

# Response to the Independent Review Discussion Paper



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21 September 2020

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Dear Peter,

Thank you for the opportunity to respond to your discussion paper.

The 2019 Victorian Ombudsman (VO) report, and the consequential independent review you are conducting serves as a timely and necessary catalyst for further change and reform.

The findings by the VO require a considered response from agents and we need to show a way forward.

The Ombudsman in her 2016 report noted the overall system in Victoria is not broken. It is also recognised that workers' compensation is a highly complex area. The VO has challenged decision making on complex claims, the effect of the remuneration model, and WorkSafe's oversight of agent decision-making.

Fundamental questions were also raised about the efficacy of the agent model itself. Is it capable of meeting the requirements of managing complex claims or are there alternatives available?

Xchanging is proud of its record and its contribution in helping deliver insurance schemes in Australia and around the world. We accept our responsibility to ensure the schemes we support are efficient and effective, meeting the varied needs of stakeholders, and our performance is open to scrutiny, review and continuous improvement.

Our role in providing claims management services for WorkSafe is no different. We understand that we play our part in, and take our share of responsibility for, WorkSafe's performance and the well-being of injured workers.

We have considered the Ombudsman's findings carefully and have suggested reform measures, detailed in the attached submission, that directly tackle the cause of the identified issues, and that will help to deliver benefits to injured workers and the scheme itself.

In line with the themes of your discussion paper, we make the following comments.

## **Reducing conflict**

The subjective nature of the 130-week entitlement test makes decision-making challenging for injured workers and agents alike, and inevitably provides grounds for conflict and dissatisfaction between the parties.

As a point of comparison, the Victorian Transport Accident Commission (TAC) scheme is significantly different to the Victorian workers' compensation model. The TAC system assesses ongoing weekly benefit entitlements subject to an objective test under the American Medical Association (AMA) guidelines. The workers' compensation test in Victoria is a more subjective determination of whether an injured worker has a capacity to return to work.

While we are not suggesting applying the same test as the TAC, adding more objectivity to the current test would assist with improved decision making. Currently, agents seek information about a worker's capacity for work which is sometimes contradictory. Objectivity could be increased in the 130-week test by allowing or enforcing agents to access a Medical Panel to determine an injured workers' capacity to return to work (RTW). Agents cannot currently access the Medical Panel for this purpose. Bringing medical panel resources in earlier in the decision-making process supports proper decision making and service delivery in complex matters. This would allow for a more definitive process at 130 weeks, reduce discretionary decision-making by agents and lessen points of conflict between injured workers, employers and agents.

Combined with the Ombudsman's recommendation for a binding dispute resolution process this is most likely to improve injured worker experience, and reduce conflict, around the most significant point of the scheme's contention, the 130-week test.

## **Remuneration – getting the balance right**

The remuneration model for agents has started to change in line with the Ombudsman's direction, and scope is now available for further change.

The WorkSafe agent remuneration model has three key components:

- an annual base fee
- an Annual Performance Adjustment (APA); and
- a long-term incentive linked to the performance of the scheme.

In her 2019 report the Ombudsman overviewed the APA component, which has historically been balanced across three measures - Return to Work (RTW), Service and Sustainability.

This financial year (2020/21) WorkSafe has rebalanced the APA to further emphasise RTW and Service performance and removed several components which related to Sustainability. Simultaneously WorkSafe is increasing investment in programs to improve RTW outcomes.

The current WorkSafe contract with agents, established before the 2016 Ombudsman report limited WorkSafe's capacity for more substantial change to the remuneration model. The renegotiation of agent contracts, which is due to commence in coming months, provides WorkSafe with greater opportunity to rebalance the remuneration model toward a base fee with a smaller incentive component necessary to encourage and reward agent innovation.

This, together with the recent adjustment to the APA, should materially change the remuneration model for the first time since the 2016 report. This directly resolves the issue of incentivised behaviours that the Ombudsman has sought to be altered.

### **More oversight tools for WorkSafe**

The 2019 Ombudsman report made a series of recommendations to WorkSafe regarding their oversight of the scheme. These included

- Establishing an independent review system
- Amending its quality decision review programs
- Establishing a centralised complaints process
- Updating its claims policies in a range of areas including the use of surveillance, use of independent medical examinations (IMEs), and the assessment of mental injury claims
- Altering contract requirements around the timeliness of assessment for re-instatements and requests for medical services.

