

**INQUIRY INTO 2018 REVIEW OF THE WORKERS
COMPENSATION SCHEME**

Organisation: Unions NSW

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2018 review of the workers compensation scheme

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Submission by:

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2018 review of the workers compensation scheme

Unions NSW welcomes this opportunity to make a submission to the 2018 review of the workers compensation scheme. Unions NSW supports the submissions of its affiliated unions.

Unions NSW is the peak body for NSW Unions. Unions NSW represents approximately 60 affiliated unions comprising over 600 000 members. These unions represent a diverse range of workers from both blue and white-collar industries.

Unions NSW made a submission to the Department of Finance, Services and Innovation in February this year. The submission: Improving workers compensation dispute resolution in NSW outlined our position. In this submission we provided our view on the feasibility of a consolidated personal injury tribunal for Compulsory Third Party and workers compensation dispute resolution.

We continue to support the position put forward in our February submission and we hold significant concerns about the merging of workers compensation and compulsory third party compensation.

Please refer to our submission below.



Improving workers compensation dispute resolution in NSW

Unions NSW Submission

16 February 2018

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Improving workers compensation dispute resolution in NSW

Unions NSW welcomes the opportunity to make a submission to the Department of Finance, Services and Innovation on improving workers compensation dispute resolution in NSW. Throughout this submission reference will be made to, *A discussion paper on potential reforms to the NSW workers compensation dispute resolution system (the Discussion Paper)* and the questions posed in that paper will be addressed.

Unions NSW is the peak body for NSW Unions. Unions NSW represents approximately 60 affiliated unions comprising over 600000 members. These unions represent a diverse range of workers from both blue and white-collar industries.

Unions NSW supports the view put forward by the NSW Legislative Council Standing Committee on Law and Justice in the *First review of the workers compensation scheme (2017)*, that a dispute resolution system should provide claimants with an easy to navigate system allowing them to exercise their legal rights when required. We agree with the Discussion Paper that the current system is complex and that there needs to be greater clarity around the roles of the various government agencies involved.

However, we do not share enthusiasm for and outright oppose the concept of a one-stop shop with compulsory third party insurance (CTP), and believe that the Government's focus should be on fixing those elements of the workers compensation dispute resolution system that urgently require attention and resourcing. This submission will focus on those areas.

Questions 1 & 2 (page 9)

Do you support developing a single system for resolving personal injury disputes?

What do you think might be the benefits and/or costs of a single system?

Unions NSW does not support a single system for resolving personal injury disputes.

The problems with workers compensation dispute resolution are acute. They need to be fixed now, not delayed by the Government undertaking some much larger reform process involving CTP disputes.

Any synergies between workers compensation and CTP should not be over-stated. Workers compensation and CTP both deal with injuries but the two systems are very different and result in very different disputes. Workers compensation is a highly litigious area of law given the nature of the relationships of the disputing parties, whereas CTP does not generally involve complex and/or highly personal relationships. Generally fault is easier to determine in CTP matters and therefore liability is much clearer. CTP matters also do not involve the particularly complex areas of workers compensation that often result in disputes, such as pre-injury average weekly earnings (**PIAWE**), work capacity decisions (**WCD**) and return to work (**RTW**) decisions.

A single system for resolving personal injury disputes may result in some minor cost savings in reducing some duplication, however Unions NSW is of the strong view that an improved workers compensation dispute resolution system as we outline later in the submission will result in major cost savings to the scheme.

Question 3, page 18

Does the case for change outlined here reflect your experience or knowledge of the system?

- Claimant Support

The current system is extremely difficult to navigate for claimants and this often exacerbates injuries and/or creates new injuries. In assisting claimants Unions NSW has frequently referred them to WIRO. Our experience in referring these workers to WIRO has been extremely positive with WIRO often able to quickly support and assist claimants in navigating their way through the complexity of the system and frequently resolving disputes very early before they escalate.

Unions NSW would support a greater resourcing of WIRO as an independent body to enable it to expand offering of assistance to claimants. Resourcing should be provided to WIRO to continue to offer support to all non-claimant parties in the disputes process, however, the far greater resourcing should be directed at assisting claimants as they are the least able to navigate the system and the most vulnerable within the system.

