



31 May 2018

Dr Rhys Bollen
State Insurance Regulatory Authority
GPO Box 2677
Sydney NSW 2001

Via email: [REDACTED]

Dear Dr Bollen

Claims Administration Manual and Guidelines Review

Thank you for providing Coal Services with the opportunity to provide feedback as part of SIRA's development of the new claims administration manual (CAM) for New South Wales workers compensation insurance claims.

Coal Services would be pleased to further assist with the development of the CAM and associated workers compensation guidelines and we look forward to continuing to work with SIRA on this important initiative.

If you have any enquiries regarding the attached feedback could you please direct them to Lynette Harper – Deputy General Manager, Insurance on [REDACTED], or at [REDACTED]

Yours sincerely

Lucy Flemming
Managing Director/CEO

Your ref: D18/092225

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Claims Administration Manual and Guidelines Review

Coal Services' feedback

Summary

Notwithstanding the application of Section 7A of the *Workers Compensation Act 1987* (NSW), Coal Services supports the introduction by the State Insurance Regulatory Authority (SIRA) of the proposed Claims Administration Manual (CAM) as described in the discussion paper.

Complexity associated with the various relevant Acts, regulations and guidelines presents a challenging landscape for the workers compensation claims manager to navigate through. Furthermore, aspects of legislation require interpretation, which can lead to inconsistency in both practice and application.

Coal Services notes that the proposed CAM consolidates all the relevant regulatory and associated resources into a centralised, easy to navigate online tool.

In addition to the user-friendly benefits of a centralised online tool, Coal Services considers that the primary value of the CAM relates to the "single source of truth" approach where resource material is not only simplified for ease of interpretation but also articulates to the end user a preferred approach or direction especially relevant to topics or areas that are not clearly defined and are often subject to interpretation.

Coal Services believes that the simplification of guidance material, complemented by a broad-based information platform as a key component of the proposed CAM, will assist in mitigating ambiguity and promoting greater consistency in claims management practices across the New South Wales workers compensation system.

CAM – Proposed content

The proposed content of the CAM as outlined in the SIRA discussion paper via chapter and topic headings appears to be comprehensive, covering the key elements associated with workers compensation claims management and administration.

Coal Services notes that the CAM may incorporate links to information, relevant research and resources that in turn promote claims management behaviour intended to improved outcomes for injured workers, their employers, and the workers compensation system overall.

Coal Services agrees that the inclusion of relevant links and information is a valuable feature of the proposed CAM.

CAM – Additional considerations and inclusions

In terms of the chapter and topic relating to eligibility or the 'triaging' aspect of the claims management and administration process, Coal Services takes this opportunity to highlight the recent passing of the Coal Industry Amendment Bill 2018 and to propose that, on assent of the *Coal Industry Amendment Act 2018*, reference be made in the CAM to the consequent changes made to the *Coal Industry Act 2001* and the effect on where coverage should be held by an employer whose employees work in or about a coal mine.