



## Memorandum

To	[Out of Scope], DCE – Strategy, Engagement and Prevention; Chair, IPGG Injury Prevention Governance Group
From	[Out of Scope] (Channel Delivery Manager), [Out of Scope] (Senior Strategy Advisor)
Date	4 December 2025
Subject	<b>IP frameworks, implementation</b>

### Purpose

This paper responds to IPGG’s October 2025 requests regarding the operationalisation of the investment framework and the implementation plan for all three enabling frameworks. The focus is on how the Investment framework framed by the Pipeline framework will apply to both new and re-investments, ensuring a consistent approach across the Injury Prevention portfolio. The paper also outlines the definition of a ‘balanced’ portfolio, practical application of the investment framework, decision-making processes, and the implementation plan as part of the broader transition to the new structure (Go-Live: February 2026).

### Recommendations

1.1	<b>Note</b> the proposed definition of a balanced portfolio for injury prevention.	<b>Noted</b>
1.2	<b>Note</b> the proposed application of the investment framework.	<b>Noted</b>
1.3	<b>Note</b> the implementation plan for the three frameworks within the broader transition plan, including indicative timings and resourcing requirements.	<b>Noted</b>
1.4	<b>Note</b> the proposed process flow.	<b>Noted</b>

### Background and strategic context

Earlier this year, a new Investment and Pipeline Framework for Injury Prevention (IP) investments was approved by the IPGG. Since then, work has been undertaken to operationalise the framework and to align it to the new operating model and structure.

The objective of this work was to take the framework from the conceptual level and break it down into clear process, which would create a clear pathway to investment and enable clear



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and consistent decision-making. It included confirming our approach to a balanced portfolio, creating a staged process and building out clear criteria derived from the framework.

## We have confirmed our approach to a balanced portfolio

To support our strategic objectives, we need a balanced portfolio that aims to maximise overall returns, enable innovation, and support continuous improvement, while managing risk and ensuring equity. When considering what a balanced portfolio would be for IP, we prioritised:

- Maximising returns for organisational sustainability and affordability.
- Maximising value for levy payers through lower levies.
- Creating value for communities by minimising harm, especially where it is disproportionate.
- Balancing risk: Allowing for a controlled proportion of higher-risk, innovative investments (e.g., pilots, proofs of concept), while ensuring the majority of investments are well-defined and deliver strong ROI.
- Meeting our legislative requirements: Investments must return value at least slightly greater than their cost, but some risk-taking is necessary for innovation and equity.

This has led us to the following annual allocation (indicative), which we believe would enable us to achieve a balanced portfolio:

- Up to 10% for high-risk, innovative or undeveloped areas.
- 35% for moderate size/depth or moderate ability to intervene.
- 55% for well-defined, sizeable injuries with well-formed interventions.

A clear process, criteria and scoring has been developed to help provide more information on how potential initiatives may fit within each of the groups outlined above.

## We have built out a clear process for investment to implement our framework

In the future, IP will follow the high-level process outlined below:

1. Problem identification (issues analysis) / high level logic: Understanding the ACC problem and whether we can intervene
2. Initial Scoring: Assessment against eligibility criteria.
3. Portfolio Positioning: Map investments to identify strengths/weaknesses.
4. Decision Point: Proceed, stop, or park based on resource availability and portfolio limits.
5. Logic Development: Develop and present investment/intervention logics to IPGG.
6. Assessment: Confirm position and proceed to business case if viable.
7. Business Case Development: Seek IPGG approval for full business case.



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## We have broken this process into 3 stages

To strengthen the process outlined above and to ensure structured, evidence-based investment decisions, we have broken the process into 3 key stages:

- Stage Gate 1: Identify injury types/causes/settings worth exploring. Insights team analyses eligibility and prepares concept briefs.
- Stage Gate 2: Develop investment and intervention logic; assess alignment with priorities and address weaknesses.
- Stage Gate 3: Refine business case and seek IPGG approval.

At each stage, decisions are made to proceed, stop, or park proposals, with clear criteria and decision-making groups. Templates and scoring ensure consistency and alignment with resource commitments.

This enables us to put more emphasis and scrutiny on the problem identification and intervention/investment logic phases well before the development of the business case, ensuring we are truly being driven by our data and insights and that we are confident we can intervene.

## Criteria aligned to the framework has been developed that will support the process and enable consistent decision-making

### *Eligibility criteria*

To support stage gate 1, we have developed eligibility criteria that will enable early assessments that test whether we have clearly identified an ACC problem and have an ability to intervene.

These criteria are:

- Size and depth of issue: Financial burden, claim volume, and frequency.
- Injury trend: Direction and strength of recent trends.
- Ability to intervene: Quality of research/evidence and past programme success.
- Amplifiers: Partners, providers, and strategic contribution (equity, high-impact claims, re-injury, protective factors).

Each factor is scored and combined to inform decision-making. These criteria will be applied equally to new and re-investments.



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If initiatives do not meet the criteria, further work or refinement may be required or there can be a decision to not pursue. This ensures that resource is being focused on areas of most potential.

**Investment logic and criteria**

If an initiative meets the eligibility criteria and proceeds to stage gate 2, a more detailed investment and intervention logic will be developed. They will then be assessed against the following criteria.

- Investment Logic: Why the investment is needed and what it aims to achieve.
- Intervention Logic: How outcomes will be delivered.
- Criteria: ROI, investment required, net returns, risk/complexity, reach/efficacy, benefit timeframe.
- Assessment: Modelled by the Investment Performance & Intelligence Team, with forecasted ROI and benefit timeframes compared to the existing portfolio.

If the logic meets the criteria, it will be able to proceed to stage gate 3 and a full business case will be developed, which will outline in more detail the initiative and provide a more detailed analysis of how it will meet the criteria and be delivered.

**Implementation plan**

We intend to implement the new investment process as part of the transition to the new IP structure. We will utilise the ADKAR change management model to support the teams through transition.

Our proposed timeline is:

- Dec 2025–Feb 2026: Finalise plans, frameworks, training, and process flows.
- Feb–May 2026: Finalise templates, run training, and provide on-the-job support.
- Transition of the entire portfolio to new frameworks by the start of FY 2026/27. Some components already underway; others begin pre-Go-Live and continue post-Go-Live as teams settle into new roles.

**Endorsement**

[Out of Scope], Head of Injury Prevention	[Out of Scope]	Date Signed 5/12/2025
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I have reviewed this recommendation and the [Conflict of Interest Policy](#), and confirm that I do not have an actual, potential or perceived conflict of interest that prevents me from endorsing it.

Note: If you cannot tick this box due to a conflict of interest, please complete a [Conflict of Interest Form](#)

### Approval

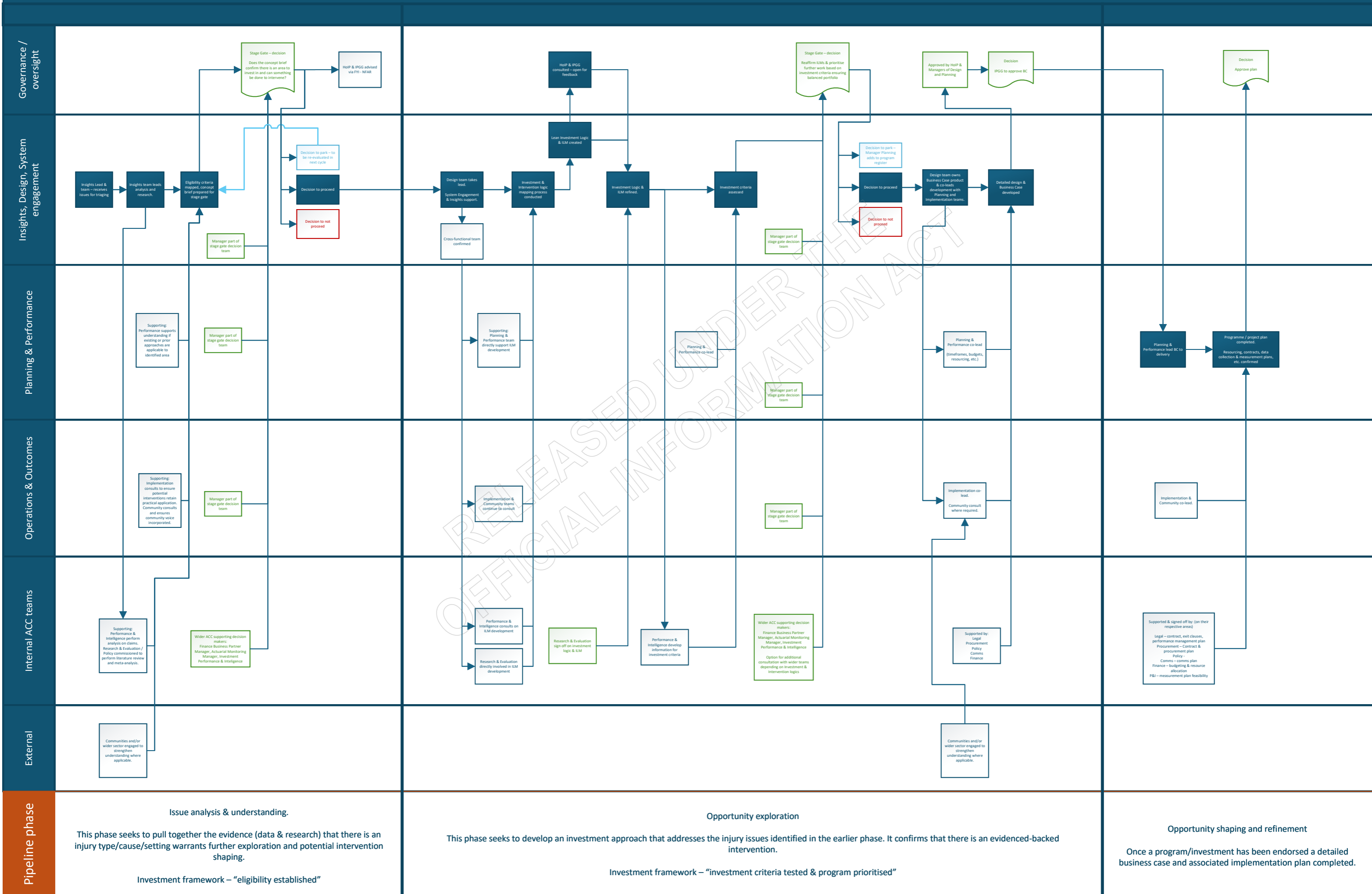
<b>[Out of Scope], Deputy Chief Executive – SEP; Chair, Primary Prevention Portfolio Governance Group</b>	<b>[Out of Scope]</b>	Date Signed 22/12/25
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Note: If you cannot tick this box due to a conflict of interest, please complete a [Conflict of Interest Form](#)

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# Injury Prevention workflows – new ideas/initiatives



# Injury Prevention – Investment Framework

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## Framework to application

10 December 2025

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# The Investment Framework

## Refresher

The investment framework has been developed to:

- Provide clear guidelines for teams when developing new or reinvesting in programmes.
- Facilitate a reset of expectations for consistency across Injury Prevention programmes.
- Create the standard for decision making around maintaining a balanced portfolio.
- Establish mechanisms to include innovation / pilots in a structured and methodical way.
- Supports clearer expectations to providers and partners.

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# Applying the Investment Framework

## Application



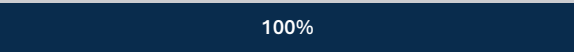
We have concluded that implementing the Investment framework through a staged approach framed by the Pipeline framework is the most effective approach. This method helps us avoid overcommitting to new or reinvestment opportunities that may not be suitable for ACC to pursue. Moreover, following this staged process enables us to develop the essential components of a business case in a structured, consistent, and sequential manner.

There will be three stage gates, each with defined criteria and decision-making groups responsible for collectively determining whether a potential program should proceed. Decisions not to proceed may involve recognising investments that require further refinement for future consideration or programs that are promising but contingent upon exiting another program, allowing for several months of transition recovery.

**\*Please note that the following slides are for illustrative purposes only and do not represent the finalised tool(s).**



# Applying the Investment Framework

	Stage gate 1		Stage gate 2		Stage gate 3	
Question to be answered	Is there an injury type / cause / setting that warrant further exploration?		Is there a viable program or investment aligned with priorities to take forward?		Does this investment fit into IP's current portfolio mix and will it do so for the entirety of its delivery -	
What is happening	Insights team initiates analysis into injury type / cause / setting – checks against 'eligibility criteria' and Insights team make recommendations and prepares each lean case for stage gate decision.		Investment logic developed Intervention logic developed Investment criteria met plus additional checks: <ul style="list-style-type: none"> <li>Any weaknesses identified in stage 1 e.g., no providers, weak trends, partner agencies not focussing on issue, etc.</li> <li>Measurement/data collection plan</li> </ul>		Business case refined and sent to IPGG for approval	
Working group	<ul style="list-style-type: none"> <li>Prevent, ISE</li> <li>Prevention, PP</li> <li>Investment Performance &amp; Intelligence</li> <li>Research &amp; Evaluation</li> </ul>		<ul style="list-style-type: none"> <li>Prevention, ISE</li> <li>Prevention, PP</li> <li>Investment Performance &amp; Intelligence</li> <li>Research &amp; Evaluation</li> </ul>		<ul style="list-style-type: none"> <li>Prevention, ISE</li> <li>Prevention, PP</li> <li>Prevention, OD</li> </ul>	
Supporting teams	<ul style="list-style-type: none"> <li>Actuaries</li> <li>Policy</li> </ul>		<ul style="list-style-type: none"> <li>Legal</li> <li>Finance</li> <li>Actuaries</li> <li>Procurement</li> <li>Prevention, OD</li> </ul>		<ul style="list-style-type: none"> <li>Investment Performance &amp; Intelligence</li> <li>Research &amp; Evaluation</li> <li>Procurement</li> <li>Finance</li> </ul>	
Consulted (if needed)	<ul style="list-style-type: none"> <li>SC&amp;P</li> <li>Customer Equity</li> <li>Prevention, OD</li> </ul>		<ul style="list-style-type: none"> <li>Policy</li> </ul>		<ul style="list-style-type: none"> <li>Actuaries</li> <li>Legal</li> </ul>	
Decision	<ul style="list-style-type: none"> <li>Continue (assigning resource as per portfolio balance)</li> <li>Stop</li> <li>Park</li> </ul>		<ul style="list-style-type: none"> <li>Continue (to full business case development)</li> <li>Stop (if something changes)</li> <li>Revise (if certain criteria are not met)</li> <li>Park (if cannot fit into existing portfolio)</li> </ul>		<ul style="list-style-type: none"> <li>Business case signed off by IPGG</li> <li>Business case parked</li> </ul>	
Who makes decision	<ul style="list-style-type: none"> <li>Investment Performance &amp; Intelligence</li> <li>Research &amp; Evaluation</li> <li>IP Managers &amp; Head of IP</li> </ul>		<ul style="list-style-type: none"> <li>Investment Performance &amp; Intelligence</li> <li>Research &amp; Evaluation</li> <li>IP Managers &amp; Head of IP</li> </ul>		IPGG	
IPGG papers	NA	FYI in IPGG papers – no action or decision required	NA	Investment & Lean intervention logics advised to IPGG – open to feedback	NA	Business case approval
% of business case developed						
Time frames: months	Injury Prevention - Investment Framework - Framework to application (10 December 2025) – Document 3			4	5	6

# Stage 1: Scoring a potential investment

Name	Avocado related cuts - all ages
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Factor cluster	Factor	Definition	Score
Identifying an issue that warrants further development / pursuing	Size and depth of issue	<p>The scale and impact of an identified injury issue to determine its significance for investment. This factor considers both financial burden and claim dynamics:</p> <ul style="list-style-type: none"> <li>- Total lifetime cost: Aggregate cost of all claims associated with the issue over their lifetime.</li> <li>- Average lifetime cost: Typical cost per claim across its duration.</li> <li>- Volume of new claims (per annum): Number of new claims arising each year.</li> <li>- Frequency of new claims (per annum): Rate at which new claims occur annually.</li> </ul> <p>This measure helps prioritise issues that represent the greatest burden on ACC and wider systems, ensuring resources are directed where they can achieve the most meaningful impact.</p>	3 (Less Attractive - Low)
	Injury trend	<ul style="list-style-type: none"> <li>- Strength, direction and extent of recent claims trends, including considering of the trend likely to self correct</li> <li>- Strength, confidence and clarity of underlying Underline change that is occurring around behaviours and or new activities driving increased claims</li> <li>- Policy or other underlying drivers trending in a highly relative way &amp; strongly connected to claims (e.g. demographics)</li> </ul>	9 (More Attractive - High)
Ability to intervene	Research / Evidence	<p>Evaluate the level and quality of research supporting the proposed approach to injury prevention. The strength of evidence indicates confidence in effectiveness and informs investment attractiveness.</p> <p>This factor assesses whether the intervention is supported by credible research and the robustness of that evidence. Higher levels of evidence (e.g., systematic reviews, meta-analyses) indicate greater confidence in outcomes, while lower levels (e.g., case series, cross-sectional studies) suggest limited certainty.</p>	5 (Mid)
	Previous Injury Prevention programs	<p>Has ACC previously delivered or funded programmes that provide evidence of effective injury prevention approaches relevant to the identified issue? A programme is considered relevant if it demonstrates:</p> <ul style="list-style-type: none"> <li>- Evidenced success in addressing the same or similar injury type, cause, setting, or population.</li> <li>- Transferable learnings that can inform or strengthen the proposed intervention.</li> <li>- Documented outcomes that show measurable impact or improvement in injury prevention.</li> </ul>	2 (Less Attractive - Low)
Amplifiers - additional factors that add to or detract from a potential area for investment	Partners	<p>Partners are public, private, or non-governmental organisations that contribute resources (e.g. FTEs, capability, expertise, or funding) alongside ACC to prevent injuries in a mutually beneficial way. An initial environmental scan should determine:</p> <ul style="list-style-type: none"> <li>- Whether the issue relates to another entity;</li> <li>- Whether that entity is aware of the issue;</li> <li>- Whether they are actively seeking to prevent the associated injuries.</li> </ul>	2 (Less Attractive - Low)
	Providers	<p>Providers are organisations or individuals with demonstrated experience in successfully addressing the identified issue. This includes:</p> <ul style="list-style-type: none"> <li>- Evidence of delivering effective interventions for similar injury types, causes, or settings.</li> <li>- Experience working within the relevant sector or with the affected population or cohort.</li> <li>- A proven track record of impact in comparable contexts.</li> </ul>	10 (More Attractive - High)
	Strategic contribution	<p>Does this potential program contribute to IP's focus areas:</p> <ol style="list-style-type: none"> <li>1. Equity</li> <li>2. High-impact claims</li> <li>3. Re- &amp; subsequent injury</li> <li>4. Protective factors</li> </ol>	10 (More Attractive - High)



