

Toll Holdings Limited Accredited Rehabilitation and Return to Work Program (ARRTW Program)

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Table of Contents

1	Purpose of Document	3
2	Scope	3
2.1	Legislation and Guidelines	3
2.2	Roles and Responsibilities	3
2.3	Obligations – Collection, Use and Disclosure of Personal and Health Information	5
3	Policy and Procedures	6
3.1	Workplace Rehabilitation Policy	6
3.2	Injury Management Standard	6
3.2.1	Injury Management System (IMS)	6
3.2.2	Injury Management Strategic Plan	6
3.3	Early Intervention Program – InitialCare	7
3.4	Employee Assistance Program	7
4	Rehabilitation and Return to Work Program (ARRTW Program)	8
4.1	Referral to the Accredited Rehabilitation and Return to Work Program	8
4.2	Ongoing Participation in the Accredited Rehabilitation and Return to Work Program	9
4.2.1	Common Law Claim	9
5	Elements of the Rehabilitation and Return to Work Program	9
5.1	Initial Needs Assessment	9
5.2	Consultation	10
5.3	Reasonable Support and Services	10
5.4	Rehabilitation and Return to Work Planning	11
5.4.1	Return to Work Goals	11
5.5	Rehabilitation and Return to Work Plan (RRTW Plan)	12
5.5.1	Plan Development	12
5.5.2	Plan Distribution and Acknowledgement	13
5.5.3	Maintenance of the Plan	13
5.6	Suitable Duties Program	13
5.6.1	Development of Suitable Duties Plan	14
5.6.2	Distribution of Suitable Duties Plan	15
5.6.3	Review and Approval of Suitable Duties Plan	15
5.7	Monitoring and Review	15
6	Workplace Rehabilitation Providers	15
7	Grievance Resolution	16
7.1.1	Complaint Management Process	16
7.1.2	Outcome and Documentation	17
8	Measurement and Evaluation	17
8.1.1	Objectives, Targets and Performance Indicators	17
8.1.2	Data and Reporting	17
8.1.3	Worker Satisfaction Surveys	17

8.1.4	Complaint Register	18
8.1.5	Audit Framework.....	18
8.1.6	Education, Training and Competency	18
9	Management Review.....	19
10	Controlled Document Amendment Record History	19

1 Purpose of Document

The purpose of this Accredited Rehabilitation and Return to Work program (ARRTW Program) outlines our approach and overall system, including policies and processes, adopted by Toll Holdings Limited, Queensland in the management of work-related injuries. The program complements Toll's *Injury Management System (IMS)* and outlines our commitment to assist Queensland workers achieve the best possible outcome following a work-related injury.

The document details our commitment and processes to;

- Facilitate early and safe rehabilitation and return to work (RRTW) for our workers,
- Coordinate, develop and maintain Rehabilitation and Return to Work Plans (RRTW Plans) to optimise a workers' return to work outcomes, and
- Provide clear guidance for our workers, people leaders, return to work co-ordinators and Self-Insurance team in the delivery of rehabilitation and return to work, and the separation of function between these parties.

2 Scope

2.1 Legislation and Guidelines

The program is not intended to replace the need for Toll Holdings Limited ('insurer') and Toll Group ('employer') to refer to their legislative obligations in the delivery of rehabilitation activities.

The procedures detailed in this program should always be read in conjunction with the relevant legislation, and performance standards and other guidance material issued by the Workers' Compensation Regulatory Services, including but not limited to;

- Workers' Compensation and Rehabilitation Act 2003
- Workers' Compensation and Rehabilitation Regulation 2014
- Privacy Act 1988
- WCRS, [Queensland Self-Insurance Audit Process](#), July 2021
- WCRS, [Guidelines for Standard of Rehabilitation, 2nd Edition](#), 18 July 2016
- WCRS, [Understanding Rehabilitation and Return to work terms, roles and responsibilities](#), 8 May 2023
- WCRS, [Accredited Rehabilitation and Return to Work program guidelines – for insurers](#), 8 May 2023
- WCRS, [Rehabilitation and Return to Work plan guidelines – for insurers](#), 8 May 2023.

2.2 Roles and Responsibilities

In the delivery of rehabilitation and return to work, there are many different stakeholders who contribute to the overall success of return to work outcomes.

Further information on the specific roles and responsibilities across the Queensland Workers' Compensation scheme can be sourced from the Workers' Compensation Regulator Services publication, [Understanding rehabilitation and return to work terms, roles and responsibilities](#).

Within the delivery of rehabilitation and return to work outcomes across Toll, the key stakeholders' roles and responsibilities include;

