



Public Service Association of SA Inc

Community and Public Sector Union · SA Branch · SPSF Group

18 January 2008

Mr Gareth Hickery
Secretary
Statutory Authorities Review Committee
Parliament House
North Terrace
ADELAIDE SA 5000

RE: Legislative Inquiry into the Workcover Corporation of South Australia

Dear Mr Hickery,

Please find herein enclosed the PSA submission in regards to the Legislative inquiry into the Workcover Corporation of South Australia. The submission is entitled 'Outsourcing of Workers Compensations Claim Management in South Australia.'

Any queries in relation to the submission may be directed to Ms Gayle Peak, Assistant Chief Industrial Officer on email gp@cpsu.asn.au or phone 8205 3288.

Yours Faithfully,

A handwritten signature in black ink, appearing to read 'J McMahon', written in a cursive style.

**JAN MCMAHON
GENERAL SECRETARY**

**The Outsourcing of Workers' Compensation Claims Management in South
Australia**

Kevin Purse

1.0 Introduction

Workers' compensation is a form of social insurance that provides monetary recompense to injured workers and their families in the event of work related injury, disease or death. It also provides a range of important ancillary entitlements such as coverage for rehabilitation, medical and hospital treatment. More generally, the payment of workers' compensation may be regarded as the commodification of work related injury - the price paid for the appropriation of workers' health arising from their employment, as determined by the legislature.

In most parts of the world, workers' compensation entitlements are delivered through publicly owned and managed institutions. Usually these arrangements are integrated into the social security system although in some countries stand-alone workers' compensation schemes are preferred (Alberta WCB 1998: 1). Almost universally, workers' compensation arrangements are administered on a national basis. Australia is one of the rare exceptions as are Canada and the United States. In these countries workers' compensation is largely the responsibility of state or provincial governments.

Australia is also one of the few countries where there is specific legislative provision for private sector involvement in the core business of workers' compensation schemes. Private sector involvement assumes a number of different forms. Although public underwriting of workers' compensation insurance predominates in Australia, and is estimated to account for approximately 85% of total premiums (Productivity Commission 2004: 314), in a number of jurisdictions - Western Australia, Tasmania, the Northern Territory and the Australian Capital Territory - private insurance companies are directly responsible for the underwriting of scheme finances. In addition, all states, territories and the Commonwealth make provision for self insurance. This enables employers that meet specified licensing requirements to administer a jurisdiction's compensation laws with respect to their own workforce without having to pay workers' compensation premiums to the compensating authority. Finally, in New South Wales, Victoria and South Australia, scope exists for private sector claims agents - generally insurance companies - to manage the compensating authorities claims portfolio and or levy collection functions in these jurisdictions. This capacity to outsource a scheme's claims management function is a relatively recent development and one that is unique to Australia.

The aim of this submission is to review the outsourcing of the claims management function as it pertains to the South Australian WorkCover scheme. The advantages of outsourcing have frequently been proclaimed but rarely examined. The main focus of this submission will therefore involve an investigation of whether the benefits claimed by the advocates of outsourcing have a sound evidentiary basis or not. Consideration will also be given to a number of regulatory issues that have arisen within the outsourced claims management environment, as they have a not insignificant bearing on the scheme's management and overall financial performance. On the basis of the available evidence it will be suggested that outsourcing has not only failed to meet the

financial and other objectives laid down by its supporters but has also created new tensions that have added to the complexities of managing the WorkCover scheme.

2.0 Policy and Legislative Background

2.1 From Private to Public Management

Workers' compensation insurance in Australia during the first eight decades of the 20th century, with the exception of Queensland and the Commonwealth, was underwritten by private insurers. The employer levy setting practices associated with private underwriting, however, frequently created a highly volatile environment in which discounting wars between insurance companies resulted in artificially low levies followed by excessive increases, a situation described by one Labor Minister as "economically destabilising" (SAPD 1986:85). This cyclical volatility was particularly evident during the 1970s and early 1980s. Workers' compensation costs for employers in South Australia more than doubled between 1980-81 and 1986-87 (WorkCover 1993a: 3). Compounding the situation was the increasingly sclerotic nature of the workers compensation system - a system characterised by poor linkages with occupational health and safety, a lack of focus on vocational rehabilitation, high transaction costs, increased claims disputation and extended delays in dispute resolution (Byrne 1980:17-19, 41, 21-24).