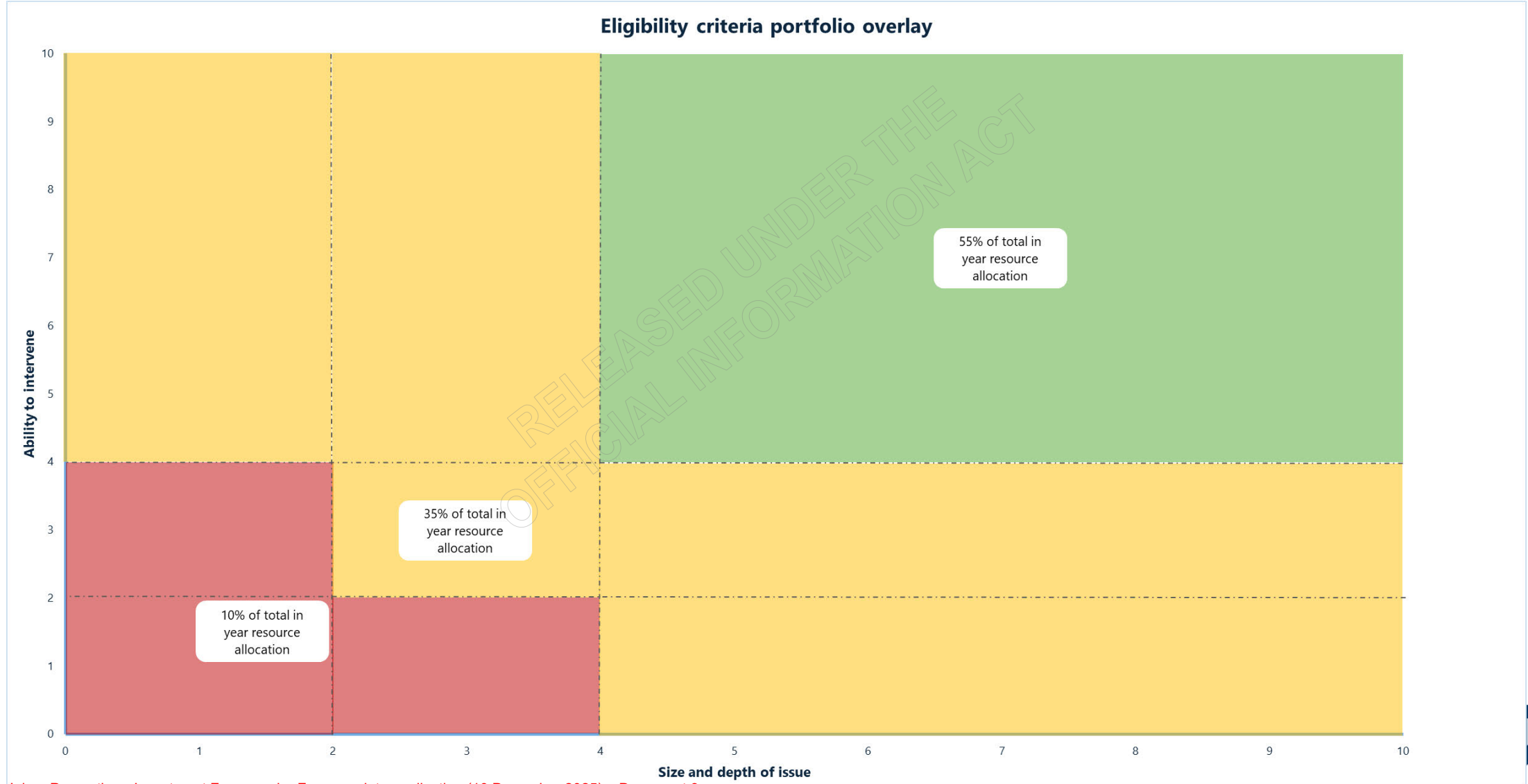
# Scores added to new initiative/re-investments

## Raw scoring and calculated values

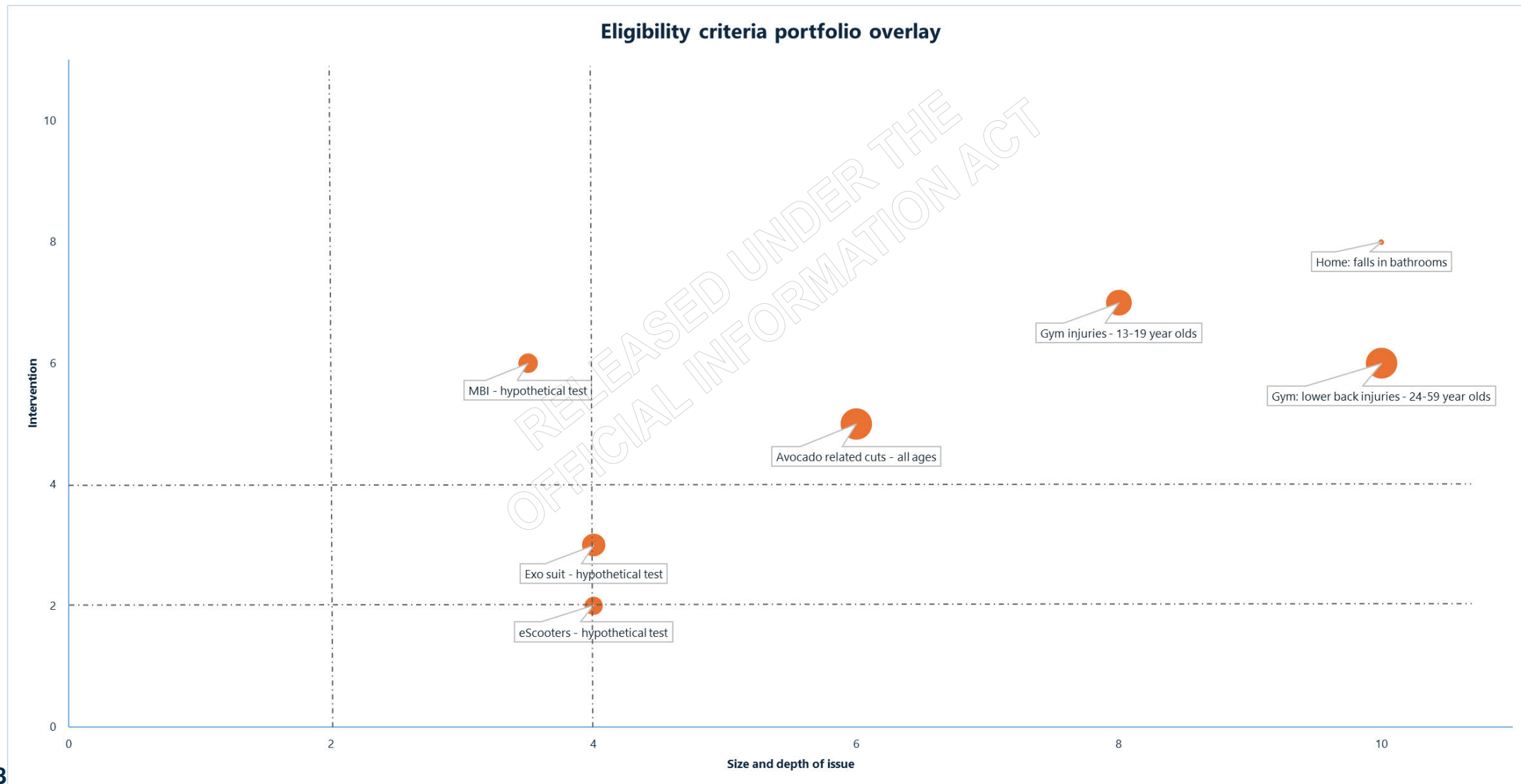
Name	Identifying an issue that warrants further development / pursuing		Ability to intervene		Amplifiers - additional factors that add to or detract from a potential area for investment			Numbers for bubble chart		
	Size and depth of issue	Injury trend	Research / Evidence	Previous Injury Prevention programs	Partners	Providers	Strategic contribution	Size of prize (x axis)	Intervention (y axis)	Amplifiers (bubble size)
Gym injuries - 13-19 year olds	6	10	7	0	4	9	8	8	7	21
Avocado related cuts - all ages	3	9	5	2	10	10	10	6	5	30
Gym: lower back injuries - 24-59 year olds	10	10	6	5	10	10	10	10	6	30
Home: falls in bathrooms	10	10	8	0	0	0	0	10	8	1
eScooters - hypothetical test	5	3	2	0	8	2	0	4	2	10
MBI - hypothetical test	2	5	6	0	3	3	6	3.5	6	12
Exo suit	5	3	3	0	6	6	4	4	3	16



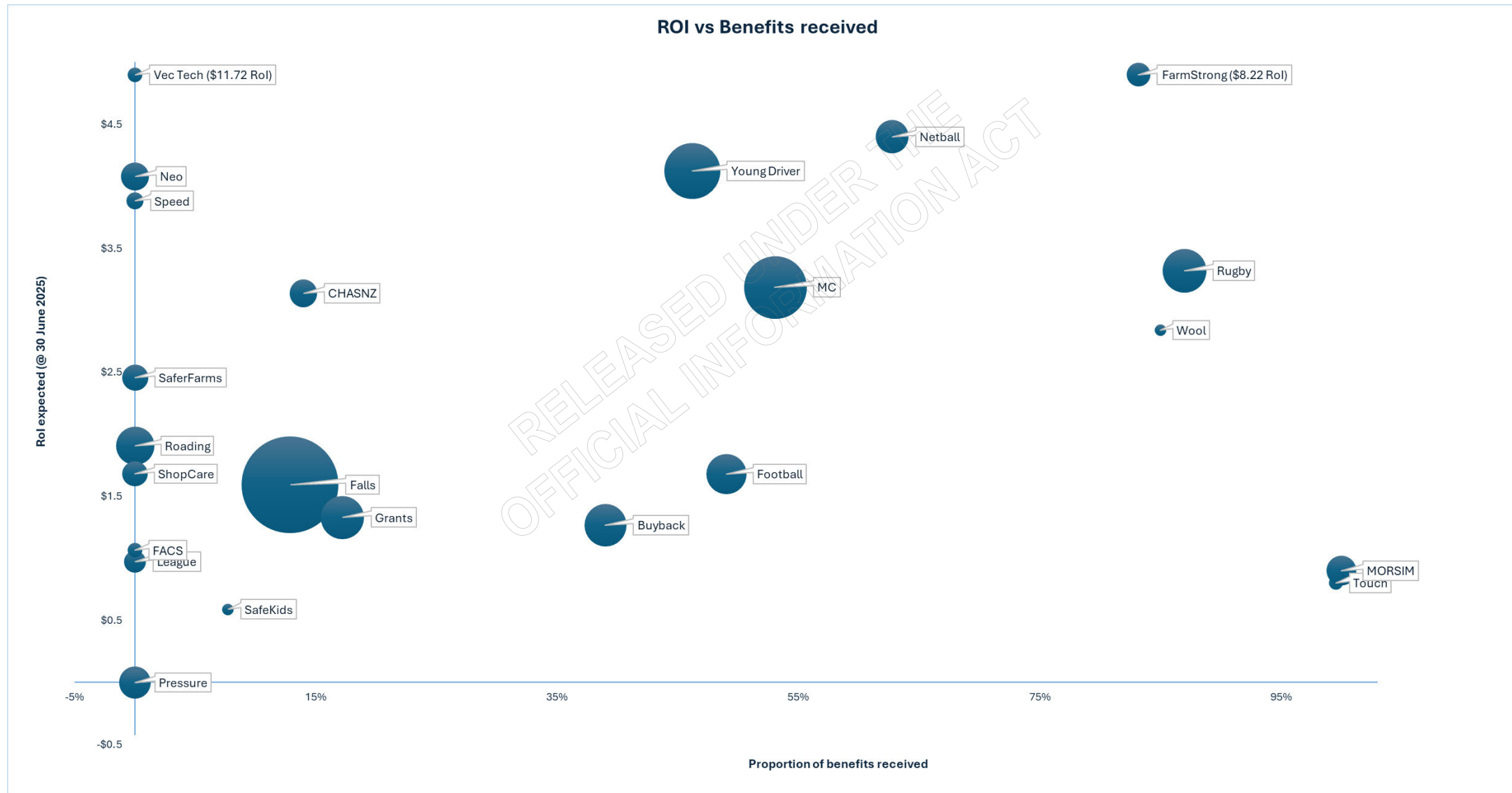
# Illustrative portfolio balance



# New initiative/re-investments scored



# Snap shot of existing portfolio



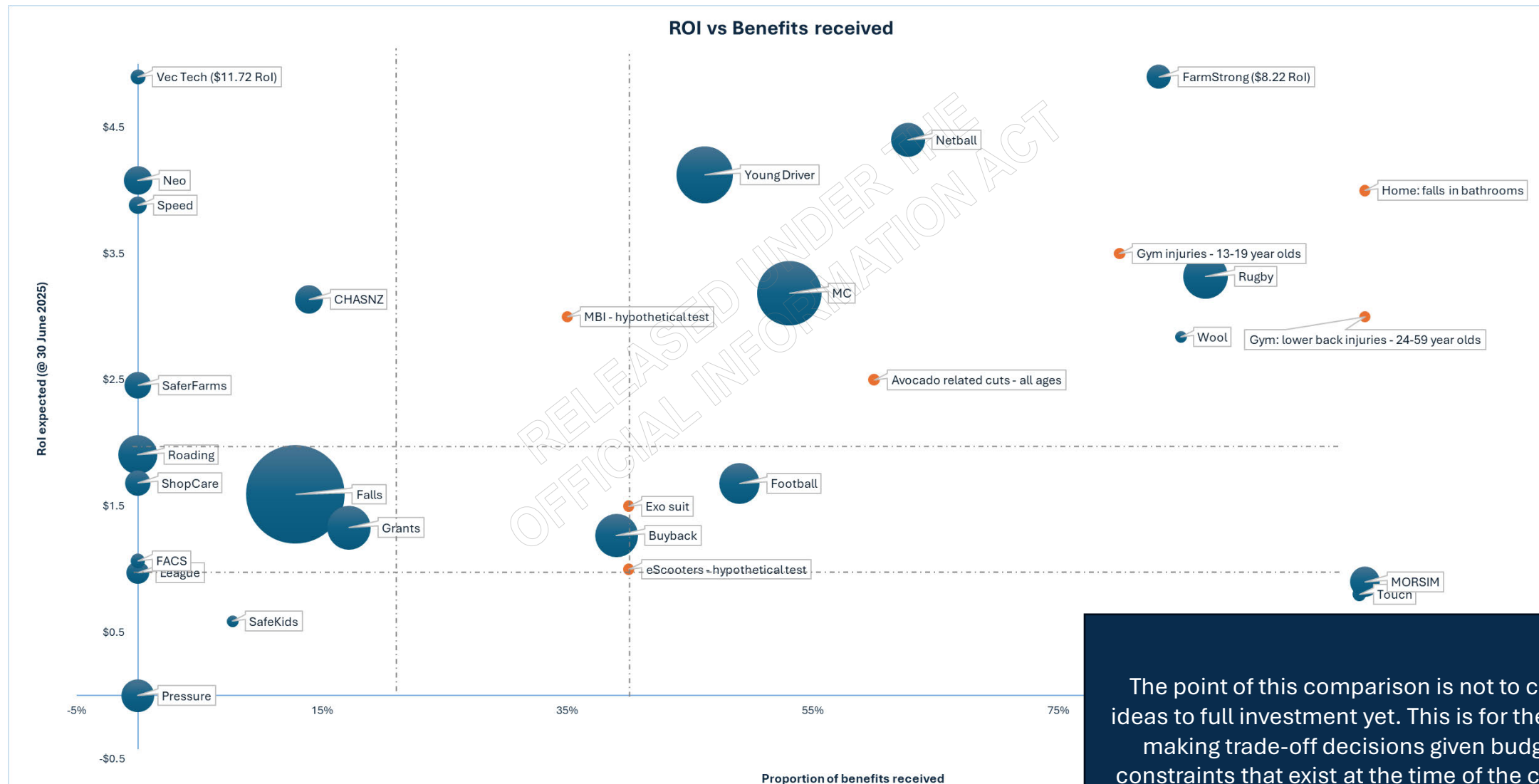
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# Snap shot of existing portfolio – with portfolio bounds



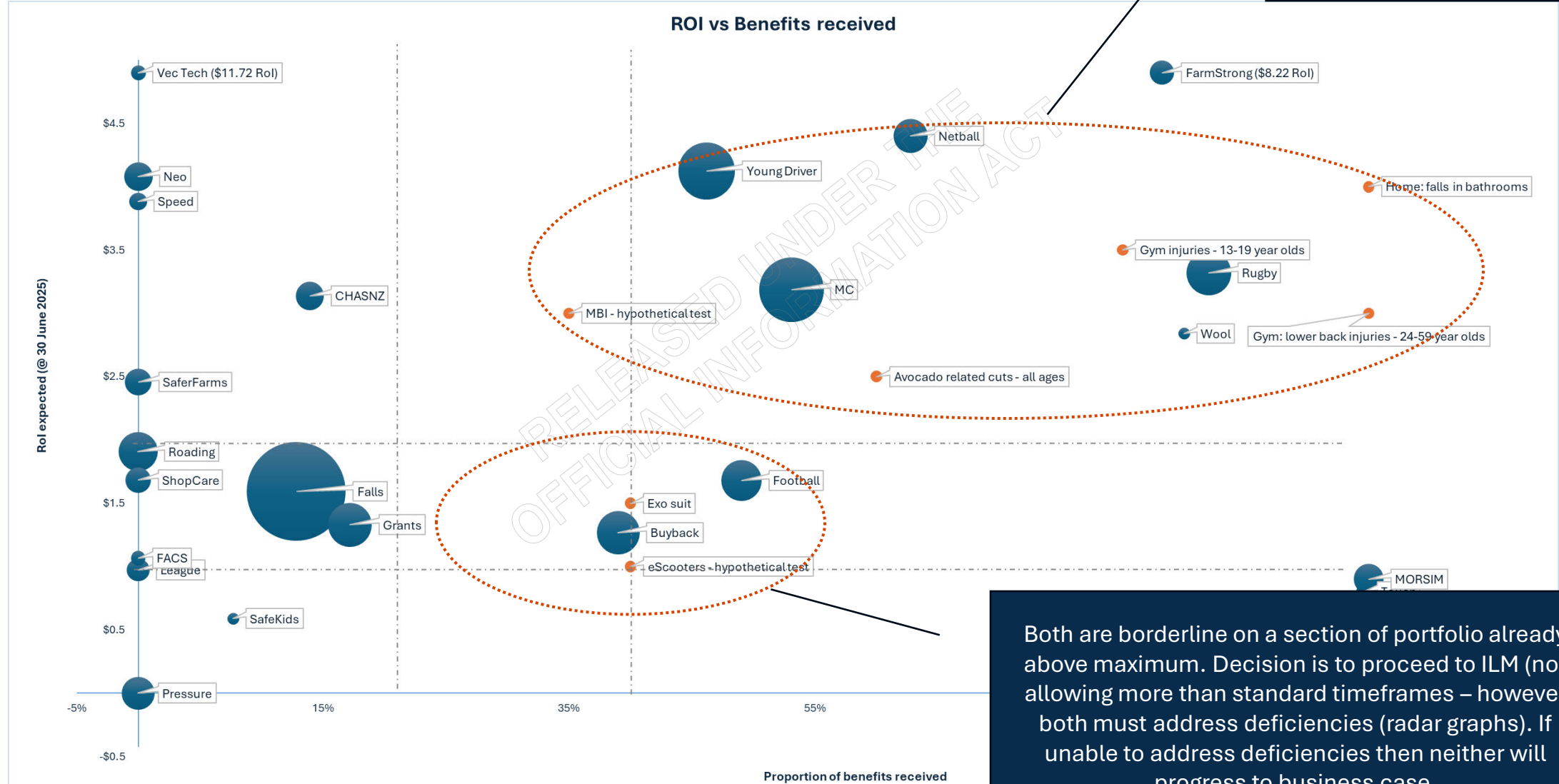
# Overlaying new-/re-investment with existing



The point of this comparison is not to commit the ideas to full investment yet. This is for the purpose of making trade-off decisions given budget or FTE constraints that exist at the time of the comparison.

