

Integrity Services

Decisions on proposed change

SENSITIVE INTERNAL

EMBARGOED Until

5pm 15 Aug 2018

Thanks for your feedback



Thank you to everyone who took the time to provide feedback on the proposal. We acknowledge that this is a challenging and impactful time, and want to thank your for your perseverance and your considered input.

We received 65 submissions representing the views of over 80 people.

There was a lot of positive support for the proposed model, structure and process particularly the ability to address the root causes of issues and influence more broadly and consistently.

Based on initial feedback we re-consulted with Integrity Services with the alternative proposal focused around a stronger alignment to key future customers in Christchurch than Dunedin. This process has now concluded and feedback has been reviewed and considered.

A number of changes, enhancements and alternatives were suggested to the proposal. These have been thoroughly considered and have resulted in some changes.

A number of submissions posed suggestions for how we can ensure we are successful in our transition. These are appreciated and useful and will be incorporated in our next level of planning.

This presentation:

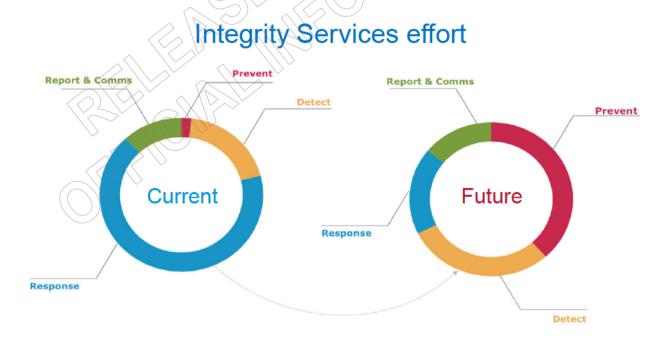
- 1. Summarises the key feedback themes and our response
- 2. Confirms the model and structure we believe best sets us up to deliver in the future
- 3. Explains how the confirmed changes impact your current position and your team
- 4. Advises the selection process and timeframes
- Will be published on the Sauce along with the confirmed position descriptions and expression of interest (EOI) template





We aim to:

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







In reviewing your feedback we were guided by a few key change themes.

These themes are as follows:

Location:

- Proximity to key leadership & design functions
- Ability to service all our customer needs (branch network, provider, clinical, business customer)
- Influencing & advising ensuring our input is proactive, strategic and advisory wherever possible

Practice Leadership:

- Investing in new and emerging practices of Risk Advisory and Engagement (Prevention)
- Adapting our Response practice
- Dedicated practice leadership

Practice Development:

- Co-located teams to develop and refine practices
- Dedicated Team Managers to ensure consistency, develop staff and manage resourcing across practices





A full summary of key themes and associated responses are included in Appendix 2 however the following indicates some of the key responses at a high level:

Location:

- Initial proposal Auckland, Hamilton, Wellington and Dunedin
- Initial feedback prompted a re-consultation for our South Island location
- Not feasible for us to have an adequate presence in both Dunedin and Christchurch and ensure the required quality, consistency and practice development
- Christchurch favoured due to proximity to key future state customers, access to South Island branches and ability to source externally if required
- Confirmed locations are Auckland, Hamilton, Wellington and Christchurch

Positions:

