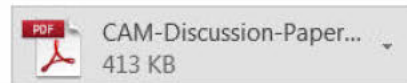


SIRA Claims Administration Manual and Guidelines Review

To ☐ Team Policy and Design

Cc [REDACTED]



Hello,

Please see below [REDACTED] response to the CAM discussion paper.

We are happy for our feedback to be made publically available however request that it be anonymous.

General

1. Do you have any comments regarding the introduction of the CAM and the review of the Guidelines?

Response - We view this as a positive initiative centralising the reference material and seeking to clarify legislation, guidelines and the implementation of such.

Content

2. Do you have any feedback on the proposed content?
3. Are there topics that are not covered that you would like to see included in the CAM?
4. Do you have any feedback or information that you would like SIRA to consider regarding these topics?

Response - We make recommendation that the manual also include:

- Injury Management Program Guidelines – these are not currently located on SIRA's website.
- Claims Finalisation – specifically we are seeking clarity on timeframes e.g. pre-injury duties certificate, declinature of a claim. (we note the consultation session handout, so perhaps this is already being considered)
- Claims Estimation Manual – this is currently not online and is an old WorkCover 2012 version. We suggest that the Manual should be readily available and SIRA should have a position on this for self-insurers. We are not making recommendation that the Manual be changed as we believe this a topic for consultation, however the claims estimation manual is a pivotal tool in claims management due to the impacts on claim costs, actuarial valuations, premiums and bank guarantees.

Focus areas

5. What would you like SIRA to consider in these areas?
6. Are there any other claims management matters you believe would benefit from clarification from SIRA?

Response - below comments and proposal relates to the **Application of reasonable excuse for weekly benefits**

- The operationalisation of this is confusing for injured team members as well as businesses and adds unnecessary process to employers/insurers without any clear benefit, particularly to those injured team members who sustain low level injuries requiring no first aid, treatment or time off. The requirement for written formal acknowledgement of ALL reported injuries adds cost, time, confusion and unnecessary process and can be operationalised in ways other than providing the team member with a letter
- The definition outlined in the Workplace Injury Management and Workers Compensation Act 1998, Section 4. Definitions states injury “means a personal injury arising out of or in the course of employment” which is a broad definition reliant on interpretation. The guidelines do not provide a clear definition of injury either.
- It is essential from a safety perspective to have a strong reporting culture which includes all level of injuries no matter how minor. This enables analysis of risk and prevention of incidents and injuries both minor and more significant. The current definition of injury and the application of reasonable excuse in accordance with Section 267 & 268 of ‘the Act’ does not encourage strong reporting cultures
- Providing those who have not required treatment or time off from work with a letter including their rights and a reasonable excuse is confusing at best and at worst could be seen as adversarial or bringing the team member into ‘the system’ where it is not required
- We propose that the “in writing” requirement for Section 286 of the Act (reasonable excuse and workers’ rights) can be operationalised for minor injuries such as 1) injuries not requiring first aid or medical treatment and 2) injuries requiring first aid only, through other communication means such as the implementation of posters on noticeboards - “if you are injured at work” posters, induction and training, and procedures for incident reporting and injury management (which are accessible to team members)
- We propose that a written acknowledgement “letter” only be required when the team member has required ‘medical’ treatment

If you wish to discuss any of the above please let [REDACTED] know.

Kind regards

[Redacted]

[Redacted]

Please consider the environment before printing this email

[Redacted]

This email is confidential and may contain legally privileged information. If you are not the intended recipient, you must not disclose or use the information contained in it. If you have received this email in error, please notify us immediately by return email and delete the document.