It was against this background that the Bannan Labor government sought to modernise South Australia's workers' compensation arrangements through the enactment of its WorkCover legislation in 1986. In administrative terms, the crucial changes associated with the new arrangements were the shift to public underwriting and the establishment of a centrally funded scheme. Other important features of the new scheme included a greater emphasis on rehabilitation and injury prevention, an alternative dispute resolution system and improved entitlements for more seriously injured workers.

Under the new entitlement regime income maintenance, in the form of weekly payments for injured workers, was set at 100% of their notional weekly earnings for up to 12 months and 80% thereafter, contingent on a review after a further 12 months of incapacity to determine whether the extent of their incapacity was such that they were unable to resume suitable employment. Prior to WorkCover, the duration of weekly payments had been subject to artificially imposed limits. This meant that weekly payments were automatically discontinued once they exceeded a specified dollar amount. While this was beneficial for employers in that it limited their liability for work related injury, it was highly disadvantageous for the small percentage of seriously injured workers - the 'long tail' in insurance parlance - with incapacities that prevented a return to work; either before the weekly payments cut-off limit was exceeded or, in some cases, permanently. Although this could be offset, at least partially, where workers could establish negligence on behalf of their employers and thus secure common law damages, this was not an avenue of redress available to most workers. The result was that many seriously injured workers had little option but to seek social security relief once their weekly payments were terminated. This in turn meant that a considerable proportion of the cost associated with work related injury

was shifted from the workers' compensation arena to the social security system and, consequently, borne by taxpayers rather than industry.

One of the advantages of the WorkCover scheme was that by providing greater income support to more seriously injured workers it significantly reduced the extent of cost shifting. However, the move away from the 'closed liability' system of weekly payments that prevailed under the old scheme to an 'open liability' model under WorkCover necessitated a more sophisticated and proactive management approach - one based on identifying and addressing obstacles associated with the return to work process as opposed to the traditional, and often simplistic, insurance industry preoccupation with claims management.

When the new scheme commenced operations in September 1987 it was initially managed through an agency agreement with a subsidiary of the State Government Insurance Commission, but by April 1989 WorkCover had assumed full responsibility for the management of the scheme (WorkCover 2007a: 4). In doing so it brought over many of the managers from its former agency partner and with it a management style imbued with a traditional claims management mentality. This type of arrangement was not suited to an operating environment in which skills and experience in managing a long tail were the essential prerequisites to effective scheme management. The failure to adapt to this new environment consequently resulted in an increase in the average employer levy rate from 3.1% to 3.8% in 1990 (WorkCover 1990: 1) and fuelled pressures from the business community for reductions in entitlements, which in 1992 culminated in the abolition of the right of workers to seek common law damages from their employers for pain and suffering arising from work related injury (WorkCover 1993b: 6).

2.2 The Outsourcing Agenda

The scheme's early poor financial performance also resulted in a commitment by the state Liberal Party "to re-introduce the private sector insurance companies back into workers' compensation administration" (Ingerson 1991: 5). Following the demise in 1993 of the Labor government, an expanded role for the private sector featured prominently in the incoming Liberal coalition government's WorkCover agenda. Liberal Party policy, at this time, stated

"WorkCover may tender out to the private sector insurance companies some or all of the collection of levy fees and the management of claims administration related to workers compensation and rehabilitation. Allowing the private sector to compete in management and administration of claims will establish a scheme which is more service orientated and cost effective" (SAPD 1994: 577).

In large part, the government's position reflected the neo-liberal discourse which had come to dominate the public policy arena in Australia and which held that social problems were generally best addressed through market mechanisms. In this respect it had much in common with the approach adopted by the Kennett government in Victoria which had been swept into office in late 1992 on a platform that included

proposals for a root and branch overhaul of that state's dysfunctional workers' compensation scheme.

Legislation to give effect to the government's policy was presented to the South Australian parliament in March 1994. In essence, the government's Bill sought to extend WorkCover's powers to enable it to use the services of private insurance companies "to manage claims if that approach is considered appropriate and desirable by the Government and the board of the corporation" (SAPD 8/3/94: 305). This provision was vigorously opposed by Labor and denounced as "back-door privatisation" designed to "ringbark the single insurer concept" (SAPD 22/3/94: 448), widely regarded as the hallmark of the WorkCover's scheme. Despite this opposition, the legislation was duly passed and came into operation as the *WorkCover Corporation Act* ("the Act") in July 1994.

