

SIRA

Treasury Managed Fund Audit Report Government Employer Compliance

Appendix 2

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1. Executive Summary

This report sets out the findings and actions SIRA will take following its review into government employers' compliance with their employer obligations under the NSW workers compensation legislation and return to work (RTW) performance. Delivered as a component of SIRA's integrated Treasury Managed Fund Review (TMF), the Government Employer compliance and performance review commenced in March 2023 and was conducted by authorised SIRA officers.

In conducting this review, SIRA exercised its authority under the *Workers Compensation Act 1987* (the 1987 Act), the *Workplace Injury Management and Workers Compensation Act 1998* (the 1998 Act) and the *Workers Compensation Regulation 2016* (the Regulation) together with, the Workers Compensation legislation.

Ten government employers were identified and underwent a compliance audit with a focus on the following key employer legislative obligations:

- Employers are to keep a readily accessible register of injuries (section 256(1) the 1998 Act).
- An employer who maintains a register of injuries in electronic form must provide education, training and facilities to ensure that workers are able to access the register (section 40(2) the regulation).
- An employer must establish a return to work program with respect to policies and procedures for the rehabilitation of any injured workers of the employer. An employer's return-to-work program must be established in accordance with the regulations and comply with the Guidelines for workplace return-to-work programs (section 52(1) & 52(2(a)) the 1998 Act).
- An employer must notify the insurer within 48 hours after becoming aware that a worker has received a workplace injury in the manner prescribed by the regulations (section 44(2) the 1998 Act).

Overall, the ten government employers were 64% compliant with the 27 audit criteria associated with an employer's legislative obligations.

1.1. Summary of key insights

Register of injuries

- Government employers predominantly utilise an electronic register of injuries accessed via the agency's intranet, with some established at a cluster level and others specific to the agency.
- Across the audited government employers there are varied procedures regarding who completes the entry into the register i.e. some have workers completing their own, while others have the worker's line manager completing the entry with information gathered from the worker.
- The majority of the registers are linked to payroll systems.
- Some government employers included fields where a worker could advise their intent to 'claim workers compensation' for the injury they were reporting.
- Some government employers provided training and education on the use of the register of injuries through online compulsory modules at employee induction and some as part of training on an annual basis and incorporated with modules on work health and safety, workplace rehabilitation and/or the organisation's return to work program.
- Ten per cent of government employers could not demonstrate that all workers had access to their electronic register of injuries. These workers were referenced as 'unwired' due to their lack of access to any organisation issued email address or intranet access.

Return-to-work program

Overall, the ten government employers when assessed against the SIRA Audit Tool (Appendix 1) demonstrated:

- their commitment to helping workers recover at work
- how positive and effective communication with injured workers and the RTW team was maintained
- how their RTW program was made available via their agency and/or cluster intranet
- some RTW programs were established at a cluster level and applied to all agencies within that cluster. In other circumstances, individual agencies within clusters had their own tailored RTW program

When assessed against the SIRA checklist common areas of non-compliance in the reviewed Return to Work Program included:

- demonstrating the RTW program's connection to WHS policies and procedures
- documenting and implementing a workforce wide approach to the communication and training arrangements for their RTW program.

Early notification of injury

Government employers' processes and practices for early notification of injury varied from automated systems which allowed a daily direct upload from the employer's register of injuries to their claims service provider, to manually created individual notification emails sent to the insurer.

Fifty per cent of employers failed to notify within 48 hours or did not notify at all. The reasons for this included:

- the worker did not want to make a claim
- the employer only notified injuries where treatment and/or weekly payments were required
- the employer determined that the severity of the injury did not warrant notification.

Where potential non-compliance was discussed, the employers expressed significant concern at their ability to meet the requirements of the legislation due to:

- the variance in the type and nature of injuries reported by workers
- the 'administrative burden' required to comply
- additional costs associated with systems / personnel requirements
- the possible negative impact to the 'reporting culture' of the workplace
- their claim service provider's ability to manage a significant increase in notifications.

1.2. Summary of actions

Engagement

- SIRA to establish formal quarterly engagements with some government employers to support their understanding and application of regulatory requirements and provide opportunities for feedback and collaboration on challenges in the system.
- Refine the agenda of the existing TMF quarterly forum to include employer specific agenda items focused on building compliance and evidence-based practices.

