



# Corporate Plan 2025-26



Professional Services Review acknowledges the Traditional Owners and Custodians of Country throughout Australia, and acknowledges their continuing connection to land, waters and community.

We pay our respects to the people, the cultures, and the elders past, present and emerging.

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## A message from our Director

I am honoured to present the Professional Services Review (PSR) Corporate Plan 2025–26 which outlines how we intend to deliver against our purpose over the next 4 years (2025–26 to 2028–29).

Since our inception in 1994 as a statutory agency within the Health, Disability and Ageing portfolio, we have been an adaptive organisation, responding to challenges and continuing to evolve to improve our business processes. We have maintained and enhanced our legal and investigative expertise and capability to ensure competent and effective assistance is provided to PSR Committees and the Determining Authority (DA), and to ensure that PSR's processes are fair to persons under review.

We continue to position PSR as a more mature regulator, guided by our values of being fair, professional and transparent.

This plan outlines the purpose and priorities of PSR and explains how we will measure our performance over the next 4 years, with the aim of continuing to enhance our efficiency and effectiveness.

This plan should be read with the strategic direction laid out in the Portfolio Budget Statements, the values and performance frameworks set out in the *Public Service Act 1999* (PS Act), the Minister's Statement of Expectations (August 2023) and my response in our Statement of Intent (October 2023).

## Statement of preparation

As the accountable authority, I present the 2025–26 Corporate Plan which covers the period 2025–26 to 2028–29, as required under paragraph 35(1)(b) of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act). This plan has been prepared according to section 16E of the Public Governance, Performance and accountability Rule 2014 (PGPA Rule).

Associate Professor Antonio Di Dio

Director Professional Services Review 18 August 2025

## **About us**

The Australian Government has in place a dedicated range of compliance tools to protect the Australian healthcare system. As part of this broader framework PSR operates a peer-based review scheme which works to protect the integrity of the medicare, child dental benefits and pharmaceutical benefits programs.

We safeguard patients and the Australian community in general against the risks associated with inappropriate practice by health practitioners by undertaking reviews following a request from the Chief Executive Medicare to review and investigate health practitioners and corporate entities who are suspected of inappropriate practice.

Reviews are initially conducted by the Director or an Associate Director of PSR, who may take no further action in relation to a review, seek to enter into a negotiated agreement with the person under review (PUR) or refer the PUR to a Committee of their professional peers. This review could be undertaken in relation to services provided under the Medicare Benefits Schedule (MBS), Pharmaceutical Benefits Scheme (PBS) or Child Dental Benefits Schedule (CDBS).

Any directions contained in agreements or final determinations following a Committee process, including MBS, CDBS or PBS disqualifications and financial repayments, must be ratified or approved by the DA, a separate statutory body which ensures our matters are appropriate and scrutinised.

Our role and functions are set out in Part VAA of the Health Insurance Act 1973 (HIA).

PSR is a non-corporate Commonwealth entity under the PGPA Act.

## At a glance

A summary of our purpose, outcome, program and key activities is shown in Figure 1.

Figure 1. Our purpose, outcome, program and activity

#### **Purpose**

Our purpose is to safeguard the Australian public and the Commonwealth from the risk and cost of inappropriate practice within the medicare, dental and pharmaceutical benefits programs.

#### **Enabling legislation**

• Health Insurance Act 1973

#### **Outcome**

A reduction of the risks to patients and costs to the Australian Government of inappropriate practice, including through investigating health services claimed under the medicare and pharmaceutical benefits schemes.

## Program 1.1: Safeguarding the Integrity of the Medicare Program and Pharmaceutical Benefits Scheme

The Australian Government, through PSR, aims to safeguard the community against the risks and costs of inappropriate practice by health practitioners. PSR liaises with governments, medical and health care regulatory bodies, and professional organisations to protect the integrity of the medicare benefits, pharmaceutical benefits, and child dental benefits programs.

#### Portfolio Budget Statements

#### Regulator performance

- · Ministerial Statement of Expectations
- · Regulator Statement of Intent

### Corporate Plan

#### **Key activities**

- investigate through peer review whether practitioners have engaged in inappropriate practice
- actively engage with professional bodies through consultation.

#### **Performance measures**

The progression of cases with PSR as per the expected performance results.