The relevant part of the Act then enabled WorkCover to outsource its claims management responsibilities, section 14 (3), stipulated that:

The Corporation may only enter into a contract or arrangement –

(a) conferring power on a private sector body -

(i) to manage and determine claims; or

(ii) to provide rehabilitation services; or

(iii) to implement or manage programs to assist or encourage workers who have suffered compensable disabilities to return to work; or

(iv) to collect levies; or

(b) conferring other substantial powers on a private sector body,

if the contract or arrangement is an authorised contract or arrangement.

The qualified manner in which this provision was formulated was the consequence of amendments passed by the upper house of parliament - where the government was in a minority - which did not share the government's unbridled enthusiasm for the private insurance industry. More particularly, the requirement for 'any contract or arrangement' to be 'authorised' was intended to ensure that any outsourcing proposals would be subject to parliamentary scrutiny and if found to be unsatisfactory could be disallowed. Nevertheless, the legislative foundation for outsourcing had been established and, for all practical purposes, this formulation did not pose any real threat to the government's policy objectives.

Following the passage of the legislation the government released a Discussion Paper seeking public comment on the outsourcing option. In doing so it maintained that any "decision on whether to outsource individual functions or not will be based primarily

on an assessment of cost savings, but with regard to other factors including service, choice and system control” (WorkCover 1994: 11).

The view of the trade union movement as expressed by the state’s peak body, the United Trades and Labor Council (now SA Unions), was that outsourcing would undermine many of the gains that had occurred under the WorkCover scheme. In particular, it argued that “the loss of economies of scale as a consequence of displacing WorkCover as the sole insurer will lead to increased administrative costs, greater bureaucracy and fragmented management of compensation” (UTLC 1994: 3). South Australia’s major public sector union added that the “decision to outsource is ideologically rather than logically driven” (PSA 1994: 1).

Concerns were also raised by the government’s own Commission of Audit which had been established shortly after the government acceded to office. Its remit was to examine South Australia’s finances and compare the performance of the state’s public sector with those of other jurisdictions. In relation to the WorkCover outsourcing proposals, the Commission cautioned that “Competition may not produce benefits” because “the present monopoly in claims administration enjoyed by WorkCover allows economies of scale to be realised” (SA Commission of Audit 1994: 319).

While the views of organised labour were ignored those of employer organisations were given careful consideration. On coming to office in 1993 considerable thought was given by the government to the reintroduction of private underwriting. However, as had been the case in Victoria, this was opposed by employer associations who were apprehensive of a return to the boom and bust premium cycles of the 1970s and early 1980s. Instead the government opted to maintain public underwriting of the scheme. It also decided that the collection of levies would be retained by WorkCover. Consequently, private insurers returned to the South Australian workers’ compensation market not as underwriters but as claims agents, and it was in this new role that they became part of the WorkCover scheme in August 1995 (WorkCover 2007a: 5).

3.0 The Outsourcing Experience

In the first phase, from 1995 to 1998, claims management was outsourced to nine private insurance companies. In 1998 the number was reduced to five and then, following an amalgamation, to four by 2004. More recently, in 2006, these insurers were replaced by a sole claims agent, Employers Mutual Ltd (WorkCover 2007a: 5-6).

When outsourcing commenced it was presented as the adoption of a “competitive model” (WorkCover 1994: 21). It would be more accurate though to describe the new market structure as one of regulated oligopoly - in which a few players dominated the market and were the subject of varying degrees of regulatory control by WorkCover. An indication of the extent of market concentration is provided by WorkCover’s own data which for 2000 found that one agent alone accounted for approximately 40% of the market (WorkCover 2000: 32). Finally, perhaps the most ironic aspect of the outsourcing saga has been the return to a monopoly based approach, albeit one based

this time on a private rather than public claims management monopoly – a development that has virtually brought the claims management cycle full circle.

The key performance criteria underpinning the then government’s decision to outsource claims management were, as indicated earlier, lower administrative costs, increased choice for employers and improved service and system control.

3.1 Administration Costs

Of these criteria, lower administrative costs were put forward as the most important consideration. Although no empirical studies had demonstrated administrative costs in an outsourced environment would be lower, the government was sufficiently confident that this would be the case; and it was on this basis that the Minister responsible for WorkCover argued that reductions “in the vicinity of 10 to 15%” should be achievable benchmarks (WorkCover 1994: 21).