Update the Guidelines

SIRA will utilise the findings from the audit of the government employers to consider opportunities to improve the Guidelines for Workplace Return to Work Programs. These include clarifying SIRA's expectations of what must be included in an employer's return to work program and reducing confusion or inconsistencies, specifically in relation to roles and responsibilities.

Monitor compliance and areas for improvement

SIRA will monitor the performance and compliance with the Workers Compensation legislation to identify employers requiring regulatory intervention and more broadly areas for improvement across the government sector.

Focus on early notification

SIRA will establish a project focusing on the compliance of government employers in the early notification of injuries (compliance with Section 44 1998 Act). Utilising the findings and insights from this audit SIRA will prioritise government employers for further investigation.

Remediation

SIRA's inspectors will continue to engage with those government employers where remediation action is continuing to ensure compliance is achieved. As some investigations are ongoing further proportionate regulatory action may be taken.

2. Background

There is strong evidence that a positive workplace culture underpinned by organisational systems and processes has a significant influence on recovery at work outcomes. As the NSW regulator for workers compensation SIRA holds employers to account for outcomes with an enhanced focus on employer capability alongside increased supervision and enforcement activity.

SIRA is focused on government employer's systems and practices as these activities, which commence prior to any work-related injury, are where an employer has the greatest opportunity to positively influence outcomes for injured workers. All NSW employers must have a RTW program which outlines the systems and processes an employer will use to manage workers with work-related injuries or illnesses. The workplace RTW program presents an opportunity for an employer to reinforce a positive workplace culture by promoting the health benefits of work, consulting and engaging with their workers and through training and implementation conveying a strong commitment to support them at the first sign of injury.

An essential component of employer RTW systems includes mechanisms for early reporting of work-related injury enabling provision of early intervention and support. Workers must understand how to report an injury, but as importantly, know that they will be supported in making a claim. A longer time between date of injury and making a claim is associated with an increased likelihood of a longer time away from work¹. RTW outcomes are improved when a worker has low levels of concern about making a claim and perceive the employer to have provided appropriate pre-claim assistance². Workers who are not concerned about making a claim are more than three times more likely to RTW³.

1 Gray SW, Sheehan LR, Lane TJ, Beck D, Collie A. May 2018. Determining the association between workers compensation claim processing times and duration of compensated time loss. COMPARE project team. Insurance Work and Health Group, Monash University: Melbourne.

2 Wyatt, M. and Lane, T. 2017. RTW: a comparison of psychological claims and physical injury claims analysis of the RTW Survey results. Commissioned by Safe Work Australia.

3 Sheehan LR, Gray SW, Lane TJ, Beck D, Collie A. 2018. Employer Support for Injured Australian Workers: Overview and association with RTW. COMPARE project team. Insurance Work and Health Group. Monash University: Melbourne. Cited in SafeWork Australia. National RTW Strategy 2020-2030.

3. Review

3.1. Scope

The review included ten government employers, selected from the 12 employers identified in the claims file review cohort. Government employers were selected from across the clusters represented in the claims audit cohort and in accordance with a risk and outcomes based regulatory approach. The sample parameters were:

- All employers were deemed to be employers in the Treasury Managed Fund.
- All employers had claims being reviewed as part of the claims file review cohort.

Section 4 of the 1998 Act defines a government employer as *the Crown or any government agency, and includes –*

- (a) *A public health organisation within the meaning of the Health Services Act 1997*
- (b) *(a1) a person exercising employer functions for the Crown or a government agency in relation to a worker*
- (c) *an employer prescribed by the regulations.*

Utilising an audit tool comprising 27 criteria, government employers were assessed for compliance against the following legislative obligations:

Total no. of criteria	Employer obligations
1	Have a readily accessible register of injuries (section 256(1) of the 1998 Act)
1	The register of injuries to be kept in a form in accordance with the regulations (section 256(3) of the 1998 Act)
1	Where the register of injuries is kept in electronic form the employer provides education, training and facilities to ensure that workers are able to access the register. (Clause 40(2) of the Regulations)
24	<p>A return-to-work program has been established with the policies and procedures for the rehabilitation (and, if necessary, vocational re-education) of any injured workers of the employer and in accordance with the regulations and must comply with the Guidelines for workplace return to work programs established by SIRA. (Section 52 of the 1998 Act)</p> <p>Auditing of the employers Return to Work Program was against the following key components as set out in Part 2 of the Guidelines:</p> <ul style="list-style-type: none"> • Leadership and commitment (3) • Workplace arrangements (5) • Rights and obligations (2) • After an incident (4) • Support for the worker (4) • Recovery at work (3) • Dispute prevention and resolution (2) • Administration (1) <p>(refer to Page 12 for expanded criteria)</p>

3.1.1. Government employer audit period

Secretaries from clusters included in the TMF Claims file review were notified on 15 March 2023 of the intention to include an audit of employer compliance within the TMF review.