Workers	<ul style="list-style-type: none"> • Satisfactorily participate in rehabilitation designed to assist in recovery, including any return to work program, treatment recommendations or suitable duties. • Report any concerns, or matters affecting your recovery to your doctor and appointed Senior Claims Manager as soon as possible.
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	<ul style="list-style-type: none"> • Report any concern or difficulties with any agreed suitable duties being performed to your manager and RRTWC as soon as possible. • Adhere to medical restrictions as outlined by your doctor at all times, both at work and at home. • Ensure you continue to provide medical certification until a full medical clearance is received.
Employer (Toll Group)	<ul style="list-style-type: none"> • Develop and maintain workplace policies and procedures to support position Rehabilitation and Return to work outcomes • Legal responsibility to report all injuries for which compensation may be payable. • Take all reasonable steps to provide rehabilitation for injured workers in order to facilitate early and safe return to work. • Maintain confidentiality and ensure that all information and documents relating to a workers' rehabilitation are used solely for the purpose of supporting a workers' rehabilitation and retained separate from a workers' employment records.
People Leader	<ul style="list-style-type: none"> • Support the worker with the provision of appropriate and meaningful suitable duties in accordance with the workers' skills and abilities. • Ensure the worker is treated respectfully whilst participating in return to work activities and reasonable assistance is provided to the worker to support them during their return to work. • Establish an agreed approach to regularly review progress with the worker (ie. check-in prior to starting shift and/or end of your shift). • Escalate any concern or issue with the discharging a workers' RRTW Plan to the insurer as soon as practicable.
Injury Management Advisor (Rehabilitation and Return to Work Co-ordinator)	<p>Is appointed by Toll, the employer and performs the functions of the Rehabilitation and Return to Work Co-ordinator, including;</p> <ul style="list-style-type: none"> • Initiate early communication with the worker. • Developing, reviewing and monitoring suitable duties program in accordance with medical restrictions. • Liaising with the worker, employer, insurer and doctor (where indicated) throughout the rehabilitation and return to work process. • Ensure information obtained is only used and disclosed for the purpose of return to work. • Escalate any concern or issue with the discharging a workers' RRTW Plan to the insurer as soon as practicable.
Insurer (Toll Holdings Limited)	<p>Toll Holdings Limited is responsible for:</p> <ul style="list-style-type: none"> • developing an Accredited Return to Work Program outlining how it will early and safe Rehabilitation and Return to Work.
Senior Claims Manager	<p>Is employed by Toll Holdings Limited, as the Insurer and is responsible for;</p> <ul style="list-style-type: none"> • determining and managing claim liability • consults with key stakeholders to co-ordinate the development of a Rehabilitation and Return to Work Plan. • facilitating and guiding the Rehabilitation and Return to Work processes whilst maintaining collaborative communication with relevant stakeholders. • approving and paying for reasonable costs associated with treating and rehabilitation.

Treating Doctor	<ul style="list-style-type: none"> Consider the Health Benefits of Good work when considering the workers' capacity for work. Arrange appropriate treatment referral and monitor workers' compliance and treatment outcomes. Providing certification in the completion of a Work Capacity Certificate – Workers' Compensation for all periods of total or partial incapacity and treatment. Provide input regarding suitable duties program as requested. Escalate any concern or issue with the discharging a workers' RRTW Plan to the insurer as soon as practicable.
Treating Health Provider	<ul style="list-style-type: none"> Providing treatment or arranging appropriate treatment referrals and support to an injured worker Providing advice regarding a worker's capacity for work Escalate any concern or issue with the discharging a workers' RRTW Plan to the insurer as soon as practicable. Ensure delivery of treatment in accordance with the Clinical Framework for Health Services
Workplace Rehabilitation Providers	<ul style="list-style-type: none"> Appointed by the Insurer to deliver independent expert opinion and solutions to support delivery of Rehabilitation and Return to work services. Ensure service delivery in accordance with the nationally agreed Principles of Practice for Workplace Rehabilitation Providers.
Workers' Compensation Regulator	<ul style="list-style-type: none"> Responsible for regulating the Queensland workers' compensation scheme under the Workers' Compensation and Rehabilitation Act 2003.
Workers Compensation Regulatory Service (WCRS)	<p>Is the delegate of the Workers' Compensation Regulator and is responsible for the delivery of the 'Regulator' functions;</p> <ul style="list-style-type: none"> Maintains and monitors data for the scheme; Administers the Medical Assessment Tribunals; Provides an independent review of claims decisions by insurers; oversees monitoring and compliance of self-insured employers.

2.3 Obligations – Collection, Use and Disclosure of Personal and Health Information

The Toll Group Privacy Policy outlines the groups obligations on how it manages the collection, use, disclosure and handling of personal data in accordance with [Australian Privacy Principles](#).

Toll is obligated under the Privacy Act 1988, to safeguard the security and privacy of personal information, whether obtained personally, by telephone, mail, email, over the Internet or other electronic medium. This includes an obligation to take reasonable steps to protect the personal and health information we hold from misuse, loss, unauthorised access, modification or disclosure.

The information contained in the development and distribution of the Rehabilitation and Return to Work Plan may include personal and health information.

Toll Holdings Limited considers their obligations in the development of Rehabilitation and Return to Work Plan, and ensures only reasonably necessary information is recorded to fulfil our responsibilities as an insurer, in accordance with s220 of the Workers' Compensation and Rehabilitation Act 2003.

The information contained in the plan is not retained on the workers' personnel record and or used for any purpose relating to the workers' employment.

Date: 21/08/2023 Version: 4.1 Review: 08/2025	Page 5 of 21	Accredited Rehabilitation and Return to Work Program Approved: WCRS September 2023
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The distribution of the developed Rehabilitation and Return to Work plan to relevant parties, including the worker, employer and treating doctor, informs parties of their obligations relating to privacy, and the purpose for which the information detailed in the Rehabilitation and Return to Work Plan is to be used.

The worker is informed of their right to access their personal and health information.

The Toll Group Privacy policy can be found at [The Toll Way-Policies](#) webpage (Intranet Home Page/ The Toll Way / Policies).

3 Policy and Procedures

3.1 Workplace Rehabilitation Policy

Toll Group articulates its commitment to workplace rehabilitation through its Workplace Rehabilitation Policy.

The Workplace Rehabilitation Policy forms the foundation of a framework to drive the desired operating behaviours and enact our Rehabilitation and Return to Work procedures and practices.