Unions NSW wishes to emphasise the importance of the fact that WIRO is independent. The Government has invested vast resources in attempting to remove the conflicts of interest within the workers compensation system by separating out WorkCover NSW, SIRA and icare. To consider giving a claimant support/dispute resolution role to SIRA would run completely counter to this direction.

The process outlined in the Discussion Paper whereby a trigger would instigate contact from the claimant support provider could be undertaken by WIRO and is currently a role undertaken by them. Unions NSW would note however that triggers based on analytics such as employer, occupation and injury type rather than timeframes

might be more effective at resolving problems before they fester or escalate.

- Legal Support

Unions NSW is concerned the references to ‘targeted’ legal support and ‘incentives’ might be code for limiting even further current levels of legal support. We believe legal support should be expanded rather than reduced.

Unions NSW and its affiliate unions have found the current Independent Legal Assistance and Review Service (ILARS) to be effective and we would endorse the continuation of this service in its current form with increased functions and powers. We would recommend legal advice and support be made available in the early stages of a dispute where needed, however we would prefer a degree of informality in the initial stages so as to avoid locking claimants into one particular pathway.

Unions NSW supports the current legal representation model whereby ILARS, managed by WIRO, delivers efficient and affordable legal representation to claimants. Lawyers engaged to work through ILARS must be paid as they work. We do not support a return to a model where costs follow the event. We would like to see all workers compensation disputes managed through the ILARS model.

We note that there was some discussion about the quality of legal services provided through ILARS. In general unions are very satisfied with the quality of legal services provided to claimants and Unions NSW would suggest that any concerns relating to the quality of professional work should be addressed through consultation with the Law Society.

We see an urgent need for legal assistance in PIAWE and WCDs in the early stages.

Unions NSW welcomes the Workers Compensation (Legal Costs) Regulation 2016, which inserted new clauses into the Workers Compensation Regulation 2016 to allow for workers to have access to legal representation in order to challenge WCDs. This reform was desperately needed to restore some degree of fairness to this area of disputation.

WCDs have such life altering effects, appear to be made almost arbitrarily and can be up to 13 pages long with 187 pages of attachments.¹ They are often unintelligible and incomprehensibly written.² In those circumstances legal support for all stages of the WCD process is crucial.

PIAWE decisions are also highly complex decisions. The process of calculating PIAWE is complicated and frequently misunderstood, thereby leading to miscalculations creating a high level of disputation. The calculation of PIAWE has life changing consequences for claimants and therefore should also be covered by legal support.

We further support a greater focus on, the legal support for, RTW disputes from the earliest stages. Initially WIRO can play a role attempting to informally resolve these disputes, with the Workers Compensation Commission (**WCC**) conciliating and arbitrating where the dispute is unable to be resolved. Given the supposed central importance of RTW in the 2012 changes to the workers compensation system, and the huge cost savings to the scheme if RTW is taken seriously by employers, this must be an important element of any workers compensation disputes system.

¹ Legislative Council Standing Committee on Law and Justice, Parliament of NSW, First review of the workers compensation scheme (2017) 56[4.36]

² Ibid [4.39]

- Dispute management and resolution

Unions NSW suggests the publication of a simple flow chart, which could also be available online, to assist all claimants in navigating the dispute resolution process. We have attached an example flow chart based on our proposed model. This could be provided to all claimants through the insurer once a claim is lodged and initial contact is made, regardless of the likelihood of a dispute arising. This would assist the claimant in understanding their options and would in turn support all parties to the dispute.

WIRO should be better resourced to continue to provide an expanded informal dispute resolution role and would be the first point of contact for a claimant who has questions about their claim or is concerned about the progress of their claim. In our experience often a simple phone call to an employer or insurer will resolve a claimant's issue. WIRO is independent and already operates effectively in this space. WIRO should have increased resourcing to continue to do this more comprehensively.

Unions NSW supports WIRO expanding these services to include questions or concerns regarding WCDs, PIAWE decisions and RTW decisions.

Merit and procedural reviews would be handled by the WCC, as an independent tribunal. We support conciliation by the WCC the first instance. Our experience with conciliation in the WCC as a form of dispute resolution has generally been positive. Initial contact could be via phone if appropriate, as currently occurs with unfair dismissals through the Fair Work Commission.

If conciliation fails to resolve the dispute, we support arbitration by the WCC. We support the right of a party to object to the conciliator arbitrating their matter. This process works well in the Fair Work Commission.