The selected government employers were notified via email between 22 March 2023 – 27 March 2023 of their inclusion in the employer compliance audit. The email outlined the intended process, the employer obligations included in the audit tool, the documentation that would need to be made available and the arrangements for the onsite visit.

Employers were also advised that where a breach of the legislation was identified a SIRA Authorised Officer or Inspector may elect to pursue regulatory action as a separate action beyond the audit.

Onsite visits with the ten employers were conducted between 27 March 2023 and 12 April 2023.

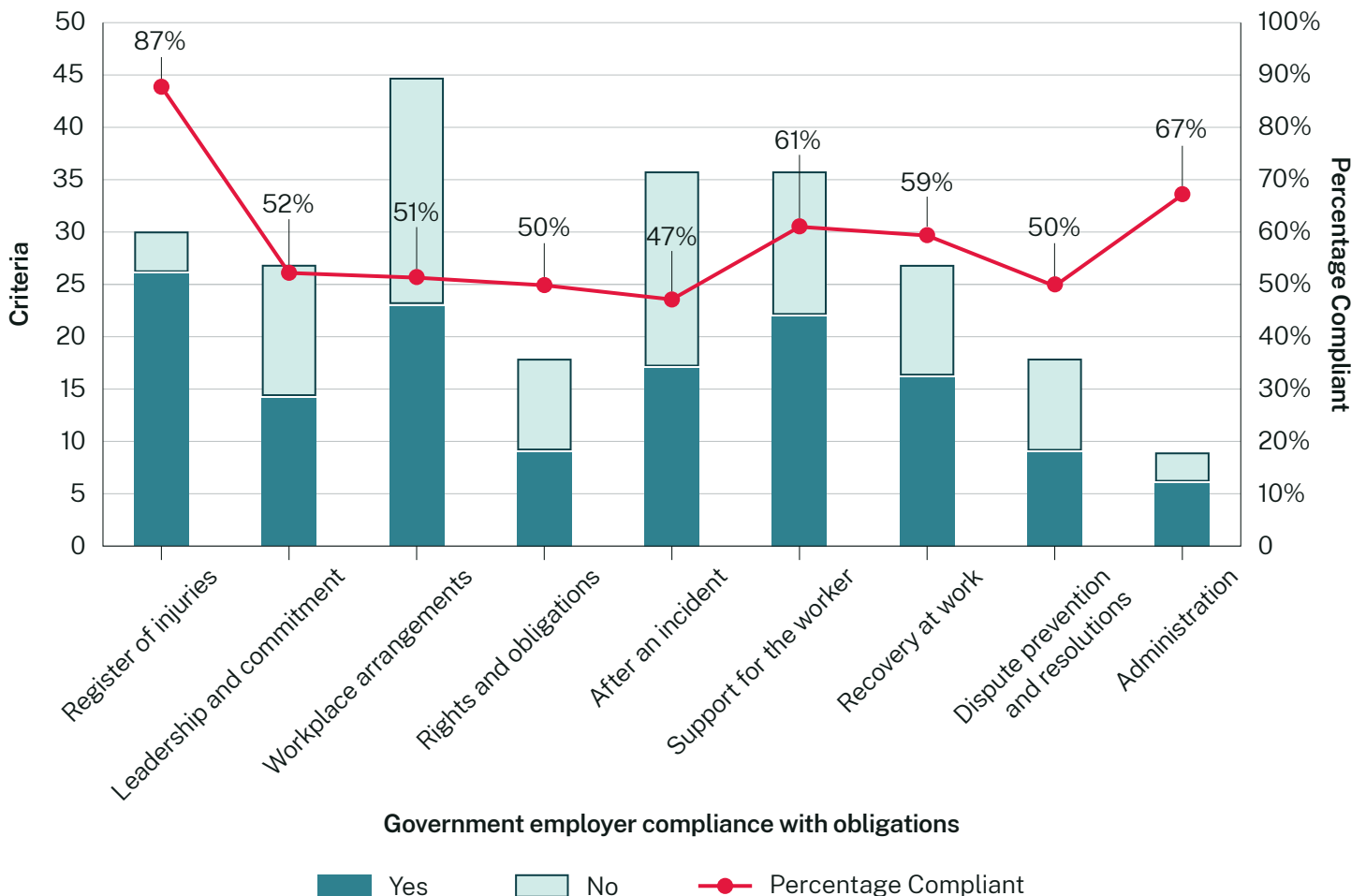
4. Detailed findings

4.1. Audit outcome



Overall, the ten government employers were

64% compliant with the 27 audit criteria.