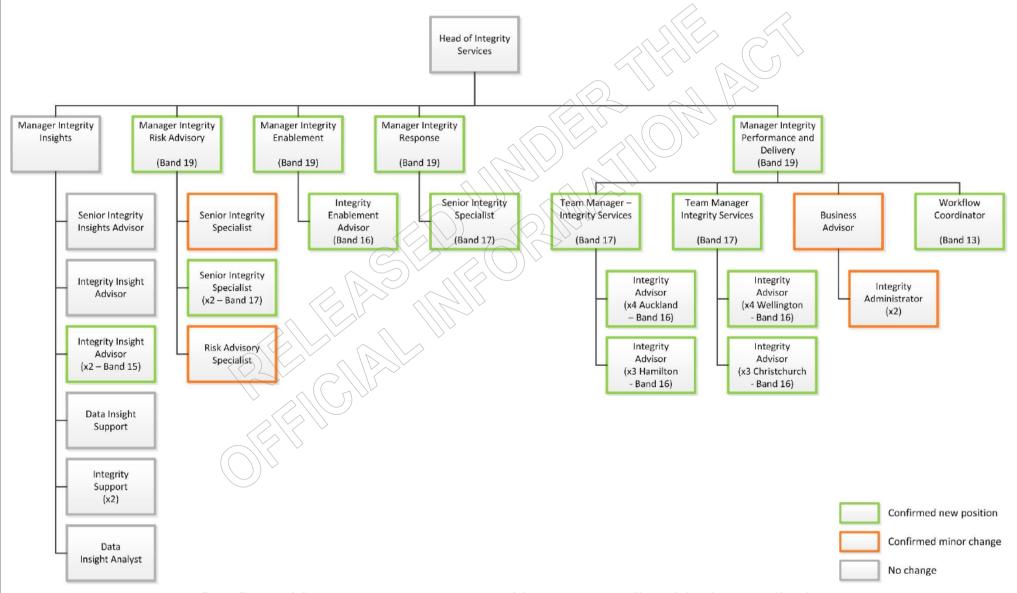
 Based on feedback Manager Integrity Enablement and Manager Integrity Response positions have been re-evaluated and confirmed at Band 19

Structure:

 Proposed structure, with the exception of the changes above confirmed with minor changes to position descriptions

Confirmed Integrity Services structure





Confirmed impacts to current positions are outlined in Appendix 1





Confirmed new positions (27 positions):

- Integrity Insight Advisor x2
- Integrity Risk Advisory Manager
- Integrity Enablement Manager
- Integrity Response Manager
- Senior Integrity Specialist x3

- Integrity Enablement Advisor
- Integrity Performance and Delivery Manager
- Team Manager Integrity Services x2
- Workflow Coordinator
- Integrity Advisor x14

Confirmed locations for affected roles:

Auckland	Hamilton	Weilington	Christchurch
Integrity Advisor (x4)	Integrity Advisor (x3)	 Integrity Insight Advisor (x2) Integrity Enablement Manager Integrity Enablement Advisor Integrity Performance and Delivery Manager Integrity Advisor (x4) 	Integrity Advisor (x3)
 Team Manager - Integrity Services (x1) Auckland or Hamilton 		 Team Manager - Integrity Services (x1) Wellington or Christchurch 	
Integrity Risk Advisory Manager Integrity Response Manager Senior Integrity Specialist (x3) Workflow Coordinator Auckland or Hamilton or Wellington or Christchurch			

Changes from proposal



- 3x permanent Integrity Advisors located in Christchurch instead of Dunedin
- Manager Integrity Response and Manager Integrity Enablement confirmed at Band 19
- Numerous minor position description amendments

Transition

As outlined in the proposal we are looking to move to providing strong, practice driven systemic input and advice across all key customers in the future.

As highlighted throughout consultation new ways of thinking and working will be key to our success along with a well planned transition to the new structure.

Detailed transition planning will consider elements such as work and knowledge transition, process, physical logistics, communications, training and induction, support and scheduling, and our people support plan.

A core team have started high level planning options for transition. However, for transition to be successful we will be looking for our people to contribute to transition and we acknowledge the importance of the practice lead roles to develop detailed plans for each component. We will provide further details as these become available.

If you have any additional ideas or suggestions for transition please send these through to IntegrityServicesConsultation@acc.co.nz.

Confirmed selection process



EOI

(15 - 22 Aug)

Review and Assessment

(Indicatively 21 Aug – 14 Sep 18)

Offers and Feedback
(Indicatively by 21 Sep 18)

- All employees whose substantive positions are to be disestablished need to complete an EOI form indicating their preference for available positions along with some supporting rationale against the confirmed selection criteria or confirmation they do not want to express interest. Those currently in ACC's redeployment pool will also be eligible to be considered for available positions at the same time.
- Anyone wishing to express interest in new positions will need to complete the EOI process for these positions by 5pm 22 August.
- Further information may be requested for shortlisting purposes. Shortlisted employees will then be interviewed by a panel including the Head of Integrity
 Services and General Counsel for management positions and representatives of the Integrity Services Leadership team for non-management positions and asked to complete a short scenario exercise.
 Selection will be based on those best able to demonstrate they meet the proposed selection criteria as per the ratings outlined below. These criteria are outlined in Appendix 3. Reference checking will be utilised if required.
- Verbal and written
 offers for successful
 candidates, and
 feedback for
 unsuccessful
 candidates, will be
 provided as soon as
 practicable after
 selection decisions
 are made.
- Any remaining vacancies would then be advertised internally and externally.