Annual performance statements

Assessment of performance in achieving our purpose

## Our vision, strategic goals and values

### Our purpose

Our purpose is to safeguard the Australian public and the Commonwealth from the risk and cost of inappropriate practice within the medicare, dental and pharmaceutical benefits programs.

#### **Our vision**

Our vision is to:

- play a key role in protecting the integrity of Australia's universal health system
- be held in high esteem by the professions and the people running the PSR scheme
- · be a model public service agency.

## Our strategic goals

To achieve our vision, over the next 3 years we will:

 Continue to efficiently and fairly investigate all referred cases, ensuring that the health of any PUR is a high and consistent priority

We will do this by:

- adhering to statutory timeframes and established key performance indicators (KPIs)
- engaging with the health community consistent with our External Communications
   Strategy and Stakeholder Engagement Framework
- working with other health regulators across the Australian Government to ensure as much as possible that the privacy, dignity and well-being of any PUR is respected at every stage of the process.
- Continue to mature as an agency, understanding the changing nature of our work and embracing different and evolving work practices

We will do this by:

- modernising and enhancing our corporate systems using strategic and staged investments in enterprise resource planning solutions
- adopting artificial intelligence (AI) to enhance workplace productivity in ways that are safe, ethical and responsible
- continuing to strengthen and improve our governance structures and refining operational frameworks.

 Enhance workforce capacity and capability, recognising that for PSR our 'workforce' includes the consultants and Panel and DA members engaged and appointed under our enabling legislation.

We will do this by:

- investing in our staff to ensure they have the skills and knowledge they need to develop and succeed
- strengthening workforce planning to ensure we continue to attract and retain the right talent and culture
- developing and delivering training frameworks for consultants, Panel members and DA members.

#### **Our values**

We recognise our responsibilities as a part of the broader Australian Public Service (APS). As a statutory agency, we are committed to the APS Values (impartial, committed to service, accountable, respectful, ethical, stewardship) and the Code of Conduct outlined in the PS Act.

To help guide our performance we have defined our own values and behaviours which are underpinned by the APS Values. Our values and behaviours of fair, transparent and professional address the unique aspects of our business and environment and guide us in how we conduct ourselves in performing our role.

#### Being fair means:

- providing procedural fairness in the operation of the PSR Scheme
- using a consistent approach to arrive at timely, justifiable decisions
- delivering an effective and impartial PSR Scheme
- providing an inclusive and respectful work environment
- prioritising physical and psychological safety, wellbeing and engagement.

#### Being transparent means:

- accurately informing a PUR of their rights and responsibilities
- accurately informing a PUR of PSR's powers, responsibilities and intentions
- providing defensible reasons for outcomes
- consulting, communicating and collaborating in an open, constructive and genuine manner
- proactively sharing information with our external stakeholders about the PSR Scheme, our processes, outcomes and activities
- our work and decisions are recorded, understood and align with our statutory obligations.

#### Being professional means:

- complying with Commonwealth legislative requirements and expectations
- being accountable for our actions, decisions and use of time and resources
- protecting the privacy and confidentiality of the information we receive, use and create
- operating with integrity, honesty and respect
- maintaining our standards of service through teamwork.

## Our operating context

PSR is established under Part VAA of the HIA which sets out the role and powers of the agency, as well as the process it must follow when conducting its work.

Section 79A of the HIA sets out the object of the PSR Scheme:

The object of this Part is to protect the integrity of the Commonwealth medicare benefits, dental benefits and pharmaceutical benefits programs and, in doing so:

- a) protect patients and the community from the risks associated with inappropriate practice; and
- b) protect the Commonwealth from having to meet the cost of medical or health services provided as a result of inappropriate practice.

Section 81 of the Act and the Health Insurance (Professional Services Review – Allied Health, Primary Health Care and Others) Determination 2023 list the medical and allied practitioner groups subject to review under Part VAA.

We operate as an independent agency within the Health, Disability and Ageing portfolio and we are led by the Director who is appointed by the Minister for Health and Ageing (the minister) for a term of up to 3 years. Together, the Director, Associate Directors and our staff form a statutory agency under the PS Act.

### Our operating environment

The context in which government subsidised health services are being provided is becoming more complex. The rules underpinning appropriate access to government funding are adapting to changing circumstances and technology.

We continue to be asked to review and investigate a wider range of health professions and specialties. We are also asked to review employer or corporate entities that provide services and new and novel ways of working within the healthcare system.