Given the problems presented by PIAWE calculations and the inevitable disputes this creates we would suggest the WCC be resourced to give it the capacity to calculate PIAWE with an accounting division. Such a division would be staffed with people who have an understanding of industrial awards and agreements, pay systems and calculations. If disputes continue to arise these would then be dealt with by the legal arm of the WCC.

- System oversight

Unions NSW supports impartial oversight of the system that does not involve any actual or perceived conflict of interest. For this reason we do not support extending the role of SIRA as this would create a conflict of interest, and we do support extending the roles of the independent bodies WIRO and the WCC.

We also support WIRO reporting directly to the Minister as it currently does. The oversight of the system via the Ombudsman and the Law and Justice Committee should also remain in place, although it should be noted this oversight is quite remote. For further oversight Unions NSW suggests the establishment of a tri-partite body consisting of employer, Government and union representatives.

Questions 4 & 5, page 33

Should any of these options for preventing disputes be implemented? Which one/s and why?

Can you suggest any other ways to prevent disputes?

- **Reform of the independent medical examination system**

Unions NSW and its affiliates share many concerns about the independent medical examination system and believe it is in dire need of reform. We strongly support the notion put forward in the Discussion Paper that reforming this system could assist greatly in reducing the number of disputes arising and eliminating an area of

stress and frustration for claimants. We believe major costs savings could be made across the scheme and by insurance providers were there to be a reduction in medical assessments.

Unions NSW strongly oppose the current system that appears to encourage cash for comment doctors. We would like to see the elimination of doctor shopping by insurance providers. Unions NSW views the current practice of doctor shopping as an expensive exercise which simply delays the treatment of the claimant thereby delaying recovery and return to work. Furthermore it has the potential to further injure the claimant particularly where psychological injury is involved. Doctors and specialists who operate in this manner should be disciplined through the current professional channels.

Unions NSW would like to see the professional medical diagnosis of the general practitioner or specialist recognised and accepted at the first instance by insurance providers. As discussed any concerns around misdiagnosis by general practitioners or specialists should be dealt with through current professional avenues already in place and in consultation with the Australian Medical Association (AMA).

If the claimant is assessed by their general practitioner and/or specialist, and the insurance provider is of the strong view that this assessment is incorrect, we would support the insurer's ability to challenge this assessment where the claimant is able to choose from an appropriately qualified panel of independent medical examiners allocated by WIRO. This would be a medical arm or division of WIRO and would improve the impartiality of medical assessments.

Where there are conflicting medical assessments or reports we believe the disputing parties should be able to reach an agreement on a middle ground. Again this could be facilitated by conciliation through either WIRO or the WCC.

Further to ensure absolute transparency claimants must have access to all reports.

- **Establish a single claim identifier and improve data collection**

If a single claim identifier is introduced Unions NSW believes this number should identify the claim and not the individual to prevent the irrelevant previous medical history of the individual being used to prejudice decision-making. This practice already occurs where cash for comments doctors attempt to connect current injuries with past injuries and illnesses. This practice does nothing to expedite the recovery of the claimant or their RTW, it simply encourages disputes and often leads to secondary injuries placing further burdens on the medical system.

- **Commutation, or lump sum exit from the scheme**

Unions NSW is of the view that sometimes the best outcome for the claimant is to exit the scheme through commutation or lump sum exit and we support a more flexible approach in this area. We note that affiliates report this informal approach, whereby a payment is made to resolve a dispute and exit a worker from a workplace, is currently happening among private sector employers and some employers who are self-insurers. Given this already occurs we see a role for the Government to support commutations and lump sum payments by expanding the current preconditions, including the requirement for the claimant to have at least 15% permanent impairment. We further believe the Government should regulate in this area to ensure informal agreements do not result in claimant exploitation and inadequate payments that will leave the claimant reliant on welfare or charity in years to come. Such arrangements must be open to public sector workers, which is not currently the case.

Claimants wishing to exit the scheme through these options should have access to legal advice and support through ILARS and access to financial advice to ensure the decision is fully informed. Access to a

free and reputable financial advice service could be provided through WIRO via ILARS and/or possibly the Public Trustee.

- **Simplify insurer’s notices to claimants**

Unions NSW is of the view that the notices provided to claimants are overly complex and often unnecessarily long and incomprehensible. Unions NSW endorses the simplification of notices.