# Overlaying new-/re-investment with existing

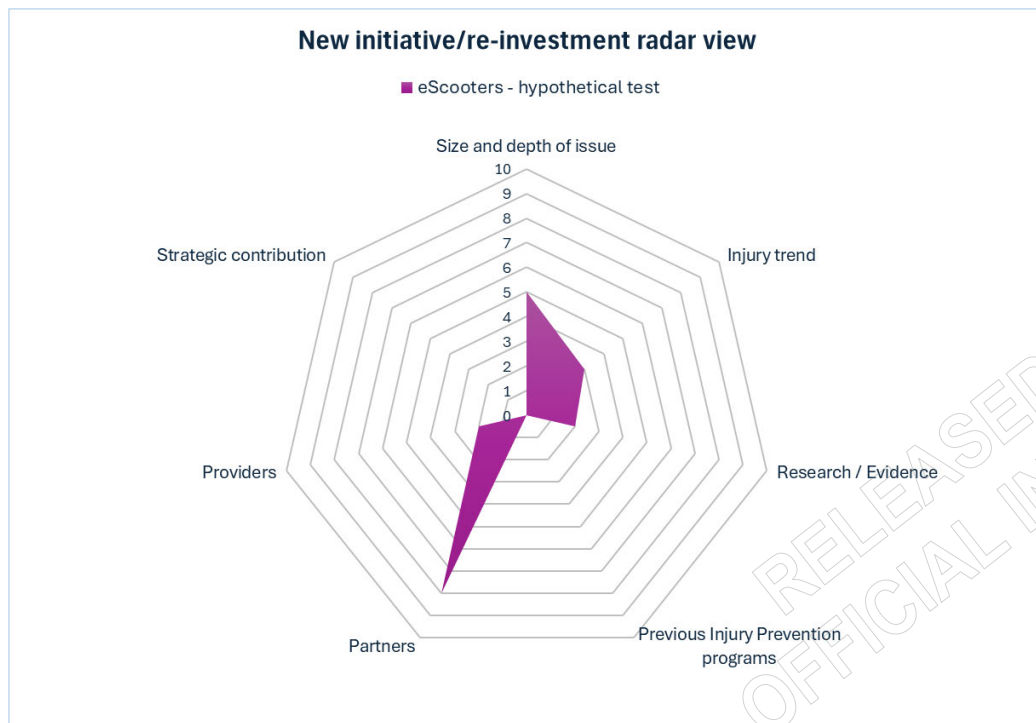
Neither of these areas of the portfolio are near capacity therefore proceed to ILM development



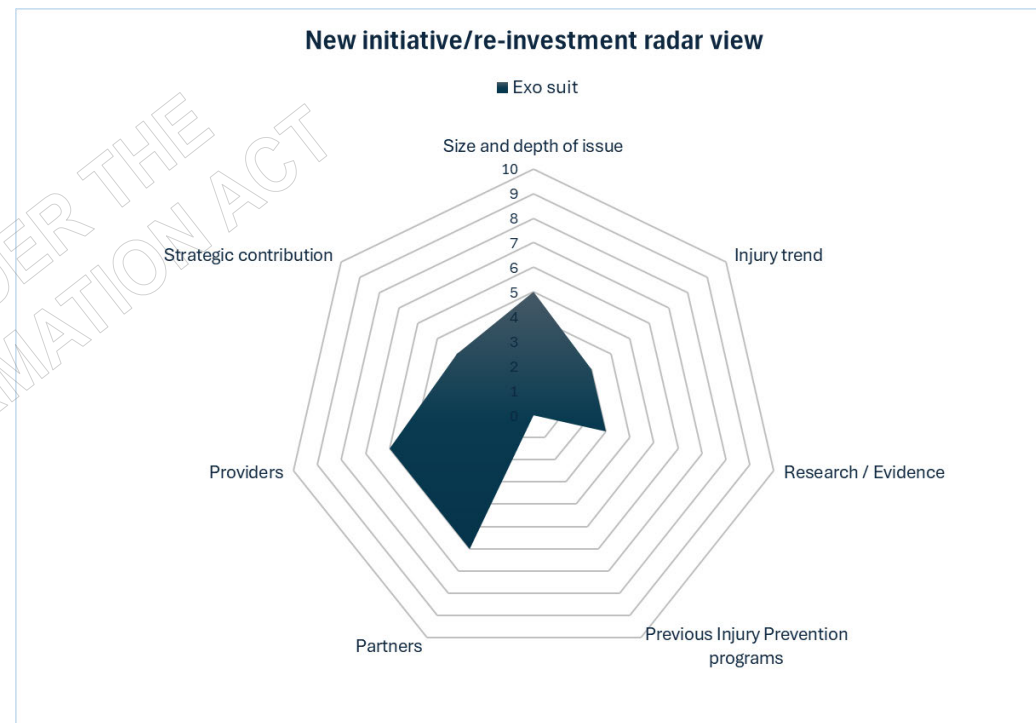
Both are borderline on a section of portfolio already above maximum. Decision is to proceed to ILM (not allowing more than standard timeframes – however both must address deficiencies (radar graphs). If unable to address deficiencies then neither will progress to business case.



# Deficiencies to be addressed



This potential area for new investment is weak in most areas. If through the process of developing the ILM we are not able to address improve the risk by identifying an appropriate intervention and providers to deliver this, then this idea will not progress.



This potential area for new investment is weak in the ability to intervene with no prior programmes and weak research. If through the development of the ILM either a low but cost-effective approach or significantly better intervention is identified then idea will not progress as existing area of portfolio is already above maximum threshold.



# Stage 2: Building investment & intervention logics

## Purpose

- Build on Stage 1 work.
- Develop:
  - Investment Logic – Why & What: Why investment is needed, what it aims to achieve.
  - Intervention Logic – How: How outcomes will be delivered.
- Prepare lean versions for IPGG feedback.

## Modelling & decisions

- Criteria assessed by Investment Performance & Intelligence Team.
- Model whole-of-life ROI, benefit timeframes, confidence intervals.
- Compare against portfolio to decide progression to full business case.

## Assessment criteria

- **ROI** – Expected return.
- **Investment required** – FTE & budget.
- **Returns** – Net benefits after costs.
- **Risk & complexity** – Delivery risk, influence on causes, proximity to outcomes.
- **Reach & efficacy** – Ability to reach target audience & achieve outcomes.
- **Benefit timeframe** – Time to realise benefits.

## Additional factors

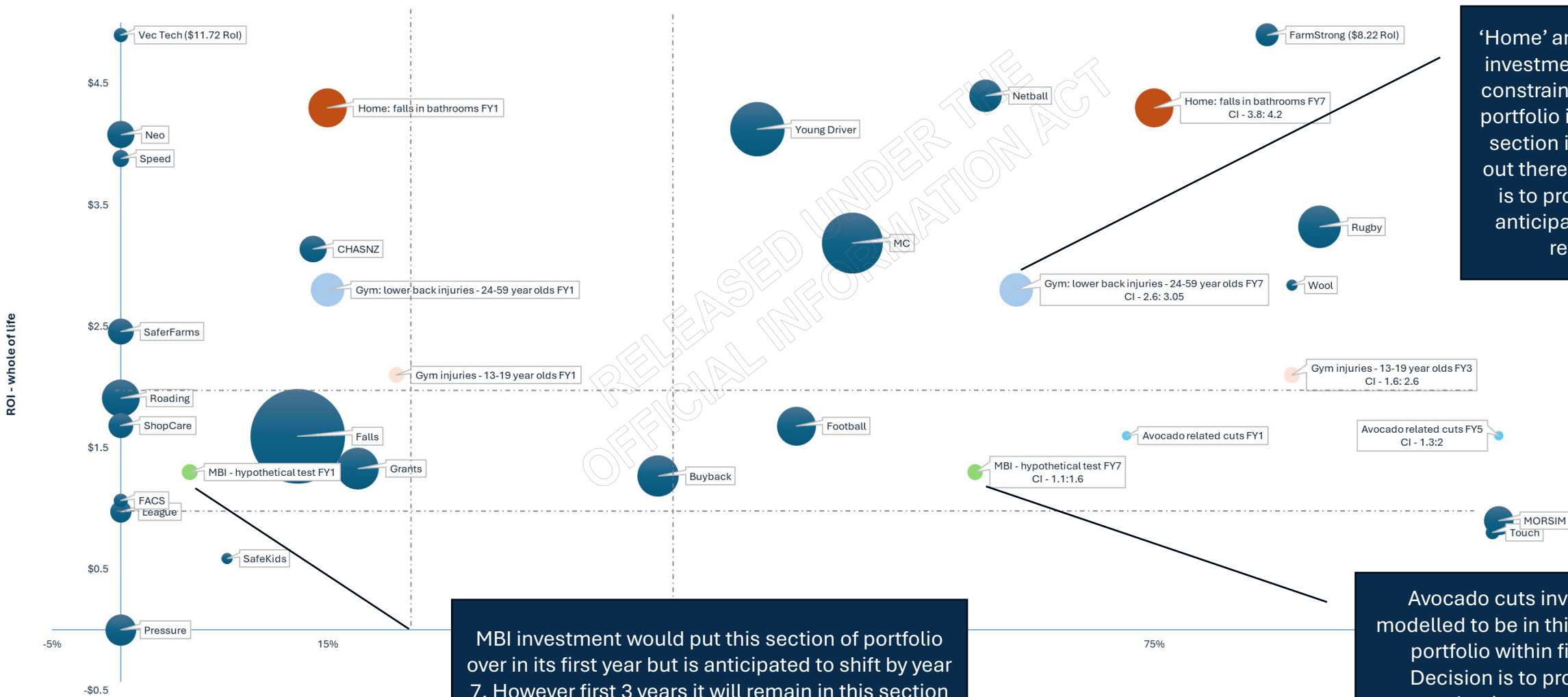
- Address Stage 1 weaknesses.
- Define measurement & data collection plan.

# New-/re-investment ideas modelled



# Ideas modelled – overlaid with existing portfolio

ROI vs Benefits forecasted



‘Home’ and both ‘Gym’ investments will be in constrained section of portfolio in year 1. This section is not maxed out therefore decision is to proceed given anticipated lifetime returns.

MBI investment would put this section of portfolio over in its first year but is anticipated to shift by year 7. However first 3 years it will remain in this section of the portfolio – trade off decision to be made.

Avocado cuts investment modelled to be in this section of portfolio within first year. Decision is to proceed to business case.



## Board Paper – Assurance Checklist

Completed by Lead Author: [Out of Scope], Senior Policy Advisor, Policy

Please complete this checklist and submit it with the paper to your Executive Approver (step 6 below). Once approved, please email it to [Governance@acc.co.nz](mailto:Governance@acc.co.nz) (step 7 below). The purpose of this checklist is to provide assurance to the Executive Approver and the Executive Team during their Board preparation/page turn meeting. It will be removed before the paper is released to the Board.

1.	<b>Plan:</b> Confirm with your Executive Approver that they approve for the Board paper to be submitted [your Executive Approver will have discussed/agreed the need for the paper with the Chief Executive]. Ensure the paper is in the <a href="#">Board Work Programme</a> . Except for emergency/urgent ‘no surprises’ papers, <b>allow at least 2 months</b> to draft, consult, have your paper peer reviewed and approved by your Executive Approver.	<input checked="" type="checkbox"/> Completed																								
2.	<b>Draft:</b> Use the Board paper template below. Write for the reader (i.e. our Board that governs ACC). Keep the paper high level – key insights and only relevant information that will aid the Board’s strategic decision-making and direction. <b>Paper limit – 5 pages + Appendices.</b> Keep Appendices to a minimum. The Appendices must be clearly referenced in the paper. Use this style “See ... in <b>Appendix 1.</b> ” <b>Page 1 (Cover Page)</b> – Complete the header, footer and title drop downs. The Purpose, Background and Recommendations sections should all be in page 1. <b>Page 2-5</b> - Complete the sections and use the pre-set wording. On the rare occasion that a heading is not applicable, insert “Not applicable” under the heading. Do not remove the heading for consistency of papers, and to inform the Executive and Board that the area/issue has been considered.	<input checked="" type="checkbox"/> Completed																								
3.	<b>Consultation:</b> Consult Pae Ora, Legal, Finance, Actuarial and relevant business partners early. Depending on the complexity of the matter/parties to consult/team workload, allow at least 5-10 working days review time before the paper is due to your Executive Approver. Best to check with relevant teams/their hub site on how much time will be required. <b>Record the Key Contacts you consulted below:</b>	<input checked="" type="checkbox"/> Completed																								
	<table border="1"> <thead> <tr> <th>Key Contact</th> <th>Team/Group</th> <th>Summary of areas reviewed</th> </tr> </thead> <tbody> <tr> <td>[Out of Scope]</td> <td>Manager, Workplace Safety</td> <td>Reviewed paper</td> </tr> <tr> <td>[Out of Scope]</td> <td>Injury Prevention Lead</td> <td>Reviewed paper</td> </tr> <tr> <td>[Out of Scope]</td> <td>Design and implementation Senior Advisor</td> <td>Reviewed paper</td> </tr> <tr> <td>[Out of Scope]</td> <td>Legal</td> <td>Reviewed paper, provided text for legal sections</td> </tr> <tr> <td>[Out of Scope]</td> <td>Risk</td> <td>Reviewed paper and risk section</td> </tr> <tr> <td>[Out of Scope]</td> <td>Head of Levies</td> <td>[Out of Scope] knows all</td> </tr> <tr> <td>[Out of Scope]</td> <td>Manager, Scheme Policy</td> <td>As above, but [Out of Scope]</td> </tr> </tbody> </table>	Key Contact	Team/Group	Summary of areas reviewed	[Out of Scope]	Manager, Workplace Safety	Reviewed paper	[Out of Scope]	Injury Prevention Lead	Reviewed paper	[Out of Scope]	Design and implementation Senior Advisor	Reviewed paper	[Out of Scope]	Legal	Reviewed paper, provided text for legal sections	[Out of Scope]	Risk	Reviewed paper and risk section	[Out of Scope]	Head of Levies	[Out of Scope] knows all	[Out of Scope]	Manager, Scheme Policy	As above, but [Out of Scope]	
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4.	<b>Peer Review:</b> Have your paper peer reviewed (tip: best to ask a peer reviewer who doesn’t know the paper’s topic, and test with them whether the key messages in the paper would land well with the Board).	<input type="checkbox"/> Completed																								
5.	<b>Proofreading:</b> Have your paper proofread for grammar, spelling and formatting.	<input type="checkbox"/> Completed																								
6.	<b>Executive Team Consultation (For Discussion/Decision papers):</b> Support your Executive Approver to brief and obtain the Chief Executive’s feedback early and to consult with relevant Executive members/the Executive. <b>Executive Member Final Review/Approval:</b> Have your Exec member review and approve the paper.	<input type="checkbox"/> Completed																								
7.	<b>Submission:</b> Send your approved paper to <a href="mailto:Governance@acc.co.nz">Governance@acc.co.nz</a> by the paper call up due date (hard deadline). Late papers will not be presented to the Board (except in exceptional circumstances, and Megan and the Chair’s approvals would be required).	<input type="checkbox"/> Completed																								



## Board Paper – Proposal to Cease WorkSafe Funding

### Purpose

To seek the Board’s agreement to cease ACC’s annual funding of WorkSafe’s injury prevention activity.

### Background

- In 2018, the Board agreed to a ten-year funding arrangement of up to \$15 million per year between ACC and WorkSafe. The funding was for WorkSafe to lead investments in workplace injury prevention.
- Both ACC and WorkSafe have raised concerns about the arrangement following its introduction. The biggest issue being that ACC has a legal requirement to demonstrate a ‘return on investment’ for investment in injury prevention and WorkSafe has struggled to meet this legal requirement.
- It is timely to change this funding arrangement given ACC’s new approach to injury prevention, aligned to Huakina Te Rā. ACC would like to give WorkSafe as much notice as possible following a decision.
- There are reputational and political risks that relate to ceasing WorkSafe’s funding.

### Recommendations

1. **Note** that in 2018, the Board agreed to a 10-year funding arrangement of up to \$15 million per year to WorkSafe.
2. **Agree** to cease our funding of WorkSafe by June 2025.
3. **Note** that, over time, ACC intends to reinvest the \$15 million per year in other injury prevention measures that align with the new injury prevention approach.
4. **Note** that ACC and WorkSafe have refreshed the 2023 to 2026 joint action plan to reduce harm in workplace (Harm Reduction Action Plan), which is required by our legislation.

<b>Prepared by</b>	[Out of Scope], Head of Injury Prevention
<b>Approved by</b>	[Out of Scope], DCE Prevention and Partnerships
<b>Date</b>	22 September 2023

## Relevance to strategic goals

The recommended option enables ACC to achieve the goal of **Ringa Atawhai | Guardianship**. Playing a direct role in the workplace injury prevention space means ACC can build meaningful and deliberate partnerships, and work to ensure prevention is integrated into everything we do. It also allows ACC to focus on actions that actively care for, foster, and nurture partnerships with stakeholders such as other government agencies, employers and tangata whenua.

## We propose to end our funding arrangement with WorkSafe by July 2025

ACC and WorkSafe have a funding agreement in place for *up to* \$15 million a year to be used by WorkSafe for injury prevention measures (Agreement). This Agreement was recommended by the Independent Taskforce's report into Workplace health and Safety following the Pike River Mine disaster. It was envisioned that a funding agreement between ACC and WorkSafe would improve alignment and co-ordination of workplace health and safety activities across the system.