We must retain the confidence of the professions and the community while demonstrating the organisational agility required to meet these changes and future challenges.

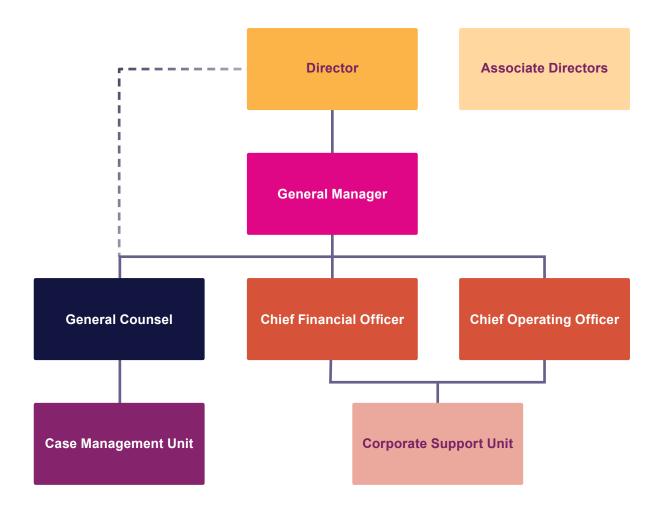
Our future capability has been enhanced through the creation of a new statutory office of Associate Director of the PSR and appointment of 2 part-time Associate Directors in 2024. Associate Directors exercise the same powers as the Director in reviewing inappropriate practice for particular cases as necessary.

### Our corporate structure

The General Manager (Senior Executive Service (SES) Band 1) reports to the Director of PSR and is responsible for leading our 2 main business units: the Case Management Unit and the Corporate Support Unit, as displayed in Figure 2.

- The Case Management Unit supports the Director, Associate Directors, Committees
  and the DA to manage and progress cases which have been referred to us within the
  key performance indicator targets.
- The Corporate Support Unit supports all aspects of corporate functions including executive and secretariat support, governance, communications, parliamentary, ICT, finance, human resources, procurement, property and security.

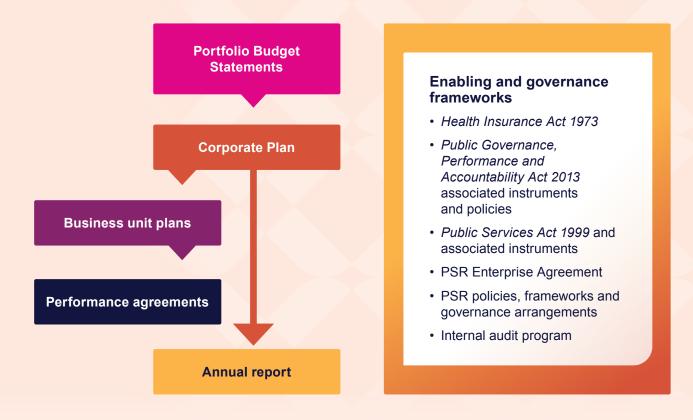
Figure 2. Our corporate structure



## Our strategic planning framework

Our governance and strategic direction are underpinned by a strategic planning framework shown in Figure 3. The corporate plan is our primary planning document and covers the next four-year period, 2025–26 to 2028–29. This plan flows into our business unit plans, and to individual performance agreements. We report on our activities through the annual report.

Figure 3. The strategic planning framework underpinning our governance and strategic direction



## Corporate governance arrangements that underpin our strategic planning framework

#### **Director**

The PSR Scheme is managed by the Director, an independent statutory officer appointed by the minister under section 83 of the HIA. As head of the PSR agency, the Director is the accountable authority for the purposes of the PGPA Act.

#### **Executive Management Team**

The Executive Management Team (EMT) is constituted of the Director, General Manager, General Counsel, Chief Operating Officer and Chief Financial Officer and is our foremost decision making body. The EMT provides strategic direction and leadership to ensure the outcomes documented in the PBS and the Corporate Plan are achieved. The EMT operates in an advisory capacity to the Director as the Accountable Authority.

#### **Audit and Risk Committee**

The Audit and Risk Committee (ARC) provides independent advice and assurance to the Director on the appropriateness of our financial reporting, systems of internal control, performance reporting, and systems of risk oversight and management.

#### **Health and Safety Committee**

The Health and Safety Committee (HSC) brings together workers and management to assist in the development and review of health and safety policies and procedures for the workplace. Outcomes of the HSC are reported to the EMT regularly.

