

---

# Appendix 1 – Response from entities

## Response from Corrective Services NSW



Corrective Services NSW  
Locked Bag 5000  
Parramatta NSW 2124  
Tel 02 8346 1333  
[www.dcj.nsw.gov.au](http://www.dcj.nsw.gov.au)

SGM26/3597

23 April 2026

Bola Oyetunji  
Auditor-General  
GPO Box 12  
SYDNEY NSW 2001

Dear Mr Oyetunji,

Corrective Services NSW (CSNSW) appreciates the opportunity to provide a formal response to the Audit Office of NSW's (AONSW) Final Report *Managing Unplanned Leave and Overtime*. This document presents CSNSW's position on the key findings and recommendations of the report and details the initiatives currently in place or in progress, in response.

CSNSW in principle agrees with all four (4) recommendations identified in the report. However, there are recognised limitations that may impact the agency's ability to fully implement the recommended actions, including:

### **Financial**

CSNSW operates within fixed budget parameters and is currently managing a range of competing operational priorities and financial pressures. Implementing the recommended actions (particularly those requiring updated staffing formulas, additional relief staffing, or new workforce planning initiatives) would require significant additional funding. Without a dedicated budget allocation, the scope and pace of implementation may be limited.

### **Timeframe**

Multiple recommendations involve complex, system-wide changes such as reviewing rostering models, redesigning work practices, and conducting formal evaluations of existing initiatives. These processes require substantial planning, stakeholder engagement, and phased implementation. As a result, achieving meaningful and sustained outcomes within the suggested timeframes may be challenging.

### **Staffing Resources**

Current staffing shortages and reliance on overtime already place pressure on centres and operational teams. Implementing the recommended changes will require dedicated personnel to undertake analysis, consultation, evaluation, and operational adjustments. Limited availability of specialised staff (particularly in workforce planning, DCJ Human Resources, and operational oversight) may slow the ability to progress or sustain recommended actions.

### **Industrial Position**

With a strongly unionised workforce, any changes to staff profiles or staffing formulas which will impact how CSNSW conducts its rostering will involve lengthy negotiations. There will be an inherent expectation from industrial bodies that staffing numbers and rostering formulas provide an increase in employees. It will be critical for CSNSW to manage stakeholder engagement carefully to manage expectations and still achieve outcomes.

As the recently appointed Commissioner, I have been brought in to lead a significant reform agenda to improve outcomes across CSNSW. I am pleased to provide the below detail on work that is underway, as we continue to work towards ongoing reform.

### **Return to Work Project**

The CSNSW Return to Work Project commenced in late 2024 at the Metropolitan Remand and Reception Centre and Mid North Coast Correctional Centre, introducing dedicated Senior Assistant Superintendent staff to manage incident investigations and support injured workers to return to work in partnership with the Department of Communities and Justice Injury Management directorate.

A six-month evaluation demonstrated strong wins, including faster and higher-quality completion of SafetySuite investigations, improved incident oversight, and clear progress in safely returning staff to work from workers' compensation. Based on these outcomes, the Workers' Compensation Steering Committee agreed the model should extend across all CSNSW sites. The project has since expanded to 18 locations, with further rollouts scheduled from June 2026. Key outcomes include:

- Improved safety practices
- Enhanced staff experience
- Return to work improvements
- Financial impact

### **Over-Establishment**

This process is a mechanism that allows a role to be over-established on an ongoing basis. It is utilised to allow long-term worker's compensation staff to be placed into an ongoing role where there is no existing vacancy to achieve pre-injury duties status. Benefits include:

- Closure of worker's compensation claim.
- Ability to retain a staff member, and limit recruitment and training resourcing through staff attrition.
- Additional resourcing for business units with no vacancies.
- Allows correctional centres to fill posts ongoing at the base rate, rather than by way of overtime.
- Mitigates risks of claims progressing to Whole Person Impairment and Work Injury Damages compensation.

### **Review of Rostering Principles**

CSNSW has been focused on revising rostering principles to enable greater flexibility whilst maintaining safety. The first phase of implementing this work will be to undertake a trial of a revised approach to filling daily vacancies, which will occur at two sites:

- Macquarie Correctional Centre
- Dillwynia Correctional Centre

The trial will commence in April 2026. Importantly, steps are in place to ensure that the trial can be evaluated properly and can incorporate any feedback. Specific information and support are being provided to both trial sites as the work gets underway. The safety of our correctional centres will not be compromised, particularly when it comes to ensuring adequate emergency response capability.