WorkSafe accepted the Ombudsman's recommendations and has worked with agents to implement them.

Additionally, agents continue to implement their own controls. As an example of ongoing improvement, we note the 2019 Ombudsman report was concerned about the use of surveillance. The scheme has implemented stronger controls over the usage of surveillance including additional training, evidence requirements and approvals. WorkSafe conducts audits of agents' usage of surveillance and Xchanging also completes its own sample reviews.

To further improve the process Xchanging is implementing a process whereby surveillance is retrospectively reviewed by an internal but independent group. This will ensure the surveillance was organised in a way consistent with both WorkSafe's policy and the intention of the policy. Where inconsistent, training and development steps will be undertaken.

This program could be expanded to a scheme level, where all surveillance is made available to an independent group – which could then select a thorough sample to review. The intention would be to confirm the surveillance was consistent with both the wording and intent of WorkSafe's policy. Policy changes could be recommended from this group to WorkSafe.

WorkSafe's oversight is continually developing. The previous recommendations of the Ombudsman have been implemented but have not had time to fully develop. The Ombudsman recommendations together with ongoing process improvements, like those listed above, should result in appropriate oversight, transparency and accountability.

### **What does the Agent Model deliver?**

Evidence suggests workers' compensation schemes across Australia which have multi-agent models provide superior support for injured workers and employers.

A multi-agent model provides benefits through benchmarking, competition and innovation that ultimately better support injured workers, employers and other stakeholders. In a highly complex workers' compensation environment, single provider models, either insourced or outsourced, do not provide these benefits. Recently, scheme changes in both South Australia and New South Wales saw the schemes move to single provider models that have, arguably, had detrimental effects on the experience of stakeholders across the scheme.

Janet Dore completed a review of the NSW Workers' Compensation scheme in December 2019. In her report she referenced a report by McKinseys. Her reference noted:

".... McKinsey identified the trade-off of a single partner model as 'a reduction in the level of competition between partners, a perceived reduction in choice for employers, and less optionality to easily swap out partners.'"

Agents have an obvious commercial interest in seeing the scheme work, and this can be harnessed to drive innovation that improves performance and outcomes. As an example, agents have worked with WorkSafe to introduce triage programs and the scheme has developed successful pilots and programs over the years, including Mobile Case Management and Mental Health interventions involving Facilitated Discussions. These and other programs will continue to develop and improve through the work of individual agents, shared efforts across agents, and collaboration with WorkSafe and other stakeholders.

Agents are best placed to facilitate and deliver the changes necessary for the scheme. They have the corporate insight, the supporting processes and experienced and dedicated staff readily available to facilitate new programmatic and structural changes – whether that be through greater practice of early triaging of injured workers, or the establishment of specialised complex claim management teams.

## **A new chapter in complex claims management**

Like the Victorian Ombudsman, we do not consider the Victorian workers' compensation system to be broken. There is, however, a need to improve the management of complex claims and the experience of injured workers with complex conditions.

The current system is comparatively generous and financially viable. The vast majority of injured workers and employers are well supported by the scheme. We need to maintain this while we improve the experience for those with complex claims.

Agents are a key part of the workers' compensation infrastructure within Victoria. The agent model provides competition, innovation and benchmarking. A single provider, either internal or external, brings substantial risk and has demonstrably reduced service and outcomes in other jurisdictions. As scheme design is reviewed, and change implemented, the best possible outcomes will be obtained with a multi-agent model.

There are recognised needs for improvement in the scheme, and these can be met. The current model also has inherent strengths, and these should be built upon. Conflict can be reduced with increased objectivity at the 130-week test. The remuneration model has already been rebalanced, with further changes available with the future contract. WorkSafe's oversight has already been strengthened and the current independent review together with the Ombudsman's recommended dispute resolution process will provide lasting oversight structures.

Together with the supporting initiatives outlined in our submission, these key measures can be quickly introduced, and their effectiveness monitored and will bring about positive and lasting change to the experience of injured workers with complex claims.

Again, thank you for the opportunity to make this submission. We are happy meet with you to discuss any aspect further.

Yours sincerely



John Fleming  
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Xchanging

## BACKGROUND

1. For individuals, please explain your experience of the workers' compensation scheme if any.

Not applicable.