All notices should be written in plain English without the use of industry jargon.

We would like to see claimants who are from non-English speaking backgrounds sent all notices in their language of choice. It is simply not acceptable to expect these claimants to attend their lawyer or ask a friend, for translation of these documents.

We agree with the suggestion in the Discussion Paper that the use of a single form written in plain English or the language of choice of the claimant, would assist the claimant in understanding the outcome of their claim as well as how to proceed should they wish to dispute the decision.

A simple dispute flowchart like that attached to this paper could also be provided at this point.

We do not object to online forms, applications or processes. When written well and with proper consultation of Stakeholders, online forms can be very useful, providing flexibility of access to claimants comfortable with and able to access online services. However we strongly support the maintenance of telephone information and support services that include translator services in both the claimant support service area and the legal support service area. All such support services should be operated out of WIRO.

- **Provide simpler, clearer public information about dispute resolution options and processes.**

Unions NSW agrees there must be simpler, clearer public information about dispute resolution options and processes. Unions NSW suggests it is important to acknowledge as part of this public information process that some disputes are likely to arise during a workers compensation claims process. We also support providing a flow chart of the dispute process, such as that attached to this submission.

Questions 6 & 7, pages 42

Which option do you prefer and why?

Are there other options for a one-stop shop you would prefer? If yes, what are they and why?

The proposed options are hopelessly lacking in detail. Given this lack of detail, even if the options had the basic elements of a system we would support, Unions NSW would find it impossible to endorse any option. Workers compensation is a complex system and the devil is in the detail.

Instead of a one-stop personal injury shop, Unions NSW proposes a one-stop workers compensation dispute resolution process. This could incorporate all of the elements of Recommendation 14 of the Committee of Law and Justice namely:

- *allows disputes to be triaged by appropriately trained personnel*
- *allows claimants to access legal advice as currently regulated*
- *encourages early conciliation or mediation*
- *uses properly qualified judicial officers where appropriate*
- *facilitates the prompt exchange of relevant information and documentation*
- *makes use of technology to support the settlement of small claims*
- *promotes procedural fairness*³

Unions NSW suggests proposed model is outlined in the flow-chart attached to this submission. The essential elements are:

³ Ibid xiii

1. Abolishing the separate dispute pathway for WCDs (namely internal reviews by insurers, merit reviews by SIRA and procedural reviews by WIRO).
2. Early access to legal support through ILARS, managed by WIRO.
3. Bolstering the capacity of WIRO to support claimants and less formally resolve all issues that might become disputes.
4. Expanding the role of the WCC, so it can conciliate and arbitrate in relation to all workers compensation matters, with special accounting and medical divisions.
5. Simplifying all paperwork and documentation.
6. Appeals to NSW Supreme Court and NSW Court of Appeal as is currently the case.

Option 1 – One stop shop

Unions NSW does not support option 1 as it does not provide for the change necessary to improve the current system, which is in dire need of reform. Unions NSW does not believe the introduction of an online portal as suggested in this model would reform the dispute resolution process.

Option 2 – One stop shop, with more focused claimant and legal support

Unions NSW does not support option 2 as it does not go far enough in addressing systemic problems within the workers compensation dispute resolution system. Unions NSW does support expanding the role of WIRO however we do not support removing WIRO's capacity to report to the Minister under s27(c) of the *Workplace Injury Management and Workers Compensation Act 1988*. Given the limited

information provided in the Discussion Paper Unions NSW is unable to comment further on this model.

Option 3- one stop shop, with increased CTP consistency

Unions NSW cannot support option 3, particularly the suggestion SIRA has oversight of ILARS and the dispute resolution functions of the scheme. Our affiliates report anecdotally of regulatory failures by SIRA, and feel there is a failure on SIRA's part to adequately regulate insurance providers.

Unions NSW suggests that SIRA remain focused on its role as Regulator, to ensure it is able to satisfactorily carry out this important task. The effective regulation of insurance providers to ensure compliance with the legislation would greatly assist in minimising disputes.

Were SIRA's role to be expanded to deliver a one stop shop model as suggested in option 3, a situation would arise creating a conflict of interest, as with the previous WorkCover NSW model. The Regulator would be regulating itself as well as the legal practitioners who should provide independent and impartial advice and support.