CSNSW supports the AONSW recommendations in principle and is progressing a range of reforms to address unplanned leave and overtime, while acknowledging the financial, industrial, resourcing constraints that may affect full implementation. Through initiatives such as the Return to Work Project, over-establishment arrangements and revised rostering trials, CSNSW is taking measured, evidence-based steps to strengthen workforce sustainability without compromising safety or operational outcomes.

Yours sincerely



Gary McCahon PSM  
Commissioner  
Corrective Services NSW

# Response from Fire and Rescue NSW

OFFICIAL



File ref. no: B26/410  
Contact: Kathryn Natoli, Director Governance, Audit, Risk and Legal

Bola Oyetunji  
Auditor General for New South Wales  
Level 19, Darling Park Tower 2  
201 Sussex Street  
Sydney NSW 2000

22 April 2026

Dear Bola,

**Re: FRNSW Response to the 2026 Performance Audit – ‘Managing unplanned leave and overtime’**

Fire and Rescue NSW (FRNSW) acknowledges the findings of the NSW Auditor-General’s report titled Performance Audit: Managing unplanned leave and overtime. The agency welcomes the Auditor-General’s examination of overtime and unplanned leave and recognises the value of independent assurance in strengthening governance, accountability, and service delivery across the NSW public sector.

Managing overtime and unplanned leave at FRNSW is complex and we appreciate the Audit Office’s dedication to understanding, examining and communicating the scale and volume of complexities that are inherent in high-risk, 24-hour emergency services contexts where the safety of our people and community underpin everything we do.

The audit has reinforced the priorities FRNSW has been progressing over the past 18 months, including addressing the underlying drivers of unavailability which drive excess overtime. FRNSW recognises that achieving sustainable improvement will require fundamental reform, which can be complex, lengthy and resource-intensive. Notwithstanding, important foundational work for future reform has been completed, alongside targeted actions within our current operating environment to reduce unnecessary overtime. Over the past 18 months, FRNSW has strengthened oversight, reporting and governance of financial performance, with a specific focus on overtime, and has implemented initiatives to better manage overtime, including through the Overtime Comptroller function and the Attendance Management and Firefighter Welfare policy and the implementation of this policy.

Fire and Rescue NSW

ABN 12 593 473 110

Commissioners.Office@fire.nsw.gov.au

Commissioner’s Office

Locked Bag 12  
Greenacre NSW 2190

T (02) 9265 2999

[www.fire.nsw.gov.au](http://www.fire.nsw.gov.au)

Page 1 of 5

OFFICIAL

**OFFICIAL**

While there remains more to deliver, FRNSW is beginning to see the benefits of the work to address overtime, evidenced by a reduction of 60,261 hours of overtime compared to the previous financial year.

It is pleasing that this report highlights the complex challenges and causes of high unplanned leave and the resulting overtime by articulating, among other things;

1. The need to review and update the retained/on-call firefighter model to meet the needs of changing communities and address the availability of our on-call staff as it is a significant driver of overtime at FRNSW;
2. The impact of changes to parental leave and increasing workers compensation claims on unplanned leave; and
3. Cost drivers associated with various roster options worked within FRNSW.

In relation to the recommendations contained in the report, FRNSW is committed to addressing the recommendations in a timely and proportionate manner, having regard to:

- Existing initiatives already underway;
- The financial investment required to support the proposed reform initiatives;
- Operational, legislative and industrial constraints; and
- The need to balance reform with continuity of frontline service delivery.

**Recommendation 1**

*Undertake preparatory work to determine whether its current rostering and shift patterns, including the default 10/14 roster, the alternate 24-hour shift arrangement and the use of overtime, remain an efficient and sustainable model, and to lay the groundwork for a future roster trial by:*

- a) *Reviewing current rostering practices to identify elements that contribute to overtime pressures and fatigue risks*
- b) *Developing alternate roster options that address the limitations identified through the review*
- c) *Designing the framework for a future trial, including selection criteria for trial sites and measures to assess impacts on overtime, staffing flexibility and fatigue risks*

Agency response:

FRNSW supports this recommendation with the following considerations:

- The Overtime Comptroller function has already developed and implemented improved roster practices that mitigate risks and issues connected with overtime pressures and fatigue risks over the past 12 months. Examples of these improvements include implementing limits on single day long service leave requests and limiting the length of overtime shifts where possible.
- The roster of permanent firefighters is defined by their Award and therefore the introduction of alternative rosters requires extensive consultation with impacted staff and our industrial partners.
- The detailed analyses of our workforce and service delivery models, including the on-call model, is likely to inform approaches to the roster.

