years – achieving returns of \$1.92 ROI in 2025. However, evidence suggests that we need to make more impact if it is to make a meaningful difference to the sustainability of the scheme. A new Injury Prevention Strategy was launched last year to ensure that we are getting more impact, this includes disinvesting in initiatives that are not having an impact on injury prevention.

Please note that names and contact details of individuals have been deemed out of scope of your request and removed from the documents provided.

**If you have any questions about this response, please get in touch**

You can email me at [GovernmentServices@acc.co.nz](mailto:GovernmentServices@acc.co.nz).

If you are not happy with this response, you can also contact the Ombudsman via [info@ombudsman.parliament.nz](mailto:info@ombudsman.parliament.nz) or by phoning 0800 802 602. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz).

Ngā mihi



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