#### **Information Governance Committee**

The Information Governance Committee (IGC) is responsible for coordinating the management of our information assets. The IGC provides recommendations to the EMT to enable them to make informed decisions regarding PSR's information governance. The IGC supports best practice information governance across PSR by implementing fit-for-purpose management systems, policies and strategies.

# Our risk oversight and management framework

We manage risk according to the Commonwealth Risk Management Policy and PSR Risk Management Framework. Risk management is a standing agenda item for the EMT meetings, and the ARC provides independent advice and assistance on risk oversight and management, and systems of internal control.

The Director is the owner of the entire risk profile, supported by EMT members as individual risk owners. The risk owners carry the primary management, monitoring and coordination responsibility for their risk. We identified 6 key risks, provided in Table 1, that have the most significant impact on our strategic priorities and operations.

Table 1. Our 6 key risks

Key risk	Key mitigation strategies
Privacy and information security  PSR effectively protects the information entrusted to it	PSR has policies, processes and other controls in place to promote a secure environment where the protection of the highly sensitive information PSR is entrusted with is paramount. PSR staff receive annual training and oversight and monitoring occur through reporting and governance arrangements
Effective case management PSR effectively discharges its case management responsibilities and meets its statutory obligations	PSR has legal expertise and capability to ensure compliance with legislation, supplemented with external skills and knowledge as required. Case management and review is embedded in our day-to-day processes, and KPIs are monitored and reported on through governance arrangements
Organisational effectiveness PSR operates effectively and appropriately as a high-performing organisation	PSR has policies, processes and other controls in place to support effective performance, compliance and continuous improvement  PSR undertakes regular workforce planning. Roles, processes and procedures are documented, and staff receive regular training

Key risk	Key mitigation strategies
Wellbeing and safety PSR creates and maintains a safe working environment	PSR invests in the wellbeing of staff and promotes a safe and positive workplace culture embedded in frameworks, policies, instructions and guidance
Business system capability and availability PSR's business systems are fit-for-purpose and available	Plans (such as business continuity and disaster recovery), shared services arrangements and oversight of procurement and contract management practices are in place, and where necessary, regularly reviewed
Relevance, professional standing and stakeholder confidence  PSR maintains the confidence of its stakeholders and its reputation as an influential element within Australia's medical system	PSR's External Engagement Strategy and Stakeholder Engagement Framework and Panel Member Training Framework continue to be implemented and adjusted for effectiveness  PSR continues to strengthen and invest in relationships with its key stakeholders

The 6 key risks are integrated into our governance framework through:

- oversight, regular monitoring and reporting of the key risks to the EMT monthly meetings and quarterly to the ARC
- quarterly reporting to the EMT and the ARC on our KPIs.

Effective risk management assists our people to make better decisions, encourages engagement with risk and positions us to be more agile to deal with current and emerging challenges. Leadership actively demonstrates PSR's desired risk culture and actively encourages our people to engage with risk responsibly.

### **Our capability**

We recognise the importance of maintaining our capability to undertake core functions, ensuring the integrity of the PSR Scheme and maintaining the wellbeing of PURs while managing risks effectively.

#### Workforce capability

We will continue to strengthen our workforce capacity through continued focus on mental health and wellbeing as well as talent attraction and retention.

We are committed to creating a positive integrity culture. We will continue to embed our integrity framework to build a strong integrity culture that is diverse, equitable, inclusive, committed to service, accountable and respectful.

#### **APS Strategic Commissioning Framework**

We operate in line with the Strategic Commissioning Framework. Core work is done in-house in most cases, and any outsourcing of core work is minimal and aligns with the limited circumstances permitted under the framework.

#### Workforce planning

Our employees collaboratively enable PSR to meet our goals and are our greatest asset. The capability of our dedicated employees, including their diverse technical skills and experiences, enable us to respond effectively to the needs of our stakeholders.

To support our statutory responsibilities and enhance workforce support and development, we aim to:

- maintain a strong emphasis on work health and safety, particularly concerning workload and job design
- ensure we have the right people with the right skills at the right time
- focus on people and actively encourage and cultivate a culture of professionalism, stewardship, integrity, transparency and respect
- prioritise continuous development through learning and development, ensuring that our workforce is equipped with the knowledge and tools necessary for success
- use flexible work arrangements, including remote work and working from home arrangements, to promote workforce agility and adaptability
- foster effective internal collaboration to function as a unified agency.

