

Below is the submission from K&S:

**1. OHS:**

The response is in line with the K&S previous submission on the OHS amendments.

**2. Off site recess breaks**

Appreciating that the reason for re-instatement of this provision was to re-align the SRC Act with State legislation, the original reason for the exclusion still remains an issue for K&S in that there is a loss of control over what happens to employees (and the activities that they undertake) whilst they are off site having a meal break. K&S are strongly against this change.

**3. Payment of medical expenses when suspended under S36 or S37:**

The aim of this amendment being to continue to facilitate medical improvement for injured employees that are suspended under S36 or S37. This is seen by K&S as a positive amendment as it will ensure that there is ongoing medical progression on suspended rehabilitation cases and is in line with the values of K&S Freighter's in supporting injured employees back to recovery.

**4. Statutory time limits:**

K&S currently monitor the performance of our claims manager (CGU) in determining claims and ensuring that claims are determined within the targeted time frames set down by the Commission. The concern in regards to the proposed amendment is that there is no indication as to potential timeframes nor penalties for non-performance within these timeframes. Also, it is important to note that in regards to specific claim types, such as stress claims, the evidence of a psychiatrist (not psychologist) is best practice in regards to seeking information to determine these claims. It can be very difficult to get an appointment with medical specialists within short-term timeframes.

Regards

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