2. For organisations, please describe your organisation.

Xchanging Integrated Services Victoria Pty Ltd (Xchanging) is a company limited by shares. The ultimate holding company of Xchanging Integrated Services Victoria Pty Ltd is DXC Technology. DXC Technology is a Fortune 500 company and represented in the S&P 500 Index. DXC is a global Third-Party Administrator of insurance claims and policies, with experience in personal injury and workers' compensation and the leading independent supplier of technology solutions to the insurance industry.

Xchanging has been an agent of WorkSafe Victoria since July 2002 and provides workers' compensation services to over 25,000 Victorian employers.

Xchanging employs 300 people and is located at Level 10, 390 La Trobe Street, Melbourne, Victoria 3000 and 4 Wesley Court, Burwood East, Melbourne, Victoria 3151.

## IDENTIFYING AND ASSESSING COMPLEX CLAIMS

### 3. What are the features of a claim for worker's compensation that make it complex, or at risk of being complex?

There are a range of claim features which lend themselves to complexity. The more features which exist, the more complex the case is likely to be.

In our experience features may include;

- Duration – longer term claims are generally more complex than short term ones, as they accumulate more complex features
- Injury type – mental injury claims can be more complex than physical ones
- Number of injuries sustained - multiple injuries can be more complex than singular ones – often requiring the coordination of a range of service providers (eg GP, surgeon, OT, OR, home help, home modification, etc)
- Co-morbid conditions – e.g. obesity,
- Pre-existing injuries or illnesses – e.g. diabetes, heart disease, back complaints
- Mental illness – schizophrenia, paranoia, depression, anxiety
- Geographic location – difficulties can arise with access to appropriate health services in rural areas, and interstate
- Employment connection and relationship – complexity increases if the connection is severed or the relationship is poor
- An injured worker's attitude to their injury – motivation, resentment, bitterness, rage or desire for revenge can complicate the management of a claim
- Age – recovery times can be longer for older workers
- An injured worker's personal circumstances e.g. drug or alcohol addiction, abusive relationships, or homelessness.

### 4. How, and at what stage, should claims for worker's compensation be assessed as being complex, or at risk of becoming complex?

Currently triage occurs at several stages throughout the claim lifecycle, e.g. at claim assessment, the onset of risk factors (such as a diagnosis of depression), duration, or separation of employment. Throughout the lifecycle of a claim the claim is assessed during case conferencing cycles. RTW is the focus of these conferences and factors which may limit RTW are reviewed.

While many people RTW without significant intervention, continuing assessment, triggered by the features outlined in our response to Question Three, is an ideal way of monitoring changes in complexity.

In our experience, RTW outcomes are increasingly difficult to achieve for claims in excess of 26 weeks duration due to the number of complex features. The expiry of the 52-week employer obligation period is a further challenge, decreasing the likelihood of RTW past this point. Consequently, we aim to facilitate RTW as early as possible.

## CASE MANAGEMENT OF COMPLEX CLAIMS

### 5. Are current case management practices able to support and treat the individual needs of injured workers with complex claims?

We believe the majority of injured workers are well supported by the scheme, including people with complex claims. This is supported by WorkSafe's surveys of injured workers and employers. However, there is room for improvement in case management practices to improve the experience of those with complex claims.

The current model has seen many improvements and service initiatives in recent years to support people with complex claims. Recent scheme examples include;

- Programs to support people suffering silicosis
- The development and deployment of Mobile Case Management, and
- The development of programs to support RTW outcomes for those suffering a mental injury e.g. facilitated discussions.

Xchanging has separately innovated, including;

- Support for paramedics suffering PTSD, which, in 2018, was recognised by the Personal Injury Education Foundation (PIEF), a national body devoted to improving the skills and competencies of people in the personal injury industry.
- A program where, in 2016, we partnered with three OR providers to support long term injured workers to reintegrate into the community through education and training. The Fresh Start program won an industry award for excellence in RTW.

In our experience better outcomes are achieved when case management programs start as early as possible and there is support for the path to recovery from the worker, their treating health practitioner and the employer. Additionally, when you have highly skilled case managers who understand the complexities of the injured worker's situation and have the skills, supports and programs available to manage them you are more likely to obtain better outcomes.

6. If your answer to question 5 is yes, describe how current case management practices respond to the individual needs of injured workers with complex claims.

Please refer to our response to question five.