Over the next the next 3 years, we will focus on:

- strengthening our ongoing strategic workforce planning to ensure that we are well-equipped and resourced for current and future responsibilities and we continue to attract and retain the right talent and culture
- enhancing our workforce's skills through ongoing training programs and leadership development at all levels to ensure our people can meet current and future challenges
- fostering high levels of staff engagement and innovative thinking by encouraging a culture where creativity and new ideas are welcomed
- strengthening our capability by embracing diverse perspectives and implementing initiatives that promote inclusivity to ensure all voices are heard and valued
- building on our strong relationships with our stakeholders by enhancing our communication and engagement strategies to ensure transparency and foster trust among our partners and the community.

As we move forward, we will continue to rely on our strengths and address any gaps in capability. By investing in our people and fostering a collaborative environment, we aim to enhance our overall performance and deliver exceptional value to our community.

#### Information communications and technology (ICT) capability

With changes to our ICT capability following the transition to secure cloud services and engagement of a new managed service provider, we will be updating our ICT strategy. We will remain focused on enabling staff and key stakeholders with secure, sustainable and scalable ICT and a continued alignment to our corporate and strategic objectives and whole of Australian Government policies.

We will continue to explore advances within the wider technology environment to streamline and enhance processes and to suit a modern service offering with a strong focus on maintaining the security of the information it holds. We have published our Al transparency statement<sup>1</sup>, acknowledging the potential for Al to improve operational processes and reporting that may inform and gain insights when applied responsibly.

<sup>1</sup> Our Al transparency statement is available at <a href="https://www.psr.gov.au/publications-and-resources/publications/corporate-documents/artificial-intelligence-ai-transparency-statement">https://www.psr.gov.au/publications-and-resources/publications/corporate-documents/artificial-intelligence-ai-transparency-statement</a>.

## Working with our stakeholders

We are committed to working cooperatively and collaboratively with our stakeholders to achieve our outcomes. The engagement and collaboration we have with our stakeholders is underpinned by our External Communications Strategy and Stakeholder Engagement Framework.

Our primary stakeholders fall under 3 categories: health professions, government and legal.

#### **Health profession stakeholders**

This stakeholder group includes medical practitioners and allied health practitioners, as well as the medical colleges and professional organisations that represent the interest of each profession and specialty.

#### Government stakeholders

Our main government stakeholders include the Department of Health, Disability and Ageing (the department) and the minister, Services Australia, and the Australian Health Practitioner Regulation Agency. We communicate with other Australian Government entities when relevant to our work and legislative obligations, and regularly participate in whole of government initiatives to sustain relationships across the APS.