Toll Group has an established Workplace Rehabilitation Policy endorsed by the executive leadership team and serves to inform all employee at Toll Group workplaces about the Toll's commitment to workplace rehabilitation, who it applies to and general principles for implementation.

The Workplace Rehabilitation Policy can be found at [The Toll Way-Policies](#) webpage (Intranet Home Page/ The Toll Way / Policies).

3.2 Injury Management Standard

Injury Management, in the Toll context, relates to the rehabilitation, claims management, early intervention and litigation activities that arise out of the respective workers regional compensation jurisdictions.

The Injury Management and Workers' Compensation Standard, as part of the Health, Safety, Environment and Quality Global Management System Standard, serves to support the processes to minimize the impact of workplace injury and illness to impacted employees and focus on injury management activities to assist Toll employee return to pre-injury duties in a timely manner.

3.2.1 Injury Management System (IMS)

Toll's Injury Management System (IMS) details Toll's approach to the management of workplace injury/disease under the provision of the legislation and how business goals and associated legislative and regulatory requirements are met.

The key components of the IMS framework are governance, planning, implementation of initiatives, analysis and reporting and communication. The effective operation of each component is necessary to establish continuous improvement in the way workplace injury and illness is managed within Toll. The ongoing review and evolution of the management system is essential to ensuring that the approach to management of injury continues to meet Toll's business objectives and regulatory and legislative requirements.

3.2.2 Injury Management Strategic Plan

As part of the *Injury Management System (IMS)* an Injury Management Strategic Plan is developed by the Workers Compensation and Injury Management Teams and endorsed by the Global- Head of Health Safety and Environment, incorporating five main priorities:

Date: 21/08/2023 Version: 4.1 Review: 08/2025	Page 6 of 21	Accredited Rehabilitation and Return to Work Program Approved: WCRS September 2023
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- Early intervention processes for our workers
- Improve recovery and return to work process
- Stakeholder engagement
- Claims and benefits
- Improve governance and verify compliance

The plan creates the blueprint for the direction of injury management in Toll. The injury management vision for Toll is:

Reduce the impact of workplace injury to both our employees and the business through improved service delivery, education and analysis

3.3 Early Intervention Program – InitialCare

Toll Group’s Early Intervention Program is designed to make sure that all Toll Group employees who report a work-related injury can receive early advice, medical treatment and a safe transition back to work.

If a worker reports a work-related injury, they will be offered access to Toll Group’s Early Intervention Program; **InitialCare**.

This is a voluntary program, and workers are notified of their right to lodge a claim for compensation. Each worker is provided with information regarding the Early Intervention Program which includes their rights to lodge a claim. A Declaration is signed by the worker detailing their decision to participate in the program, and their right to lodge a claim for compensation, seek treatment for their own nominated doctor and aware of who can be in attendance at any medical review.

InitialCare is a 24/7 telephonic nurse triage service which, if needed, can refer a workers to Injurnet’s network of doctors and physiotherapists.

Injurnet have the largest network of treating practitioners in Australia and the practitioners are independent from Toll. The advantage of using the program’s network of treating practitioners is that it guarantees easy access to treatment either on the same day or next day following a reported injury.

InitialCare is voluntary for all employees to participate in, and employees always have the option to consult their own treating doctor or allied health provider.

The program provides access to early treatment including;

- Up to four doctor appointments
- Up to four physiotherapy appointments
- Basic imaging such as x-rays
- Basic ancillary costs such as bandages or strapping

Where an injury that occurs is not suitable to be managed under the Toll Group’s Early Intervention Program. (For example, where a worker may require more treatment than that prescribed under InitialCare or if there is a reduced capacity for work), then this is managed by Toll Group under the Workers’ Compensation framework.

3.4 Employee Assistance Program

The Toll Group Wellbeing Program available to all employees delivers diverse resources through a three tier Employee Assistance Program (EAP) model, allowing Toll Group to provide tailored and responsive care to all employee and families.

Information regarding Employee Assistance Program is readily available to all employee at the [Wellbeing Chaplaincy and Employee Support webpage](#) (Intranet Home Page / Working@Toll / Wellbeing, EAP, Chaplaincy and Employee Support).

An Employee Assistance Program (EAP) offers a range of **confidential** service to assist employees and their family, including four **free sessions** to speak with a qualified, experienced counsellor across a range of issues including:

- Work and personal stress
- Work, career and life changes
- Personal and workplace relationships
- Emotional difficulties
- Communication and relationship tension, conflict and breakdown
- Grief and loss
- Sleep and fatigue
- Gambling, drug, alcohol and other addictions
- Anger and violence

This service is available to all employees and their families through Converge International;

Phone: 1300 687 327 (Australia) +613 8620 533 (International)

Email: eap@convergeintl.com.au

4 Rehabilitation and Return to Work Program (ARRTW Program)

Rehabilitation and Return to Work, (RRTW) is the process that comprises activities and procedures undertaken or established for the purpose of achieving a timely, safe and durable return to work for workers following a work-related injury.

The goal of Rehabilitation and Return to Work outcomes is to;

- Support workers to recover at work; or
- Ensure earliest possible safe return to work; and

- Return employees to their pre-injury/illness duties and hours of work; or
- Maximise independent functioning; and;
- Provide for durable employment.

Toll Holdings Limited drives a person-centered approach to the delivery of rehabilitation and return to work, through considering individual worker needs and tailoring services and support to optimise durable return to work outcomes for employees and the business.