4.2. Register of injuries

4.2.1. Accessible register of injuries

Section 256 of the 1998 Act requires an employer to have a register of injuries that is readily accessible for any worker to enter particulars of any injury that was received by the worker. If particulars of an injury are entered in a register of injuries as soon as possible after an injury happened, the entry is sufficient notice of the injury for the purposes of this Act. If an employer fails to comply with their obligation, penalties may apply.

Employer Obligation	Number of Criteria	Percentage Compliant
Accessible register of injuries	1	100%

Insights:

- Government employers predominantly utilise an electronic register of injuries accessed via the agency's intranet.
- Some government employers supplement their electronic register with paper-based forms where workers have limited intranet access.
- Some registers of injury were established at a cluster level, others were specific to the agency.
- Where the register of injuries was at cluster level, agencies did express concern about the ability to tailor or upgrade to meet their needs where deficiencies were identified.
- Across the cohort there are varied processes for who completes the entry into the register i.e. some have workers completing their own, while others have the worker's line manager completing the entry with information gathered from the worker.
- Some electronic systems record hazards and incidents in addition to being the register of injuries and are utilised to support their work health and safety practices.
- One government employer has established processes where the register of injuries is uploaded directly to the claim service provider's system daily, reducing the administrative burden of notifying all injuries and illnesses within 48 hours.

4.2.2. Register to be kept in a form in accordance with the regulations

Clause 40 of the Regulation stipulates the employer's register of injuries may be kept in written or electronic form. The particulars to be entered in the register of injuries are the following:

- (a) the name of the injured worker
- (b) the worker's address
- (c) the worker's age at the time of injury
- (d) the worker's occupation at the time of injury
- (e) the industry in which the worker was engaged at the time of injury
- (f) the time and date (or deemed date) of injury
- (g) the nature of the injury
- (h) the cause of the injury.

Employer Obligation	Number of Criteria	Percentage Compliant
Register to be kept in a form in accordance with the regulations	1	90%

Insights:

- Most government employers register of injuries were linked to their internal payroll system, enabling auto population of some of the required information.
- In most instances government employers gathered more than just the minimum required by the regulations and this information was utilised to review work health and safety systems and processes and/or plan for workplace rehabilitation activities.
- Some government employers included fields where a worker could advise their intent to 'claim workers compensation' for the injury they were reporting. This correlated with some of the government employers who were identified as potentially breaching their obligation under section 44 of the 1998 Act to notify all injuries and illnesses within 48 hours to the insurer.

4.2.3. Government employer provides education, training and facilities to ensure workers are able to access electronic register of injuries

Clause 40(2) of the Regulation permits an employer to maintain a register of injuries in an electronic form if the employer provides education, training and facilities to ensure that workers are able to access the register.

Employer Obligation	Number of Criteria	Percentage Compliant
Government employer provides education, training and facilities to ensure workers are able to access electronic register of injuries	1	70%

Insights:

- For those government employers deemed compliant with this obligation they provided their training and education on the use of the register of injuries through online compulsory modules at employee induction and some on an annual basis.
- The training was incorporated into modules covering a range of topics related to work health and safety, workplace rehabilitation and/or the organisation's return to work program.
- To achieve compliance with this criterion a government employer needed to provide evidence of the training being completed by workers. It was noted that for ten per cent of the non-compliant government employers while they could not demonstrate evidence of training all staff, they could demonstrate that workers who had not engaged in the online training module were entering incidents and injuries into the organisation's register of injuries. This suggests the presence of informal processes where there is direct communication from line managers to staff about the requirements.
- Ten per cent of government employers could not demonstrate that all workers had access to their electronic register of injuries. These workers were referenced as 'unwired' due to their lack of access to any organisation issued email address or intranet access.

