

Self Insurers of South Australia Inc

# Annual Report 2023–24



For SISA as an organization, in this past year has seen the emerging evolution of change that our Members are achieving. This is testament to not only the resilience of our members but the importance that they apply to their jobs in keeping their employees safe, first and foremost and helping those injured, recover and recalibrate their lives, including returning to the workforce if possible.

SISA bid farewell to Wayne Potter following a change process, we welcomed Rachel Webber to the role of General Manager further engaging with members and enhancing our value proposition. Maintaining member services, keeping important information flowing and advocacy has been our stock in trade. Our members have been engaged in what they would like to see, additionally, from SISA in 2025 and beyond.

Accordingly, we are increasing the engagement from Members on our calendar of professional development and education activities, we have seen a significant and welcome increase in the requests from Members regarding relevant and current topics with our in person and an online offerings to join is ever improving providing necessary flexibility, we continue with the re-fresh of our website and expanded our Associate Member numbers and networking opportunities for members. We are heavily invested in improving our agility to respond to members concerns and queries and being heard as the peak advocate body for Self insurers. That is always ongoing! It has been a active year for SISA in the context of those changes mentioned. We continue to strive to be as influential as possible and supportive of our members and in promoting well-being and safety for all.

Rachel Webber, Chair

# Annual Report 2023–24

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## About SISA

**The Self-Insurers of South Australia (SISA) is an incorporated association whose members are South Australia's largest private sector employers that are self-insured under the Return to Work Act 2014 as well as the State public sector**

Self-insurance represents about 39% of the State's employment by remuneration. SISA was first incorporated on the 3rd of August 1984 as the Employer Managed Workers Compensation Association (EMWCA). The name was officially changed to SISA in November 2005.

SISA is recognised as the sole representative organisation for South Australian self-insured employers. Its objectives include:

- Provision of networking, information, support and guidance to Self-Insurers with regard to:
  - Their rights and obligations under the South Australian return to work scheme and the work health and safety legislation.
  - Events and developments of interest to members.
- Promotion of the highest standards in work health and safety and return to work both within the SISA membership and in the broader community.
- Ensuring that Self-Insurers' views are known when legislation and policy development are under consideration.
- Provision of continuously improved and competitively priced services and resources to its members.

SISA members cover a diverse range of industries, including pillars of the State economy such as retail, manufacturing, winemaking, mining, steelmaking, health, aged care, banking and utilities. The State public sector is also self-insured in its entirety.

SISA is a respected voice in the governance of work health and safety and return to work in South Australia.

## About self insurance

### **Self-insurance in the context of the South Australian return to work scheme means that an employer is granted the right to fund and manage compensation claims made by its own workforce**

Self-insurance is a business model that requires careful examination by organizations considering applying, as in some cases it requires considerable investment in resources and management commitment to reach the minimum standard

Self-insurance can deliver excellent results for employees and employers alike when it is soundly implemented.

Self-insurance is only possible for organisations that can meet set criteria and standards.

To be able to determine and manage claims for compensation, the self-insurer has certain powers delegated to it under the legislation. The self-insurer is in effect an insurer in its own right because it must fund all workplace injury and disease claims made upon it by its employees. It is also subject to the same review and appeals mechanisms as ReturnToWorkSA and its claims agents.

A self-insurer is still subject to regulatory control by ReturnToWorkSA because under the legislation, ReturnToWorkSA remains the 'insurer of last resort' for the private sector self-insurers. All private sector Self-Insurers must, among other things:

- Provide ReturnToWorkSA with a financial guarantee from an approved financial institution or an insurance bond from an approved insurer.
- Pay an administrative fee to ReturnToWorkSA (calculated as a percentage of the premium it would have paid had it not been self-insured).
- Carry excess of loss reinsurance.
- Conform with performance standards set by RTWSA for work health & safety and return to work management systems.

The State public sector is deemed to be self-insured under the Return-to-Work Act 2014 and does not have the obligation to provide guarantees or carry excess of loss reinsurance. It does, however, work to the same performance standards set by RTWSA and pay an administrative fee.

Grants of private sector self-insurance are made by the Board of ReturnToWorkSA and cannot exceed 5 years. There are various conditions an employer must meet before self-insurance can be granted. After the initial grant period of up to 3 years, the self-insurance grant can be renewed for up to 5 years provided the self-insurer continues to meet the various conditions and performance standards.

ReturnToWorkSA has the power to reduce or revoke grants of self-insurance where there is a clear and sustained failure or refusal to meet the conditions. The Code of Conduct for Self-Insured Employers contains the broad policy requirements for self-insurance. It can be accessed via [www.rtwsa.com](http://www.rtwsa.com) or [www.sisa.net.au](http://www.sisa.net.au).

# Chair's Report

**2023–24 was a time for many business to start moving out of the shadow of Covid and into a cost of Living crisis the full impact is yet to be realized.**

Like all of society and businesses, SISA also has gone through significant change in 2023–2024 and is adjusting and re-freshing.

For SISA as an organization, the resilience of our members has been the key to sustainability. Maintaining member service and keeping important information flowing has been our stock in trade. That our members have maintained their support for the association is, I believe, evidence that we have succeeded. Technology greatly aids our ability to assist and inform our members and bring them together.

The availability of online attendance at events has encouraged participation, especially for those who might otherwise be unable to for geographical or other reasons. This year SISA saw the departure of Wayne Potter, this was a deliberate change by the Committee, Wayne's tenure was only for 12 months, the brief set for Wayne was certainly met, Rachel Webber as the new General Manager will continue the change process to enhance our member service, ascertain what Members want from SISA and to ensure deliver an improved value proposition is delivered.

