



28 April 2015

John Holland Group Pty Ltd
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Committee Secretary
Senate Education and Employment Committees
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Dear Sir/Madam,

Safety, Rehabilitation and Compensation Amendment (improving the Comcare Scheme) Bill 2015

I refer to the Safety, Rehabilitation and Compensation Amendment (improving the Comcare Scheme) Bill 2015 ('the Bill') which has been referred by the Senate to the Senate Education and Employment Legislation Committee for inquiry and report.

These submissions and feedback are provided on behalf of John Holland Group Pty Ltd, John Holland Pty Ltd and John Holland Rail Pty Ltd (collectively 'John Holland') which hold self-insurance licences under the Safety, Rehabilitation and Compensation Act 1988 ('the SRC Act'). John Holland has considered the Bill and explanatory memorandum, and provides the following general comments:

1. CONSISTENCY

The Bill provides recognising existing legislation (Cth) and aligns definitions and approaches with that existing legislation (for example, with the Fair Work Act 2009, Social Security Act 1991 and Work Health and Safety Act 2011). John Holland supports this approach and considers this will minimise anomalies, increase certainty and should decrease disputes.

2. ADMINISTRATION

John Holland supports the streamlining of processes and reducing of red tape where the administration does not serve to improve the delivery of service to employees and achieve return to work outcomes. Examples of this include the streamlining of the rehabilitation process from a two stage to a one stage process and the changes proposed for s61(2) and s64(1).

3. INITIATIVES

John Holland supports the initiatives undertaken to support businesses in achieving better Return to Work and rehabilitation outcomes for our people, specifically with the broadening of the definition of suitable duties and introduction of the Comcare Incentive Scheme. This will provide additional scope for our business to support our people as the end of a project life-cycle approaches.

4. EARLY INTERVENTION AND SUPPORT

The Bill allows for flexibility and the ability to deliver early support to employees via the early rehabilitation and provisional medical expenses processes.

5. MEDICAL SCHEDULE

John Holland considers that the mandated schedule of fees for medical treatment, examination and reports will negatively impact on our employee's ability to access appropriate care in a timely manner. Mandating schedule fees for independent medical examinations may also restrict the number of bookings doctors are willing to take which may also delay decisions regarding claimed entitlements or treatment options such as surgery requests. John Holland considers that treatment outcomes as well as managing costs associated with it, can be better achieved through initiatives such as clinical frameworks. We strongly suggest that any schedule of fees that is developed, be developed in a manner providing for flexibility to account for changes in location; urgency; particular; and peculiar circumstances. Our people are often working in remote and rural settings where choice of treatment is limited and we do not support legislation that may result in them needing to seek treatment in alternate locations purely due to cost; or situations where our employees themselves will be required to contribute to their own medical treatment as a result of the introduction of a mandated schedule of fees.

John Holland welcomes the review of the SRC Act and measures designed to modernise the scheme so it better reflects current best practice, encourages better practice and, above all, promotes the effective delivery of support to our people.

Yours faithfully,

Russell Cuttler
Executive General Manager, Operational Support