Note: The indicative date for implementation of the new structure will be 5 November 2018

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



Support

We acknowledge and understand that for many people this decision represents a significant change and may be an unsettling time for you as you work through the EOI process and make an informed decision on your future.

Online Resources

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



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



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





We acknowledge and understand that for many people this decision represents a significant change and may be an unsettling time for you as you work through the EOI process and make an informed decision on your future.

Support with EOI

- We have developed a user guide to give you step by step instructions for using the EOI spreadsheet
- Here is a <u>tips and tricks document</u> that will guide you on how to answer EOI selection criteria and structure your responses.

EOI Outcome

- If you have participated in the EOI process, the outcome will be discussed with you individually. This includes if you are being offered a position in the new structure, or if you have been unsuccessful and the next steps.
- Detailed in formation on potential outcomes of the EOI process can be found here

Career Transition Support

- If your position has been impacted and you haven't been successful through the EOI process, we have partnered with Career Partners International to offer you a tailored programme of support.
- Included in your Outcome of EOI letter, we will confirm the package of support available to you, and a career coach will make direct contact with you.
- For more information on Career Transition Support please read this page.



Appendix 1 – Confirmed impacts of proposal

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



Appendix 1 – Confirmed impacts of proposal

Confirmed Impact	FTE	Position	Indicative Banding
New	2	Integrity Insight Advisor	Band 15
Positions	1	Manager Integrity Risk Advisory	Band 19
	1	Manager Integrity Enablement	Band 19
	1	Manager Integrity Response	Band 19
	3	Senior Integrity Specialist	Band 17
	1	Integrity Enablement Advisor	Band 16
	1	Manager Integrity Performance and Delivery	Band 19
	2	Team Manager – Integrity Services	Band 17
	1	Workflow Coordinator	Band 13
	14	Integrity Advisor (4x Auckland, 3x Hamilton, 4x Wellington, 3x Christchurch)	Band 16
Total	27		

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





Below are the key themes and associated responses

Support

- Alignment between structure and desired benefits
- · Ability to improve integrity maturity across ACC
- · Focus on education and prevention
- Increased emphasis on risk advisory practice
- · Ability to deepen and extent reach
- · Setting Integrity Services up to adapt with future customer changes
- Good balance between proactivity and responsiveness

- Flexibility in the model and structure
- Ability to address root cause of issues
- Shift in focus from regional to national
- Benefits of establishing hubs aligned to key customers.
- Increase in consistency
- Enhanced career paths and greater ability to share knowledge
- Enhanced Integrity Services brand
- Make Integrity Services more accessible

Structure

- Advisors in the future will be involved in risk advisory. Suggestion that Integrity Advisors are education/enablement as well as response activity. We believe the best better aligned under the Manager way to balance these needs and affect the change in ways of working Integrity Response required is to have the Integrity Advisors aligned under dedicated team managers reporting to the Manager Integrity Performance and Delivery
 - We believe we can achieve the same outcomes through utilising the capacity of the delivery teams in conjunction with the insights team and believe that a number of lower level interventions will be able to be automated in the future, or will be performed by frontline personnel
 - The response practice will have access to Integrity Advisors on a needs basis

- Suggestion to establish a triage team under Manager Integrity Insights including planning and completion of low-level interventions
- Moving two Integrity Advisors under Manager Integrity Response





Christchurch

- Need for continued alignment for large branch around investigations
- Christchurch a 'Centre of Excellence'
- · Accommodation concerns in Dunedin
- Larger Provider Engagement and Performance and Business Customer Solutions presence
- Ability to recruit externally and ease of access to South Island Sites
- Dunedin being predominately Client based where leadership and design is driven centrally from Wellington

Dunedin

- Highlighting the extensive and broad operational groups in Dunedin
- Suggestion that the South Island locations should have a split presence between Christchurch and Dunedin



