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CONSULTATION DRAFT GUIDELINES FOR THE PROVISION OF RELEVANT SERVICES (HEALTH AND RELATED SERVICES)

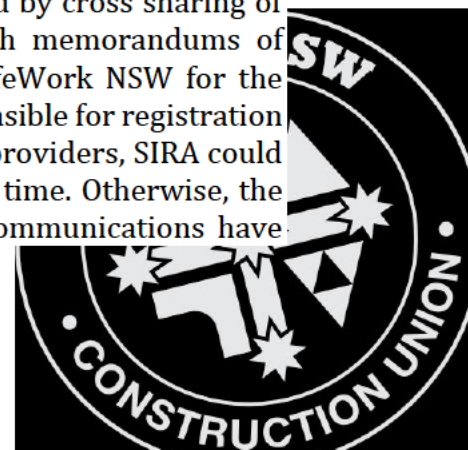
CFMEU SUBMISSION

The CFMEU welcomes the opportunity to make this modest submission in relation to the *Draft Guidelines for the Provision of Relevant Services (Health and Related Services)* (The **Guidelines**). The CFMEU supports the submission of the Teachers Federation and notes the important points made in that submission regarding the wording in the clauses of the Guidelines.

The CFMEU has great concern at the administrative and regulatory burden that is being placed on service provisions through the imposition of these Guidelines. Many providers in this space operate small businesses with little assistance with their administrative processes. By imposing such significant administrative burdens on these providers there is a very real chance of the providers exiting the workers compensation system thereby reducing the number of competent providers and reducing the injured workers choice of provider even further.

We are particularly concerned about the loss of services that are already scarce, psychology and psychiatric service providers. As it currently stands, it can take several weeks for a worker to find an appointment. If there is less choice, the availability of treatment decreasing. If workers cannot get the appropriate treatment in a timely manner, they are less likely to return to work putting further pressure on the return to work rates for psychological injury.

It would appear that many of the matters could be better managed by cross sharing of information between regulators. This could be achieved through memorandums of understanding like that negotiated between NSW Health and SafeWork NSW for the provision of data regarding silicosis cases. Since the agencies responsible for registration have registers outlining the conditions placed on relevant service providers, SIRA could negotiate an MOU to ensure that the information is shared in real time. Otherwise, the Guidelines are disproportionately focussed on ensuring all the communications have



been sent rather than whether injured workers are receiving value based health care which was the original intention of the legislative provision.

The CFMEU is concerned that the Guidelines are regulation for the sake of regulation rather than ensuring that workers are receiving the best health care available. SIRA should give some serious thought to whether the Guidelines meet the organisations objects under the *State Insurance and Care Governance Act 2015* and the objects of the workers compensation scheme. At present, it is debateable.

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