4.1 Referral to the Accredited Rehabilitation and Return to Work Program

Pursuant to s220, Toll Holdings Limited must take all reasonable steps to secure the rehabilitation and early return to suitable duties of workers who have an entitlement to compensation, and workers participating in the accredited rehabilitation and return to work program of the insurer.

Further, Toll Holdings Limited;

- may refer a worker who is receiving compensation for an injury to an accredited rehabilitation and return to work program of the insurer; and
- must refer a worker who is receiving compensation for an injury, and has asked the insurer to be referred to a rehabilitation and return to work program, to an accredited rehabilitation and return to work program of the insurer; and

- must refer a worker who has stopped receiving compensation for an injury under s144A, s168 and or s190(2), and has not returned to work because of the injury, to an accredited rehabilitation and return to work program of the insurer.

The only exemptions to these are if Toll Holdings Limited is satisfied the program is not able to further assist the worker with rehabilitation for the injury or, the worker is already participating in an accredited rehabilitation and return to work program.

Toll Holdings Limited is committed to supporting workers following a workplace injury and takes a proactive approach to referring all workers to the Accredited Rehabilitation and Return to Work Program who;

- have an **accepted claim for compensation**, and
- **who require a documented Rehabilitation and Return to Work Plan.**

If a claim for compensation is denied, the employees' capacity for work is managed in accordance with the company's employment policies and procedures.

4.2 Ongoing Participation in the Accredited Rehabilitation and Return to Work Program

A workers' participation in the ARRTW Program continues until Toll Holdings Limited is satisfied that the program is not able to further assist the worker with rehabilitation for the injury. Examples of this may include;

- The worker achieves a recovery and returns to normal duties and hours of their appointed position.
- The worker achieves a return to work in accordance with their identified RTW goals.
- The work no longer suffers a work-related injury.

The ongoing participation in the program is also reviewed when;

- A worker communicates that they are unwilling or unable to participate in the continuation of the program.

Further, in accordance with the obligation under the act, Toll Holdings Limited will review a workers' participation in the program when a workers' entitlement to compensation ceases under s168, s190(2), s144A of the Workers' Compensation and Rehabilitation Act 2003.

Where a workers' participation in the program is excluded from referral or ceased by Toll Holdings Limited, the worker will be afforded natural justice in the first instance.

If following natural justice, it is confirmed that a worker is excluded from ongoing participation in the ARRTW program, then Toll Holdings Limited will provide the worker with written notification in accordance with s220 of the Workers' Compensation and Rehabilitation Act 2003 and the worker will be informed of their right of review.

4.2.1 Common Law Claim

When a Notice of Claim for Damages has been received by the Toll Holdings Limited, the Senior Claims Manager will assess the worker's rehabilitation and employment status, including the status of their participation in the ARRTW Program and may refer the worker to the ARRTW Program for further assistance. Each case will be considered on the circumstances and workers' capacity for work and the outcomes of workers previous participation in the program.

5 Elements of the Rehabilitation and Return to Work Program

5.1 Initial Needs Assessment

When supporting a workers' rehabilitation and return to work, the primary goal is to ensure worker received

Date: 21/08/2023 Version: 4.1 Review: 08/2025	Page 9 of 21	Accredited Rehabilitation and Return to Work Program Approved: WCRS September 2023
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reasonable support and services and provision of appropriate suitable duties that support a recovery at work, supporting their recovery and to return to their pre-injury role.

The level of rehabilitation and return to work support required is dependent upon the worker's rehabilitation needs and certified capacity for work, having regard to their appointed position and business needs.

The initial assessment also includes early identification of psychosocial risks that may be present, and considering appropriate support and services that may be reasonable to minimise the risk of psychological harm.

An initial assessment includes consideration of;

- the nature of your injury/illness and relationship to work
- the worker's readiness to return to work, including current certified medical restrictions and physical and/or psychological tolerances and limitations.
- certified capacity for work (including requirement for reduced hours, capacity to travel, side effects of medication)
- the type and frequency of assistance recommended to support recovery (i.e. treatment frequency)
- reasonably practicable workplace support, aids, equipment and or modifications that may be required to support the worker's safe return.
- employment considerations, including assessment of workplace and consultation with key stakeholders.
- return to work goals.
- identification of appropriate suitable duties
- formalised psychosocial risk assessment where appropriate (ie. Orebra Assessment)
- if available, written report containing recommendations about the rehabilitation program that will support the worker.

If the worker has an incapacity or reduced capacity, the worker is referred to the appointed Rehabilitation and Return to Work Co-ordinator (RRTWC) or to a [Workplace Rehabilitation Providers](#) for the purpose of facilitating the return to work for the worker.

The initial assessment is conducted based on documentation received and initial discussions with the worker. Upon initial contact with the worker, the worker is informed of Toll Holdings Limited ARRTW Program and the overall aims of the program to support them, including the [health benefits of good work](#).

5.2 Consultation

The ARRTW program includes consultation and collaboration between key stakeholder; including the worker, employer, treating doctor/providers and the insurer.

Consultation occurs in the initial assessment, planning, implementation and review phases of the program, through various means including;

- Initial contact with the worker to collaborate and discuss their rehabilitation needs to support optimal recovery.
- Transparency in communication regarding roles and responsibilities of parties, progress and goals.
- Distribution of the developed Rehabilitation and Return to work plan to all parties.
- Providing opportunities for parties to actively participate and provide feedback through the process.
- Regular monitoring and revision of plans as required.