The Agreement relates to section 264B of the Accident Compensation Act 2001 (the AC Act) which requires that a written agreement must be in place between ACC and WorkSafe, before the parties jointly undertake injury prevention measures, or before ACC funds WorkSafe to perform such measures.

The Agreement is a framework within which Injury Prevention Measure Commitments can be agreed to between WorkSafe and ACC (Commitments). These Commitments include a schedule of activities that ACC will fund and WorkSafe will implement.

Whilst we consider ACC likely has no *obligation* to provide WorkSafe with \$15 million of funding per annum, there is an expectation from WorkSafe that this will be made available.

We recommend ceasing our funding of WorkSafe by running out all current Commitments (and not making any new Commitments). We propose to retain the underlying funding Agreement. If approved, we propose ACC's funding of WorkSafe's injury prevention activities would end by July 2025. WorkSafe will be fully consulted on this approach.

## WorkSafe struggles to meet the Accident Compensation Act 2001's legislative requirements

Section 264B of the Accident Compensation Act 2001 (the AC Act) requires any injury prevention undertaken by WorkSafe and funded by ACC to be 'likely to result in a cost-effective reduction in actual or projected levy rates in the Work Account'. This is often referred to as requiring a 'return on investment' (**ROI**). Over the lifetime of the Agreement, WorkSafe has struggled to report back and demonstrate a return on investment on the workplace health and safety work we fund.

At the time that the Agreement was developed, it was thought that an ROI would be an effective measurement of success. This assumed that any improvements to workplace health and safety would flow on as savings for the AC Scheme via reduced injury costs. This has not proven to be the case.

### **Neither ACC nor WorkSafe support the current arrangements**

As outlined in ACC and WorkSafe advice to Ministers in April 2022, both agencies agree that the current funding arrangement is not working. For WorkSafe, there is a duplication of reporting, where WorkSafe must report on its own targets, as well as ACC's ROI target.

The ROI requirement incentivises WorkSafe to make targeted, short-term investments with a high certainty of meeting their target. This is counter to WorkSafe's function as a system leader in the health and safety system – they should be free to invest in long term, system initiatives that will improve health and safety across the system.

It also distorts the relationship between ACC and WorkSafe. WorkSafe views ACC as a 'funder' rather than a 'partner' to reduce the incidence and severity of injury in New Zealand workplaces. This makes it difficult to partner with WorkSafe to deliver on shared injury prevention objectives.

### **ACC and WorkSafe will continue collaborating to reduce work-related harm**

We consider that ACC's Injury Prevention team is best placed to use the WorkSafe funding (up to \$15 million per annum) on preventing harm for working-aged adults. This spending will align with our new approach for injury prevention. We are still working on shaping up what this would look like, and it could take two or three years to scale up and spend this allocation.

Both agencies have recently approved a refreshed version of their joint action plan to reduce harm in workplace (the Harm Reduction Action Plan 2023-2026), as required by legislation. The plan outlines the approach to collaborate and address system issues impacting harm in the workplace as well as the individual agencies focus areas aimed at preventing harm. Aligned to our new prevention approach, we will apply a wide set of levers at their disposal including the use of economic incentives, and primary and secondary prevention, and its role as stewards of the prevention system.

### **There are risks that need to be managed**

Our recommended option aligns with ACC's risk appetite of receptive for the Injury Prevention category. It acknowledges that the status quo is untenable, while managing the potential risks of the decision (discussed below). There are five critical risks that may affect the ability to deliver our recommended option.

- Reputational. ACC could be perceived to be withdrawing funding from the workplace health and safety system. This risk is exacerbated as WorkSafe is currently facing funding pressures. This risk can be managed by engaging WorkSafe, the Ministry of Business, Innovation and Employment's (MBIE) Health and Safety Policy team, the Minister for ACC and the Minister for Workplace Relations and Safety early. Further details available in the 'next steps' section.
- Relationship. ACC's withdrawal of up to \$15 million per annum of funding from WorkSafe could damage WorkSafe's willingness to work with ACC in future. This risk can be managed by ACC meeting all current Commitments (until their end date) and communicating its intention to not agree any future Commitments.
- ROI risk: The preferred option prolongs ACC's exposure to the poor performance of ACC's investments with WorkSafe. This risk needs to be balanced with the need to give WorkSafe and MBIE enough time to respond to us ceasing their funding. The preferred option strikes this balance.
- Delivery. There is a risk that ACC will be unable to spend the \$15 million per year.

- Stakeholders. The recommended option could harm ACC’s relationship with MBIE and the Treasury. Both agencies could perceive this decision as ACC forcing the Crown to seek appropriations via the budget process to account for the loss of up to \$15 million per year. This will be mitigated by engaging them early on our decision to cease funding.
- Political. There is a risk that the Minister for ACC directs ACC to continue the status quo and continue funding WorkSafe, without addressing the underlying problems with WorkSafe’s ability to fulfil the AC Scheme legislative ROI requirements. This risk cannot be mitigated, but we can minimise the harm of the risk realising by leaving the Agreement in place. This way, if we are directed to continue funding under the Agreement, we can simply enter into a new Commitment instead of having to develop a new funding agreement.

**We considered other options, but they didn’t solve the root cause of the issues**

The table below summarises the other options that we have considered.

Alternative option	Analysis
<p><b>Termination by ACC</b>                      A ‘hard exit’ where WorkSafe is given notice of its failure to deliver the minimum ROI under existing Commitments, and subsequent termination of those Commitments by ACC if the ROI issue cannot be resolved (under the terms of the funder agreement), and termination of the full Agreement.                      This approach reflects our view that WorkSafe cannot deliver on our legislative requirement for an ROI for injury prevention funding.</p>	<ul style="list-style-type: none"> <li>• The sudden drop-off in funding would likely require WorkSafe to rapidly stop or re-shape its injury prevention programmes.</li> <li>• It could have a significant financial impact on WorkSafe, especially if it can’t find an alternative source of funding quickly.</li> <li>• A swift exit could damage our relationship with WorkSafe if not undertaken with their agreement.</li> <li>• There is a moderate risk that WorkSafe would dispute unilateral termination of the Agreement and the end of funding.</li> <li>• A new written agreement would need to be put in place to enable any future ACC funding of WorkSafe injury prevention measures (as per section 264B of the AC Act).</li> </ul>
<p><b>Termination by agreement with WorkSafe</b>                      The parties agree the terms of an immediate termination of the Agreement, and all current Commitments.</p>	<ul style="list-style-type: none"> <li>• The sudden drop-off in funding would likely require WorkSafe to rapidly stop or re-shape its injury prevention programmes suggesting that such an agreement may be difficult to reach.</li> <li>• It could have a significant financial impact on WorkSafe, especially if it can’t find an alternative source of funding quickly.</li> <li>• A swift exit could damage our relationship with WorkSafe if not undertaken with their agreement.</li> <li>• A new written agreement would need to be put in place to enable any future ACC funding of WorkSafe injury prevention measures (as per section 264B of the AC Act).</li> </ul>

**Retain the status quo**

Review the current Agreement between WorkSafe and ACC (as required by the Agreement). Provide further advice to the Board in 2024 on ways to improve the current arrangement.

- Does not address WorkSafe's inability to meet the required ROI on ACC investments.
- It changes the relationship from 'high trust, low touch' to one where ACC must consider each investment decision WorkSafe make.
- Diverts WorkSafe's focus away from fulfilling its functions as the lead regulator of workplace health and safety and diverts it to meeting our legislative requirements on an ROI.

**Next steps would include engaging WorkSafe and MBIE, and reporting back to the Board**

Pending the Board's decision, we intend to engage with a range of stakeholders to communicate the decision. We recommend that both WorkSafe and ACC's Board Chairs and Chief Executives meet to discuss this decision.

ACC's Scheme Policy team will engage their counterparts in MBIE's Accident Compensation Policy team, Health and Safety team and the Treasury. We will provide you relevant updates of this work via our monthly policy update.

In addition, we will provide you relevant updates on their progress to allocate and spend the \$15 million per year on preventing injuries in working-aged adults.



## Phase 2 drawdown for Ririki Haumarū Safekids Aotearoa ‘Safekids’

To	[Out of Scope], DCE – Strategy, Engagement and Prevention; Chair, IPGG Injury Prevention Governance Group
Approved by	[Out of Scope], Acting Head of Injury Prevention
Authors	[Out of Scope], Partnered Delivery Manager, Child and Youth Wellbeing [Out of Scope], Injury Prevention Partner
Date	15 October 2025

### Purpose

This paper seeks endorsement of \$5.68m to maintain and strengthen Safekids child injury prevention activity from 1 January 2026 to 30 June 2028. This is a stage-gate drawdown under the approved 2023 business case *Keeping Children and Tamariki Safe from Injury*<sup>1</sup>.

### Key points:

- Child unintentional injury claims cost ACC \$263m in 2024; Safekids is our main partner to reduce these claims as New Zealand’s leading authority on child injury prevention.
- This proposal outlines short- and long-term child injury prevention initiatives to reduce the number and severity of injuries where they occur with 44% at home and 66% elsewhere, and to increase equitable ACC access for rehabilitation to prevent re-injury.
- The recommended investment option is \$5.68m over 2.5 years (18% below the original \$6.9m agreement), fully funded from Injury Prevention’s current budget.
- The whole-of-life cost to 31 December 2025 for Safekids is \$9.85m. If approved, ACC’s total investment in Safekids is projected to reach \$15.5m by June 30 2028.
- The current ROI is \$0.54 (impacted by Statistical Case Estimate); the proposed ROI is \$0.31.
- Safekids strongly aligns with Injury Prevention’s strategic focus on equity and protective factors, supports the ‘homes’ business case and contributes to the Government Child and Youth Strategy<sup>2</sup>. The equity focus aligns with internal needs-based service advice.
- A strengthened benefits framework will assess Safekids’ impact on claim reduction, aligned with the Injury Prevention Measurement and Benefits Framework.
- This partnership enables child injury prevention which ACC can’t resource alone, including community education, home modifications, sector leadership and policy advocacy.
- Controls are in place to manage investment risks.

<sup>1</sup> [Signed memo](#) and [signed business case](#)

<sup>2</sup> Priority 3 – preventing child harm



## Recommendations

1.1	<b>Note</b> that this is a stage gate drawdown request under the <i>Keeping children and tamariki safe from injury</i> business case approved in April 2023.	<b>Noted</b>
1.2	<b>Note</b> total whole-of-life cost to date is \$9.85m <sup>3</sup>	<b>Noted</b>
1.3	<b>Note</b> that Safekids has achieved all contracted deliverables to date.	<b>Noted</b>
1.4	<b>Note</b> the ROI is \$0.31 which is below the IP target, which has been reduced in part due to the SCE which is outside programme control.	<b>Noted</b>

### For Injury Prevention Governance Group:

1.5	<b>Endorse</b> the recommended Option 2: reduced investment in Safekids	<b>Endorse</b>
1.6	<b>Endorse</b> the investment of \$5.68m for the period 1 Jan 2026 – 30 June 2028	<b>Endorse</b>

### For Deputy Chief Executive – Strategy, Engagement and Prevention

1.7	<b>Approve</b> , upon the endorsement of the IPGG, the investment of \$5.68m for the period 1 Jan 2026 – 30 June 2028	<b>Approve</b>
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## Background

**New Zealand has a high rate of preventable child injuries, contributing significantly to ACC claims, hospitalisations, and long-term impacts.**

In 2024, 317,000 claims for children aged 0–14 cost ACC \$263m, with 44% occurring at home.<sup>4</sup> Māori tamariki are 1.9 times more likely to die from unintentional injuries than European children.<sup>5</sup> While ACC leads child injury prevention, responsibility for addressing injury causes span multiple sectors and legislative contexts (appendix 5).

**ACC has partnered with Safekids since 2015 to support work to reduce preventable child injuries**

Safekids sits within Starship Hospital, Te Whatu Ora and is New Zealand's only expert body focused on child unintentional injury prevention. ACC initially funded the Home Safety Programme (HSP) only.<sup>6</sup> In 2023, a new *Keeping Children and Tamariki Safe from Injury* business case was approved by the Chief Executive and DCE Prevention and Partnerships. The five-year Safekids Partnering Agreement sits under this business case and expanded delivery across five prevention workstreams: policy, research, community and digital engagement, and sector coordination. An overview of phase one deliverables are included in appendix 2. This five-year agreement was split into two phases, with phase two only to be drawn down at a stage gate upon successful completion of phase one.

<sup>3</sup> Includes 4.4m spent from 2014-23 and \$5.45m in phase one from 1 July to 31 December 2025

<sup>4</sup>All child claims excluding treatment injuries, assaults and sexual violence which are outside of Safekids scope.

<sup>5</sup> Mortality data between 2016-2020 provided by Safekids, 2025

<sup>6</sup> The Home Safety Programme provides home child safety assessments and installation of safety devices



## Phase One achievements

**The Phase One investment successfully achieved its objectives and created the foundations for long term change through implementing initiatives across the primary prevention system<sup>7</sup>**

The Safekids Partnering Agreement was developed in alignment with [Manini Tua](#) and aimed to establish the foundations for long-term child injury primary prevention. The initiative commitment had four objectives – 1. deliver and strengthen core business, 2. undertake engagement with whānau, communities and services providers, 3. build a foundation for wider engagement in Phase Two, and 4. support Mātauranga Māori, Pacific knowledge and practices to be woven into IP practice. These objectives had success indicators with measures<sup>8</sup> and all were achieved.

Phase one deliverables resulted in:

- 4,976 safer homes created (150% of target).
- 600+ professionals and whānau reached via education sessions.
- 31 policy submissions advocating for safer environments.
- 25 digital child injury prevention campaigns reaching 5.3M on Facebook alone.
- A shift to culturally informed practice guided by mātauranga Māori and community insights.
- 130 community research conversations informing Phase Two.
- Demonstration of national leadership in child injury prevention.
- All Phase 1 deliverables achieved, with high fidelity to the approved business case.
- Safekids' multi-workstream structure boosted their impact, including influencing Government life jacket law progression, Kāinga Ora housing safety measures, and local dog control bylaws.

At the end of Phase One, ACC needed to show positive tracking against multiple criteria<sup>9</sup>. This included a report on progress against measures, an updated ROI and a plan for Safekids to scale and strengthen nationally – all of which are complete.

## Investment request

**We are seeking \$5.68m over 2.5 years (18% below the original \$6.9m agreement) to implement the Phase Two proposal which builds on Phase One learnings to maximise impact<sup>10</sup>.**

Safekids submitted a comprehensive proposal to scale its impact through immediate and long-term interventions addressing child injury risks and systemic drivers.<sup>11</sup> Four investment options were assessed against ACC's strategic priorities and operating environment. Option 2 – an 18% reduction to \$5.68m – is recommended for its balance of cost-efficiency, strategic alignment, and potential impact. Option 2 includes deliverables across the primary prevention functions with refreshed delivery and

<sup>7</sup> As described in [Manini Tua](#), page 9

<sup>8</sup> [Safekids Partnering Agreement](#), page 7

<sup>9</sup> Page 39 *Keeping Children and Tamariki Safe from Injury* business case

<sup>10</sup> See summary of learnings in appendix 3

<sup>11</sup> The full Safekids scale and strengthen proposal is attached at appendix 6



tested methods staffed by 13.1 FTE. The financial request is detailed in appendix 4, with costs split across delivery OPEX (\$2,091,710) and staffing costs (\$2,979,863). The total cost includes \$100,000 for external evaluation and a negotiated 10% Te Whatu Ora overhead<sup>12</sup>. Deliverables include continuing the Home Safety Programme, policy influencing, community engagement, workforce development and digital engagement (detailed in appendix 4 and 6) and a new pilot embedding child IP into parental antenatal education.

Options and costs	Benefits	Risks
<p><b>Option 1: Sustain the current Safekids partnership</b> Full delivery of the Safekids proposal, with strengthened monitoring and \$100K ringfenced for FY28 external evaluation <b>Total of \$6.9m over 2.5 years (\$2.76m/year)</b>, ex IP overheads.</p>	<p>Full delivery of proposal; maximizes impact and continuity; includes \$100K for FY28 evaluation</p>	<p>Limited reach; unclear claim reduction; ROI \$0.26</p>
<p><b>Option 2: Reduce investment – RECOMMENDED OPTION</b> Maintain all workstreams with reduced scope of 18% (excluding proposed Kohanga Reo pilot, equity tools, and some events), and ringfencing \$100K for FY28 external evaluation. <b>Total of \$5.68m over 2.5 years (\$2.27m/year)</b>, ex IP overheads.</p>	<p>Maintains most initiatives; no staffing cuts; includes \$100K for evaluation</p>	<p>Reduced reach; potential partnership impact; unclear claim reduction; ROI \$0.31</p>
<p><b>Option 3: Fund Home Safety Programme only</b> Stop funding and measuring all Safekids initiatives (long term system change) beyond the Home Safety Programme <b>Total of \$2.8m over 2.5 years (\$1.1m/year)</b>, excluding share of IP resourcing (overheads).</p>	<p>Targets home injury risk; aligns with ‘Homes’ business case Highest ROI at \$0.84</p>	<p>Short-term impact; only addresses 44% of child claims. Triggers major programme cuts; likely staff restructure – will require senior ACC leadership brokering.</p>
<p><b>Option 4: Decommission</b> Adjust contracted deliverables to allow a one-year decommissioning period starting 1 January 2026. <b>Total of up to \$2.2m</b> (using current decommission rate).</p>	<p>Reduces IP spend in an area with low ROI.</p>	<p>Likely loss of national child injury prevention capability; service disestablishment</p>

### Benefits and Outcomes

**Safekids is showing early signs of improving child safety behaviours; further investment will enable attribution measurement against claim reduction and ROI.**

<sup>12</sup> Te Whatu Ora has a 25% overhead policy for contracts, Safekids negotiated this down to 10% for this contract



Evaluation<sup>13</sup>, end of contract reporting and case studies show promising results, with the approach supported by the *Growing Up in NZ study*<sup>14</sup>, but direct impact on claim reduction and ROI is not yet established.

There was not a claim saving target specifically for Safekids in this current contract; the Child IP business case has a 10-year goal of 1300 claims saved by June 2033. While child claims have dropped by 80,000 since 2016 (potential \$50M annual savings<sup>15</sup>), regression modelling is unable to show a direct link to Safekids yet. While Safekids likely contributed to the reduction through evidence-based interventions, further measurement is needed to confirm attribution. As children are at the highest risk of having over 20 claims, re-injury and subsequent injury<sup>16</sup> along with focusing on claim reduction, Safekids also is aiming to reduce the severity of injury and increase ACC access for target populations to ensure rehabilitation to reduce re-injury. Ceasing this investment now would lose the opportunity to measure the impact of this comprehensive, injury prevention strategy aligned approach; and claim numbers could either rise or stay the same.