- The feedback in this space especially with customers shows a strong need to reposition Integrity Services and ensure equitable and consistent service throughout the country, shifting to more strategic influencing and advising. Note that when required, formal investigations will always be led by Integrity Services.
- This is purely from a technology and ways for working perspective so is not something that informed the subsequent proposed presence in Christchurch
- Acknowledged however not a major contributing factor to preferred location
- We acknowledge these are key customers in the future hence an alternative proposal was released for further feedback. Acknowledged that these customers indicated a preference for Christchurch
- This feedback was acknowledged and part of the rationale for the subsequent proposal
- We tested this with the Head of Client Service Delivery who confirmed that Client Service Delivery could be effectively supported with a presence in either Dunedin or Christchurch therefore this formed part of the alternative proposal
- A substantive presence in both Christchurch and Dunedin is not feasible
- As per the original proposal there are definitely merits of co-location with customers in Dunedin however we believe that the strong client presence can be effectively influenced and supported under the proposal model of operational support from Christchurch and strategic and system influence from Wellington (with the support of other hubs). We see significant benefits of having a team of a minimum of three in each location and this has been supported by numerous pieces of feedback
- As a result we are confirming that Christchurch rather than Dunedin will be the Integrity Services location going forward









Tauranga

 A number of areas were highlighted for consideration including growth in the region, current performance, potential precedents, property constraints in other areas and suggested alternative servicing models



 A number of areas were highlighted including specific differences and requirements in the area, travel distances, current performance and proposal for a hub and spoke model

Auckland

 Travel and property considerations were highlighted with preferences for consolidated location on Newmarket, Northshore or transition to Newmarket over time

General

- · Ability to be able to work virtually
- · Cost and travel considerations
- Need for local representation
- Challenges around housing in large cities

Workflow Coordinator

Could this be located in any of the preferred locations?

Locations

- We have considered the information provided and while valid points highlighted
 we do not see a strong rationale for a continued presence in Tauranga given
 that is is primarily a branch servicing local needs. Consistent with feedback and
 response to Christchurch branch servicing, we see a need to proactively
 manage and reset expectations in Tauranga to ensure that Integrity Services
 efforts shift to more strategic influencing and advising frontline personnel, as this
 will enable a more effective, proactive and consistent service throughout the
 country
- We have considered the information provided and note particular points
 regarding responding to specific needs, however do not see a strong rationale
 for a continued presence in Whangarei. We see significant benefits of having a
 team of a minimum of three in each location and this has been supported by
 numerous pieces of feedback, and plan to meet local investigation-related
 needs via the co-source panel and Advisor teams
- Newmarket is preferred location for Auckland however as per property constraints the consolidated move there will need to happen over time

- Acknowledged. Risk Advisory & Education/Awareness forms an important part
 of our work going forward, and we feel that co-located hubs will best support
 these emerging practices. We recognise the need for regular, proactive and
 planned face to face time in all ACC branches and the travel time required to do
 this effectively
- We believe that while a preference for this position being in Wellington we will consider suitable candidates from other preferred locations also







- Suggestion of more resources under Manager Integrity Response
- Question around potential blend of permanent and fixed term resource
- Question around effect on contractor resource
- Suggestion that more resources should be in Auckland

- Concern around less investigation work leading to challenges and negative impact
- Specific concern where there are currently strong branch relationships
- Risks around short term ROI
- Risk around the loss of long serving staff/Intellectual Property
- Trust and confidence in the regions may drop
- Concern around ability to leverage and influence at more senior levels

Resourcing

- The response practice will have access to Integrity Advisors on a needs basis, along with Risk Advisory and Education and Enablement
- We believe we can deliver what we need to and make the required shift with the proposed level of resourcing.
- There will always be a need for contingent resource however we believe that having more flexibility in the structure in the future will help to mitigate that, in addition to careful deployment of resources available under co-source panel
- We believe that Auckland can be adequately serviced through a virtual team model and through the use of co-source panel resource to meet contingent demand