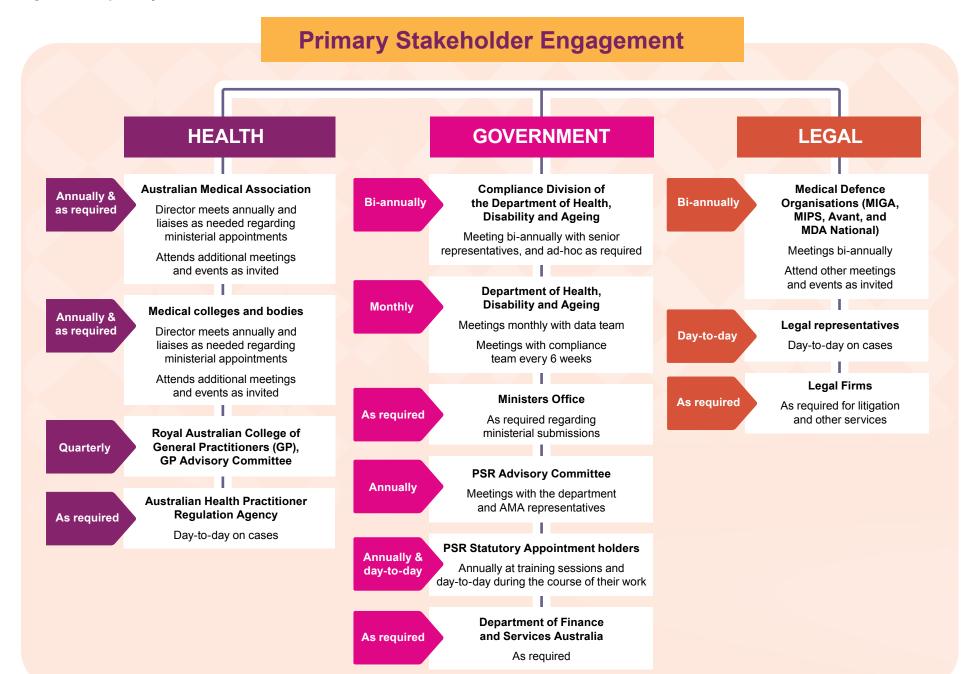
#### Legal stakeholders

The legal stakeholders include the medical defence and legal organisations and their representatives.

An overview of our primary stakeholder engagement is at Figure 4.

Through our partnerships with all of our stakeholders, PSR will ensure the Australian health system continues to realise high levels of integrity.

Figure 4. Our primary stakeholders



## Measuring our performance

## Regulator performance reporting

We approach regulatory performance reporting according to the Resource Management Guide – Regulator Performance (RMG 128)<sup>2</sup>. We also consider the 3 principles of regulatory best practice:

- 1. Continuous improvement and building trust
- 2. Risk-based and data-driven
- 3. Collaboration and engagement

### How we measure our performance

The PBS measures our performance based on the progress of cases with PSR, with the following expected performance results:

- At 30 June, more than 50% of active cases have been with PSR for less than one year
- At 30 June, fewer than 15% of active cases have been with PSR for more than 3 years.

We have also set KPIs against the PBS key activities:

- On referral from the Chief Executive Medicare, review and investigate through a peer review process whether practitioners or persons who employ or otherwise engage practitioners have engaged in inappropriate practice
- Actively engage with professional bodies through consultation.

Table 2 outlines how we will measure our performance against the PBS expected performance results and our KPIs for the financial years covered by the plan. Our progress against these performance measures will be regularly monitored and reported to the EMT and ARC.

We will report on our performance results in our annual report.

<sup>2</sup> The Regulator Performance (RMG 128) is available on the Department of Finance's website.

Table 2. Our expected performance results and KPIs against the PBS key measures and key activities

#### Our purpose

To safeguard the Australian public and the Commonwealth from the risk and cost of inappropriate practice within the medicare, dental and pharmaceutical benefits programs

#### **Our PBS outcome statement**

A reduction of the risks to patients and costs to the Australian Government of inappropriate practice, including through investigating health services claimed under the Medicare and Pharmaceutical benefits schemes

The program we contribute to: Safeguarding the Integrity of the Medicare Program and Pharmaceutical Benefits Scheme

The Australian Government, through PSR, aims to safeguard the community against the risks and costs of inappropriate practice by health practitioners. PSR liaises with governments, medical and health care regulatory bodies, and professional organisations to protect the integrity of the medicare benefits, pharmaceutical benefits, and child dental benefits programs.

## The performance measure we are responsible for. Progress of cases with PSR

Expected performance results 2025–26 to 2028–29	Methodology used to assess if the expected performance is achieved	
At 30 June, more than 50% of active cases have been with PSR for less than one year.	Quantitative data to demonstrate the time between the date a case is referred by the Chief Executive Medicare to PSR and a decision under sections 91, 92 or 93 of the HIA is made within 12 months, for at least 50% of active cases.	
	This includes matters:	
	<ul> <li>that are at the Director or Associate Director,</li> <li>Committee and DA stage</li> </ul>	
	<ul> <li>that are suspended due to court action</li> </ul>	
	<ul> <li>where a final determination has been made but is yet to come into effect</li> </ul>	
At 30 June, fewer than 15% of active cases have been with PSR for more than 3 years.	Quantitative data to demonstrate 15% or less of cases that were referred by the Chief Executive Medicare to PSR has been with PSR for less than 3 years.	
	This includes matters:	
	<ul> <li>that are at the Director or Associate Director,</li> <li>Committee and DA stage</li> </ul>	
	<ul> <li>that are suspended due to court action</li> </ul>	
	where a final determination matter that has been complete but is waiting to come into effect.	

