

13 November 2003

Assistant Commissioner
National Workers' Compensation and OHS Inquiry
Productivity Commission
PO Box 80
Belconnen ACT 2616

Dear Mr Plunkett,

The Executive of the Australian Rehabilitation Providers Association (ARPA) has read, with great interest, the interim report on the National Workers' Compensation and Occupational Health and Safety Frameworks. Clearly, the recommendations provide an opportunity for the design and implementation of mechanisms to encourage the application of best practice principles to injury management, claims management and occupational health and safety. We appreciate the opportunity you are providing at 11 am on 8 December 2003 for ARPA Executives to input further to this process.

The effective application of evidence-based best practice principles will be reliant on correct detail in scheme design. Expert advice from representatives of the key components of the industries of occupational health and safety and workers compensation will be critical if correct and effective design is to be achieved.

Occupational Rehabilitation Providers are the only stakeholders in the workers' compensation industry who have expertise in all aspects of workplace rehabilitation. The knowledge and experience acquired from our professional training, clinical practice, experience in a broad range of workplaces, and constant negotiation and collaboration with all parties, has enabled us to develop both broad and specific insight into, and understanding of the complexities of this process.

Our involvement with injured workers during the return to work process places us in the privileged position of first-hand witness to the complex impact of injury on a worker including to their physical and psychological health, family, finances, recreation and work. Our interactions with employers and their workplaces, ensures that we recognise the impact of work injury on other workers and workplace dynamics, as well as understanding the significant operation and administration challenges to employers. Our professional knowledge of injury management ensures that we are able to effectively communicate with treating practitioners and formulate recommendations to optimise the success, safety and durability of an individual's return to work.

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ARPA is the peak body of Occupational Rehabilitation Providers in Australia. Our councillors are elected by our affiliate members, the eight state and territory rehabilitation provider associations. This body holds the highest level of expertise and has the combined experience of delivery of rehabilitation services in every workers compensation jurisdiction in Australia. We consider the involvement of ARPA in scheme design, standards development and monitoring of performance, will be integral to the successful interface of injury management best practice with other scheme processes.

Other processes that directly impact on the success of injury management outcomes are early intervention, workplace-based rehabilitation, effective claims management and the scheme benefits structure. These links are addressed in the Interim Report, and there have been several studies within Australia that confirm the crucial interaction between these processes and their subsequent influence on rehabilitation outcomes and claim costs.

Best practice principles for Injury Management have been acknowledged by all jurisdictions, however few schemes have achieved the definition of processes that encourage the application of these principles. Scheme attributes need to provide incentives to all parties to engage with these practices, to ensure quick, smooth and non-confrontational claims determination and management, referrals to the right service at the right time, and workplace focus throughout rehabilitation. We have observed significant consequences arising from subtle differences in scheme requirements.

ARPA enthusiastically welcomes the opportunity to contribute to the facilitation of consistent, fair and effective workers' compensation across our nation. Australia is providing international leadership in many areas of Injury Management, OH&S and Workers' Compensation, the recommendations of the Interim Report illuminate the path toward greater health, social and economic advancement in these programs.

Our submission will address the areas of scheme design, implementation and monitoring that are critical to the successful application of best practice injury management principles. We will promote to the Productivity Commission the importance and immense value of ARPA being represented on the new national body for workers' compensation.

Yours Sincerely,

Pam Garton
Secretary