

Manager Policy and Legislative Services  
Workcover WA  
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12 January 2024

Dear Sir/Madam,

**Re: Submission on Consultation Papers**

Thank you for the opportunity to provide a submission to the New Act Implementation Consultation Papers released by Workcover WA.

We would like to submit the below information for consideration regarding Implementation Consultation Paper 26: Fees Order for Workplace Rehabilitation Services, specifically the section of the paper that relates to travel (Page 4).

- *Page 4, Travel - "It is intended the fee order will require a logbook of all point-to-point travel be kept with the date, distance and time travelled for each service recorded."*

We support the documentation and transparency of travel charges. Longstanding common practice amongst workplace rehabilitation providers is to document travel information (including time taken and locations) on the case file and billing timesheets, which are then included on the invoice submitted to Insurers for payment. This provides transparency to Insurers regarding travel charges.

We would suggest for efficiency of processes and to avoid duplication, instead of a logbook, travel information is recorded on the case file and billing timesheet which is then transferred to the invoice. This information is then transparently available to Insurers upon review of the invoice and can be easily provided to Workcover WA on request or reviewed upon audit of a file. Invoices can also be provided to injured workers upon request.

**A separate logbook would be duplication of an existing process for providers, reduce efficiency when reviewing or auditing, and represent an unnecessary administrative task.**

- *Page 4, Travel - "No travel is to be charged if returning from a service location to the workplace rehabilitation provider's office location."*

We believe travel is a critical part of workplace rehabilitation to facilitate the delivery of best practice services which are specific and local to the injured worker and employer, and are delivered fairly and proactively. Workplace rehabilitation providers play a critical role in preventing and overcoming psychosocial barriers to recovery and return to work for injured workers. This is supported by current evidence, including the key principles of the Australasian Faculty of Occupational and Environmental Medicine position paper, 'It Pays to Care'.

It has always been standard practice in WA for workplace rehabilitation providers to charge for return travel. We strongly believe it would be detrimental to the outcomes and experience of the injured worker and employer to disincentivise the delivery of face to face workplace rehabilitation services. Only allowing workplace rehabilitation providers to charge travel one way would negatively impact the efficiency of service delivery.

Key to workplace rehabilitation is the right of the injured worker to choose their workplace rehabilitation provider, and as such a worker should not be limited only to those providers local to them. Restricting travel charges to one way would make it financially unviable for providers to deliver local services efficiently across WA. This would significantly impact access to services for injured workers located regionally and remotely.

We believe all efforts should be made by workplace rehabilitation providers to share and combine travel costs across multiple cases where possible - this is established practice amongst providers and is reflected in the Workcover WA Workplace Rehabilitation Providers Principles and Standards of Practice (Principles and Standards).

The Principles and Standards also provide timeframes for provider service delivery with the intention of services being delivered efficiently, and with a sense of urgency. The ability to travel as required (and to charge for that travel) underpins these principles of efficient and urgent service delivery.

**We would strongly recommend workplace rehabilitation providers be able to charge for return travel as required.**

We thank you again for the opportunity to provide the above information. We would be happy to discuss any aspect in further detail if required.

Yours sincerely



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