4.3. Return to work program

Section 52 of the 1998 Act requires all NSW employers to establish a RTW program within 12 months of becoming a category 1 or category 2 employer. It must be consistent with their insurer's injury management program and compliant with the Guidelines for workplace RTW program.

The Guidelines for workplace return-to-work programs have eight topics that employers must cover in their RTW program, with varying criteria in each that need to be compliant.

In undertaking the audit of the 24 criteria, the audit team excluded one government employer due to the agency not having been established for 12 months. As Category 1 employers the Guidelines for workplace return to work programs afford a government employer 12 months from commencement to establish a tailored RTW Program.

Overall, the nine government employers had a combined compliance of 64% when audited against the eight topic areas.

Employer Obligation (Topic area)	Number of Criteria	Percentage Compliant
Leadership and commitment	3	52%
Workplace arrangements	5	51%
Rights and obligations	2	50%
After an incident	4	47%
Support for the worker	4	61%
Recovery at work	3	59%
Dispute prevention and resolution	2	50%
Administration	1	67%
Total	27	64%

When broken down to the individual audit criteria against each employer's return to work program, the audit results are as follows:

Criteria	Percentage Compliant
Leadership and Commitment	
State employer's commitment to helping workers to recover at work	78%
Show program's connection to work health and safety (WHS) policies and procedures	22%
Detail how organisation will develop a positive culture that promotes recovery at work	56%
Workplace Arrangements	
List RTW coordinator's name, contact details, role, resources and authority	33%
Nominate approved workplace rehabilitation provider and give their details	56%
Describe arrangements for consulting workers and their unions	67%
Outline communication and training arrangements for the program	44%
Detail monitoring, review and display/notification arrangements	56%
Rights and Obligations	
Describe how workers will be informed of their rights and obligations	44%
Outline obligations for support team	56%
After an Incident	
Detail organisation's arrangements for providing first aid	56%
Describe the register of injuries and how workers will be trained to use it	44%
Include procedures for workers to report an injury and employer to notify the insurer	56%
Explain process for reporting notifiable incidents to the WHS regulator	33%
Support for the Worker	
Outline plan to maintain positive communication with injured workers and support team	78%
Describe how employer will request worker's informed consent	44%
Give procedures for managing weekly payments	56%
State employer's commitment to participating and cooperating in developing injury management plan	67%
Recovery at Work	
Describe plan for identifying and providing suitable employment	56%
Outline procedures for developing and maintaining a recover at work plan	56%
Describe how employer will manage the dismissal of injured workers within NSW law	67%
Dispute Prevention and Resolution	
Detail plan for preventing and resolving disputes	67%
Explain how employer will advise workers of formal and informal mechanisms for resolving disputes	33%
Administration	
Include procedures for keeping records and maintaining confidentiality	67%
Grand Total	64%

Overall, the ten government employers were substantially compliant when the RTW programs:

- Included a statement that demonstrated the employer's commitment to helping workers recover at work. This statement needed to reflect the organisation's structure and operating environment. 78% of the audited government employers complied with this criterion.
- Maintained positive and effective communication with workers and the RTW team, and documented who will be responsible for this. 78% of the audited government employers were able to demonstrate compliance with this criterion.

The following criterion was the least compliant overall:

- Demonstrating the RTW program's connection to WHS policies and procedures. Specifically, being able to detail how, following an injury, they review their WHS policies and procedures to identify gaps and opportunities for improvement. Concerningly only 22% of the audited government employers were able to demonstrate compliance with this criterion.

Insights

- Only 44% of the audited government employers had a documented and workforce wide approach to the communication and training arrangements for their RTW program.
- Government employers predominantly make their RTW program available via their agency and/or intranet.
- Some RTW programs were established at a cluster level and applied to all agencies within that cluster. In other circumstances, individual agencies within clusters had their own tailored RTW program. These arrangements were dependent on the organisational arrangements of the cluster and how the workers compensation legislative definition of a government employer applied to the agency and/or cluster.
- The level of detail and tailoring within each reviewed RTW program generally reflected the complexity, size and maturity of the agency and/or cluster it covered.

4.4. Additional finding – Early notification of injury

Section 44(2) of the 1998 Act requires a government employer to notify their insurer within 48 hours after becoming aware that a worker has received a workplace injury. The Workers Compensation Regulation (2016) creates an offence for the failure to notify in the prescribed timeframe and a penalty is applicable. There is strong evidence that workers have better RTW outcomes when workplaces engage with them early and provide support immediately following notification.