We support WIRO continuing to have oversight of the disputes process and would like to see funding increased to enable WIRO to do more in this space. We note that WIRO was unable to complete the Parkes Project and the Effeney Review of Hearing Loss due to funding withdrawals and believe that projects such as these would provide valuable research and data potentially leading to improvements in efficiencies and outcomes throughout the system.

Option 4- consolidated personal injury dispute resolution model

Unions NSW does not support option 4 as we do not support the merging of workers compensation disputes with CTP.

Unions NSW does not support an expanded model for claimant support delivered by SIRA, with system oversight also from SIRA. This is as an absolute conflict of interest and will lead to further disputes.

Unions NSW does not support the abolition of WIRO or ILARS.

We strongly oppose the awarding of legal costs to claimants at the discretion of SIRA's Dispute Resolution Service.

Option 5 – Unions NSW workers compensation dispute resolution model

Unions NSW suggests the model that is outlined in the flowchart attached to this submission.

In this model WIRO would have the capacity to identify the claimant for early support and assistance.

Through this initial contact WIRO would have the capacity to resolve the dispute at an informal level.

It should be noted that this system gets rid of the different WCD dispute resolution pathway (insurer internal review, SIRA merit review and WIRO procedural review). The informal dispute resolution role of WIRO would not be limited and should look at every element of the dispute to assist in resolving it. A prudent insurer would of course conduct an internal review when problems arise with a claim but having this as a formal part of the system causes delays, disputation and anxiety.

WIRO would have the capacity at this point to allocate ILARS funding and triage the matter as needed.

Where the matter is unable to be resolved informally by WIRO, one simple form would cover all claim matters and begin the WCC

dispute resolution process. WIRO would be able to assist the claimants initiating the WCC stage of the dispute process.

The WCC would initially conciliate the dispute via telephone or in person.

Where the dispute is not resolved the WCC would arbitrate the matter, with the ability of either party to object to their conciliator conducting the arbitration.

Claimants and non-claimants would be able to appeal to the NSW Supreme Court and then the NSW Court of Appeal to seek a judicial review.

Question 8, page 44

What digital solutions could help improve the dispute resolution system?

As stated earlier in our submission Unions NSW does not object to digital solutions so long as there are more traditional pathways for those who are not technologically savvy.

Question 9, page 44

Do you think insurers should be required to conduct internal reviews of all disputed decisions as the first step in the formal dispute resolution process? Please explain why or why not.

Unions NSW does not support requiring insurers to conduct internal reviews of all disputes decisions as the first step in the formal dispute resolution process. The current multi-tiered model only serves to delay the resolution of a dispute rather than expedite it. It also serves to further aggravate the disputing parties. There is also a conflict of interest when internal reviews are made by insurers, given the incentives for insurers to determine that a claimant has some capacity to work.

We believe once WIRO is involved in informally resolving a dispute, it would be prudent for an insurer to conduct an internal review, however this does not need to be mandated as part of the system and it should certainly not extend to all workers compensation disputes

The WCC would of course look at merit (including medical) and procedural questions and an arbitrated binding decision made. A decision made by an impartial third party with expertise in the area is more likely to be viewed as fair by claimants, thereby allowing claimants to feel fairly treated.

Questions 10, page 45

So you think removing the requirement for full documentation before conciliation would be beneficial? Please explain why or why not.

Unions NSW supports simplifying the process leading up to the conciliation stage before the WCC. It may be some documentation would be beneficial, but it will depend on the case so there needs to be flexibility. Requiring full documentation as a matter of course before conciliation increases costs and is a barrier to timely dispute resolution.

Questions 11 and 12, page 46

Should any of these proposals for process improvements be implemented? Which one/s and why?

Can you suggest any other process improvements?

There are a number of ways to reduce disputation in workers compensation.

Unions NSW supports the suggestion of separating the conciliation and arbitration stages to encourage settlement at conciliation, as per our workers compensation dispute flowchart. We are also not opposed to allowing more conciliation at more points in the process. 'Fast track' assessments may also be a good idea, although resources

would need to be provided to the WCC to enable this kind of advanced triaging and responsiveness.

We have also outlined below some suggestion of our own to reduce disputation.

- **The use of prosecutions where breaches occur and the effective regulation of insurance providers and employers by both SIRA and SafeWork NSW respectively.**

As discussed, Unions NSW believes the simplification of SIRA's role to allow it to focus on regulation could go a long way in reducing disputes.