The key to consultation is to ensure collaboration with key parties occurs, and that the worker is central to the discussions, participation, and established goals.

5.3 Reasonable Support and Services

As part of the initial needs assessment and consultation, consideration is given to the nature of the injury, including both primary and secondary psychological injuries. Access to reasonable support is considered in the early phase

of **Rehabilitation and Return to Work Planning**.

In these instances, and in accordance with s232AB and s232AC of the Workers' Compensation and Rehabilitation Act 2003, Toll Holdings Limited considers the provision of reasonable services to support workers in their recovery.

The consideration of reasonable service to support the worker are based on the workers' rehabilitation needs in accordance with the treating medical practitioner's certification and are offered whilst the claim is being determined. Access to services may include approval for;

- reasonable medical treatment
- consultations with a treating psychologist.
- an initial review with a treating psychiatrist.
- Initial reimbursement of medication expenses as prescribed by your treating medical practitioner.

The goal of the reasonable support is to ensure timely access to appropriate treatment for the worker to support their rehabilitation.

Approvals under s232AB apply whilst a workers' claim is being determined.
 Provision of reasonable services under s232AC apply until entitlement to compensation ends.

5.4 Rehabilitation and Return to Work Planning

Rehabilitation and Return to Work Planning is a continuous process. The process is repeated as often as necessary to support safe and durable return to work outcomes.

Each claim will be different, and therefore rehabilitation and return to work planning is considered to provide a structure to support the delivery of return to work outcomes.

5.4.1 Return to Work Goals

The return to work planning includes consideration of possible interventions and responsibility in return to work planning based on the hierarchy of return to work goals as follows;

- Same Job / Same Employer
- Different Job / Same Employer
- Same Job / Different Employer
- Different Job / Different Employer
- Independent within the community.

The Return to work goals may change during the rehabilitation process and are regularly reviewed in line with the **Rehabilitation and Return to Work Plan (RRTW Plan)**.

The following mapping tool outlines possible rehabilitation interventions considered when considering a workers' return to work needs;

<p>Same job / Same Employer Managed by the appointed RRTWC. Interventions may include;</p> <ul style="list-style-type: none"> • Consideration of suitable duties having regard to medical restrictions, and the development of suitable duties plans • Provision of suitable aids, equipment or modifications to support safe and durable return to work 	<p>Different role / Same employer Occurs only after exploration if returning to pre-injury role is not achievable. Managed by the appointed RRTWC. Interventions may include;</p> <ul style="list-style-type: none"> • Engagement with HR and or other business units across the company to understand other suitable positions • Secondments • Host business units
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<ul style="list-style-type: none"> • Review of hours of employment (days and roster) to support a reduced capacity • Consideration of breaks/recess/roster times • Rotation of actions 	<ul style="list-style-type: none"> • Vocational Assessments • Vocational Counselling • Training Needs Analysis • Reskilling and/or Retraining • Internal Job Search skills • EAP services to support Career Development • Functional Capacity Assessments
<p>Similar Job / Different Employer If based on the nature of the injury, it is accepted that the goal of RTW will be to return to work outside the company, then it may be appropriate to speak with the insurer regarding an appointment of an External Rehabilitation Provider is appropriate. Interventions may include;</p> <ul style="list-style-type: none"> • Host employment placement • Job Placement skills development • Job seeking assistance 	<p>Different Job / Different Employer Liaise with the insurer re Appointment of an External Rehabilitation Provider to ensure qualified intervention, which may include;</p> <ul style="list-style-type: none"> • Vocational Assessments • Vocational Counselling • Functional Capacity Assessments • Training Needs Analysis • Reskilling and/or Retraining • Exploration of government assisted/funded training programs • Job Placement Skills.

5.5 Rehabilitation and Return to Work Plan (RRTW Plan)

Toll Holdings Limited develops a Rehabilitation and Return to Work Plan (RRTW Plan) for all accepted claims. The goal of the plan is to outline the overall focus to support workers' whilst they recover, including supporting their return to work in line with the return to work goals.

The written plan is tailored to the rehabilitation needs of the worker and developed and in place within **10 business days after the application for compensation is accepted**.

Once in place, plans are reviewed and modified as further information becomes available.

Once the initial plan is in place, then the plans are reviewed regularly and/or modified as further information becomes available which alters the workers' rehabilitation and return to work needs.

The initial development and any review is undertaken in consultation with parties that is reasonably practicable to do so.

5.5.1 Plan Development

The Rehabilitation and Return to work plan;

- developed in accordance with s220 of the Workers' Compensation and Rehabilitation Act 2003 and;
- in consultation with key stakeholders including the worker, employer and treating providers, to the extent that it is reasonably practicable to do so, and
- outlines the rehabilitation objectives for an injured worker and the steps required to achieve these objectives.

Toll Holdings Limited develops Rehabilitation and Return to work plans in accordance with the published, [Rehabilitation and return to work plans guideline – for insurers](#).

Date: 21/08/2023 Version: 4.1 Review: 08/2025	Page 12 of 21	Accredited Rehabilitation and Return to Work Program Approved: WCRS September 2023
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All plans are in written form.

The type of plan developed is dependent upon the nature of the claim. A documented RRTW Plan is developed and distributed where a worker;

- is medically certified unfit for work or partially fit for work for a week or more following the injury.
- is medically certified as partially fit to return to work, but requires modified duties and/or hours for a period.
- may be permanently unable to return to their pre-injury role. In these cases, the RRTW plan also needs to clarify the rehabilitation goal (for example, return to a different job with the same employer, or to a new employer).

