

Dear SIRA,

I would like to submit feedback regarding the review of the self-insurer licensing framework.

I am a Safety Professional, Trainer and Auditor with twenty five years experience working in various health and safety related roles. During the last six years I have worked directly with many self-insured organisations in developing their respective health and safety management systems and in assisting them to prepare for NAT Audits conducted by the Regulator.

I support the current self-insurer licensing framework and the current regulatory monitoring of Self-Insurers, in particular NAT auditing by the Regulator. Regarding NAT audit frequencies, I support the current 3 year audit frequency for those Self-Insurers that meet the benchmarks and the annual audits for Self-Insurers that don't meet the established benchmarks.

I have worked in many workplaces and observed first hand that Self-Insurers' that are motivated by the anticipation of a Regulator Safety Audit maintain safer workplaces than employers that expect to go unchecked or are audited against standards, such as AS/NZS 4801 or similar, by external accreditation bodies.

Any relaxation in the current self-insurer licensing framework and the current regulatory monitoring of Self-Insurers will send an unfortunate and unfavourable message to these organisations regarding the Regulator's commitment to workplace health and safety, and the correlation between health and safety management systems and the prevention of work related injuries and illnesses. It has long been held that the interactions between self-insured organisations and other organisations, including suppliers and contractors, and the imposition of health and safety requirements upon these organisations, increases compliance to health and safety legislative requirements and prevention of injuries and illness in their workplaces and the wider community.

I fear that reducing a very reasonable level of scrutiny (3 yearly NAT auditing that I understand the majority of Self-Insurers comfortably pass) will compromise safety. It is my experience that many self-insurers do not adequately maintain their health and safety management systems between audits, preferring instead to update systems in preparation for the Regulator Safety Audit. The removal of these audits or a lessening in the frequency of these audits will definitely result in a deterioration in health and safety standards and an increase in adverse health and safety outcomes.

I believe that the Regulator (formerly WorkCover NSW) currently has the right balance in their approach to auditing and that extending this period to more than 3 years would be detrimental to the safety standards within the Self-Insurers' workplaces and everyone exposed to the risks arising from their activities. It is not reasonably practicable for the Regulator to audit every employer in NSW, but, I believe that a reasonable sample of organisations and workplaces are audited under the current self-insurer NAT auditing arrangements and that their compliance to requirements is forcing other organisations to comply.

Yours sincerely,  
Peter McKay