ROI declined from \$1.09 (Q4 FY22) to the current \$0.54, with SCE adjustments having a significant impact on this reduction. The ROI for the recommended Option 2 is \$0.31, which is lower than the current ROI because of the inclusion of the phase one 'in design' costs and redefining injury parameters to match Safekids delivery. Child-focused interventions yield a lower ROI than adults' with lower claim costs due to no weekly compensation.

Strong evaluation is planned which includes matching HSP addresses to claims<sup>17</sup>, measuring collective intervention impact in Northland, an external review in FY28, a Monitoring & Evaluation plan aligned to the IP Measurement and Benefits framework, and establishing a Strategic Equity & Child Injury Prevention Advisory Group. Updates will be provided through a revised Quarterly Outcomes Performance report.

The benefits and outcomes for this investment were identified in the intervention logic (appendix 1) and further expanded on in the Safekids Proposal (appendix 6, page 22). The ACC benefits include:

- a reduction of claims from childhood injuries within the home;
- reduced severity of childhood injury;
- decrease in average claim cost; and
- more equitable scheme access meaning increased claims from identified population groups.

<sup>13</sup> Brown, E. & Paine, SJ. (2025). Injury Burned of Indigenous Children and Young People: A Conceptual Framework and Scoping Review. The University of Auckland.

<sup>14</sup> Deloitte Limited. (2024). Te Whiri Tuamaka Safekids Aotearoa Home Safety Programme Evaluation.

<sup>15</sup> Based on 2024 average claim costs

<sup>16</sup> ACC IDI study showed that children with ACC claims were 3 x more likely to have over 20 claims, 2x more likely to have over 10 claims, and 1.6 x more likely to have a subsequent injury in 12 months or reinjury within 24 months than adults aged 25-39

<sup>17</sup> Pending Te Whatu Ora ethics approval



## Financial implications

	FY25/26	FY26/27	FY27/28	Total
Total Investment per annum	\$2.4m <sup>18</sup>	\$2.3m	\$2.08m	\$6.78m

The Safekids investment is fully funded from the Injury Prevention operating budget, with FY26 already budgeted, subject to IPGG approval. If approved, an additional \$2.3M for FY27 and \$2.08M for FY28 will be required from the IP operating budget.

## Risks

The ACC’s Enterprise Risk Management Framework is being applied, and risk management measures are being integrated into contracting and performance reporting.

Risks	Mitigations
Despite ongoing reduction of child injuries, attribution to Safekids interventions remains unproven. Continued investment without clear attribution may limit programme credibility and impact.	<ul style="list-style-type: none"> <li>Embed claims reduction and attribution expectations into future contracts and data collection.</li> <li>Target Phase 2 initiatives more precisely and evaluate Safekids impact through address-to-claim matching, Northland study, FY28 external review, and advisory group oversight and claims modelling.</li> </ul>
The proposed option includes long-term focussed deliverables like policy and legislation influencing, which do not have guaranteed success due to external dependencies and are hard to quantify through ROI.	<ul style="list-style-type: none"> <li>Prioritise funding for short-term, measurable initiatives.</li> <li>Continue working with Safekids to identify high-impact areas for influence and collaboration.</li> <li>Classify long-term initiatives as ‘in-design’ until delivery begins.</li> <li>Track policy progress through annual ROI assessments.</li> </ul>
ACC is funding ~85% of Safekids which will be unsustainable for ACC in the long-term, especially if the investment fails to demonstrate claims savings.	<ul style="list-style-type: none"> <li>Maintain understanding of other system players and regularly reflect on roles.</li> <li>Establish regular high-level ACC and Te Whatu Ora governance.</li> <li>A clear exit strategy and aligned sustainability plan from Safekids will be required as part of the agreement.</li> </ul>
ACC funding represents ~85% of the Safekids operating budget, so exiting a partnership early will have a material impact to the organisation.	<ul style="list-style-type: none"> <li>Any exit approach would need to include a reasonable exit period.</li> <li>Clear rationale for exiting would need to be confirmed.</li> <li>Proactive relationship management at a senior management level.</li> </ul>
If a funding decision is not reached at the October IPGG meeting, the programme will require a further six-	<ul style="list-style-type: none"> <li>Immediate follow-up with the Head of Injury Prevention and Procurement post-IPGG to confirm next steps and minimise disruption.</li> </ul>

<sup>18</sup> Including \$1.1m currently contracted for Jul-Dec 25 and \$1.3m dependant on approval, has been reduced by \$300k due to Injury Preventions deprioritisation budget



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<p>month extension, delaying progress and increasing uncertainty.</p>	
<p>If ACC does not continue with any option, there will be a temporary gap in child injury prevention investment while alternative options are explored, potentially impacting momentum and sector confidence.</p>	<ul style="list-style-type: none"> <li>• Contract Safekids for a decommissioning period to maintain continuity while new options are considered.</li> <li>• Engage with other Injury Prevention workstreams to identify opportunities for short-term support and integration of child injury prevention learnings.</li> </ul>

### Consultation to date

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>• [Out of Scope], Senior Financial Advisor</li> <li>• [Out of Scope], Manager Investment Performance &amp; Intelligence</li> <li>• [Out of Scope], Lead Advisor Investment Performance &amp; Intelligence</li> <li>• [Out of Scope] Principal Advisor</li> <li>• [Out of Scope], Business Risk &amp; Compliance Manager</li> </ul> | <ul style="list-style-type: none"> <li>• [Out of Scope], Senior Research Advisor</li> <li>• [Out of Scope] Senior Strategy Advisor</li> <li>• [Out of Scope], Lead Advisor Equity</li> <li>• [Out of Scope], Senior Procurement Partner</li> <li>• [Out of Scope], Strategic Procurement Lead</li> <li>• [Out of Scope]es, Chief Actuary and Head of Actuarial Services</li> </ul> |
|---|--|

### Next steps

An outcomes contract has been drafted and includes a reporting framework to support the increased measurement approach and to enable testing of the pilot initiative. The contract will be amended to match the IPGG decision.

### Endorsement

[Out of Scope]

9 October 2025

[Out of Scope], Head of Injury Prevention

Date Signed

I have reviewed this recommendation and the [Conflict of Interest Policy](#), and confirm that I do not have an actual, potential or perceived conflict of interest that prevents me from endorsing it.

Note: If you cannot tick this box due to a conflict of interest, please complete a [Conflict of Interest Form](#)

### Approval

[Out of Scope], Deputy Chief Executive – SEP; Chair, Primary Prevention Portfolio Governance Group

Date Signed

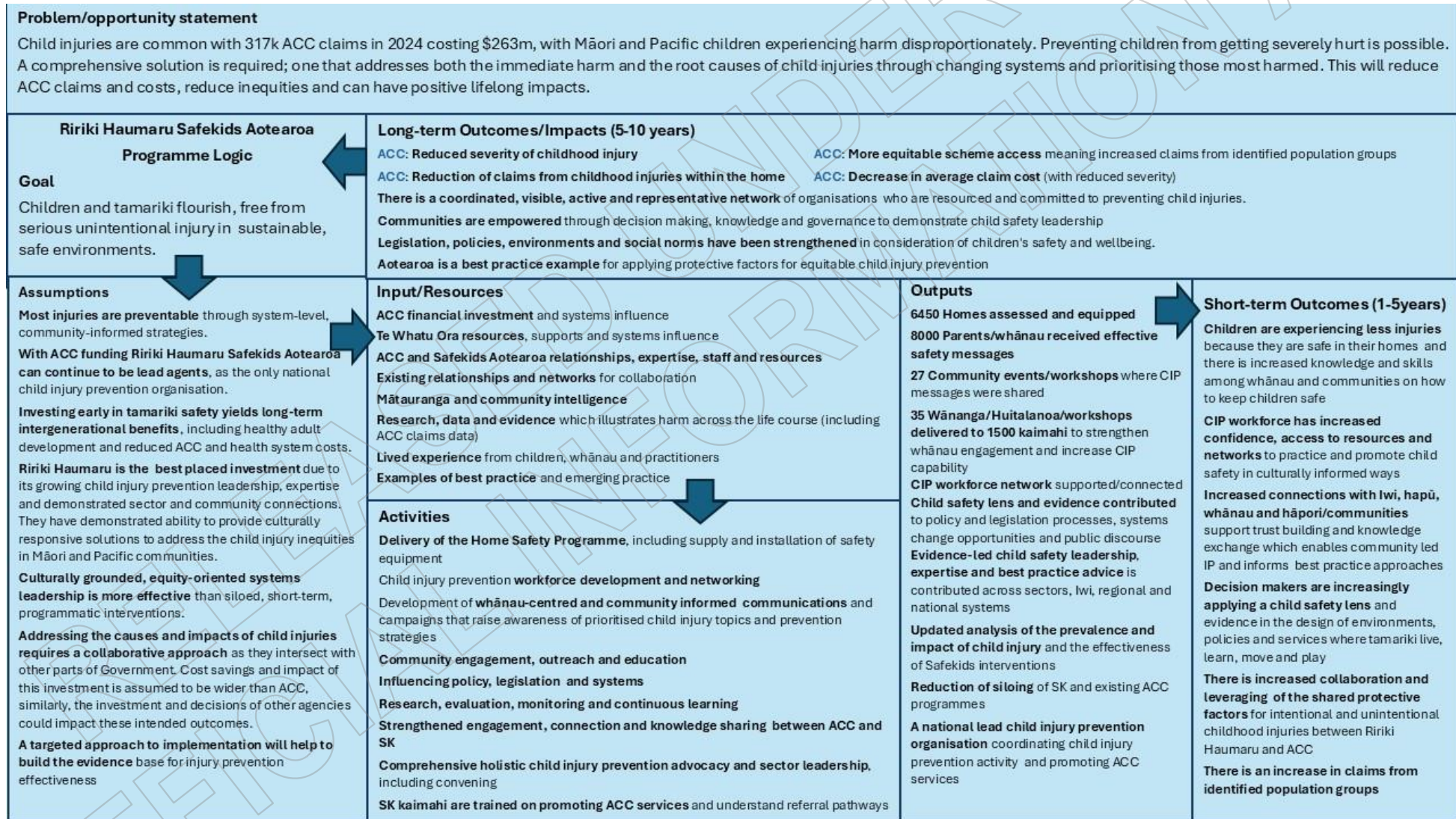
I have reviewed this recommendation and the [Conflict of Interest Policy](#), and confirm that I do not have an actual, potential or perceived conflict of interest that prevents me from endorsing it.

Note: If you cannot tick this box due to a conflict of interest, please complete a [Conflict of Interest Form](#)



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## Appendix 1 – Safekids Intervention Logic





## Appendix 2 – Phase one contracted deliverables

	Description of each party's obligations (services and deliverables)
1	Partner will establish a skilled team with the necessary capability and capacity to drive the objectives of the initiative.
2	ACC and Safekids will work in partnership to evaluate impact of initiatives and establish learning practices together including: <ul style="list-style-type: none"> <li>Establish our Monitoring, Evaluation and Learning model for this two-year initiative</li> <li>Integrating ACC's updates to ROI</li> <li>Establish an approach and practice with shared learning questions and evidence building to demonstrate shifts towards short term outcomes using mātauranga-led tools and practices (e.g., Niho Taniwha model)</li> </ul>
3	Deliver the Home Safety Programme to a minimum 2,650-3,268 whānau in total over the two years. Targets for each year are: <ul style="list-style-type: none"> <li>Year 1: 1,200-1,520 whānau</li> <li>Year 2: 1,450-1,748 whānau</li> </ul> Safekids to secure signed agreements with partners and will provide updates received from its partners no less than quarterly on their reach, activities, areas to strengthen and improve, evaluation data and other reports. Safekids will source and manage the provision of a range of agreed safety devices.
4	Strengthen child-wellbeing workforce capability, networks, and cultural competency through workshops and wānanga on topics such as Ririki Haumarū. <ul style="list-style-type: none"> <li>Year 1: 12 wānanga/workshops with 342 provider kaimahi</li> <li>Year 2: 15 wānanga/workshops with 540 provider kaimahi</li> </ul>
5	Child Unintentional Injuries and Fatalities databook update completed, shared with, and accepted by Safekids and ACC (initiated under previous contract). Initial draft due 22 Dec 23 and finalised 29 Feb 24.
6	Kaupapa Māori informed Home Safety programme evaluation report shared with ACC by Safekids by 25 November 23 and accepted as finalised by 31 Dec 23 (initiated under previous contract).
7	Behaviour change comms/social media through development of whānau-led communications across multiple platforms that use storytelling, pūrākau and analytics to build awareness utilising culturally grounded and tikanga-led messages and for whānau Māori and Pacific People's on haumarutanga (mātauranga child safety promotion) and Pae ora (flourishing and thriving whānau and whakapapa).
8	ACC will connect Safekids with other agencies also working in early years/child and whānau wellbeing space. ACC and Safekids will work together to identify broader opportunities to inform haumarutanga and mokopuna and whānau wellbeing.
9	ACC will support Safekids by sharing marketing content, promoting and attending Safekids' workshops and wānanga, and encouraging ACC's regional teams and commissioned partners to attend Safekids' workshops and wānanga.
10	Partners will attend quarterly roundtable to share, reflect, learn, and track progress together. ACC will keep a record of the roundtable discussions that can be used in reporting requirements for both partners.
11	Safekids will undertake small-scale consultation with communities, iwi and hapū to capture learning, whānau voice and hāpori mātauranga to inform Safekids future work programme and implementation approach. Safekids will provide to ACC: <ol style="list-style-type: none"> <li>Plan for consultation approach, timelines, and deliverables.</li> <li>Interim share back at an agreed part way point of the project to enable planning, scoping for years 3-5 delivery.</li> <li>Summary Report of findings and recommendations.</li> </ol> Findings will be applied to proposal for years 3-5 scaling and strengthening of Safekids' child injury prevention activities.
12	Contribute to policy development with a focus on haumarutanga and linking policy opportunities at local and national levels through research, data and home/community settings. Focus towards socio-economic factors and equity as the basis for child injuries and Te Tiriti o Waitangi. Contributing to any legislative changes as required. <ul style="list-style-type: none"> <li>Annually: 10 Safety Lit, 10 Tūmatakahuki</li> </ul>



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Description of each party's obligations (services and deliverables)	
	<ul style="list-style-type: none"> <li>Annually: 4 (minimum) submissions at local/national levels.</li> <li>2-years: Maintain membership across 6-8 local/national and international levels relating to child-wellbeing, child injury prevention, child, family and community safety, councils and research.</li> <li>2-Years: Lead or support 2-4 research projects that impact child safety, and injury prevention that will guide and shape future policy development.</li> <li>2-Years: Support, review and update 8-10 injury area safety messaging and advice.</li> </ul> <p>Policies, learnings and inputs will be shared through cross agency mechanisms.</p>
13	Parties will work together in developing (and agreeing) a communications activity plan, to be reviewed at quarterly roundtables
14	<p>A refreshed approach to the Home Safety Programme, incorporating recommendations from the Kaupapa Māori Evaluation (being completed during 2023/24), is agreed and planned.</p> <ul style="list-style-type: none"> <li>Provide ACC with an update on recommendations that will be adopted immediately and short-term [by June 2024].</li> <li>Discuss plans with ACC at the quarterly roundtables.</li> <li>Provide ACC with a plan on recommendations that will be phased over a period at the following quarterly roundtables for phase 2025 to 2028.</li> </ul>
15	No less than three months prior to the conclusion of the second year a further proposal will be developed and agreed for the subsequent three years which will draw on learnings and outcomes established through the community consultation activity, quarterly roundtables, alongside all initiatives delivered in the first two years of the partnership. Including any further investment required beyond FY24/25.

### Appendix 3 - Summary of Phase One learnings informing Phase Two proposal

Lessons learned	Key changes for phase two
The Home Safety Programme is needed, valued and influences behaviour and attitude change.	Extend reach. Monitor impact in a target area and investigate matching of HSP homes to claims.
Child IP requires more than devices and public awareness - coordinated systems change which centres tamariki wellbeing is needed.	<ul style="list-style-type: none"> <li>Maintain long-term, protective factor strategies.</li> <li>Focussed ‘falls system influencing’ project to address the highest cause of child claims.</li> </ul>
We haven’t mastered impact measuring of this multiple-injury, systems change approach yet.	<ul style="list-style-type: none"> <li>Strengthened evaluation approach.</li> <li>Targeting initiatives – by location and injury type.</li> <li>Redefined parameters for ACC data and ROI.</li> </ul>
Indigenous knowledge can provide more traction than traditional messaging.	<ul style="list-style-type: none"> <li>Continue to build child IP mātauranga as both a prevention strategy and delivery system</li> <li>Increase evaluation for impact</li> </ul>
Child safety is often held by women. Children are both at risk and are protectors to others.	Increase collective responsibility for child safety, especially in messaging and policy work.
Child IP workforce is small and has skill gaps.	Extend capacity building and professions engaged.
We can leverage Safekids mahi across ACC.	Build connections with wider IP and ACC teams.
Many workstreams requires effective staffing.	Budgeted PD and reduction in proposed initiatives.
Contracting with Te Whatu Ora doubles the impact of Government changes.	Allow adequate time to progress contracting.
ACC data has child injury prevalence gaps.	Refer to ACC and health data sets.