#### Key activity 1

Investigate through peer review whether practitioners have engaged in inappropriate practice

#### What we will do to ensure the key activity is fulfilled

#### Our KPIs (how we will know we have fulfilled our key activities) 2025–26 to 2028–29

1. PSR will provide support

to assist PSR Committees

## Methodology to assess if KPI is achieved

The Director and
Associate Directors will
conduct reviews of health
care professionals and
employers or corporate
entities referred by the
Chief Executive Medicare
and in appropriate cases
enter into agreements.

to complete not less than 80% of their investigations within 18 months of the commencement of a PSR Committee hearing

Quantitative data to demonstrate for all final reports sent to a PUR during the reporting period, the time between a PSR Committee first hearing date and the date the final report is cleared was less than 18 months

#### Where appropriate, the Director or an Associate Director will refer the PUR to a PSR Committee for peer review.

2. The Director or Associate
Director will make a decision
under sections 91, 92 or 93
of the HIA within the statutory
timeframe in all cases

## **Data source:**Data maintained internally

Quantitative data to demonstrate section 91, 92 and 93 (of the HIA) decisions were made within statutory timeframes

## statutory within statutor S Data source:

Data maintained internally

The DA will consider ratification of agreements and make appropriate determinations.

3. The Director or Associate
Director will submit 100% of
section 92 agreements with
sufficient notice to the DA,
to enable the DA to decide
whether to ratify agreements
entered into between the
Director or Associate Director
and the person under review

Quantitative data to demonstrate the DA decided to ratify or refuse to ratify agreements

Where the DA did not make a decision, quantitative data will be used to validate whether the notice period that was given to the DA complied with the DA service standards

#### Data source:

Data maintained internally

4. PSR will assist the DA to issue its final determination within 9 months of receiving a final report in 80% of cases Quantitative data to demonstrate for all final determinations issued in the reporting period, the time between receiving a final report from a PSR Committee and signing a final determination is less than 9 months

#### Data source:

Data maintained internally

Key activity 1 Investigate through peer review whether practitioners have engaged in inappropriate practice				
What we will do to ensure the key activity is fulfilled	Our KPIs (how we will know we have fulfilled our key activities) 2025–26 to 2028–29	Methodology to assess if KPI is achieved		
	<ol> <li>The status of every case is reviewed by the Director and senior staff in at least 48 weeks in a year</li> </ol>	Quantitative data to demonstrate the Director and the Case Management Unit's principal legal officers convened to review all cases referred to PSR at least 48 weeks in the 12-month period		
		Data source: Data maintained internally		
Key activity 2 Actively engage with professional bodies through consultation				
	essional bodies through consultation	วท		
	Our KPIs (how we will know we have fulfilled our key activities) 2025–26 to 2028–29	Methodology to assess if KPI is achieved		
Actively engage with profe What we will do to ensure the key	Our KPIs (how we will know we have fulfilled our key	Methodology to assess if KPI is		

## **Appendix A – adjustment of KPIs**

Table 3 provides a summary of minor changes made from the Corporate Plan 2024–25.

Table 3. Summary of changes to PSR KPIs

Relevant performance information from Corporate Plan 2024–25	Performance information revisions in Corporate Plan 2025–26	Changes made	Rationale for changes
KPI1: PSR will provide support to assist PSR Committees to complete 80% of their investigations within 18 months of the commencement of a PSR Committee hearing	PSR will provide support to assist PSR Committees to complete not less than 80% of their investigations within 18 months of the commencement of a PSR Committee hearing	<ul> <li>Text added 'not less than'</li> </ul>	Minor editorial refinements to improve wording
KPI2: The Director has made a decision under s91, s92 or s93 within the statutory timeframe in all cases	KPI2: The Director or Associate Director will make a decision under sections 91, 92 or 93 of the HIA within the statutory timeframe in all cases	<ul> <li>Associate         Director         included</li> <li>long form of the         word section/s         included</li> <li>reference to         HIA specifically</li> </ul>	Reflecting the appointment of Associate Directors following legislative amendments in 2023 Minor editorial refinements to reflect HIA and improve wording
KPI3: The Director will submit 100% of s92 agreements with sufficient notice to the DA, to enable the DA to decide whether to ratify agreements entered into between the Director and the person under review	KPI3: The Director or Associate Director will submit 100% of section 92 agreements with sufficient notice to the DA, to enable the DA to decide whether to ratify agreements entered into between the Director or Associate Director and the person under review	<ul> <li>Associate Director included</li> <li>long form of the word section/s included</li> </ul>	Reflecting the appointment of Associate Directors following legislative amendments in 2023 Minor editorial refinements to reflect HIA and improve wording





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