# Submission form: Proposed changes to ACC’s Accredited Employers Programme

The Ministry of Business, Innovation and Employment (MBIE) would like your feedback on proposals on proposed changes to ACC’s Accredited Employers Programme. Please provide your feedback by **5pm, on 6 November 2022.**

When completing this submission form, please provide comments, evidence, and any data that may aid your submission. Your feedback provides valuable information and informs decisions about the proposals.

We appreciate your time and effort taken to respond to this consultation.

# Instructions

**To make a submission you will need to:**

1. Fill out your name, email address, phone number and organisation.
2. Fill out your responses to the discussion document questions. You can answer any or all of these questions in the [**discussion document**](https://www.mbie.govt.nz/dmsdocument/25235-consultation-on-accs-accredited-employers-programme-pdf). Where possible, please provide us with evidence to support your views. Examples can include references to independent research or facts and figures.
3. If your submission has any confidential information:
4. Please state this in the email accompanying your submission, and set out clearly which parts you consider should be withheld and the grounds under the Official Information Act 1982 (Official Information Act) that you believe apply. MBIE will take such objections into account and will consult with submitters when responding to requests under the Official Information Act.
5. Indicate this on the front of your submission (e.g. the first page header may state “In Confidence”). Any confidential information should be clearly marked within the text of your submission (preferably as Microsoft Word comments).
6. Note that submissions are subject to the Official Information Act and may, therefore, be released in part or full. The Privacy Act 1993 also applies.
7. Submit your feedback:
8. As a Microsoft Word document by email to[**ACregs@mbie.govt.nz**](mailto:ACregs@mbie.govt.nz) with subject line:*Consultation: Proposed changes to AEP*
9. By mailing your submission to:

The Manager, Accident Compensation Policy   
Ministry of Business, Innovation and Employment  
PO Box 1473

Wellington 6140  
New Zealand

# Submitter information

MBIE would appreciate if you would provide some information about yourself. If you choose to provide information in the section below it will be used to help MBIE understand the impact of our proposals on different occupational groups. Any information you provide will be stored securely.

**Your name, email address, phone number and organisation**

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| Name: |  |

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| Email address: |  |

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| Phone number: |  |

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| Organisation: |  |

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|  | The Privacy Act 2020 applies to submissions. Please tick the box if you do **not** wish your name or other personal information to be included in any information about submissions that MBIE may publish. |
|  | MBIE may upload submissions or a summary of submissions received to MBIE’s website at [**www.mbie.govt.nz**](http://www.mbie.govt.nz). If you do **not** want your submission or a summary of your submission to be placed on our website, please tick the box and type an explanation below: |

|  |
| --- |
| I do not want my submission placed on MBIE’s website because… [insert reasoning here] |

**Please check if your submission contains confidential information**

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|  | I would like my submission (or identifiable parts of my submission) to be kept confidential, and **have stated** my reasons and ground under section 9 of the Official Information Act that I believe apply, for consideration by MBIE. |

**Product Proposals we are seeking your views on**

**Questions on Proposal 1: Implement new health and safety assessment requirements**

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| --- | --- | --- | --- | --- | --- | --- |
| General feedback | 1. Do you support the proposed new health and safety requirements, or would you prefer one of the other options? Why/why not?  |  | | --- | | [insert response here] |  1. What benefits and/or risks do you see if ACC adopts external health and safety management assessments? Why?  |  | | --- | | [insert response here] |  1. What impacts do you expect when an AE adopts one of the proposed tools?  |  | | --- | | [insert response here] |  1. How would these changes impact on your participation in the Programme?  |  | | --- | | [insert response here] |  1. If you don’t support any of the options, what alternatives do you propose?  |  | | --- | | [insert response here] | |
| Worker engagement feedback | 1. Do you think the proposed changes will improve worker engagement in health and safety? Why/why not?  |  | | --- | | [insert response here] |  1. Do you think the proposed changes will improve worker outcomes? Why/why not?  |  | | --- | | [insert response here] | |

**Questions on Proposal 2: Strengthen the assessment of Claims and Injury Management**

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| General feedback | 1. Do you support the proposed changes to C&IM? Why/why not?  |  | | --- | | [insert response here] |  1. If you don’t support these changes, what alternatives do you propose?  |  | | --- | | [insert response here] | |
| Worker performance feedback | 1. Do you support the proposed changes to C&IM from a worker perspective? Why/why not?  |  | | --- | | [insert response here] |  1. Do you think that the proposed changes will improve worker satisfaction with how claims and injuries are managed in the workplace?  Yes/no; Why/why Not?  |  | | --- | | [insert response here] |  1. Do you think the proposed increased employee representation will improve C&IM?  |  | | --- | | [insert response here] | |

**Questions on Proposal 3: Performance Monitoring**

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| --- | --- | --- | --- | --- |
| General feedback | 1. Do you agree with the proposed changes to performance monitoring of AEs, or would you prefer one of the other options? Why/why not?  |  | | --- | | [insert response here] |  1. How would these changes impact on your participation in the Programme?  |  | | --- | | [insert response here] |  1. If you don’t support these changes, what alternatives do you propose?  |  | | --- | | [insert response here] | |

**Questions on Proposal 4: New pricing options for the Partnership Discount Plan**

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| --- | --- | --- | --- |
| General feedback | 1. Do you support the proposed changes to the Partnership Discount Plan? Why/why not?  |  | | --- | | [insert response here] |  1. If you don’t support these changes, what alternatives do you propose?  |  | | --- | | [insert response here] | |

**Questions on Preliminary Proposal 1: Require Full & Final Settlement for Full Self Cover**

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| --- | --- | --- | --- | --- | --- | --- |
| General feedback | 1. Do you support the preliminary proposal to change the FSC plan to require full and final settlement at the end of the CMP? Why/why not?  |  | | --- | | [insert response here] |  1. Do you think that the proposed changes would reduce the administrative burden of claims invoicing?  Yes/no; Why/why not?  |  | | --- | | [insert response here] |  1. Do you agree with the proposed principles for developing a methodology for calculating a full and final settlement? Yes/no; Why/ why not?  |  | | --- | | [insert response here] |  1. If you don’t support these changes, what alternatives do you propose?  |  | | --- | | [insert response here] |  1. Should sufficient support be received for the preliminary proposal, would you like to be involved in the next round of consultation?  |  | | --- | | [insert response here] | |