Planned actions:

- a) FRNSW will analyse available information of current rostering practices and alternate rosters to identify elements that may contribute to overtime pressures and fatigue risks.

**OFFICIAL**

- b) FRNSW will consult with our industrial partners consistent with Award obligations.

**Recommendation 2**

*Review and update the permanent firefighter relief staffing model to reflect changing patterns of leave, unavailability, and service demand, to reduce reliance on overtime.*

Agency response:

FRNSW supports this recommendation with the following considerations:

- While FRNSW workforce planning analysis can determine appropriate relieving ratios to accommodate the changing nature of leave types, staff availability and service demand, implementing new/revised relief staffing models will require increased establishment.
- Concurrently, FRNSW will continue to implement initiatives targeted at improving firefighter availability, including strengthening attendance management and early intervention, supporting health and wellbeing, improving workforce planning and recruitment outcomes, and refining rostering and deployment practices to maximise operational coverage.

Planned actions:

- a) FRNSW will continue to focus on improving firefighter availability to reduce the pressure on current reliever ratios.
- b) FRNSW will continue to mature its workforce planning practices to support staffing models that are fit for purpose, fully funded and appropriate to meet the service delivery expectations of the community.

**Recommendation 3**

*Ensure consistent application of the policies for management of sick and unplanned leave, with clearer manager guidance, improved accountability through centralised oversight and early intervention when individual staff exceed thresholds.*

Agency response:

FRNSW supports this recommendation with the following considerations.

- Following extensive industrial engagement, FRNSW released the Attendance Monitoring and Firefighter Welfare policy in November 2025, with reporting and full roll out effective in early 2026. The policy establishes clearer expectations for the management of sick and unplanned leave, including defined thresholds, manager actions and welfare-focused early intervention.
- To drive consistent application, FRNSW has strengthened centralised oversight and reporting. The Overtime Comptroller function reports weekly to the Commissioner's Leadership Group (CLG) on leave and overtime trends and recommends adjustments to improve consistency. In parallel, the business management leads from the seven Area Commands meet regularly to clarify manager responsibilities, ensure consistent application of process and address emerging issues early.
- Early implementation is strengthening welfare conversations and improving visibility of leave patterns. Where individuals exceed defined thresholds,

**OFFICIAL**

managers are supported to intervene early and apply the policy consistently. This is contributing to improved staff availability and a sustained reduction in overtime compared with the same period in the previous year.

Planned actions:

- a) FRNSW will continue to support accountable managers to implement the Attendance Monitoring and Firefighter Welfare policy consistently, including through practical guidance material, refresher communications and targeted capability uplift for managers in Field Operations.
- b) FRNSW will maintain centralised monitoring and reporting arrangements (including through the Overtime Comptroller and CLG) to strengthen accountability for the management of sick and unplanned leave. This includes tracking compliance with required manager actions, monitoring instances where individuals exceed defined thresholds, and escalating matters for early intervention and support where appropriate.
- c) FRNSW will strengthen centralised oversight of attendance management and rostering disposition to support consistent decision-making and policy application.

**Recommendation 4:**

*Undertake detailed analyses of its workforce and service delivery models, including the on-call model, and propose options to address structural issues impacting staffing availability and operational coverage, in consultation with relevant stakeholders.*

Agency response:

FRNSW supports this recommendation with the following considerations.

- FRNSW has identified that structural reform of the on-call/retained workforce is necessary to address unavailability and retention challenges, particularly in regional locations with relatively small populations from which to recruit. FRNSW recognises the significant demands placed on on-call firefighters, who balance response readiness and availability commitments with other paid employment and personal commitments. If on-call staff are to provide increased availability in these circumstances, they must be supported by a more modern workforce model to sustain the required availability for operational response.
- A workshop was held in March 2026 with a range of stakeholders from on-call firefighters, industrial representatives and senior leaders to discuss the structural limitations and benefits of the current retained model. The workshop identified initiatives that can quickly be implemented, the definition of a number of areas of alignment between FRNSW and our industrial partners which can be discussed in the upcoming Award negotiations and the identification of larger structural changes for future industrial negotiation.

Planned actions:

- a) FRNSW will develop a Regional and Retained Firefighter Model Review. The review will seek to modernise the current model to ensure it meets the needs of NSW communities and addresses significant unbudgeted overtime. This review will analyse demographic change, capability requirements, and regional demand patterns to determine a contemporary and fit-for-purpose model.

**OFFICIAL**

Finally, I would like to thank the team from the Audit Office of NSW for their professionalism and collaborative approach during the audit process.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael Morris'.