WorkCover’s actual experience with outsourcing, however, has been quite different - scheme administration costs have not been reduced but on the contrary have risen significantly under outsourcing, as can be seen from Table 1.

Table 1. WorkCover Administration Costs – Real (\$M)

Year	Pre-Outsourcing Cost	Post-Outsourcing Cost	Variation
94-95	67.417		
96-97		72.939	5.522
97-98		71.081	3.664
98-99		72.547	5.130
99-00		76.415	8.998
00-01		73.414	5.997
01-02		69.543	2.126
02-03		81.411	13.994
03-04		77.306	9.889
04-05		82.332	14.915
06-07		71.727	4.310
Total		748.715	74.545

Sources: WorkCover Annual Reports and ABS CPI Series

The second column of Table 1 shows the cost, expressed in June 2007 prices, of scheme administration in the last full financial year, 1994-1995, prior to the outsourcing of claims administration. Similarly, the data in the third column represent the scheme’s administration costs expressed in real terms following outsourcing. Administration costs include all such costs specified in WorkCover’s audited financial statements as well as payments to claims agents once outsourcing commenced. The final column shows the extent to which administration costs have increased since outsourcing began. It should also be noted that data for 1995-1996 and 2005-2006 have been excluded as these two years were transitional periods where additional,

unrepresentative, costs may have been incurred. In the case of 1995-1996 when outsourcing first commenced start up costs for the new system would have been involved while in 2005-2006, with the switch from multiple agents to a single agent, both start up and run off costs would have been incurred.

The overall picture to emerge from this aggregate 10 year period is that outsourcing has consistently failed to meet the key financial targets set by its chief proponents. Not only have workers' compensation administration costs under the outsourcing regime fallen well short of the Liberal government's 1994 benchmarks, they have also been consistently higher than those that prevailed when WorkCover managed its claims portfolio in-house. Far from delivering cost efficiencies, outsourcing has increased WorkCover's administration costs by \$74.5 million over this period. This represents an 'outsourcing loading' of 11%. The shift to a single claims agent in 2006 appears to have reduced administration costs when compared with the multiple agent set-up. However, it still resulted in an overall increase of over 6% in 2006-2007. More generally, in relation to administration costs, it is apparent that the outsourcing of WorkCover's claims management function was based on exaggerated expectations and compounded by the lack of a sound evidentiary basis that a prudential approach to scheme management would have required.

3.2 Choice

The importance of providing employers with the choice of claims agent has also been exaggerated. In 1994 when outsourcing was initially being considered it was already apparent that South Australian employers were no more likely to exercise this choice than their interstate counterparts. A review of outsourcing arrangements in New South Wales and Victoria reported that "employers have used this choice infrequently" (WorkCover 1994: 16). Following its return to office in 2002 the Labor government commissioned an independent review of the WorkCover scheme - the Stanley Review - which found that the 'choice factor' was "somewhat illusory given the initial allocation of employers to agents by WorkCover and the very small proportion of employers to exercise this choice and change agents" (Stanley, Meredith and Bishop 2002: Vol. 2, 80). Although WorkCover at the time persisted with the rhetoric of 'choice' (Ibid: 79) it subsequently acknowledged, in the wake of its decision to move to a single claims agent, that "on average less than 1 per cent of employers change agent in any given year" (WorkCover 2006: 10).

3.3 Service Delivery

In dealing with the issue of service in a workers' compensation context it is often necessary to address the question of service for whom? All too often, employers are regarded as 'customers' while injured workers are relegated to the status of 'claims'. The main reason for this revolves around the nature of the relationship between agents, employers and workers. In three party transactions epitomised by workers' compensation insurance, one party - the employer - contracts with a second party - the agent - for compensation services to a third party - the worker - in the event of work related injury. However, because of the commercial nexus involved, there is often a

much closer relationship between the agent and the employer as it is the employer that pays the levies and, to a large extent, the agent's remuneration.

The result of this uneven relationship is that service delivery by agents to injured workers is not infrequently subordinated to the interests of employers. This in turn can give rise to 'bad faith' claims management (Guthrie 2001) that results in delays in the acceptance of claims and payment of compensation as well as outright denial of liability and termination of compensation payments in a manner that is not in keeping with either the spirit or letter of the guiding legislation - problems, it must be acknowledged, that are by no means the sole preserve of claims' agents operating in an outsourced environment.