7. If your answer to question 5 is no, describe what needs to change in the case management practices of complex claims so that injured workers are better supported and treated.

We believe there are opportunities to improve case management practices to support those with complex claims. While there is not one program or intervention that will fit every situation, we believe there are attributes that are likely to lead to better outcomes, including;

- Timely case management interventions
- Support from all parties, including the injured worker, their treating health practitioner and the employer
- High case manager expertise; and
- Appropriate support programs.

We support the approach of early triage, continuing triage when there is no RTW, and subsequent referral to specialist resources with appropriate interventions.

Additional tools that could be developed include;

- Increased objectivity during the 130-week test by allowing access to the Medical Panel where appropriate
- Lower caseloads on the most complex of claims to support greater individual attention
- Training. While substantial training programs already exist, with triaging and more support programs, additional training will be required
- Integrated programs including programs for mental injury and community connection e.g. Men's Shed. There are some excellent initiatives being undertaken but they need further scale
- Post 130 weeks RTW or return to community trials in which the injured worker could participate without the risk of losing benefits.

## FINANCIAL INCENTIVES AND AGENT DECISION MAKING

### 8. What role do the current financial incentives for agents have in the agent's management of complex claims?

Financial incentives play a pivotal role in determining agent priorities. Schedule G penalties, outlined in the agency contract, focus agent efforts and investment on timeliness and accuracy. Together with the injured worker satisfaction measure they create the baseline for service delivery.

The Recovery Assistance Program, currently in pilot, provides those with complex claims with the support to return to the community. The measure considers the complexity of the case and encourages agents to focus on understanding worker issues and using community support programs to assist in their recovery.

### 9. Do the current financial incentives for agents support prompt, effective and proactive outcomes for injured workers with complex claims?

The current financial incentives and disincentives support prompt, effective and proactive outcomes for all injured workers, including those with complex claims.

We believe further focus could be made on promoting RTW, return to health and community connection. WorkSafe's new Recovery and Return to Work program is an example of a program that identifies the injured workers at highest risk of not returning to work and promotes a level of increased support and intervention. This program was only implemented in the current (2020/21) financial year and is already showing positive signs. WorkSafe is supporting agents to implement the program via its APA program.

The current customer service incentives promote clear and timely communication, and innovation to improve the service experience of injured workers.

### 10. If your answer to question 9 is yes, describe

#### a. how the current financial incentives for agents maximise outcomes for injured workers with complex claims.

Please see our response to Question Nine.

b. any different or additional measurements which could be linked to financial incentives to promote quality decision making by agents.

Additional measures which could be considered include;

- Maximum caseloads for complex claims management to enable high quality service provision
- Enhanced training and skill development for agent staff required to make decisions (e.g. technical managers) or support the decision-making process (e.g. injury management advisers)
- Support programs for injured workers, such as transition support, to equip injured workers to prepare for and manage legislatively prescribed decisions.

11. If your answer to question 9 is no, describe a. the ways in which the current financial incentives for agents could be changed to maximise outcomes for injured workers with complex claims. b. any different or additional measurements which could be linked to financial incentives to promote quality decision making by agents

Please refer to our response to Question Ten.

12. Describe any non-financial mechanisms by which agents could be encouraged to promote quality decision making.

Quality decision making is already a key component of agent programs and is heavily supported within Xchanging. We support quality decision making through extensive training, a dedicated senior legal manager, quality decision making processes and audits.

There is, however, always room for improvement. Some additional mechanisms that could be considered include;

- Specialist referral panels such as the medical panel – currently a feature of the dispute resolution process - which can be used during the decision-making process
- Training – ongoing competency-based training programs for agent staff.

## OVERSIGHT OF AGENTS BY WORKSAFE

### 13. Are WorkSafe's processes for overseeing agents' management of claims achieving prompt, effective and proactive outcomes for injured workers?

The 2019 Ombudsman's report made a series of recommendations to WorkSafe regarding their oversight of the scheme. WorkSafe accepted the Ombudsman's recommendations and has worked with all agents to implement them.

Additionally, agents are implementing their own controls. As an example of ongoing improvement, we note the 2019 Ombudsman's report was concerned about the use of surveillance. The scheme has implemented stronger controls over the usage of surveillance including additional training, evidence requirements and team leader sign off. WorkSafe conducts audits of agents' usage of surveillance and Xchanging also completes its own sample reviews.