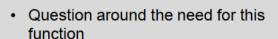
Risk/Customer Impact

- We don't believe this to be the case and believe thorough development and socialisation of the model, service options standards will help to mitigate any misconceptions. Response is still a key part of the new model and investigations (when necessary) will be managed by Integrity Services
- This will require repositioning and concerted effort to change behaviours so that Integrity Services impact is optimised and consistent across the whole country rather than particularly strong support in a few key cities
- This is acknowledged however we believe more prevention activity will produce greater value in the long term
- This risk is acknowledged and will be assessed along the process with appropriate interventions put in place when and if required
- This will have to be proactively managed however we believe the perception of this is likely to be higher than the reality
- Although this may be a challenge we believe this is an important step. Our approach is supported by ACC leadership, and we will ensure the appropriate stakeholder engagement to enable this





- Question of the feasibility of attracting the skillset for the position and that more could be provided in this space from Communications and Engagement
- The importance of this function to the overall model was highlighted as well as the new ways of working required



 The importance of this function to the overall model was highlighted as well as the new ways of working required

- Concerns around large scope and conflicting priorities of the position – converse opinions also
- Suggestion to align performance and support functions with Enablement

Manager Enablement

- We socialised the proposed position with Communications and Engagement and they were supportive. We do work with them currently in this space however they are more of an enabling function rather than delivery. We see investment in this space as critical to prevention and believe that although an emerging discipline there are people with these skills on the market
- As planned this position was re-evaluated in light of feedback and has been confirmed at a Band 19

Manager Response

- Response must adapt as efforts are rebalanced with Prevention activity. We must retain an effective response capability, including formal investigations and prosecutions where necessary and this position will enable the required shift, including specific responsibility for managing co-source panel assignments
- As planned this position was re-evaluated in light of feedback and has been confirmed at a Band 19

Manager Performance and Delivery

- We believe the scope of this position is feasible given the support of the Business Advisor, Workflow Coordinator and Team Managers having operational responsibility for the teams
- As above and we see a specific focus on Enablement at the leadership team level as important to the long terms success of the model







 Suggestion that this is the same as the current investigator position

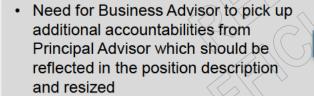


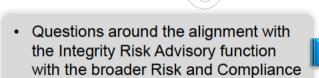
Integrity Advisor

We see the skills and focus areas required as well as ways of working being significantly different to that of the current investigator positions

Workflow/Admin

- Position Descriptions have been updated to provide more clarity. The
 administrators are currently focused around individual case setup,
 maintenance and closure whereas the coordinator will be more focused on
 forward planning activity balancing competing demands. The functions are
 complimentary
- The coordinator will work closely with the Team Managers however given this is critical to the success of model we see benefit in having a key supporting role for the management in this space
- Need for close working relationship between coordinator and administrators with the suggestion of similar reporting lines for both
- Question as to why this isn't just a Team Manager accountability





function



 The Position Description has been updated accordingly and reassessed by Remuneration with no change to the indicative banding of Band 16

Alignment

 Integrity Services will focus on integrity risk (fraud, waste and abuse) providing subject matter expertise and advice on integrity matters. This fits within and will complement the existing operational risk function







Selection

- Suggestion that ACC experience be included as a criteria
- Suggestion that the change should be re-scoped to just be the leadership level who would then help design a further proposal around the team level positions.



- We know that all Investigators have specific ACC knowledge and experience and that all staff eligible to express interest have ACC experience, therefore we do not believe it is necessary to add this as an EOI selection criteria
- Although some of the practices are new and emerging, we believe the full structure needs to be agreed and implemented at the same time to enable the required focus and flexibility to further define and move to the new model

Transition

 A number of points have been made around transition including: importance of strong implementation, strong engagement, enabling processes and tools, internal integrity



Thèse points have been noted and will be revisited during transition planning

Position Descriptions

 A number of suggestions were made around minor changes to draft position descriptions



 These have all been reviewed and incorporated in final confirmed position descriptions where relevant