Within the South Australian scheme, service issues have been nowhere more conspicuous than in the return to work area and can be illustrated by reference to two scheme critical issues - the often adversarial approach to claims' management, and the failure to administer WorkCover's employment protection provisions. It should be noted though that major concerns with poor return to work services do not arise for most injured workers, as they are usually able to return to work within a few days or weeks. However, for workers with injuries that make an early return to work unlikely or more difficult the experience can be quite different.

Adversarial claims management techniques adopted by claims agents, in which workers are subjected to insensitive or uncaring treatment, can lead to loss of self worth, anger and depression. These 'anti-therapeutic' effects of workers' compensation have been well documented, both nationally and internationally, and can seriously compromise the return to work process. (House of Representatives 2003, Lippel 1999, Strunin and Boden 2004).

A study of 85 long-term WorkCover claimants found that workers experienced a range of impediments due to an adversarial "return to work process that created considerable stress and concern" (Roberts-Yates: 2003: 898). The obstacles encountered included a claims management system that was "too rigidly process-oriented" and ignored individual differences in workers' return to work needs (Ibid: 900). A lack of trust in case managers, who were frequently "perceived as the principal trigger for conflict and heightened emotional responses", was a related complaint (Ibid: 903). A further issue raised was that case conferences frequently ignored the views and needs of injured workers. As one worker summed it up "I just felt like a number with skin on" (Ibid: 900). It was this adversarial and counterproductive approach, which reinforced the stereotype of injured workers as "claims", that contributed to the Stanley Review's recommendations in 2002 that outsourcing be "finalised as soon as practicable" (Stanley, Meredith and Bishop 2002: Vol. 2, 80).

Management by claims' agents of the scheme's employment protection provisions has also been the subject of much criticism. WorkCover's long-tail is comprised disproportionately of workers who have had their employment terminated following injury. The value, therefore, of these provisions - which provide WorkCover with a legislative basis for imposing sanctions on employers who unreasonably dismiss injured workers - is that they facilitate improved return to work rates.

When initially adopted, responsibility for the administration of employment protection provisions resided with WorkCover. However, with the introduction of claims agents this responsibility was outsourced. Prior to outsourcing 33% of proposed, or actual, dismissals involving injured workers were prevented, or rescinded (Purse 1998: 254). Following outsourcing, this figure fell dramatically to less than 14% (Ibid: 258). The performance of the claims agents was considered so unsatisfactory that responsibility for this function was resumed by WorkCover in the latter part of the 1990s, with a corresponding improvement in performance. This later led one commentator to observe that “South Australia currently leads the country in this area, both in terms of the extent of the employer’s duty and with the degree of seriousness with which this obligation is overseen and enforced. No other jurisdiction has taken up the systematic supervision of such an obligation to the degree that the WorkCover Corporation has (Clayton 2005: 31).

This, however, did not prevent WorkCover from again outsourcing primary responsibility for this significant function in 2007 following the shift to its single agent model of outsourcing. As on the previous occasion there was no prior evaluation of the appropriateness of this move, or any recognition of the effectiveness of the in-house management of this function, and has resulted in trade union calls for this decision to be reversed in order to protect injured workers (PSA 2007: 14).

3.4 Regulatory Concerns

It must also be noted that employment protection provisions for injured workers is not only a service delivery issue but also an important regulatory concern, one that impacts directly on the scheme’s financial position. By enhancing improved return to work rates these provisions lower the average duration of claims, the scheme’s major cost driver. Thus the proper administration of these provisions is of benefit to both workers and the financial viability of the scheme. Indeed, from a system-wide viewpoint, employment protection provisions may best be viewed as a crucial liability management tool.

More generally, from a system control, or regulatory, perspective the failure of claims agents in this area of claims’ management can be viewed as an illustration of the principal - agent problem. Principal-agent problems can arise as a consequence of differing objectives between two contracting parties. In circumstances where a product or service required by a principal from an agent can be unambiguously specified the potential for conflicting behaviour can be either eliminated or minimised. When, for example, a principal orders 200 rear vision mirrors from an agent, conforming to certain technical specifications, to be delivered weekly by the close of business on Thursday it is a relatively simple matter for the principal to monitor that it gets what it contracted for. Either the mirrors meet the specifications required or they do not. Similarly, they are delivered on time or they are not.