Complaints to SIRA from affiliates in relation to insurance provider breaches are rarely resolved by SIRA, but are often resolved through a simple call from WIRO to the insurance provider. As stated, the Regulator must regulate the industry. This will reduce disputes.

WIRO is often able to resolve disputes in the early stages of the dispute and our feedback from both WIRO and our affiliates, who refer claimants to WIRO, is that many of these disputes need not have occurred had the insurance provider been following the legislative requirements.

Unions NSW emphasises that the best way to prevent workers compensation disputes is through the prevention of injuries and/or illnesses. Over time unions have witnessed the reduced role of SafeWork NSW in prosecuting breaches.

The reduction of prosecutions in NSW is deeply concerning to Unions NSW and we want to see an increase in prosecutions where breaches occur. Increasing prosecution would act as a deterrent to employers who flagrantly breach health and safety legislation, which will reduce injuries/illnesses and thereby disputes about workers compensation claims.

Case Managers

The role of the case manager is a significant one in the life of the claimant. It is a complex role and it involves balancing the needs of many different parties. It also requires a good understanding of workers compensation legislation. It is deeply concerning that a role of such a complex nature requires very little training and no particular qualification. Case managers with no medical or legal training are making complex medical and legal decisions daily.

The case manager is also the first point of contact for the claimant and often lacks the necessary communication skills required to relay complex information in a way that is understandable and with any level of empathy or care.

Unions NSW is hopeful that icare's new model will go some way to reversing this problem however we strongly suggest that the training and qualifications required to undertake this role are re-examined. In doing this we also suggest that the pay and conditions for case managers be examined in consultation with the Finance Services Union.

The turn over among case managers is excessive and suggests that the role is overwhelming, difficult and lacks the necessary pay and conditions to keep people in the job.

Government should lead the way in best practice

Unions NSW wants to see the Government lead the way with best practice in both health and safety and workers compensation. Best practice in both these areas will reduce the number of disputes and will go some way towards making the Government an employer of choice. It is quite shameful that Government departments are some of the worst performers when it comes to disputes about workers compensation claims.

- **S. 39 cut offs**

Unions NSW supports removing the ability to cut workers off the scheme if they do not meet the more than 20% whole person impairment (**WPI**) test. This threshold is a huge source of disputation. The current model is arbitrary and is exceedingly high, meaning that ‘...no more than 5% of injured workers are likely to be assessed as having ‘high needs’ or the ‘highest needs’⁴

The method for determining the 20% WPI is also questionable with the American Medical Association (**AMA**) Guides stating that:

*It must be emphasized and clearly understood that impairment percentages derived according to Guides criteria **should not** be used to make direct financial awards or direct estimates of disabilities.⁵*

This threshold does cause disputes. As previously stated, an assessment that impacts so significantly on a claimant’s life will, and should, be disputed as a matter of course.

The removal of s39 would go a long way in removing disputation within the system. It would also ensure that injured workers are fairly compensated for workplace injuries and loss of income as a result of this.

Conclusion

We are concerned at the timing of this process. The Christmas period is a holiday period for many stakeholders and this has made it difficult for Unions NSW as the peak body to seek feedback from our affiliates as many are returning to work early February due to carer commitments.

⁴ Macquarie University, Centre for Workplace Futures: *The Impact on Injured Workers of Changes to NSW Workers’ Compensation*, Report No 3 (2015) 6.

⁵ Ibid

We would hope that submissions are made available to the public, unless stated otherwise, to ensure full transparency. We also expect to be consulted further regarding the outcomes of this process.

Generally we found the discussion forum held by the Department of Finance, Services and Innovation to be helpful and informative in this process. We were disappointed that the forum was held in mid-January when many of our colleagues were on leave and therefore unable to attend.

We are also perplexed as to why the Discussion Paper is limited to Recommendations 14, 15 and 16 of the Standing Committee on Law and Justice's First review of the Workers Compensation Scheme when 26 Recommendations were made in total.

Unions NSW thanks the Department of Finance, Services and Innovation for the opportunity to make a submission to the Discussion Paper and we look forward to working with the Department to help improve this important area in need of urgent reform.

WORKERS COMPENSATION DISPUTE RESOLUTION MODEL UNIONS NSW PREFERRED OPTION

