



26 November 2020

Dear	
DCai	,

ASORC Letter of Support for ARPA NSW submission to State Insurance Regulatory **Authority (SIRA)**

Thank you for bringing to our attention ARPA NSW's submission to State Insurance Regulatory Authority (SIRA) concerning the regulatory requirements for workplace rehabilitation service provision in NSW personal injury schemes.

The Australian Society of Rehabilitation Counsellors Ltd. (ASORC) is pleased to support your submission, particularly aspects that apply to Rehabilitation Counsellors (RCs). However, in doing so we need to point out that ASORC represents individual Rehabilitation Counsellors not organisations or providers per se, although some of our members happen to wear a dual hat in that they are both RCs and providers.

It is the opinion of ASORC that going forward the role of Rehabilitation Counsellors in workplace rehabilitation will be more important than ever. The unique skills Rehabilitation Counsellors possess in helping people remain engaged in meaningful work, as well as facilitating their return to work in this challenging environment will be of critical importance.

In supporting the ARPA submission we draw particular attention to ARPA's comments below in italics:

7 C ii) The list of allowable qualifications should be expanded

- ASORC (Australian Society of Rehabilitation Counsellors) Full members- who are accepted by SIRA to perform a number of services – as per the SIRA NSW Supplement. Supplement to the Guide: Nationally consistent approval framework for workplace rehabilitation providers should include ASORC Associate members (under the ASORC supervision program).
- Associate members are currently not able to provide Full member services by SIRA in NSW

7 D i) Mandatory referral to workplace rehabilitation

Early referral will minimize delay to support; delays of RTW and the associated wages recorded on the claim. Further, it will significantly improve the employer's experience and the worker's experience by allowing the worker to RTW earlier, stay engaged with work and recover at work.

7 D ii) SIRA to develop guidelines to ensure WR services are not interrupted

ARPA's recommendation that SIRA develops a comprehensive set of guidelines which clearly articulates when a Scheme Agent can or cannot reduce, cut or deny WR service requests.

7 E i) Non-accredited providers should either be banned or subject to the same rules

ARPA NSW would strongly recommend that either the non-accredited providers are banned from the scheme or are covered by the WR provider framework.

7 E iii) Mental health injury claims to be referred to WR ASAP

The most significant drivers of prolonged work absence are psychosocial factors and therefore Rehabilitation Counsellors are critical to addressing the psychosocially targeted assistance to support the employer and in turn the worker through a workplace-based intervention to produce the greatest results.

ARPA NSW recommends that it is imperative that these cohorts should be referred for workplace rehabilitation services as soon as practicable.

Sincerely,

Australian Society of Rehabilitation Counsellors (ASORC)

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