With outsourced claims management arrangements, however, the complexities involved are such that it is often difficult to capture all the key objectives within a contract. This is compounded by the fact that there is invariably some degree of

tension between the various objectives. In this situation, characterised by ambiguity and uncertainty, the process of specifying and monitoring an agent's performance obligations are inherently more complex and difficult - and where there is more than one agent potential problems can be magnified. While a sophisticated approach to the structuring of agent payments may assist in resolving principal - agent problems, this is easier said than done. As pointed out in a paper commissioned for the Stanley Review, remuneration arrangements for claims' agents "have been subject to almost constant change" in South Australia and the other Australian jurisdictions that have embraced outsourcing, which suggests "that no satisfactory set of measures that will succeed in aligning agent performance with the goals and expectations of the regulator have yet been achieved" (Clayton 2002: 46). Moreover, the excessive reliance on the discontinuance of weekly payments to injured workers as a key performance incentive for agents has, as noted elsewhere, given rise to "claims management processes which are not consistent with quality rehabilitation and return to work" (Stanley, Meredith and Bishop 2002: Vol. 2, 78).

The shift in WorkCover's role since the advent of outsourcing - from claims administration to contract management - has bequeathed it with a raft of new problems; and it has struggled to cope with this new role, which has been compared to trying to drive a car by "looking through the rear vision" (Clayton 2002: 46). As the Stanley Review pointed out "The difficulties experienced by WorkCover in regulating, monitoring and assessing the nine - and later five - claims agents is evident in the evaluations, reviews and tender process documents made available to the Review" (Stanley, Meredith and Bishop 2002: Vol. 2, 80).

The main dilemma has been that WorkCover has been unable to monitor and track agent performance with sufficient expertise and vigour to expeditiously curtail negative trends as they emerge. Consequently, it is always playing a game of catch up. In doing so, it has felt compelled to adopt an increasingly prescriptive approach to its management of claims agents. While this may have moderated somewhat since the commencement of the sole claims agent, it remains the case that agent management is an exceedingly labour and resource intensive affair.

The net result is that outsourcing has resulted in a distinct deterioration of the WorkCover scheme's performance. Prior to outsourcing the average levy rate for employers in 1994-1995 was 2.84% of payroll and the scheme had a funding ratio of 70.7% (WorkCover 1995: 1, 5). By June 2007 the average levy rate had risen to 3.00% while the funding ratio had fallen to 64.7% (WorkCover 2007b: 1). This deterioration is largely, if not exclusively, attributable to the multiple agent system, as this has been the main form outsourcing has assumed since its commencement in 1995. There are grounds, however, for believing that the sole agent arrangement is also unlikely to deliver substantial improvements in the scheme's performance. At the time of its appointment it was claimed that the new agent would reduce WorkCover's claims liability by as much as \$100 million annually after two years. With one year having already elapsed, the prospect of achieving this target looks increasingly remote. Far from being reined in during this period the scheme's claims liability increased by over \$300 million (WorkCover 2007b: 71).

4.0 Summary

By any objective standard the outsourcing of WorkCover's claims' administration functions has been a failure. The benefits claimed for outsourcing have simply not materialised. On the contrary, administration costs have increased significantly, employer choice in any meaningful sense was never achieved, and service delivery to injured workers in key areas has been compromised. Most importantly, the performance of the scheme has deteriorated and the funding position of the scheme has never been at such a low level as has been the case under outsourcing.

Accordingly, the recommendation of the Stanley Review that the scheme's claims administration should be in-sourced needs to be revisited as a matter of priority. In doing so, particular scrutiny needs to be given to any failure by the current agent to meet its contractual obligations. Consideration also needs to be given to securing both staff and executives with sufficient experience, drive and ability to manage an in-sourced claims administration portfolio. Finally, there is a pressing need to ensure that reform is accompanied by a suite of innovative programs, especially in relation to the scheme's return to work objectives, to assist WorkCover to achieve its full social and economic potential.

References

Alberta Workers' Compensation Board (1998), *WCB Update*, Edmonton.

Australian Bureau of Statistics (2007), *Consumer Price Index-September Quarter, 2007*, Cat. No. 6401.0, Commonwealth of Australia, Canberra.

Australian Bureau of Statistics (1997), *Consumer Price Index-September Quarter, 1997*, Cat. No. 6401.0, Commonwealth of Australia, Canberra.