During the scoping stage of the government employer audit the employer obligation to notify injuries was not included in the onsite reviews and audit of documentation. However, during the onsite reviews, a focus on the register of injuries often led to a discussion regarding the employer's obligation to notify the insurer of a work's injury. Insights from these discussions are noted below:

Insights

- Government employer's processes and practices for early notification of injury varied from automated systems which allowed a daily direct upload from the employer's register of injuries to their claims service provider, to manually created individual notification emails sent to the insurer.
- 100% of audited government employer's had processes for early notification, however 50% were identified as being potentially non-compliant with the legislation. The observed non-compliances related to either:
 - A delay in the notification of the injury to the insurer, where the employer failed to notify within 48 hours as required by the legislation due to inadequate processes, or,
 - The employer did not notify all injuries reported through the register of injuries. The most common reasons were:
 - Following a discussion with the employer, the worker 'did not want to make a claim'.
 - The government employer only notified injuries where treatment and/or weekly payments were required.
 - The severity of the injury did not warrant notification, as determined by the employer.
- A government employer triaging the severity of an injury or only notifying an injury where a worker indicates they want to 'make a claim' is inconsistent with the requirements of NSW's workers compensation legislation.
- Where potential non-compliance was identified government employers expressed significant concern at their ability to meet the requirements of the legislation and SIRA's expectations. This was relative to either the complexity of their injury cohort, the perceived 'administrative burden' required to comply inclusive of any additional costs associated systems / personnel requirements, and/or the potential negative impact to the 'reporting culture' of the workplace.

4.5. Regulatory action

At the commencement of the government employer audit, SIRA advised the government employers that where breaches of the legislation were identified regulatory action proportionate to the breach and harm caused maybe taken. As of 5 July 2023, SIRA has issued:

- five Employer Improvement Notices for failure to have a compliant Return to Work Program
- two Employer Improvement Notices for failure to notify injuries to the insurer within 48 hours
- one Penalty Notice for failure to have a compliant Return to Work Program
- thirteen Penalty Notices for failure to notify injuries to the insurer within 48 hours
- three Caution Letters for failure to notify injuries to the insurer within 48 hours.

SIRA is continuing to engage with seven government employers to secure their compliance with their workers compensation obligations.

5. Actions

5.1. Engagement

1. SIRA to establish formal quarterly engagements with some government employers. Agency size, claim numbers, claim complexity and compliance history to be considered when identifying and prioritising which government employers to engage with formerly. The purpose of the regular engagement would be to support the understanding and application of regulatory requirements and provide opportunities for feedback and collaboration on challenges in the system. Terms of reference would be established in collaboration with the individual agency/cluster and tailored to the specific objectives and intended outcomes of the engagement.
2. SIRA to consider opportunities to refine the agenda of the existing TMF quarterly forum to include employer specific agenda items and opportunities for collaboration and expectation setting.

5.2. Set expectations – update the Guidelines

An employer's RTW program contributes to the development of a positive workplace culture and establishes the systems, policies and procedures to achieve positive outcomes for workers and employers. SIRA will utilise the findings from the audit of the government employers to consider opportunities to improve the Guidelines for Workplace Return to Work Programs, including clarifying SIRA's expectations and reducing confusion or inconsistencies, specifically in relation to roles and responsibilities.

5.3. Monitoring – track compliance and areas for improvement

SIRA will continue to hold government employers to account for their compliance and performance by establishing mechanisms for monitoring and reporting.

Regulator monitoring of performance and compliance will help identify those employers requiring regulatory intervention and more broadly areas for improvement across the government sector. By tracking and sharing RTW performance metrics, government employers, in collaboration with SIRA, can identify areas where they can improve their policies or practices.

5.4. Investigation – focus on early notification

SIRA will establish a project focusing on the compliance of government employers in the early notification of injuries (compliance with section 44 of the 1998 Act). Utilising the findings and insights from this audit SIRA will prioritise government employers for further investigation. Adopting a firm and constructive approach SIRA will hold employers to account for legislative obligations whilst also building capability and establishing processes for employers to deliver best practice workplace rehabilitation.

5.5. Remediation

SIRA's inspectors will continue to engage with those government employers where remediation actions are being undertaken to ensure compliance is achieved. As some investigations are ongoing further proportionate regulatory action may be taken.