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## Appendix 4 – Proposed Option 2 initiatives and financials

Primary prevention function	Initiative	Initiative description	OPEX Costs
Direct participant programmes	Home Safety Programme (HSP) x 6450	Provision of safety device and advice to whānau and homes via 30+ partner organisations.	\$1,092,222
	Community events x 17 (option 1) x 10 (option 2)	Attend national and regional community events to raise awareness of child injury prevention and strengthen Safekids' profile and trust with priority whānau.	\$8,920
	HSP Whānau workshops x 10	Delivery of community-led, child injury prevention workshops to deepen whānau understanding and empowerment around home safety.	\$7,170
Community mobilisation	Hapū wānanga pilot	Incorporating child safety education into antenatal and post-natal education in partnership with Ngā Wānanga o Hine Kōpū in Northland.	\$146,347
Behaviour change communications	Digital marketing BAU and audit – 8 x campaigns, 10 x videos minimum, 250 x posts	Build a 'digital village' through social media, sharing child injury prevention safety messages for whānau and practitioners and to raise awareness of Safekids work.	\$86,170
	Website refresh	To update functionality for workforce and community.	\$165,973
Legislation & policy reform	Policy development and responses - 25 x consultation briefs/submissions	Influence policy, strategy, and system-level decisions with a child safety lens.	\$38,520
	Tamariki ideas lab x 2	Capture the voices of children to influence effective policy change and build capability.	\$33,000
Workforce & organisational development	Advanced Webinars x 6	Online webinars led by subject-matter experts and researchers, delivering knowledge and practical tools to increase workforce knowledge and confidence.	\$3,670
	Huitalanoa x 25	1-day workforce development workshop for HSP partner organisations to strengthen delivery of the HSP within whānau homes and increase child safety knowledge.	\$77,450
	Wānanga x 10	2-day noho marae wānanga focussed on reconnecting with communal systems of safety, sharing lived experiences and building local leadership to embed prevention at community and sector levels. Opportunity to both educate and learn from workforce and whānau.	\$247,020
	Strategic leadership development and capacity building	Internal workforce development required to deliver increased quality initiatives and services	\$69,699
Research, monitoring & evaluation	Research sharing - 19 x Safety Lit, 19 x Tūmatakahuki	Curate and share CIP research and injury prevention insights to sector, kaimahi and system actors.	\$36,670
	Monitoring, Evaluation and Learning plan - 1 x MEL framework, 4 x learning briefs	Lead the development of a shared learning system that helps SK and ACC understand impact of child injury prevention initiatives.	\$36,670
Coordination & partnerships	Sector/national partnerships and positioning	Forge new & strengthen existing strategic partnerships to expand influence.	\$22,039



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Stewardship & advocacy	Falls prevention systems influence project	Utilise activity across all workstreams to better understand and reduce child falls with wider sector partners.	\$20,170
	Advisory group	Re-establish the cross-sector Strategic Equity and Child Injury Prevention Advisory Group.	\$0
<b>Total OPEX</b>			<b>\$2,091,710</b>

### Staffing costs by systems function

Direct Participant Programmes	\$805,932
Community Mobilisation	\$118,326
Behaviour change communications	\$340,386
Legislation and policy reform	\$136,177
Workforce and organisational development	\$895,570
Research, monitoring and evaluation	\$155,271
Coordination and partnerships	\$369,842
Stewardship and advocacy	\$158,358
<b>Total staffing costs for 13.1 FTE for 2.5 years</b>	<b>\$2,979,863</b>

### Total financial request for proposal

Total OPEX	\$2,091,710
Total Staffing	\$2,979,863
<b>Total Programme costs</b>	<b>\$5,071,573</b>
Te Whatu Ora overhead	\$507,157
FY28 external evaluation	\$100,000
<b>Total financial request for proposal</b>	<b>\$5,678,729</b>



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### Appendix 4 – Child Injury Prevention system

The causes of child injury causes are complex; therefore injury prevention responsibility spans across the state and not-for-profit sectors and a multitude of legislative contexts.



## WATER SAFETY NZ PARTNERSHIP

To	[Out of Scope], DCE – Strategy, Engagement and Prevention; Chair, IPGG (Injury Prevention Governance Group)
Approved by	[Out of Scope], Acting Head of Injury Prevention
Author	[Out of Scope], Injury Prevention Leader
Date	10 September 2025

### Purpose

This paper provides information on follow up actions requested during the discussion about the Water Safety NZ (WSNZ) Partnership at the 20 August 2025 Injury Prevention Governance Group meeting.

This paper seeks endorsement to cease all investment in the WSNZ partnership; recommended due to the lack of sufficient scale and impact on claims.

### Recommendations

The Injury Prevention Governance Group approved **Option 2** - Cease all investment in the WSNZ partnership; recommended due to the lack of sufficient scale and impact on claims.

1.1	<p>Notes</p> <ul style="list-style-type: none"> <li>a. That the current interventions and activities historically supported by ACC lack sufficient scale or impact to achieve a saving to the levy payer and meet Injury Prevention’s investment requirements.</li> <li>b. That Sport NZ (as the other government party to the WSNZ contract) has confirmed a 3-year investment in WSNZ from 1 July 2025.</li> <li>c. That if an exit is endorsed, ACC will continue to support water safety through the <i>Preventable</i> programme activities and associated costs.</li> <li>d. That <i>Preventable</i> programme activities will continue to take place in partnership with WSNZ and other sector stakeholders, regardless of which option is approved.</li> <li>e. That the ACC Finance, Actuarial, Performance and Intelligence, External Engagement, Risk, <i>Preventable</i> and Regional IP teams have been consulted on this paper.</li> <li>f. That the approved decision will be communicated to the CEO, ACC Board and Minister in September, to support a confirmed shared ACC decision on any future WSNZ investment to be shared with WSNZ by 12 December 2025.</li> <li>g. That IP will work with the ACC Risk Team to develop a risk mitigation plan to manage any risks once a decision has been made.</li> </ul>	Noted
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**For Injury Prevention Governance Group:**

1.2	<b>Endorse</b> to cease all investment in the WSNZ partnership; recommended due to the lack of sufficient scale and impact on claims.	<b>Endorsed</b>
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**For Deputy Chief Executive – Strategy, Engagement and Prevention**

1.4	<b>Approve</b> , upon the endorsement of the PPPGG, the exit of partnership investment in Water Safety NZ at the end of the current contract period from 1 April 2026.	<b>Approved</b>
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**Endorsement**

**[Out of Scope]**

10 September 2025

**[Out of Scope], Head of Injury Prevention**

Date Signed

I have reviewed this recommendation and the [Conflict of Interest Policy](#), and confirm that I do not have an actual, potential or perceived conflict of interest that prevents me from endorsing it.

Note: If you cannot tick this box due to a conflict of interest, please complete a [Conflict of Interest Form](#)

**Approval**

**[Out of Scope]**

11 September 2025

**[Out of Scope], Deputy Chief Executive – SEP; Chair, Primary Prevention Portfolio Governance Group**

Date Signed

I have reviewed this recommendation and the [Conflict of Interest Policy](#), and confirm that I do not have an actual, potential or perceived conflict of interest that prevents me from endorsing it.

Note: If you cannot tick this box due to a conflict of interest, please complete a [Conflict of Interest Form](#)

## Follow up Actions from Options Paper for Water Safety NZ Partnership (post 20 August IPGG meeting)

Provide further updates as follows to support the endorsement:

### 1. Which Minister is responsible for water safety.

- Hon Mark Mitchell is the lead Minister for water safety as part of the sport and recreation portfolio.
- Sport NZ is the official 'Government home' for water safety, including having WSNZ as a partner.
- Sport NZ is the gateway for WSNZ to receive and manage sector funding allocations from the NZ Lottery Grants Board.

### 2. The impact of an ACC exit to Water Safety NZ's operating budget; to be signed off by the Head of IP.

Based on the latest available audited WSNZ Annual Report is for the 2023/24 Financial Year:

- ACC's annual investment equates to 23% of WSNZ's annual revenue of \$4.4m.
- Sport NZ annual investment is \$3.2m. This includes \$2.5m from NZ Lottery Grants Board and equates to approximately 73% of WSNZ's annual revenue.
- The annual ACC investment into WSNZ is allocated as follows:
  - 50% for WSNZ leadership, covering 22% of WSNZ leadership expenses.
  - 50% for programmes delivered by partners (e.g. Water Skills for Life and Kia Maanu, Kia Ora for Māori water safety), covering 31% of programme expenses.
- Based on the 2023/24 Annual Report, WSNZ has \$1.6m in reserves. This includes a reserve of \$0.9m as a safeguard to ensure WSNZ can fulfil contractual capabilities.

### 3. Clarification of recommended option as an exit from WSNZ partnership OR exit from exit from investment in water safety as an injury issue.

- The recommended option is an Injury Prevention (IP) **exit of the partnership** with WSNZ based on IP's continued investment in water safety not being likely to result in levy reductions (Section 263).
- Any future ACC investment in water safety as an injury issue may be considered if it is likely to result in levy reductions.

## Option Paper (from 20 August IPGG meeting)

### Background of ACC Decisions

In March 2024 the PPPGG endorsed IP’s recommendation to exit investment in WSNZ at the end of FY25, on the basis that the current interventions and activities supported by ACC lack sufficient scale or impact to achieve a saving to the levy payer and meet IP’s investment requirements.

Table 1 - Excerpt from 14 March 2024 PPPGG minutes

Minutes Excerpt	Update
<p>Members endorsed that IP continues to invest circa \$1M in WSNZ) for FY25 (in budget) to allow the planned Government review to be completed and for ACC to determine if it wants to fund any future water safety.</p>	<p>Recommendations from Government Recreational Safety Review (that started approx. 2022) were not accepted for implementation by current Minister of Transport.</p>
<p>Members agreed:</p> <ul style="list-style-type: none"> <li>• That water safety should not be a prevention investment.</li> <li>• That the decision to continue through an alternate ACC mechanism should be made by the Board.</li> </ul>	<ul style="list-style-type: none"> <li>• Initial indications from External Engagement are that WSNZ sponsorship does not fit with its strategy or budget.</li> <li>• ACC Board view has not been scoped at this time. Subsequent request from DCE-SEP (post PPPGG meeting) to provide WSNZ with a 6-12 month extension to the current WSNZ investment to allow for the development of the business strategy for preventing and mitigating the impact of injuries and other internal work to be completed, to inform any future investment decisions (see Table 2).</li> </ul>
<p>Members noted:</p> <ul style="list-style-type: none"> <li>• That the current water safety investment is unlikely to result in a reduction in levies (S263).</li> </ul>	<ul style="list-style-type: none"> <li>• ACC-wide decision delayed, to allow for internal work (Table 2) to be completed. In the interim, a 9-month extension to the current WSNZ investment has been</li> </ul>

<ul style="list-style-type: none"> <li>The need for a final ACC-wide decision to be made by Nov 2024 thereby allowing WSNZ to adjust their expectations accordingly.</li> </ul>	contracted with WSNZ for July 2025-March 2026. New date of advising WSNZ set at 12 December 2025.
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Table 2 – ACC Work to Inform Future Investment in Water Safety

Work	Comment	Impact on WSNZ investment
Baseline review of current IP portfolio, including opportunities to strengthen performance and strategic alignment.	Complete.	No change to proposed IP exit.
Complete a review of IP’s measurement and benefits approach, including how we implement our legislative test of cost-effectiveness.	Complete and endorsed by PPPGG June 25.	No change to proposed IP exit.  Assessment within Investment Framework paper to June 2025 PPPGG noted \$0.00 ROI expected and ~100% ROI@ risk score (percentage calculation of proportion of claim savings are yet to be achieved multiplied by the proportion of funding spent).
Determine whether investment in water safety could be sustained by other teams or functions within ACC, for example ACC’s Board or External Engagement.	Initial indications from External Engagement are that WSNZ sponsorship does not fit with its strategy or budget.  ACC Board view has not been scoped at this time.	WSNZ needs confirmed ACC investment level by 12 December 2025, to inform budgeting and sector funding allocation process.

The baseline review, new measurement and benefits framework and developing Investment Framework all support IP’s recommended exit. The recommendation is further supported by the Minister’s position

in ACC's Service Agreement: *'We can only undertake an injury prevention activity if it is likely to result in a cost-effective reduction in actual or projected levy rates or the Non-Earners' appropriation. This means that we focus our efforts on injuries that have the greatest impacts on the Scheme, such as high-cost and high-volume claims that affect claim costs'*.

## ACC Investment

IP has invested ~\$20M into WSNZ and water safety programmes over the past 20+ years including most recently \$825,000 for 9 months of FY26. Historically this investment has not returned any claim savings and is not expected to in the foreseeable future. This investment is in addition to, and alongside other support ACC provides for water safety in general by way of Preventable programme activity with various water safety sector partners including but not limited to WSNZ.

In November 2024, the Head of IP approved a 9-month extension to the WSNZ partnership investment for FY26: 'The purpose of the investment is to continue supporting WSNZ to address drowning as a key issue in Aotearoa, while ACC determines how to account for and manage any future water safety investment'. From 1 July 2025, ACC entered into a contract with WSNZ for this extension, pro-rated at current levels (\$825,000)

ACC's FY26 investment in WSNZ is allocated as follows:

- \$412,500 for WSNZ sector leadership, advocacy and co-ordination.
- \$225,000 for the programme delivery of Water Skills for Life (WSFL) in high deprivation communities for 5-13 year olds. This takes a long-term strategic approach to addressing future adult drowning.
- \$187,500 for the programme delivery of Kia Maanu, Kia Ora (KMKO) kaupapa Māori water safety, with a focus on adults in high-risk activities (e.g. kai gathering) to intervene where the current highest proportion of drowning occurs.

## Future Options Considered

Due diligence has been done on investment options within the following categories:

- Sustain the current WSNZ partnership
- Cease all investment

- Change how we invest in current programmes
- New approaches.

For a full list of options considered, see Appendix 2. Of the options, the three most viable options are presented below with **Option 2** (cease all investment in the WSNZ partnership) recommended:

**Three Key Options - Benefits and Risks**

	Options and Costs	Benefits	Risks
1	<p><b>Sustain the current WSNZ partnership</b></p> <ul style="list-style-type: none"> <li>• <b>Continue to invest at current level of \$1.1M PA</b> to sustain investment in WSNZ and programme investment in Water Skills for Life and Kia Maanu, Kia Ora (Kaupapa Māori water safety)</li> <li>• Continued Preventable/ Have a Hmm messaging</li> </ul> <p>Total \$2,475,000 excl. share of IP resourcing (overheads) and Preventable costs of ~\$200-\$300K PA.</p>	<p>May enable ACC and WSNZ to determine whether an apparent reduction in young people drowning can be attributed to Water Skills for Life delivery for the past 10 years.</p> <p>Supports longer-term solution of Water Skills for Life to equip young people with skills to enable safe aquatic participation throughout life course, while also supporting Kia Maanu, Kia Ora to address current adult and Māori drowning.</p>	<p>ACC sustains a negative ROI and can't confidently address questions relating to legislative compliance or value for money. ROI impact:</p> <ul style="list-style-type: none"> <li>- Sport ROI shifts from \$1.80 to \$1.77</li> <li>- Targeted ROI from \$2.08 to \$2.07</li> </ul> <p>Option does not meet requirements of Section 263 or IP investment framework.</p> <p>Uses scarce IP FTE which compromises IP's ability to scale/ scope new opportunities, with FTE focused on WSNZ partnership with no ROI/ claims benefit.</p> <p>Investment in water safety is used as an example to suggest ACC has an inappropriate/ weak approach to how it uses public funds.</p>

			Insufficient programme reach to achieve scale of impact in a highly dispersed drowning problem.
2	<p><b>Cease all investment in the WSNZ partnership.</b></p> <p><b>(RECOMMENDED)</b></p> <ul style="list-style-type: none"> <li>Exit of IP partnership and cease all investment in WSNZ and programme investment in Water Skills for Life and Kia Maanu, Kia Ora (Kaupapa Māori water safety) programmes with effect from 1 April 2026.</li> <li>Continued Preventable/ Have a Hmm messaging</li> </ul> <p>\$0 excl. Preventable costs of ~\$200-\$300K PA.</p>	<p>Reduces IP spend in an area that provides no current or likely future ROI/ claims benefit.</p> <p>(No change to IP’s aggregate ROI as \$0.00 currently included for water safety).</p> <p>Mitigates risk of ACC being asked to explain the merit of investment into water safety to the Minister and/ or Select Committee.</p> <p>Preventable enables ACC to continue supporting water safety without material investment or resources.</p>	<p>Likely high media interest (public and Board expectation of ACC involvement) however planned communications could support this.</p>
3	<p><b>Change how we invest</b></p> <ul style="list-style-type: none"> <li><b>Reduce investment to ~\$500,000 PA</b>, to sustain some investment in WSNZ and change programme investment to a more targeted approach.</li> <li>10 hot spot community planning and implementation involving Regional IP reps.</li> </ul>	<p>Recognises the political nature of a full ACC exit, offering a way to retain some involvement in water safety in a more targeted way.</p> <p>Targets investment on current adult drowning toll and higher current claim group.</p> <p>Makes use of other IP resources to add to WSNZ impact, without any additional direct impact on</p>	<p>ACC sustains a negative ROI and can’t confidently address questions relating to legislative compliance or value for money.</p> <p>ROI impact:</p> <ul style="list-style-type: none"> <li>- Sport ROI shifts from \$1.80 to \$1.78</li> <li>- Targeted ROI shifts from \$2.08 to \$2.07</li> </ul> <p>Option does not meet requirements of Section 263 or IP investment framework.</p>

	<ul style="list-style-type: none"> <li>• Focused Preventable/ Have a Hmm messaging around 10 hot spots.</li> <li>• Advocacy with WSNZ to Ministry of Transport for lifejacket legislation.</li> </ul> <p>Total ~\$1M excl. share of IP resourcing (overheads), Regional IP staff time, Preventable costs of ~\$200-\$300K PA and Policy team costs.</p>	<p>ROI for water safety investment.</p>	<p>Uses scarce IP FTE which compromises IP's ability to scale/ scope new opportunities, with FTE focused on WSNZ partnership with no ROI/ claims benefit.</p> <p>Investment in water safety is used as an example to suggest ACC has an inappropriate/ weak approach to how it uses public funds.</p> <p>Investment amount is insufficient to achieve any claim impact.</p>
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## Recommendations

**Approve Option 2** - Cease all investment in the WSNZ partnership; recommended due to the lack of sufficient scale and impact on claims.

## Appendix 1 - Further Background

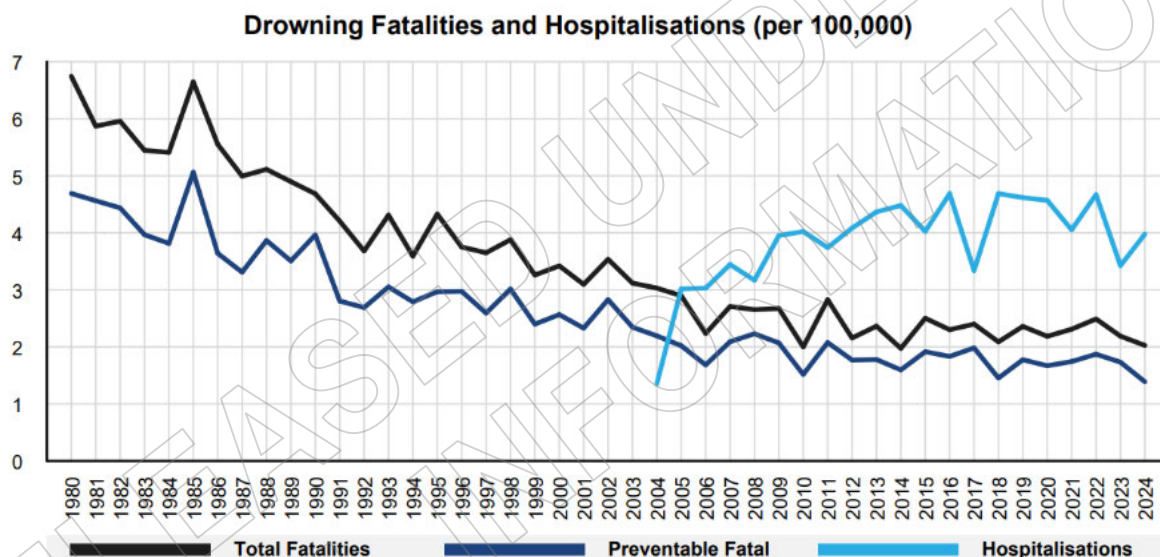
### Who Drowns

- Based on a 10-year average, 82.7 lives are lost by drowning each year.
- Drownings in New Zealand are characterised by diversity in terms of activities prior and environments.
- The annual toll is dominated by the top half of the North Island (68% of the 2024 toll) and is predominantly adult male.
- Māori drowning rates are over double that of NZ Europeans (2.67 per 100,000 vs 1.10 per 100,000).
- Kai gathering is a common theme of drownings across a variety of settings (e.g. rock fishing, scuba diving, snorkelling, fishing).
- Nine of the 10 WSNZ identified hot spots (geographical locations with the greatest number of drownings since 2000) are in the upper North Island. Analysis shows that drowning numbers are increasing at these 10 locations (4.3% of total drownings in 1999 compared to 18% of total drownings last year).