D. E. Byrne (1980), *A Workers Rehabilitation and Compensation Board for South Australia – The Key to Rapid Rehabilitation and Equitable Compensation for Those Injured At Work*, Adelaide.

A. Clayton (2005), *Review of the Framework for Rehabilitation in the South Australian WorkCover Scheme*, Adelaide.

A. Clayton (2002), Current Issues in Australian Workers' Compensation, Commissioned Paper, in B. Stanley, F. Meredith and R. Bishop (2002), *Review of Workers Compensation and Occupational Health, Safety and Welfare Systems in South Australia*, Vol. 1, Adelaide.

R. Guthrie (2001), Power Issues in Compensation Claims, *Australasian Dispute Resolution Journal*, Vol. 12, No. 4, pp. 225-239.

House of Representatives Standing Committee on Employment and Workplace Relations (2003), *Back on the Job: Report into Aspects of Australian Workers'*

Compensation Schemes, Commonwealth of Australia, Canberra.

G. Ingerson (1991), *The South Australian Opposition's I. R. Policy*, H. R. Nicholls Society XI Conference, 21 September 1991, Adelaide.

K. Lippel (1999), Therapeutic and Anti-therapeutic Consequences of Workers' Compensation, *International Journal of Law And Psychiatry*, Vol. 22, Nos. 5-6, pp. 521-546.

Productivity Commission (2004), *National Workers' Compensation and Occupational Health and Safety Frameworks*, Commonwealth of Australia, Canberra.

Public Service Association of South Australia (2007), *Workcover Under Siege*, Adelaide.

Public Service Association of South Australia (1994), *10 Reasons Why Outsourcing WorkCover is Bad for SA*, Adelaide.

K. Purse (1998), Workers' Compensation, Employment Security and the Return to Work Process Arrangements in Australia, *Economic and Labour Relations Review*, Vol. 9, No. 2, pp. 246-261.

C. Roberts-Yates (2003), The Concerns and Issues of Injured Workers in Relation to Claims/Injury Management and Rehabilitation: The Need for New Operational Frameworks, *Disability and Rehabilitation*, Vol. 25, No. 16, pp. 898-907.

South Australia (1994), *Parliamentary Debates*, Legislative Council, 21 April, 1994, p. 577.

South Australia (1994), *Parliamentary Debates*, House of Assembly, 22 March, 1994, p. 448, Adelaide.

South Australia (1994), *Parliamentary Debates*, House of Assembly, 8 March, 1994, p. 85, Adelaide.

South Australia (1986), *Parliamentary Debates*, House of Assembly, 12 February, 1986, p. 85, Adelaide.

South Australian Commission of Audit (1994), *Charting the Way Forward, Improving Public Sector Performance*, Gillingham Printers. Adelaide.

B. Stanley, F. Meredith and R. Bishop (2002), *Review of Workers Compensation and Occupational Health, Safety and Welfare Systems in South Australia*, Vol. 2, Adelaide.

L. Strunin and L. I. Boden (2004), The Workers' Compensation System: Workers' Friend or Foe? *American Journal of Industrial Medicine*, Vol. 45 No. 4, pp. 338-345

United Trades and Labor Council (1994), *Future Administrative Arrangements for WorkCover - Union Concerns*, Adelaide.

WorkCover Corporation (2007a), *Workcover SA Statistical Review Part 1*, Adelaide.

WorkCover Corporation (2007b), *Annual Report 2006-2007*, Adelaide.

WorkCover Corporation (2006), *Employers Mutual Limited Appointment - Employer Shareholder Briefing*, 31 January 2006, Adelaide.

WorkCover Corporation (2003a), *WorkCover Report*, Adelaide.

WorkCover Corporation (2003b), *Annual Report 1992-1993*, Adelaide.

WorkCover Corporation (2003c), *Workcover Corporation SA Statistical Review*, Adelaide.

WorkCover Corporation (2002), *Quarterly Report - June 2002*, Adelaide.

WorkCover Corporation (2002), *Annual Report 1999-2000*, Adelaide.

WorkCover Corporation (1995), *1994-1995 Annual Report*, Adelaide.

WorkCover Corporation (1994), *A Discussion Document Inviting Interested Parties to Comment on the Administrative Arrangements for Delivering Workers Compensation Services in South Australia*, Adelaide

WorkCover Corporation (1990), *1990 Annual Report*, Adelaide.