6. Appendix 1 - SIRA Audit Tool

Cluster		
Agency		
Employer		
Authorised Officer / Inspector Name		

Criteria Number	Employer Supervision TMF Audit	Criteria Question	Finding (choose from drop list)	Finding rationale/ observations
Register of Injuries		Overall Comment		
1	Register Of Injuries	Does the employer have a readily accessible register of injuries as per Section 63(1) and Section 256(1) of the Workplace Injury Management and Workers Compensation Act 1998?	No	
2	Register Of Injuries	Is the register of injuries in the prescribed form as per Section 40(3) of the Workers Compensation Regulations 2016?		
3	Register Of Injuries	If the Register of Injuries is in electronic form only, has the Employer provided education, training and facilities to workers to access the register as per Section 40(2) of the Workers Compensation Regulation 2016?		

Criteria Number	Employer Supervision TMF Audit	Criteria Question	Finding (choose from drop list)	Finding rationale/ observations
Return to Work Program		Overall Comment		
Leadership and Commitment				
4	Leadership and Commitment	Page 10 of the Guidelines	State employer's commitment to helping workers to recover at work	
5	Leadership and Commitment	Page 10 of the Guidelines	Show program's connection to WHS policies and procedures	
6	Leadership and Commitment	Page 10 of the Guidelines	Detail how organisation will develop a positive culture that promotes recovery at work	
Workplace arrangements				
7	Workplace arrangements	Pages 7-10 of the Guidelines	List RTW coordinator's name, contact details, role, resources and authority	
8	Workplace arrangements	Page 10 of the Guidelines	Nominate approved workplace rehabilitation provide and give their details	
9	Workplace arrangements	Pages 11 and 17 of the Guidelines	Describe arrangements for consulting workers and their unions	
10	Workplace arrangements	Page 11 of the Guidelines	Outline communication and training arrangements for the program	
11	Workplace arrangements	Pages 9-11 and 18 of the Guidelines	Detail monitoring, review and display/notification arrangements	
Rights and obligations				
12	Rights and obligations	Pages 11 and 17 of the Guidelines	Describe how workers will be informed of their rights and obligations	
13	Rights and obligations	Page 12 of the Guidelines	Outline obligations for support team	
After an incident				
14	After an incident	Page 12 of the Guidelines	Detail organisation's arrangements for providing first aid	
15	After an incident	Pages 12-13 of the Guidelines	Describe register of injuries and how workers will be trained to use it	

Criteria Number	Employer Supervision TMF Audit		Criteria Question	Finding (choose from drop list)	Finding rationale/ observations
16	After an incident	Page 13 of the Guidelines	Include procedures for workers to report an injury and employer to notify the insurer		
17	After an incident	Page 13 of the Guidelines	Explain process for reporting notifiable incidents to the WHS regulator		
Support for the worker					
18	Support for the worker	Page 13 of the Guidelines	Outline plan to maintain positive communication with injured workers and support team		
19	Support for the worker	Page 14 of the Guidelines	Describe how employer will request worker's informed consent		
20	Support for the worker	Page 14 of the Guidelines	Give procedures for managing weekly payments		
21	Support for the worker	Page 14 of the Guidelines	State employer's commitment to participating and cooperating in developing injury management plan		
Recovery at work					
22	Recovery at work	Page 15 of the Guidelines	Describe plan for identifying and providing suitable employment		
23	Recovery at work	Page 16 of the Guidelines	Outline procedures for developing and maintaining a recover at work plan		
24	Recovery at work	Page 16 of the Guidelines	Describe how employer will manage the dismissal of injured workers within NSW law		
Dispute prevention and resolution					
25	Dispute prevention and resolution	Page 16 of the Guidelines	Detail plan to preventing and resolving disputes		
26	Dispute prevention and resolution	Page 16 of the Guidelines	Explain how employer will be advise workers of formal and informal mechanisms for resolving disputes		
Administration					
27	Administration	Pages 16-17 of the Guidelines	Include procedures for keeping records and maintaining confidentiality		

7. References

- [Workplace Injury Management and Workers Compensation Act 1998](#)
- [Workers Compensation Regulation 2016](#)
- [Terms of Reference for the Treasury Managed Fund review - SIRA](#)
- [Turning around poor return to work performance - SIRA](#)
- Guidelines for workplace return to work programs – SIRA

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