Appendix 3 – Confirmed selection criteria

New Position	Selection Criteria		
Manager Integrity Risk Advisory	 Extensive and proven knowledge and capability in integrity risk management and prevention, in particular relating to leadership of best practice initiatives to manage fraud, waste and abuse risks Ability to rapidly and effectively identify key business and organisational drivers Ability to interpret data to gain actionable insights including the identification of key risk indicators and trends ACC Behaviours and Leadership Capabilities 		
Manager Integrity Response	 Extensive and proven knowledge and capability in integrity response management, in particular relating to leadership of best practice initiatives to manage incidence of fraud, waste and abuse Ability to rapidly and effectively identify key business and organisational drivers Ability to manage third party vendor activity and budget, optimising the utilisation of internal personnel and cosource partner capacity ACC Behaviours and Leadership Capabilities 		
Manager Integrity Performance and Delivery	 Proven leadership experience at a senior level providing exceptional customer service delivered in large and complex environments Proven delivery experience in programme and project management Experience in strategy and policy development and implementation Demonstrated financial management skills and experience in budget management and control ACC Behaviours and Leadership Capabilities 		
Manager Integrity Enablement	 Extensive and proven knowledge and capability in leading behavioural change initiatives, positively influencing behaviours and mindsets Proven delivery experience in programme and project management Ability to rapidly and effectively develop and communicate initiatives (internally and externally) to support key business and organisational drivers ACC Behaviours and Leadership Capabilities 		



Appendix 3 – Confirmed selection criteria

New Position	Selection Criteria
Team Manager – Integrity Services	 Ability to embed a culture of high performance and capability development Ability to engage effectively and drive pragmatic solutions for mutual gain Ability to drive operational teams to achieve ambitious results through team work Ability to drive improvement Experience in leading through change ACC Behaviours and Leadership Capabilities
Integrity Enablement Advisor	 Knowledge and capability in the development of materials supporting behavioural change initiatives, in particular relating to best practice initiatives to manage fraud, waste and abuse risks Proven experience of delivering change and strategic communication initiatives in complex environment Experience in designing, developing, facilitating and managing both external and internal communications and relationships to achieve positive outcomes ACC Behaviours
Workflow Coordinator	 Experience in an administrative or customer service role in a complex and dynamic environment Ability to plan, coordinate and report on workload and workflow allocation Ability to effectively support the design, maintenance and management technology tools and operational processes to enable effective workload management Ability to influence and resolve issues constructively High degree of attention to detail ACC Behaviours
Integrity Insight Advisor	 Proven expertise in integrity risk management, in particular in identifying and analysing trends and associated root cause identification Experience in risk management, including identification and articulation of systemic risks and organisational control weaknesses. Ability to design and manage information collection processes and information management systems used within an integrity risk environment ACC Behaviours



Appendix 3 – Confirmed selection criteria

New Position	Selection Criteria
Integrity Advisor	 Experience in integrity risk management disciplines of prevention, detection and response Identification and articulation of systemic risks and organisational control weaknesses Ability to effectively plan and manage varied workloads to meet service levels and desired outcomes Ability to focus on business needs, issues and results, and strong business acumen Ability to effectively advise and influence customers, including coaching and mentoring ACC Behaviours
Senior Integrity Specialist (Forensic and/or complex investigations)	 Proven experience and/or relevant qualification in forensic accounting and/or complex investigations and associated prosecutions Extensive and in-depth experience in integrity risk management disciplines of prevention, detection and response Ability to support practice leaders to embed a culture of high performance and capability development, working effectively in a shared services environment Identification and articulation of systemic risks and organisational control weaknesses Ability to effectively advise and influence customers ACC Behaviours
Senior Integrity Specialist (Employment relations)	 Proven experience and/or relevant qualification in employment relations law and practice Extensive and in-depth experience in integrity risk management disciplines of prevention, detection and response Ability to support practice leaders to embed a culture of high performance and capability development, working effectively in a shared services environment Identification and articulation of systemic risks and organisational control weaknesses Ability to effectively advise and influence customers ACC Behaviours
Senior Integrity Specialist (Risk management)	 Proven experience and/or relevant qualification in risk or audit management Proven experience in process and system design and review practices Extensive and in-depth experience in integrity risk management disciplines of prevention, detection and response Ability to support practice leaders to embed a culture of high performance and capability development, working effectively in a shared services environment Identification and articulation of systemic risks and organisational control weaknesses Ability to effectively advise and influence customers ACC Behaviours