- Based on a 10-year average, 5 preschoolers’ lives are lost by drowning each year (2 in 2024). The Fencing of Swimming Pools Act of 1987 is credited as one of the most effective public health policies in NZ’s history, reducing child pool deaths by almost 80%.
- Comparatively, those that swim between the flags at beaches monitored by Surf Life Saving NZ patrols are very unlikely to drown.
- Not all drownings within the annual tolls result in a claim to ACC, with claims on average equating to less than 1/3 of the drowning toll each year.

In addition, WSNZ’s 2024 Drowning Report provides key themes and findings:

- **Drowning rates are declining but progress is slowing.** New Zealand has made significant strides in reducing drowning rates, now at 1.35 per 100,000 people. However, recent trend analysis suggests a plateau, signalling the need for innovative strategies and increased resources to maintain momentum; hospitalisations are generally trending up.



- **Young New Zealanders are safer than ever.** Sustained efforts in water safety education, such as the Water Skills for Life™ programme, have contributed to a significant reduction in drowning rates among under-25s, who account for just 12% of fatalities (31% of the population).
- **Blackspots: High-risk locations identified.** Ten blackspots, high fatality areas, were responsible for 18% of drownings in 2024. Focused, community-driven interventions are critical to address these high-fatality areas.
- **Lifjacket use would save lives.** With 94% of craft-related fatalities involving individuals not wearing lifejackets, a nationwide mandate for lifejacket use on watercraft is urgently needed.
- **Alcohol’s role in drownings.** Alcohol remains a factor in 30–40% of drownings, highlighting the need for campaigns addressing risky behaviours around water.
- **Economic impact.** The economic burden of drowning fatalities, hospitalisation and injuries in 2024 exceeded \$1 billion, reinforcing the urgent need for prevention-focused investment.

## Challenges

- The investment and effort by ACC and others are not at a sufficient scale to achieve a significant impact. WSNZ estimates it requires an additional annual \$7M on top of current NZLGB/ local trust funding and ACC investment to provide fully funded access for 115,000 children from the most deprived communities who would otherwise miss out on core water survival skills. In addition, WSNZ estimates a further cost of \$4.4M to subsidize WSFL for a further 114,000 children from 3rd quartile deprived communities.
- The quantum of drowning (82.7 average over 10 years) is unlikely to attract government funding aligned to a Social ROI model. Based on how road safety investment is calculated, Water Skills for Life would need to offer a saving of ~\$1 billion PA to justify \$10m ++ PA estimated to reach the majority of primary children with Water Skills for Life.
- A fluctuating, contestable funding mix at a community and national level, with limited government funding of WSFL (and a growing number of children missing out on WSFL).
- Limited investment in prevention, with the bulk of government funding directed towards response/ front-line rescue services, including most recently to support increased flood response needs.
- Heavy reliance on volunteers for most front-line rescue coverage.
- WSFL requires practical learning (getting wet), which drives up the delivery cost due to required instruction ratios and limited access to teaching pools.
- No current indication from the Minister for ACC's Office on the Minister's interest in water safety, noting that Sport NZ (and therefore the Minister for Sport and Recreation) is the official 'Government home' for WSNZ.

## Injury Prevention's Dilemma

New Zealand is surrounded by water, and we have one of the highest rates of drowning across comparative jurisdictions such as Australia. The impact a drowning has on families, whānau, and communities is significant. ACC's Board, CE and Executive continue to express interest in addressing water safety.

ACC and New Zealand's challenge is how can we effectively and sustainably reduce drowning in New Zealand given the diversity in drowning demographics, settings, and root causes, alongside low volumes (approximately 80 per annum). The diversity and low volumes mean it's very difficult to effectively reach at-risk people and attribute any change in drowning volumes to the interventions implemented. Further, the low volume and cost constrain the level of investment that ACC can make to reduce drowning and meet Section 263. The limited potential water safety offers to prevent and mitigate the impact of injuries also makes it challenging for ACC and IP to divert scarce resources from other programmes with materially greater potential to improve the lives of New Zealanders.

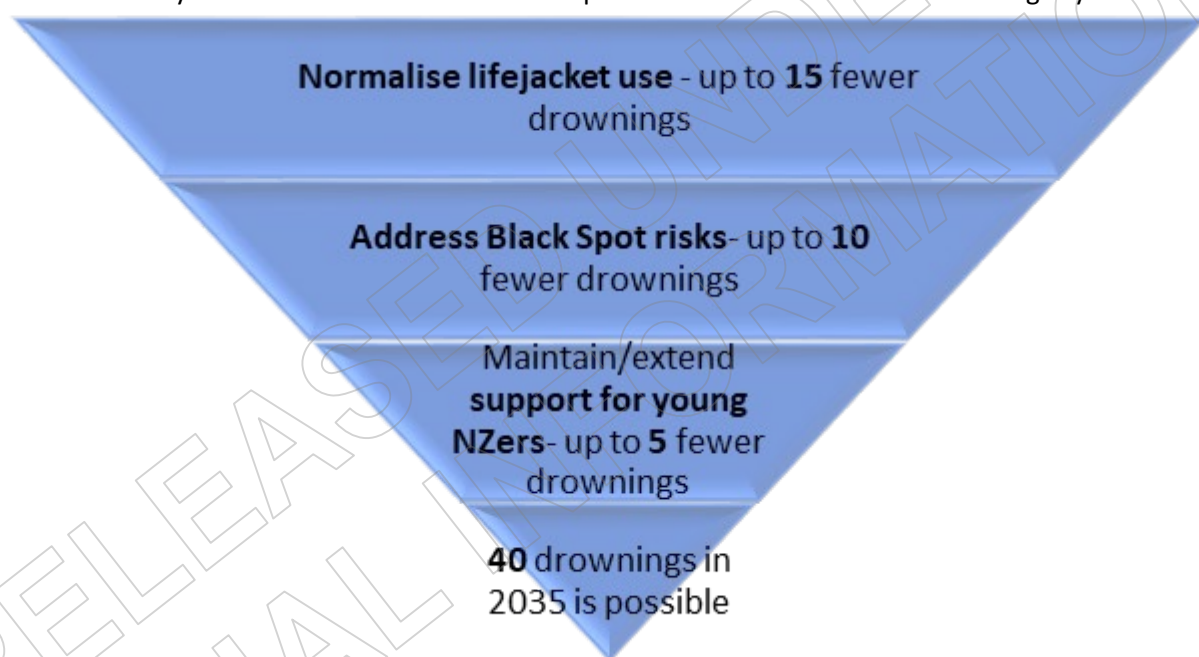
Drowning injury (fatal and non-fatal drowning) costs ACC around \$3 million per year on average (lifetime cost). Over the past 20 years, ACC has invested over \$20 million (present value of money) to address water safety, through either a partnership with WNSZ or a contestable drowning prevention funding process (pre-2012).

**Supporting Injury Prevention Activities**

- The Preventable campaign has been actively working with water safety partners including WSNZ, with recent activations focused on how to stay safe in, on and under the water this summer. It is expected that this would continue regardless of ACC’s investment decision.
- ACC has rejoined the Safer Boating Forum (hosted by Maritime NZ) which focuses on recreational boating safety.
- In line with IP’s strategy to take a systems influencing role more, there is an opportunity to engage at a policy level with the Ministry of Transport around the longstanding issue of lifejacket legislation on recreational craft under 6m.
- ACC was a key contributor to a Budget Bid in 2020 which saw the Government commit to invest \$15.5M per annum, indefinitely to support the sustainability of front-line rescue services.

**Where WSNZ recommends a focus to drive reduced drowning deaths**

In 10 years from now WSNZ projects ~70 drownings per year based on the current rate of progress, but notes some key interventions that could make it possible to reduce this to 40 drownings by 2035.<sup>5</sup>



**Appendix 2 – Full Options List**  
**Top 3 viable options (as noted earlier)**

	Options and Costs	Benefits	Risks
1	<p><b>Sustain the current WSNZ partnership</b></p> <ul style="list-style-type: none"> <li>Continue to invest at current level of \$1.1M PA to sustain investment in WSNZ and programme investment in Water Skills for Life and Kia Maanu, Kia Ora (Kaupapa Māori water safety)</li> <li>Continued Preventable/ Have a Hmm messaging</li> </ul> <p>Total \$2,475,000 excl. share of IP resourcing (overheads) and Preventable costs.</p>	<p>May enable ACC and WSNZ to determine whether an apparent reduction in young people drowning can be attributed to Water Skills for Life delivery for the past 10 years.</p> <p>Supports longer-term solution of Water Skills for Life to equip young people with skills to enable safe aquatic participation throughout life course, while also supporting Kia Maanu, Kia Ora to address current adult and Māori drowning.</p>	<p>ACC sustains a negative ROI and can't confidently address questions relating to legislative compliance or value for money. ROI impact:</p> <ul style="list-style-type: none"> <li>Sport ROI shifts from \$1.80 to \$1.77</li> <li>Targeted ROI shifts from \$2.08 to \$2.07</li> </ul> <p>Option does not meet requirements of Section 263 or IP investment framework.</p> <p>Uses scarce IP FTE which compromises IP's ability to scale/ scope new opportunities, with FTE focused on WSNZ partnership with no ROI/ claims benefit.</p> <p>Investment in water safety is used as an example to suggest ACC has an inappropriate/ weak approach to how it uses public funds.</p> <p>Insufficient programme reach to achieve scale of impact in a highly dispersed drowning problem.</p>
2	<p><b>Cease all investment in the WSNZ partnership (RECOMMENDED)</b></p> <ul style="list-style-type: none"> <li>Exit of IP partnership and cease all investment in WSNZ and programme investment in Water Skills for Life and Kia Maanu, Kia Ora (Kaupapa Māori water safety) programmes with effect from 1 April 2026.</li> </ul>	<p>Reduces IP spend in an area that provides no current or likely future ROI/ claims benefit.</p> <p>(No change to IP's aggregate ROI as \$0.00 currently included for water safety).</p> <p>Mitigates risk of ACC being asked to explain the merit of investment into water safety to the Minister and/ or Select Committee.</p>	<p>Likely high media interest (public and Board expectation of ACC involvement) however planned communications could support this.</p>

	<ul style="list-style-type: none"> <li>Continued Preventable/ Have a Hmm messaging</li> </ul>		
\$0			
3	<p><b>Reduce investment</b></p> <ul style="list-style-type: none"> <li><b>Reduce investment to ~\$500,000 PA</b>, to sustain some investment in WSNZ and change programme investment to a more targeted approach.</li> <li>10 hot spot community planning and implementation involving Regional IP reps.</li> <li>Focused Preventable/ Have a Hmm messaging around 10 hot spots.</li> <li>Advocacy with WSNZ to Ministry of Transport for lifejacket legislation.</li> </ul> <p>Total ~\$1M excl. share of IP resourcing (overheads), Regional IP staff time, Preventable and Policy team costs.</p>	<p>Recognises the political nature of a full ACC exit, offering a way to retain some involvement in water safety in a more targeted way.</p> <p>Targets investment on current adult drowning toll and higher current claim group.</p> <p>Makes use of other IP resources to add to WSNZ impact, without any additional direct impact on ROI for water safety investment.</p>	<p>ACC sustains a negative ROI and can't confidently address questions relating to legislative compliance or value for money.</p> <p>ROI impact:</p> <ul style="list-style-type: none"> <li>Sport ROI from \$1.80 to \$1.78</li> <li>Targeted ROI from \$2.08 to \$2.07</li> </ul> <p>Option does not meet requirements of Section 263 or IP investment framework.</p> <p>Uses scarce IP FTE which compromises IP's ability to scale/ scope new opportunities, with FTE focused on WSNZ partnership with no ROI/ claims benefit.</p>

**Other options considered**

	Options and Costs	Benefits	Risks
4	<p><b>Change how we invest in current programmes</b></p> <ul style="list-style-type: none"> <li><b>Continue to invest at current level of \$1.1M PA</b> to sustain investment in WSNZ and <b>change</b> programme investment to a more targeted</li> </ul>	<p>Targets investment on current adult drowning toll and higher current claim group.</p> <p>Makes use of other IP resources to add to WSNZ impact, without any additional direct impact on ROI for water safety investment.</p>	<p>Does not change ROI outcome to sufficient level (ROI baseline of \$0.00). ACC continues to sustain a negative ROI and can't confidently address questions relating to legislative compliance or value for money. Option does not meet requirements of Section 263 or IP investment framework.</p>

	<p>approach with a focus on 10 drowning hot spots.</p> <ul style="list-style-type: none"> <li>Hot spot community scoping involving Regional IP reps.</li> <li>Focused Preventable/ Have a Hmm messaging around hot spots.</li> </ul> <p>Total \$2,475,000 excl. share of IP resourcing (overheads), Regional IP staff time and Preventable costs.</p>		<p>Uses scarce IP FTE which compromises IP's ability to scale/ scope new opportunities, with FTE focused on WSNZ partnership with no ROI/ claims benefit.</p> <p>Investment in water safety is used as an example to suggest ACC has an inappropriate or weak approach to how it uses public funds.</p>
5	<p><b>Change how we invest in current programmes</b></p> <p>Increase programme investment to increase reach of Water Skills for Life to achieve scale, ~\$7.5M PA to provide subsidised/ fully funded WSFL lessons in high deprivation communities (including ongoing WSNZ investment.)</p> <p>Total \$16.875M</p>	<p>More likely to impact on future adult drowning toll as this supports closer to 100% coverage of WSFL; every 5-13 year old receiving Water Skills for Life several times over primary school years.</p> <p>Strong trust and confidence opportunity as naming partner.</p>	<p>Would further erode the ROI and would have a significant negative impact on Sport IP portfolio ROI, dropping it from \$1.79 to \$1.64, while also presenting an opportunity cost of investment not being available to support higher performing programmes (e.g. Ride Forever).</p> <p>Uses scarce IP FTE which compromises IP's ability to scale.</p> <p>Claims attribution currently also challenging (can't easily track through claims). This may be overcome with a data share agreement, however a study is required over a long period to show true impact of Water Skills for Life delivery in schools on mostly adult drowning problem.</p>
6	<p><b>Change how we invest in current programmes</b></p> <p>Exit of IP investment in WSNZ; new sponsorship partnership is agreed by ACC External Engagement and WSNZ.</p> <p>\$0 IP investment.</p>	<p>Avoids likely media interest from ACC exit and for trust and confidence value of partnership to be funded from outside IP. Allows IP resource to be directed to financially returning and scalable programmes.</p>	<p>ACC sponsorship budget lacks the scale required to be a replacement of IP investment (total annual budget ~\$1M vs current WSNZ investment is \$1.1M).</p> <p>ACC sponsorship strategy is also focused around events rather than</p>

	TBC External Engagement and any ACC leverage costs.		ongoing partnerships/ programmes. <i>Initial indications from External Engagement are that WSNZ sponsorship does not fit with its strategy or budget.</i>
7	<p><b>Change how we invest in current programmes</b></p> <p>Exit of IP investment in WSNZ and cease all related external investment but increase the focus on <i>Preventable</i> (Have a Hmm) within 10 drowning hot spots work over the peak summer period (identified by WSNZ insights).</p>	Addresses the absence of any measurable benefits coming from current investment, while enabling ACC to continue supporting communities and WSNZ to reduce drowning in identified hot spots.	<p>Exit of WSNZ partnership likely to attract negative media interest.</p> <p>Makes use of WSNZ insights without providing investment to support the insights work.</p>

	Options and Costs	Benefits	Risks
8	<p><b>New approach</b></p> <p>Undertake a procurement/ RFI process seeking solutions that can sustainably reduce drownings and generate a positive ROI.</p>	<p>Enables accumulation of market information that will either:</p> <ol style="list-style-type: none"> <li>1. Provide further evidence that reducing drowning requires a Social ROI investment approach outside the scope of ACC’s IP mandate; or</li> <li>2. Provide evidence that communities could reduce local drowning with a level of support ACC can sustain.</li> </ol> <p>A softer exit of WSNZ partnership as WSNZ could apply for investment through the RFI process.</p> <p>Recognises the political nature of a full ACC exit and offers an additional stage that</p>	<p>Uses scarce IP FTE for what could be a time-consuming RFI process and compromises IP’s ability to scale. Internal scoping work for RFI process may duplicate WSNZ efforts.</p> <p>Draws resource out of lightly resourced NGO water safety sector to respond to RFI. Based on recent RFI process run by Workplace team, reasonable probability that RFI process does not result in any new solutions that ACC can invest in.</p> <p>Creates a contestable funding process that in effect competes with WSNZ’s funding process, while also competing with Maritime NZ’s funding process for recreational boat safety; returning us to pre 2012 when ACC ran its own funding process.</p>

		<p>informs any future ACC position.</p> <p>Tests the market for innovation/ new thinking to address a complex problem.</p>	
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## Options Paper for Water Safety NZ Partnership

To	[Out of Scope], Deputy Chief Executive; Chair, Injury Prevention Governance Group
From	[Out of Scope], Acting Head of Injury Prevention
Author	[Out of Scope], Injury Prevention Leader
Date	4 August 2025
Subject	Options Paper - Water Safety NZ Partnership

### Purpose

This paper puts forward options for ACC's investment in water safety beyond the end of the current contract with Water Safety NZ (WSNZ) from April 2026. It recommends an Injury Prevention (IP) exit of the partnership based on IP's continued investment in water safety not being likely to result in levy reductions (Section 263).

While an IP exit is recommended, IP has undertaken due diligence on various options that might allow ACC to continue supporting water safety. An ACC decision agreed at all levels is required to be communicated to WSNZ by 12 December 2025 at the latest.

### Key issues

- IP's continued investment in water safety is not likely to result in levy reductions (Section 263).
- Drowning injury (fatal and non-fatal drowning) costs ACC around \$3 million per year on average (lifetime cost), with no ROI or claims saving benefits.
- ACC's Board, CE and Executive continue to express interest in addressing water safety.
- IP has undertaken due diligence on various options that might allow ACC to continue supporting water safety.