In other instances, such as where a claim is for *'medical expenses only'* and there is no lost time or minimal lost time and the worker has subsequently been certified fit to return to work, then the plan developed will be in the form of a documented file note which details individual and specific details relevant to the claim, and which is discussed and acknowledged by the worker, and an email summary of the plan is forwarded to the worker.

5.5.2 Plan Distribution and Acknowledgement

Where a documented RRTW plan is developed following consultation, the plan is distributed to key stakeholders including, worker, treating medical practitioner, employer, return to work co-ordinator or where appointed the Workplace Rehabilitation Provider.

Any party is provided the opportunity to raise any feedback with the plan for review or modification. All parties are requested to acknowledge the content of the plan and their agreement.

Parties are informed of their privacy obligations and the purpose for which the information detailed in the Rehabilitation and Return to Work Plan may be used. Refer *Obligations – Collection, Use and Disclosure of Personal and Health Information*

5.5.3 Maintenance of the Plan

The established plan is reviewed regularly to ensure that it reflects the workers' current rehabilitation needs to support their optimal recovery.

The plan is reviewed and modified as further information becomes available (s221). If the plan is reviewed and it continues to meet the worker's rehabilitation needs, then the plan can be extended where agreed between parties, and communicated .

Where required an updated plan is developed and distributed.

All plans are reviewed as a minimum where the workers' capacity changes, or new or revised information is received regarding the nature of the injury, treatment outcomes or changes in return to work goals.

5.6 Suitable Duties Program

As part of the RRTW Plan, the worker may participate in Suitable Duties.

The purpose of the Suitable Duties Program is to assist workers' recovery and safely build their fitness and capacity to return to normal duties and work hours. The Suitable Duties Program sits within the Rehabilitation and Return to Work Plan.

Suitable duties, also known as light or alternative duties, are meaningful job actions or responsibilities that align to certified medical restrictions, limitations and capacity of the worker.

They may include duties in a worker's normal appointed position or another position, which considers the worker's

Date: 21/08/2023 Version: 4.1 Review: 08/2025	Page 13 of 21	Accredited Rehabilitation and Return to Work Program Approved: WCRS September 2023
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education, skills and experience, age, place of residence and nature of injury.

The program will also consider the workers' current physical, psychological and cognitive abilities, including;

- the tasks an injured worker will perform while they recover.
- how long they'll complete these tasks for
- whether tasks will change as their capacity for work improves
- restrictions, considerations and/or workplace changes required (as outlined in a worker's Work capacity certificate – workers' compensation)
- days and hours of work.

Suitable duties are temporary in nature to support the worker's recovery at work.

Suitable duties are structured to progress and accommodate a worker's increase in capacity as they recover. Toll Group adopts a risk management approach to identifying and implementing suitable duties.

5.6.1 Employer Obligation to assist or provide rehabilitation s228

In accordance with Section 228 of the Workers' Compensation and Rehabilitation Act 2003, in the event that Toll Group are unable to provide adequate and appropriate suitable duties, written notification is required to be provided by the Rehabilitation and Return to Work Co-ordinator or another employer representative to the Insurer.

In these instances, the insurer will;

- (a) As soon as practicable after receiving the employers notice, consider the information and form an opinion if the inability to provide suitable duties is reasonable.
- (b) If it the insurer is not satisfied by the evidence provided, it will inform the employer of that opinion and the reasonable for it, and provide the employer with a reasonable opportunity to make submissions and provide further evidence.
- (c) If the insurer is satisfied by the evidence, then a review will be undertaken of the existing Rehabilitation and Return to work plan to consider appropriate rehabilitation interventions in accordance with the return to work mapping principles to continue to support the workers' return to work.

The obligation of the employer to provide suitable duties, extends to host employers under s229A, and will be considered in the same manner as a Toll employer.

5.6.2 Development of Suitable Duties Plan

Once appropriate suitable duties are identified through consultation with the worker and the employer, a Suitable Duties Plan is developed by the appointed Rehabilitation and Return to Work Co-ordinator (RRTWC) or where appointed Workplace Rehabilitation provider which outlines:

- return to work goal.
- agreed suitable duties to be performed.
- restrictions and limitations (i.e. any actions/duties to be avoided)
- accommodations, modifications or aids that may be required.
- capacity (i.e. Reduced hours; Breaks as required)
- days and hours to be worked.
- defined period of the plan in line with medical certification
- review date, being at the next medical review or, at the maximum period of 4 weeks.
- stakeholders in the return to work process

5.6.3 Distribution of Suitable Duties Plan

RRTWC will ensure appropriate consent is held prior to the distribution or contact with the workers' treating doctor.

The RRTWC or appointed Workplace Rehabilitation Provider will forward the Suitable Duties Plan to the worker, manager, treating doctor (as required) and insurer.

5.6.4 Review and Approval of Suitable Duties Plan

The worker and manager, with guidance from RRTWC, will;
review the suitable duties plan together;

- discuss the plan, address any support the worker may need,
- agree to the approach to communicate to the team regarding the worker's return to work and what support they may need during return to work, and
- establish an agreed approach to regularly review progress (i.e. daily check-in prior to starting work and at the end of the roster) to ensure a successful return to work outcome.

Once the plan is reviewed by the parties, it is signed and returned to the RRTWC to retain on the Rehabilitation File.

If the treating doctor has requested a suitable duties plan be provided for approval, this is noted and approval is sought.