WorkSafe's oversight is continually developing. The previous recommendations of the Ombudsman have been implemented but have not had time to fully develop. The Ombudsman recommendations together with ongoing process improvements, like those listed above, should result in appropriate oversight, transparency and accountability.

### 14. Do the new mechanisms implemented by WorkSafe in response to the Ombudsman's 2019 report address any limitations in WorkSafe's oversight of agent decision making?

One new mechanism implemented by WorkSafe was additional training for agent staff. This was a positive initiative resulting in improved decision making across the scheme.

The expanded population for quality decision making audits has resulted in the provision of more quality comments and recommendations and tighter controls over agent responses and issue resolution.

The implementation of the Workers Compensation Independent Review, while still in its early stages, is providing greater clarity around decision making requirements and standards.

### 15. If your answer to question 14 is yes, describe how.

Please refer to our response to Question 14.

16. If your answer to question 14 is no, describe why not.

Please refer to our response to Question 14.

17. How could any limitations in WorkSafe's oversight of agent decision making be overcome?

WorkSafe has implemented the Ombudsman's recommendations in relation to oversight. Additionally, the Ombudsman's recommendation to Government to introduce a new dispute resolution process with binding determinations, will create certainty and less conflict for injured workers with complex claims.

To further improve the management of surveillance Xchanging is implementing a process whereby surveillance is retrospectively reviewed by an internal but independent group. This will ensure the surveillance was organised in a way consistent with both WorkSafe's policy and its intent. Where inconsistent, training and development steps will be undertaken.

Surveillance review programs such as this could be expanded to scheme level. Agent surveillance instructions could be made available to an independent group who could then select a sample to review. The review group would then assess if the surveillance was consistent with both the wording and intent of WorkSafe's policy. Policy changes could be recommended from this group to WorkSafe.

## EVALUATION MEASURES

18. To what extent do current measurements of outcomes for injured workers, including return to work rates and worker surveys, accurately measure whether the agent model achieves prompt, effective and proactive outcomes for injured workers?

Xchanging supports WorkSafe in its approach to evaluating the achievements of the agent model, and we have demonstrated this support over the past 18 years as these measures have changed to meet the changing expectations of the community. We believe the current measures set the base level for performance across RTW and service but acknowledge there is room for improvement.

It must also be noted that outcome measures are not the only method of evaluation. WorkSafe has a suite of controls in place to measure performance of the agent model. For example, we believe the quality decision making audit is a positive step forward for assessing the quality of agent decisions.

19. Describe any additional or alternative methods of measuring outcomes for injured workers that should be considered?

Programs are already in place to measure injured worker sentiment. Recent changes have altered the program to re-weight towards people with over 130 weeks of compensation, which is a positive initiative.

Should you accept the recommendations of this paper additional measures would need to be implemented to evaluate their impact e.g. a reduction in disputes at the 130-week measure, and the quantitative and qualitative results of the use of surveillance.

## THE CURRENT AGENT MODEL AND ALTERNATIVE MODELS

20. Does the current agent model achieve prompt, effective and proactive management for injured workers with complex claims?

Agents are best placed to facilitate and deliver the changes necessary for the scheme. They have the corporate insight, the supporting people, processes and systems to facilitate new programmatic and structural changes – whether that be through greater practice of early triaging of injured workers, or the establishment of specialised complex claim management teams.

As an example, agents have worked with WorkSafe to introduce triage programs and the scheme has developed numerous successful pilots and subsequent programs over the years, including Mobile Case Management and Mental Health interventions involving Facilitated Discussions. These and other programs will continue to develop and improve through the work of individual agents, shared efforts across agents, and collaboration with WorkSafe and other stakeholders.

21. If your answer to question 20 is yes, to the extent you haven't addressed your response in answers to earlier questions, describe how the current agent model achieves prompt, effective and/or proactive management for injured workers with complex claims.

Please refer to our response to Question 20 and our covering letter.

22. If your answer to question 20 is no, to the extent you haven't addressed your response in answers to earlier questions, describe

a. the limitations of the current agent model,

Please refer to our response to Question 20 and our covering letter.

b. how the current agent model could be improved to achieve better health and recovery outcomes for injured workers, and/or

Please refer to our response to Question 22 a. and our covering letter.

c. any alternative models to the current agent model that would be more effective in delivering positive health and recovery outcomes to injured workers.