Michael Morris OAM  
**A/Commissioner**  
**Fire and Rescue NSW**

# Response from NSW Health

NSW Health



Ref: H26/27292

Mr Bola Oyetunji  
Auditor-General for New South Wales

---

## NSW Health response to the final performance audit report - Managing Unplanned Leave and Overtime

Dear Mr Oyetunji,

Thank you for the opportunity to respond to your performance audit report titled Managing Unplanned Leave and Overtime.

I welcome the focus that this audit has given to managing unplanned leave and overtime. I am pleased to note that the audit report has concluded that NSW Ambulance has clearly defined operating policies, procedures and accountability mechanisms to effectively manage unplanned leave and overtime. The areas highlighted for further enhancement will be considered as part of our workforce reform programs that support service delivery and staff experience.

This audit highlights the need for ongoing balance between the structural nature of emergency health care and the management of unplanned leave and overtime. Sustainable workforce programs are essential to reduce the tension between responding to life-threatening emergencies and any resulting overtime and missed breaks. The nature of emergency response requires that where there is a crew available to respond to a life-threatening situation but is otherwise on crib break or near the end of their shift, it is incumbent on NSW Ambulance to dispatch that crew. NSW Ambulance is committed to ensuring that processes are in place to effectively and efficiently manage these situations and ensure the wellbeing of staff, in context of our emergency response role.

All audit recommendations have been accepted, noting that further consideration may be required in relation to broader award reform to enable altering existing rostering and shift patterns. This includes consultation with our workforce and their representatives as well as consideration of budgetary impacts. Further detail regarding NSW Health's response to each of the report recommendations is attached to this letter.

I appreciate the support offered by the Audit Office over the duration of this audit program and for the collaborative approach to working with representatives of NSW Health.

Yours sincerely

A handwritten signature in black ink, appearing to read "Susan Pearce".

28/4/2026

**Susan Pearce AM**  
Secretary, NSW Health

Encl. Table of Audit recommendations and NSW Health response against those recommendations

1 Reserve Road, St Leonards NSW 2065  
Locked Mail Bag 2030, St Leonards NSW 1590

02 9391 9000  
[health.nsw.gov.au](http://health.nsw.gov.au)

1

## NSW Health Response to the Audit Recommendations

Recommendation	Responsibility	Agency Position	Agency Response
<b>By April 2027, NSW Ambulance should:</b>			
9. Undertake preparatory work to determine whether its current rostering and shift patterns, including consecutive 12-hour shifts, extended shifts, on-call practices and the use of overtime, remain an efficient and sustainable model, and to lay the groundwork for a future roster trial by: a) reviewing current rostering practices to identify elements that contribute to overtime pressures and fatigue risks b) developing alternate roster options that address the limitations identified through the review c) designing the framework for a future trial, including selection criteria for trial sites and measures to assess impacts on overtime, staffing flexibility and fatigue risks	NSW Ambulance	Accept in principle	NSW Ambulance accept this audit recommendation in principle, noting that it is complementary to existing Service Planning and Workforce Planning. Any proposed changes to rostering and shift patterns would be in consultation with staff and their representatives and need to consider budget impact.  NSW Ambulance is committed to optimising resources from a service delivery and welfare perspective, including managing staff wellbeing, work health and safety, and fatigue risks. NSW Ambulance will undertake work as part of existing workforce and service delivery reform objectives that consider rosters, shift patterns, on-call practices and the use of overtime that optimise service delivery through efficient and sustainable models.
10. Review and update the paramedic relief rate to reflect changing patterns of leave, unavailability and service demand across different locations, ensuring sufficient relief staff to reduce reliance on overtime.	NSW Ambulance	Accept in principle	NSW Ambulance accept this audit recommendation in principle. NSW Ambulance reviews the relief rate against a variety of workforce planning considerations. Any changes to the paramedic relief rate and shift patterns would need to include consultation with the workforce and their representatives as well as considering the budget impact.
11. Complete the rollout of central dashboards displaying real-time data on leave, overtime and rostering to give managers clearer oversight and support proactive staffing decisions that minimise overtime.	NSW Ambulance	Accept	NSW Ambulance accept this audit recommendation and will work toward its implementation.
12. Continue to monitor, evaluate and progressively refine the rollout of initiatives, such as transitioning on-call stations to 24-hour rosters and the On Duty Relief Model trial, to ensure they are delivering overall cost savings, reduced reliance on overtime and improved service outcomes.	NSW Ambulance	Accept	NSW Ambulance accept this audit recommendation and will work toward its implementation.