



THE LAW SOCIETY
OF NEW SOUTH WALES

Our ref: InjuryComp:RHap1970808

16 September 2020

State Insurance Regulatory Authority
Level 13 West, 2-24 Rawson Place
Haymarket NSW 2000

By email: consultation@sira.nsw.gov.au

Dear Sir / Madam,

Draft revised workers compensation guidelines for allied health treatment and hearing service provision

Thank you for the opportunity to comment on the draft revised workers compensation guidelines for allied health treatment and hearing service provision ("the draft Guidelines"). The Law Society's Injury Compensation Committee has contributed to this submission.

The Law Society writes to provide two brief suggestions related to the draft Guidelines.

First, we understand that SIRA is currently conducting a separate review into services to support people with work-related hearing loss in the NSW workers compensation system. Due to the nature of hearing loss claims and the specific requirements for hearing service providers and ear, nose and throat specialists (who are not allied health services providers), there does not appear to be any specific reason for, or benefit to, including guidance about hearing service providers in the same guidance document as for allied health treatment. We note the current *Guidelines for the approval of treating allied health practitioners 2016 No 2* only deal with allied health providers ("AHPs"), and would support the continuation of separate guidance for the separate groups of health service providers to avoid unnecessary confusion.

We suggest that discrete guidance for hearing service providers be developed once the outcomes of the current review are available.

Second, we suggest that SIRA consider providing, whether in the draft Guidelines or elsewhere, additional information about how to become approved as either an AHP or hearing service provider and how to maintain such approval. This might include providing links to the necessary forms.

Thank you again for the opportunity to comment on the draft Guidelines. Please contact [REDACTED] if you have any questions in relation to this submission.

Yours sincerely,

[REDACTED]

Richard Harvey
President

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