We believe workers' compensation schemes across Australia which have multi-agent models provide superior support for injured workers and employers.

A multi-agent model provides benefits through benchmarking, competition and innovation that ultimately better support workers, employers and other stakeholders. In a highly complex workers' compensation environment single provider models, either insourced or outsourced, do not provide these benefits. Recently, scheme changes in both South Australia and New South Wales saw the schemes move to single provider models that have, arguably, had detrimental effects on the experience of stakeholders across the scheme.

Janet Dore completed a review of the NSW Workers' Compensation scheme in December 2019. In her report she referenced a report by McKinseys. Her reference noted:

*".... McKinsey identified the trade-off of a single partner model as 'a reduction in the level of competition between partners, a perceived reduction in choice for employers, and less optionality to easily swap out partners.'"*

Agents have an obvious commercial interest in seeing the scheme work, and this can be harnessed to drive innovation that continues to improve performance and outcomes.

In your answer to question 22 b. and c., consider the effect of any change to the current agent model on the financial viability of the scheme.

The majority of injured workers and employers are well supported by the scheme. We need to maintain this while we improve the experience for those with complex claims.

Scheme design is highly complex. In her December 2019 report Janet Dore noted:  
*“In a multi-variate structure as outlined above, together with business groups, unions, injured workers, medical, allied health, legal providers and different Ministers, the value of constructive and collaborative relationships cannot be overemphasised. Trust and common focus on outcomes are fundamental elements of a successful workers compensation system.”*<sup>1</sup>

Agents are a key part of the workers' compensation infrastructure within Victoria. We submit the agent structure provides competition, innovation and benchmarking. A single provider, either internal or external provides substantial risk and has demonstrably reduced service and outcomes in other jurisdictions. As scheme design is reviewed, we submit improving within the current agent model is the model most likely to maintain the financial viability of the scheme.

23. Are there practices or procedures used by other compensation schemes, in Australia or overseas, that maximise outcomes for injured workers that the Review should examine?

Please refer to our response to Question 22 a. and our covering letter.

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<sup>1</sup> Independent reviewer report on the Nominal Insurer of the NSW workers compensation scheme. Janet Dore, December 2019. Paragraph 7.8.1

## VICTORIAN OMBUDSMAN 2016 AND 2019 REPORTS

24. Have you observed any changes to (i) agent decision making and (ii) the oversight of agents by WorkSafe since the 2016 Ombudsman report? Please describe.

Since the 2016 Ombudsman Report we have observed improvement in quality decision making due to the new framework, WorkSafe oversight and training and guidance. There was a significant reduction in the number of matters going to conciliation, and an improved process for auditing agent quality decisions.

25. What are the root causes of the problems identified by the Ombudsman in her 2016 report?

The industry sets a high bar on decision making, but there is tension in the system because the tests require subjective judgement, for example tests of 'reasonableness' or 'indefinitely'. This can cause inconsistency, ambiguity, uncertainty and, in some cases, errors.

26. Do you think the implementation of the recommendations 3–9 in the 2019 Ombudsman report will address those root causes? If so, how will that occur?

Like the Victorian Ombudsman, we do not consider the Victorian workers' compensation system to be broken. There is, however, a need to improve the management of complex claims and the experience of injured workers with complex conditions.

The current model has inherent strengths, and these should be built upon with the addition of a rebalancing of the remuneration model, more objectivity at 130 weeks, a new approach to surveillance governance, specialist skills to support prior to complex decisions, conciliation to apply a good faith bargaining test, and arbitration to decide - with WorkSafe retaining oversight for governance and finance.

We believe the recommendations made in the 2019 Ombudsman report, together with current WorkSafe initiatives and the recommendations outlined in our submission, will help to address the root causes of the issues identified by the Ombudsman. These changes can be quickly introduced, and their effectiveness monitored, and they will help bring about positive and lasting change to the management of injured workers with complex claims.

27. If you do not think the implementation of recommendations 3–9 in the 2019 Ombudsman report will address those causes, explain why not.

Please refer to our response to Question 26.

## FURTHER CONSIDERATIONS

28. Are there any other matters the Review should consider in meeting the Terms of Reference?

Thank you for the opportunity to comment. While we have no further matters to add, we are happy to discuss any aspect of our submission with you.