



# **Consultation on the** **DRAFT Regulatory Complaint** **Handling Policy**

December 2021

**BUSINESS**  
**NSW**

# INTRODUCTION

Business NSW welcomes the opportunity to provide input to contribute to SIRA's consultation on its *DRAFT Regulatory Complaint Handling Policy*.

As NSW's peak business organization, Business NSW has more than 30,000 member businesses across NSW. We work with businesses spanning all industry sectors including small, medium and large enterprises. Operating throughout a network in metropolitan and regional NSW, Business NSW represents the needs of business at a local, state and federal level.

# BUSINESS NSW'S SUBMISSION

## SIRA'S FUNCTIONS AND OBJECTIVES

**Recommendation 1:** That the contents of the *DRAFT Regulatory Complaint Handling Policy* be amended to:

- clarify that SIRA's functions and objectives are also set out in the *Workplace Injury Management and Workers Compensation Act 1998*;
- explain the difference between a complaint and a dispute;
- include a list of matters that SIRA can and cannot accept (cross-referencing the matters that cannot be accepted by SIRA with contact details of the appropriate body);
- in relation to the time-frame for acknowledging receipt of the complaint, replace the two working days turnaround with a same-day turnaround; and
- include a process for urgent matters (giving examples of what is considered to be urgent).

**Recommendation 2:** Arrange for all standard proforma documents in relation to which a complaint can be made under the *DRAFT Regulatory Complaint Handling Policy* to be amended to ensure they include a readily identifiable section that advises the user (of the document):

- that SIRA has a complaints process in place,
- of the preconditions SIRA requires to be followed (for example, to try to resolve the complaint with the organization or person being complained about),
- the type of evidence (relevant to the particular pro forma document's subject matter) that SIRA typically requires in order to consider a complaint,
- the fact that a complaint can be made confidentially, and
- a link to the policy document.

**Recommendation 3:** Ensure that SIRA's internal complaint handling processes and procedures adhere to *AS/NZS 10002:2014 Guidelines for complaint management in organizations*.

SIRA's objectives include<sup>1</sup>:

- to ensure the efficient operation of workers compensation insurance arrangements,
- to ensure the timely and effective resolution of disputes arising under the workers compensation legislation, and
- to ensure the appropriate co-ordination of arrangements for the administration of the schemes to which the workers compensation legislation relates.

Amending the *DRAFT Regulatory Complaint Handling Policy* as suggested in Recommendations 1, 2 and 3 will facilitate the Authority's achievement of these objectives.

---

<sup>1</sup> Paragraphs (c), (d) and (e) of subsection 22(1) of the *Workplace Injury Management and Workers Compensation Act 1998*.

## Contact

Elizabeth Greenwood  
Policy Manager, Workers' Compensation,  
WHS & Regulation  
t. +61 2 9466 4129  
e. \_\_\_\_\_

[businessnsw.com](http://businessnsw.com)

**BUSINESS  
NSW**