

Hon John Mansfield AM QC,
Independent Review of the Return to Work Act 2014
GPO Box 464
ADELAIDE SA 5001
DX 336

10 April 2018

Dear Hon John Mansfield AM QC,

Re: Opportunity to provide additional information on the Independent review of the return to Work Act 2014 and its Administration and Operation

Thank you for the further opportunity to provide submission. We have taken the time to review a number of the submissions provided thus far.

ASORC would like to submit the following points in addition to our earlier submission already sent to you:

1. We support the implementation of the mobile case management model, in so far as it was intended to provide quality customer service to scheme participants. Our members report that there has been an improvement in the interaction between mobile case managers (MCM's) and scheme participants. Our only concern with this model is that since the initial implementation, there has been a perception in the community that MCM's are there to take the role of a qualified Rehabilitation Counsellor. While some of the MCM's have an allied health qualification, many of them lack the training and experience to undertake robust psychosocial assessments that we feel are best left to our members expertise. We have received some feedback similar to ARPA's submission that even where the MCM is qualified, some injured workers feel that there is a conflict of interest and they would prefer to see this completed by someone independent.

Our other concern is based on feedback from our members, that referrals to qualified and experience Rehabilitation Counsellors are sometimes held up by either:

- The MCM attempting to manage the process themselves because they feel that they are expected to take on this role, and/or
- The referral process now taking significantly longer to complete.

This is potentially denying access to early intervention under section 24. We are unaware of the Corporation taking any actions to ensure that timely referrals are made to recovery and return to work services, with the exception of promoting treatment/ review services like second opinion medicine.

2. In addition to the above, we commented in our submission that we believe that General Practitioners/ treatment providers should be able to make a referral to return to work services.

ASORC has recently provided a submission to Monash University on the *Draft clinical guideline for the diagnosis and management of work-related mental health conditions in general practice*, in the recommendations from their literature review, it supports and encourages this concept.

While completing this submission we noticed the following review on the RTWSA website https://www.rtwsa.com/_data/assets/word_doc/0019/68131/Outcomes-of-early-psychosocial-screening.DOCX which similarly promotes the timely and early referral by the treatment team or MCM to recovery and return to work services.

3. It is noted in both of the documents mentioned in point 2, that focused Cognitive Behaviour Therapy (CBT) is the most effective treatment for work related mental health conditions (either as a primary or secondary injury). Rehabilitation Counsellors are qualified and experienced in providing these interventions however there is no item code to provide adjustment to injury counselling (like in other states - WA and QLD for example).

4. Since implementation, RTWSA has continued to hold the view that a Vocational Assessment must be completed by a Psychologist and that a Rehabilitation Counsellor does not meet their criteria. ASORC has raised this issue with RTWSA on a number of occasions and this decision remains unchanged. Full Members of ASORC are trained to complete vocational assessments in a disability or work injury context, where Psychologist's take on no specific training. In a meeting with RTWSA last year we were advised that this decision was made because it is more palatable to have a Psychologist complete them. However in YEAR, there was a challenge made in Queensland to the validity of a vocational assessment completed by a Rehabilitation Counsellor and it was found in this case, that a Rehabilitation Counsellor is suitably qualified to complete these assessments.

Kind regards



Michael Iacovino

ASORC National President, Chair and Director