5.7 Monitoring and Review

As part of the Rehabilitation and Return to Work Program, the workers' progress is continued to be monitored and reviewed until the optimal outcomes are achieved.

This occurs with different stakeholders in the return to work process including;

- The worker and manager review progress daily or as agreed in accordance with the established Suitable duties plan.
- The RRTWC/provider will maintain regular contact with the worker and employer to monitor progress in line with the agreed suitable duties plans and review dates.
- The treating medical practitioner and worker will monitor progress at relevant medical reviews.
- The insurer continues to monitor progress following updates from the worker, employer or RRTWC; when a further medical certificate is receipted and in accordance with the Rehabilitation and Return to work plan.

Toll Holdings Limited continued to review the workers' *Ongoing Participation in the Accredited Rehabilitation and Return to Work Program* until their participation ceases.

6 Workplace Rehabilitation Providers

If as part of the RTW Planning phase it is identified that the workers rehabilitation outcome would be better supported with the appointment of a Workplace Rehabilitation Provider, the following steps are undertaken by Toll Holdings Limited;

- Worker is consulted and provided details for the reason for the appointed rehabilitation provider and the process and the role and what to services to expect.
- The workers' treating medical practitioner is notified.
- The employer is notified and provided with the details of the provider.

- A written referral is made to the Workplace Rehabilitation provider detailing the scope of the referral and expectation of service delivery, including alignment with the scheme direction.
- The engagement of the Rehabilitation Provider is monitored and reviewed in line with the Rehabilitation and Return to Work Plan and service delivery.

Toll Holdings at the time of the referral to the Workplace Rehabilitation Provider establishes expectations that service is to be delivered in accordance with the established WorkCover Queensland's [Return to Work Services Table of Costs](#) and the [Principles for practice of Workplace Rehabilitation Provider](#), as published by the Heads of Workers' Compensation Authorities (HWCA).

Toll monitors the service delivery to ensure that each provider meets the requirements prescribed by the scheme direction.

6.1 Workers' right to request a different provider s221AA (4)

A worker who is dissatisfied with a Workplace Rehabilitation Provider appointed by Toll, may request in writing to the insurer to secure services from a different provider chosen by the worker.

The worker is required to provide a written request detailing the reason, and the name of their nominated provider.

Toll will reasonably accommodate the request if it is practicable to do so and not likely be adverse to affect the workers' rehabilitation.

7 Grievance Resolution

Toll Holdings Limited is committed to making every effort to resolve any grievance or complaint to the satisfaction of all parties at any time during the claim and or rehabilitation process.

The [Toll Grievance Resolution Standard](#) provides guidance to assist workers and managers resolve grievances effectively in the workplace.

At times through the rehabilitation and claim process there may be decisions which a worker or another party disagrees with or are concerned about. If this occurs, there are a number of avenues for escalate concerns, these include but are not limited to;

Raising your concern directly

- Contacting the Workers' Compensation team or your appointed Injury Management Advisor directly to raise your concern or grievance, either verbally or in writing;

Escalating through your Manager/Employer

- Speaking with your manager and asking that they escalate the concern on your behalf;
- Raise a concern online through the [Toll Disclosure Hotline](#).

Seeking Guidance from an External Party

- Speaking with your union representative to escalate your concern;
- Contacting the office of Workers' Compensation Regulator for advice at www.worksafe.qld.gov.au or calling 1300 739 021.

Where a decision is made on a claim and or the participation of a worker in the Accredited Rehabilitation and Return to work program, Toll Holdings Limited will provide workers with written notice for the reasons, including notification of their right of review.

7.1.1 Complaint Management Process

If a complaint is lodged or a grievance escalated, then Toll Holdings Limited will identify an appropriate resource to

investigate the complaint.

The party who has escalated the grievance will be contacted both verbally and/or in writing and will be informed;

- Who will be investigating the complaint
- Detail the grievance/allegation that will be investigated
- **How** the investigation will be managed
- Confirm what **Information** that will be gathered during the investigation and detail the process how the information will be obtained.
- **Timeline** for the investigation to occur
- How the **outcomes** will be communicated.
- Confirm **confidentiality** through the investigation process.

7.1.2 Outcome and Documentation

Appropriate action will be taken by way of outcome of the investigation, and the party who escalated the grievance will be informed.

Information regarding the complaint will be retained by Toll Holdings Limited as the Self-Insurer in accordance with their licensing obligation.

8 Measurement and Evaluation

In accordance with the *Injury Management System (IMS)*, Toll Holdings Limited is committed to driving successful return to work outcomes and considering continuous improvement activities as part of their overall delivery of claims and rehabilitation services.

Toll Holdings Limited actively evaluates the effectiveness of the Accredited Return to Work Program as part of the overall governance arrangements established in the Injury Management System.

8.1.1 Objectives, Targets and Performance Indicators

In accordance with the *Injury Management Strategic Plan*, Annual improvement targets are established by the Toll Board and Group Senior Executive Committee which demonstrate Toll Group's commitment to rehabilitation. Objectives are established at Division/Business Unit level to drive business outcomes aligned with *Injury Management Strategic Plan*.

Toll Holdings Limited establishes performance indicators based on data retained in the Workers' Compensation Database to monitor rehabilitation performance.

8.1.2 Data and Reporting

Monitoring and analysis of data is conducted to determine how the business is performing against its objectives and targets. Analysis occurs at both the strategic and operational levels and is applied to inform management of the key factors driving/impacting Injury Management performance.

Operationally in Queensland, Toll Holdings Limited reports **Return to Work Status** on all accepted claims to the Queensland Workers' Compensation Regulator in accordance with the established data specifications.