### Background of ACC Decisions

In March 2024 the PPPGG endorsed IP's recommendation to exit investment in WSNZ at the end of FY25, on the basis that the current interventions and activities supported by ACC lack sufficient scale or impact to achieve a saving to the levy payer and meet IP's investment requirements.

#### Table 1 - Excerpt from 14 March 2024 PPPGG minutes



Minutes Excerpt <sup>1</sup>	Update
<p>Members endorsed that IP continues to invest circa \$1M in WSNZ) for FY25 (in budget) to allow the planned Government review to be completed and for ACC to determine if it wants to fund any future water safety.</p>	<p>Recommendations from Government Recreational Safety Review (that started approx. 2022) were not accepted for implementation by current Minister of Transport.</p>
<p><b>Members agreed:</b></p> <ul style="list-style-type: none"> <li>- That water safety should not be a prevention investment.</li> <li>- That the decision to continue through an alternate ACC mechanism should be made by the Board.</li> </ul>	<ul style="list-style-type: none"> <li>- Initial indications from External Engagement are that WSNZ sponsorship does not fit with its strategy or budget.</li> <li>- ACC Board view has not been scoped at this time. Subsequent request from DCE-SEP (post PPPGG meeting) to provide WSNZ with a 6-12 month extension to the current WSNZ investment to allow for the development of the business strategy for preventing and mitigating the impact of injuries and other internal work to be completed, to inform any future investment decisions (see Table 2).</li> </ul>
<p><b>Members noted:</b></p> <ul style="list-style-type: none"> <li>- That the current water safety investment is unlikely to result in a reduction in levies (\$263).</li> <li>- The need for a final ACC-wide decision to be made by Nov 2024 thereby allowing WSNZ to adjust their expectations accordingly.</li> </ul>	<ul style="list-style-type: none"> <li>- ACC-wide decision delayed, to allow for internal work (Table 2) to be completed. In the interim, a 9-month extension to the current WSNZ investment has been contracted with WSNZ for July 2025-March 2026. New date of advising WSNZ set at 12 December 2025.</li> </ul>

**Table 2 – ACC Work to Inform Future Investment in Water Safety**

Work	Comment	Impact on WSNZ investment
<p>Baseline review of current IP portfolio, including opportunities to strengthen</p>	<p>Complete.</p>	<p>No change to proposed IP exit.</p>



performance and strategic alignment.		
Complete a review of IP’s measurement and benefits approach, including how we implement our legislative test of cost-effectiveness.	Complete and endorsed by PPPGG June 25.	No change to proposed IP exit.  Assessment within Investment Framework paper to June 2025 PPPGG noted \$0.00 ROI expected and ~100% ROI@ risk score (percentage calculation of proportion of claim savings are yet to be achieved multiplied by the proportion of funding spent).
Determine whether investment in water safety could be sustained by other teams or functions within ACC, for example ACC’s Board or External Engagement.	Initial indications from External Engagement are that WSNZ sponsorship does not fit with its strategy or budget.  ACC Board view has not been scoped at this time.	WSNZ needs confirmed ACC investment level by 12 December 2025, to inform budgeting and sector funding allocation process.

The baseline review, new measurement and benefits framework and developing Investment Framework all support IP’s recommended exit. The recommendation is further supported by the Minister’s position in ACC’s Service Agreement: *‘We can only undertake an injury prevention activity if it is likely to result in a cost-effective reduction in actual or projected levy rates or the Non-Earners’ appropriation. This means that we focus our efforts on injuries that have the greatest impacts on the Scheme, such as high-cost and high-volume claims that affect claim costs.’* 2

**ACC Investment**

IP has invested ~\$20M into WSNZ and water safety programmes over the past 20+ years including most recently \$825,000 for 9 months of FY26. Historically this investment has not returned any claim savings and is not expected to in the foreseeable future. This investment is in addition to, and alongside other support ACC provides for water safety in general by way of Preventable programme activity with various water safety sector partners including but not limited to WSNZ.



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In November 2024, the Head of IP approved a 9-month extension to the WSNZ partnership investment for FY26: *‘The purpose of the investment is to continue supporting WSNZ to address drowning as a key issue in Aotearoa, while ACC determines how to account for and manage any future water safety investment’*<sup>3</sup>. From 1 July 2025, ACC entered into a contract with WSNZ for this extension, pro-rated at current levels (\$825,000)

ACC’s FY26 investment in WSNZ is allocated as follows:

- \$412,500 for WSNZ sector leadership, advocacy and co-ordination.
- \$225,000 for the programme delivery of Water Skills for Life (WSFL) in high deprivation communities for 5-13 year olds. This takes a long-term strategic approach to addressing future adult drowning.
- \$187,500 for the programme delivery of Kia Maanu, Kia Ora (KMKO) kaupapa Māori water safety, with a focus on adults in high-risk activities (e.g. kai gathering) to intervene where the current highest proportion of drowning occurs.

### Future Options Considered

Due diligence has been done on investment options within the following categories:

- Sustain the current WSNZ partnership
- Cease all investment
- Change how we invest in current programmes
- New approaches.

For a full list of options considered, see Appendix 2. Of the options, the three most viable options are presented below with **Option 2 (cease all investment in the WSNZ partnership)** recommended:

#### Three Key Options - Benefits and Risks

	Options and Costs	Benefits	Risks
1	<p><b>Sustain the current WSNZ partnership</b></p> <ul style="list-style-type: none"> <li>• <b>Continue to invest at current level of \$1.1M PA</b> to sustain investment in WSNZ and programme</li> </ul>	<p>May enable ACC and WSNZ to determine whether an apparent reduction in young people drowning can be attributed to Water Skills for Life delivery for the past 10 years.</p>	<p>ACC sustains a negative ROI and can’t confidently address questions relating to legislative compliance or value for money. ROI impact: - Sport ROI shifts from \$1.80 to \$1.77</p>



	<p>investment in Water Skills for Life and Kia Maanu, Kia Ora (Kaupapa Māori water safety)</p> <ul style="list-style-type: none"> <li>Continued <i>Preventable/</i> Have a Hmm messaging</li> </ul> <p>Total \$2,475,000 excl. share of IP resourcing (overheads) and <i>Preventable</i> costs of ~\$200-\$300K PA.</p>	<p>Supports longer-term solution of Water Skills for Life to equip young people with skills to enable safe aquatic participation throughout life course, while also supporting Kia Maanu, Kia Ora to address current adult and Māori drowning.</p>	<p>- Targeted ROI from \$2.08 to \$2.07</p> <p>Option does not meet requirements of Section 263 or IP investment framework.</p> <p>Uses scarce IP FTE which compromises IP’s ability to scale/ scope new opportunities, with FTE focused on WSNZ partnership with no ROI/ claims benefit.</p> <p>Investment in water safety is used as an example to suggest ACC has an inappropriate/ weak approach to how it uses public funds. Insufficient programme reach to achieve scale of impact in a highly dispersed drowning problem.</p>
2	<p><b>Cease all investment in the WSNZ partnership. (RECOMMENDED)</b></p> <ul style="list-style-type: none"> <li>Exit of IP partnership and cease all investment in WSNZ and programme investment in Water Skills for Life and Kia Maanu, Kia Ora (Kaupapa Māori water safety) programmes with effect from 1 April 2026.</li> <li>Continued <i>Preventable/</i> Have a Hmm messaging</li> </ul> <p>\$0 excl. <i>Preventable</i> costs of ~\$200-\$300K PA.</p>	<p>Reduces IP spend in an area that provides no current or likely future ROI/ claims benefit.</p> <p>(no change to IP’s aggregate ROI as \$0.00 currently included for water safety).</p> <p>Mitigates risk of ACC being asked to explain the merit of investment into water safety to the Minister and/ or Select Committee.</p> <p><i>Preventable</i> enables ACC to continue supporting water safety without material investment or resources.</p>	<p>Likely high media interest (public and Board expectation of ACC involvement) however planned communications could support this.</p>
3	<p><b>Change how we invest</b></p>	<p>Recognises the political nature of a full ACC exit,</p>	<p>ACC sustains a negative ROI and can’t confidently address</p>



	<ul style="list-style-type: none"> <li>• <b>Reduce investment to ~\$500,000 PA</b>, to sustain some investment in WSNZ and change programme investment to a more targeted approach.</li> <li>• 10 hot spot community planning and implementation involving Regional IP reps.</li> <li>• <i>Focused Preventable/</i> Have a Hmm messaging around 10 hot spots.</li> <li>• Advocacy with WSNZ to Ministry of Transport for lifejacket legislation.</li> </ul> <p>Total ~\$1M excl. share of IP resourcing (overheads), Regional IP staff time, <i>Preventable</i> costs of ~\$200-\$300K PA and Policy team costs.</p>	<p>offering a way to retain some involvement in water safety in a more targeted way.</p> <p>Targets investment on current adult drowning toll and higher current claim group.</p> <p>Makes use of other IP resources to add to WSNZ impact, without any additional direct impact on ROI for water safety investment.</p>	<p>questions relating to legislative compliance or value for money. ROI impact:</p> <ul style="list-style-type: none"> <li>- Sport ROI shifts from \$1.80 to \$1.78</li> <li>- Targeted ROI shifts from \$2.08 to \$2.07</li> </ul> <p>Option does not meet requirements of Section 263 or IP investment framework.</p> <p>Uses scarce IP FTE which compromises IP’s ability to scale/ scope new opportunities, with FTE focused on WSNZ partnership with no ROI/ claims benefit.</p> <p>Investment in water safety is used as an example to suggest ACC has an inappropriate/ weak approach to how it uses public funds.</p> <p>Investment amount is insufficient to achieve any claim impact.</p>
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### Recommendations

1.1	<p><b>Notes</b> that it is recommended that IPGG endorses the Acting Head of IP to approve <b>Option 2 - Exit of IP partnership and cease all investment in WSNZ.</b></p>	<b>Noted</b>
1.2	<p><b>Notes</b> that the current interventions and activities historically supported by ACC lack sufficient scale or impact to achieve a saving to the levy payer and meet Injury Prevention’s investment requirements.</p>	
1.3	<p><b>Notes</b> that Sport NZ (as the other government party to the WSNZ contract) has confirmed a 3-year investment in WSNZ from 1 July 2025.</p>	



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1.4	<b>Notes</b> that <i>Preventable</i> campaign activations will continue to take place in partnership with WSNZ and other sector stakeholders regardless of which option is endorsed.	<b>Noted</b>
1.5	<b>Notes</b> that the ACC Finance, Actuarial, Performance and Intelligence, External Engagement, Risk, Preventable and Regional IP teams have been consulted on this paper.	
1.6	<b>Notes</b> that the approved decision will be communicated to the CEO, ACC Board and Minister in September, to support a confirmed shared ACC decision on any future WSNZ investment to be shared with WSNZ by 12 December 2025.	
1.7	<b>Notes</b> that IP will work with the ACC Risk Team to develop a risk mitigation plan to manage any risks once a decision has been made.	

#### For Injury Prevention Governance Group:

1.8	<b>Endorse Option 2 - Exit of IP partnership and cease all investment in WSNZ.</b>	<b>Endorse</b>
<b>OR</b>		
1.9	<b>Endorse</b> the approval of an alternative option from the 3 options outlined or from the full list of options in Appendix 2. Please specify option in options paper when signing.	<b>Endorse</b>

#### Financial description

Investments will be drawn from annual operational budget from Cost Centre 556.

#### Benefits & Risks

A summary of benefits and risks associated with each of the 8 options considered is contained in Appendix 2 in the full options table.



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## Consultation

The ACC Finance, Actuarial, Performance and Intelligence, External Engagement, Risk, *Preventable* and Regional IP teams have been consulted on this paper.

## Endorsement

[Out of Scope]

12/08/2025

[Out of Scope] **Acting Head of Injury Prevention**

Date Signed

I have reviewed this recommendation and the [Conflict of Interest Policy](#), and confirm that I do not have an actual, potential or perceived conflict of interest that prevents me from endorsing it.

Note: If you cannot tick this box due to a conflict of interest, please complete a [Conflict of Interest Form](#)

## Approval

[Out of Scope], **Deputy Chief Executive - Chair, Injury Prevention Governance Group**

Date Signed

I have reviewed this recommendation and the [Conflict of Interest Policy](#), and confirm that I do not have an actual, potential or perceived conflict of interest that prevents me from endorsing it.

Note: If you cannot tick this box due to a conflict of interest, please complete a [Conflict of Interest Form](#)



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## Appendix A: Options Paper - Water Safety NZ Partnership

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## Memorandum

To	[Out of Scope]
From	[Out of Scope]
Date	14/02/2025
Subject	Future funding options for Ngā Tini Whetū

### Purpose

This paper outlines future funding options for Ngā Tini Whetū as ACC has been asked to contribute a further three years' funding from July 2025.

### Background

Ngā Tini Whetū is a whānau-centred early years support programme that aims to improve whānau wellbeing by testing a new model of care based on a kaupapa Māori commissioning model, overseen by Te Puni Kōkiri (TPK). Ngā Tini Whetū is a targeted approach to achieving outcomes for whānau which are important to multiple government agencies and portfolios, while maintaining a whānau-driven, locally led approach to implementation. ACC contributed \$10.45 million in 2020 to fund an initial 2-year prototype and has provided a total of \$22 million overall.

The initiative was paused in June 2022 due to a funding shortfall of \$7.95 million after Oranga Tamariki withdrew. It was re-launched in 2023 with \$64.057 million allocated to TPK over four years through Budget 2023. ACC approved further investment of \$5.2 million for each of FY23/24 and FY24/25 subject to improved engagement, agreed mutual outcomes, and a clear measurement and evaluation framework.

### Impact of the initiative

Te Pou Matakana hold the contract for Ngā Tini Whetū. The cohort of 518 whānau onboarded by 30 June 2024 includes 1125 individuals directly participating in Ngā Tini Whetū and a total of 2166 individuals living in the same whare. The overwhelming focus for whānau has been improving their standards of living, which supports both injury prevention through He Kāinga Haumaruru and material wellbeing outcomes such as warm, dry housing. This includes:

- Safer transport and vehicles;
- Whare repairs and maintenance; and
- Whare essentials including basic household items and resources for pēpi and tamariki safety.

We receive regular reporting from Te Pou Matakana and they have met their reporting requirements to TPK. An overview of outcomes is appended.

While activity is underway, it is not clear that this is flowing onto claims saved. ACC has not been able to secure the necessary information from Te Matakana Pou to determine the impact on claims and conduct an ROI, which makes it difficult to make funding decisions. While we are still pursuing this option, the high cost of the programme and the funding already provided make achieving a positive return unlikely.

As the programme is being tested, it is included in our ‘Design’ stream and not affecting the service level agreement. However, because it is now being implemented, it will come into the general pot and need to be counted in our service level agreement target. This means we need to be confident the programme is having an impact. The new Benefits and Monitoring framework (due June 2025) may support a business case if we can consider wider benefits in addition to the ROI.

In addition, IP non-committed funding for 25/26 is approximately \$35 m. This contract will take up a large proportion of that funding.

Options for funding Ngā Tini Whetū from July 2025

Options	Comments
<b>Continue</b> injury prevention investment	Will take a portion of IP non-committed funding with any gains received in the long term. The more funding we provide, the higher ROI must be to cover the entire contract. The programme will start to affect our ROI service level agreement measure.
<b>Continue</b> investment as ACC, not as injury prevention	ACC would continue to partner with TPK, recognising the positive outcomes from NTW (which also addresses rehabilitation) and the value of multi-agency approaches to improve whānau outcomes. However, continued funding could not come from IP funding, which requires an ROI.
<b>Discontinue</b> investment but extend funding until December 2025 or July 2026 to support transition.	Under this option, we would provide 6 – 12 months additional funding before ceasing our relationship. TPK has advised that delivery to whānau would continue with TPK funding only. ACC’s MOU with TPK continues until June 2026 although the current funding agreement ends in June 2025. Ngā Tini Whetu is in design and would move to exit which would not affect ACC’s Service Agreement ROI. The overall ROI would reduce from \$1.447 to \$1.431.

Outcomes from most recent reporting from Te Pou Matakana:

# Te Ika-a-Māui: He Kāinga Haumarū Data Overview



100%

of Whānau were assessed in preparation for whare health & safety plans



84%

of Whānau Identified Hazards, within their whare.



82%

of Whānau reported they improved their knowledge regarding safety in their whare

He Kāinga Haumarū is premised by tikanga and kawa of the marae. The processes and protocols set are to keep the home people and manuhiri (guests) safe. Whānau will be guided by Kaiārahi to identify unsafe hazards around their whare with a particular focus on Tamariki. He Kāinga Haumarū is an engagement tool for Kaiārahi offering a kaupapa-Māori perspective for injury prevention. It supports whānau to identify health and safety hazards, and more importantly helps them to develop a safety plan for their whare.

- Whānau:** Use the He Kāinga Haumarū tool to help whānau identify health and safety hazards in the whare.
- Kaiārahi:** Support whānau to develop a plan for fixing the hazards they have identified or reducing the risk of harm.
- Whānau and Kaiārahi:** Develop a safety plan for the whare.
- Kaiārahi:** Support whānau to complete the ten outcome questions in the Ngā Tini Whetū Reporting Workbook:

1. Have whānau identified hazards within the whare?
2. If yes, where in the whare are the hazards?
3. Have whānau identified solutions for each of the hazards?
4. Have whānau been able to make improvements to the hazards they identified?
5. If yes, how have whānau been supported?
6. Have whānau put together a whānau safety plan?
7. Does the whānau plan include safety measures for tamariki and Pēpi?
8. Do whānau have long-term goals for whānau safety at home?
9. Are whānau looking for further training on Whānau Safety in the whare?
10. Have whānau demonstrated an increased understanding for whānau safety at home?



Rental property

47%



PapaKāinga housing

14%



Owner-occupied

13%



Social/Emergency

14%

## Hazards in the whare

this graph represents the areas in and around the whare, whānau have identified hazards that put Pēpi and Whānau in unsafe and unhealthy living conditions.



## He Kāinga Haumarū Key Results

**2166**

Total Number of People Living With Whānau

**4**

Average of Individuals per Whānau

**Where Whānau Live**

**44%**  
Urban

**29%**  
Suburban

**20%**  
Rural

- Whānau Safety Plan **62%**
- Whānau Safety Plan Includes Tamariki & Pēpi Measures **66%**
- Whānau have long term goals for whānau safety in their whare **75%**
- Increased Understanding of Whare Safety **79%**
- Whānau Want Whare Safety Training **71%**

As a result of He Kāinga Haumarū assessments, 84% of whānau were able to identify immediate solutions and obtain support for remediation at the time of reporting. This support was accessed through advocacy with landlords and social housing providers (primarily Kāinga Ora), sourcing trades and repair specialists, and utilizing whānau and community connections to create safer and more comfortable living conditions for pēpi and whānau. However, whānau living in rural, flood, and cyclone-affected areas reported difficulties in accessing tradespeople and building materials, which compromised remedial efforts.