

SIRA Consultation Paper – Feedback

Customer service conduct principles

Principle 1: Be efficient and easy to engage

Further clarification is sought in relation to requesting information from the customer particularly when the initial information is incomplete, needs further investigation, or requires verification from the business and/or treating doctor.

As a self-insurer using a service provider to deliver the service, the process might appear to be unclear from the customer's perspective and perceived efficiency due to the need to engage two agencies where one agency is not regulated by SIRA.

Principle 2: Act fairly, with empathy and respect

As a self-insurer using a service provider to deliver the service, the support provided by Case Managers and Case Workers will have a bigger impact to the care of the worker than from the agency that the worker belongs to.

The service provider has its own policies and procedures on how to deliver the service. Further clarification is sought if the intent is to overhaul contractual arrangements between parties to ensure SIRA's customer service conduct principles are included?

Principle 3: Resolve customer concerns quickly, respect customer time and be proactive

As a self-insurer using a service provider to deliver the service, the perceived resolution timeframe will depend on the relationship with the business and the service provider who have different processes particularly if the claim warrants further investigation or clarification.

The resolution time might not be acceptable to the customer but falls within the business process timeframe. An agreed resolution time between both parties might not be suitable to the customer. Further clarification is sought as to how this would be measured?

Principle 4: Have systems in place to identify and address customer concerns

As a self-insurer using a service provider, the service provider has its own process and would need to comply with its own standard of practice for continuous improvement. The governance of requiring customer feedback on service design and improvement would be difficult to impose without implementing new sets of compliance causes that might be an overlap with licensing framework, self-audit and other standards of practice.

Principle 5: Be accountable for actions and honest in interactions with customers

As a self-insurer using a service provider to deliver the service, the perceived satisfaction from the customer would vary on the outcome of the service delivered by the provider and not necessarily the self-insurer. If the customer's case was resolved within the boundaries of internal policies and procedures then it would be difficult to impose providing an apology from the business as perception of satisfaction is subjective to the outcome of the claim.

Further clarification is sought on the definition of an apology, in what format and from whom. Is it also expected that if the apology has not been accepted, would this open to further claims of damages.

Attestation requirements

Further clarification is sought in relation to the attestation requirements as to what form this would be? And what level of compliance is sought? Internal processes that is governed by performance/licensing requirements would overlap on the required further attestation to demonstrate compliance

Breach notification

Further clarification is sought in relation to the breach as some of the issues raised might still fall within the self-insurer's policies and procedures but could be perceived as a breach of this standard. Internal policies and procedures govern complaints handling process that would warrant the investigation before the breach can be confirmed.

Due to the number of claims received, the definition of breach would need to be clarified.