Analysis of monthly regulator reporting enables Toll Holdings Limited to report on final return to work outcomes, compared to the Queensland scheme.

8.1.3 Worker Satisfaction Surveys

Date: 21/08/2023 Version: 4.1 Review: 08/2025	Page 17 of 21	Accredited Rehabilitation and Return to Work Program Approved: WCRS September 2023
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Feedback on the success or otherwise of the Return to Work Program can be provided by worker following a satisfaction survey sent to all workers' that were involved in the Rehabilitation and Return to Work Program as part of their statutory claim.

The data from completed surveys are considered as part of the governance framework to measure the outcomes achieved.

8.1.4 Complaint Register

Additional feedback is considered by Toll Holdings Limited having regard to any complaint or grievance escalated and managed in accordance with [Grievance Resolution](#).

8.1.5 Audit Framework

A key component of the injury management corporate governance arrangements is the auditing of the claims management and return to work activities of Toll's self-insured jurisdictions to ensure compliance with their jurisdictional licence requirements.

The audit framework implemented by Toll Holdings Limited includes;

- **Internal Audits** – the purpose of the internal audit is to improve claim and rehabilitation service and compliance activity.
- **Self Audits** – as part of licencing requirements, where required Toll Holdings Limited undertake a self-audit at the mid point of their licence in accordance with the parameters outlined in the [Queensland Self-Insurance Audit Process](#).
- **External Audits** – The Workers' Compensation and Regulatory Services (WCRS) monitors the compliance and performance of insurers and conducts audits at licence renewal or other times to determine whether Toll Holdings Limited has exercised its functions and powers under the Act reasonable. This includes the assessment and delivery of Rehabilitation to injured workers.

In all elements of the audit program, Toll Holdings Limited ensures improvement action plans are implemented to review existing system and implement effective changes to improve the system to meet legislative compliance and drive continuous improvement.

8.1.6 Education, Training and Competency

Toll Holdings Limited consider the education and training needs of workers and appointed personnel involved in the delivery of Rehabilitation.

8.1.6.1 Education

The Toll Group induction program includes information to all employees on workplace rehabilitation and workers' compensation. All new personnel, regardless of operational level, undertake induction training, which includes instruction on workplace rehabilitation policy and procedures to ensure they understand their rights and obligations in the event of an injury.

Information regarding Rehabilitation and Return to Work is readily accessible to all employees through the [Toll Way-Policies](#) webpage (Intranet Home Page/ The Toll Way / Policies).

Workers are also provided timely Rehabilitation and Return to Work information at the time of incident reporting and at the time of their claim lodgment.

When a claim for compensation is accepted by Toll Holdings Limited, the worker is provided information about the Accredited Return to Work Program, and their referral and participation to the program.

8.1.6.2 Training and Competency

Toll Group considers the training needs of personnel involved in the delivery of Rehabilitation and Return to Work service in accordance with the Accredited Return to Work Program and provides adequate training and instruction to ensure competency when undertaking their responsibility in accordance with the Accredited Rehabilitation and Return to Work Program.

Toll Group ensures the provision of appropriate and timely training to ensure ongoing professional development.

The required training and competencies of team resources are identified by taking into account the work responsibilities, authority/delegation and activities of the appointed position.

Toll Group reviews competencies required through various processes including;

- Recruitment
- Annual Performance process
- Monthly performance discussions
- Development Plans
- Auditory processes

In addition to the established performance cycle, Toll ensures ongoing development through attendance and provision of training and information sessions.

Toll Group, appoints appropriately qualified Rehabilitation and Return to Work Coordinators in Queensland. This includes, where relevant, the completion of Regulator-approved training courses.

If it is identified through the RTW Planning phase that specialised skills, training or experience are required to support rehabilitation outcomes for complex claims, Toll Holdings Limited considers the appointment of **Workplace Rehabilitation Providers** to facilitate Rehabilitation and Return to Work outcomes in accordance with the Accredited Return to Work Program.

9 Management Review

A review of the Accredited Return to Work Program is undertaken regularly in accordance the established document control procedures and or when information arising through the monitoring and evaluation of the program requires a review in line with Toll Holdings Limited continuous improvement activities.

The management review of the Accredited Return to Work Program ensures the validity and effectiveness of the program in satisfying positive rehabilitation and return to work outcomes.

Further to Toll Holdings Limited review of the program, once accreditation is received WCRS regularly reviews the Accredited Return to Work Program for ongoing accreditation in accordance with licensing periods.

Where revisions are made to the Accredited Return to Work Program, Toll Holdings Limited submits the revised program for WCRS accreditation.

10 Controlled Document Amendment Record History

In accordance with the Document Control procedures, any printed copy of extracts within the Claims Management Manual are an uncontrolled copy.

Revision	Revision date	Summary of changes	Author	Approved by
V4.0	10/05/23	Updated Rehabilitation and Return to	Amber	WCRS

Date: 21/08/2023 Version: 4.1 Review: 08/2025	Page 19 of 21	Accredited Rehabilitation and Return to Work Program Approved: WCRS September 2023
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		Work Program in line with WCRS issued guidelines for accreditation.	Stephenson	Pending
V4.1	21/08/23	Updated to include privacy information and collection, use, disclosure of personal information	Amber Stephenson	September 2023 as part of licence renewal
V4.2	27/09/24	Updated to reflect changes from the Workers' Compensation and Rehabilitation and other legislation Amendment Act 2024	Sue Richardson	