Professional Development sessions for members were planned and delivered in most months of the financial year, along with a SISA staple of bi-monthly Friday Forums.

These sessions are held with current topical issues discussed, while providing learning and benefits to Self-Insurers, with attendance being consistently great.

The Review of Financial Requirements by RTWSA continues to be ongoing, this has generated great discussion among Members on the feasibility of Self Insurance, continuing to demonstrate it is a valuable and viable position for Organisations to maintain. There have been some agreed changes reflected by RTWSA from the initial round of feedback to RTWSA, in particular the removal of a 1% payment to the SIICA fund, a great outcome, the original discussions with RTWSA regarding this and other concerns were made by SISA.

The expected increase in psychological claims has not been realized by Self Insured Employers to the degree first expected following the introduction of the Psychosocial Regulations and Code of Practice that was introduced in the second half of the 2023 calendar year.

In a change from 2022-2023 the SISA Committee has seen a near Full Member Organisation representation, all very engaged in the success of Self-Insured Organisations and the SISA offerings to Members.

**Sue Wohlstenholme**

*Acting Chair*



## Treasurer's Report

**SISA is continuing with the budget repair. SISA is primarily dependent on the revenue raised from member fees.**

The member fee increased by 5% for the year 2024/2025 as they had not increased in over 10 years, this has had a positive influence on the budget. SISA will continue to exercise budgetary constraint with a focus on cutting costs and financial sustainability. This will not negatively impact on the extra value add with our member initiatives SISA has committed for future delivery to members.

Given that our member numbers have increased slightly, essentially in the Associate Member space, it means to us that for our members, SISA membership remains relevant and important. Our membership numbers have been relatively stable over the years despite the increase of cost-of-living crisis as self-insurance has slowly grown as a proportion of the South Australian scheme.

Members can be assured that SISA's finances are in sound hands, SISA has engaged NFPAS (Not for Profit Accounting Services) to oversee our accounting practices, they have provided great governance in reporting while ensuring the understanding of our delivery to Members.

**Matt Barton**

*Acting Treasurer*

## Manager's Report

**From an operational standpoint, most of 2023–24 has seen the commencement a review of the Injury Management Standards, a review of the Impairment Assessment Guidelines, third edition (IAG's) and the Impairment Assessor Accreditation Scheme (IAAS)**

The ongoing review of the Impairment Assessment Guidelines was due to be completed early 2024, this unfortunately did not eventuate.

SISA has embarked this year on a change management focus with greater engagement to further understand what members most want from SISA and how SISA can best add value.

The year commenced with Wayne Potter completing the 12-month management change process, following his departure the appointment of myself with a very clear and purposeful brief from the SISA Executive Committee to meet with members, engage and obtain a clear understanding of what the membership wanted in services from SISA.

The future offerings of such initiatives such Claims Management training in collaboration with RTWSA and the OCPSE, town hall meetings on what does good look like from the viewpoint of a Self-Insured member, engagement through member surveys as well as face to face conversations all provide the information needed for SISA to continue to grow and develop education and relevant topics for our community events. I can say confidently that in my discussions and meetings with members they wanted the advocacy to continue, to be regularly informed and appraised of developments in the industry, both for WHS and Injury Management as both in person sessions and online offering for members.

The TEAMS inclusion supports our members who are either interstate based, regional or simply unable to attend the sessions in person.

## **Advocacy**

In early 2024 Rachel Webber was invited to join the Return to Work Ministers Advisory Committee, the committee meets 4 times per year to discuss legislative changes as presented by RTWSA, from these meetings recommendations are provided to the Minister. This is an inaugural invitation made to SISA.

In May 2024 SISA made a written submission to the Government in relation to the draft Impairment Assessment Accreditation Scheme review.

In July 2024 SISA made a written submission to the RTWSA containing member feedback on the proposed Injury Management Standards review

In July 2024 SISA made a written submission to the Government in relation to the draft Impairment Assessment Guidelines 3rd Edition.

In September 2024 as part of a Stakeholder group of the SAET SISA met with President Justice Dolphin to discuss activities of the SAET.

In August 2024 SISA met with RTWSA to discuss the issues surrounding particular WPI assessors, establishing the need for greater oversight in the Impairment Assessment Accreditation Scheme review, to ensure adequate availability in South Australia.

## **Member Engagement and Professional Development**

SISA also produced a calendar of monthly professional development and education sessions for Members through to the end of 2024, as well as the regular bi-monthly Friday Forums, all of the education sessions have been very well attended, many more have been planned for next year with input from you, the Members on what you would like to see more of.

SISA have invited RTWSA on a number of occasions to provide relevant learnings to our members either by independent presentations or by joining one of our Associate Member forums to provide the voice or response to a particular topic on behalf of the Regulator.

Where SISA had presenter permission, TEAMS was used for external attendees, with the sessions being loaded onto the SISA website for members viewing.

With our improved technology, the Member sessions including the Forums are now check in via a QR code.

## **Growing the Membership base.**

One new Full Member and 11 new Associate Members joined SISA in 2023–2024.

## **Website Refresh**

The SISA Executive approved a website refresh, with many of the original concepts realized, there are some still to be completed as there is some modernization that is still required. SISA continues to increase marketing and publicity for members and Associates.

## **Closing the Loop Annual Conference**

The Annual Conference continues to receive an extensive review to ensure that the topics and issues to be addressed in support of Self-Insured Employers remain relevant and informative.

This has been the SISA playbook for each financial year and significant time and energy have been directed at increasing member engagement and value add with all feedback welcome.

## **The days ahead!**

Changes to the Injury Management Standards and the WHS Standards are yet to be realized by our Self-Insured Community, there will be changes requiring time where a true picture of their effectiveness emerges.

We have some continuing changes to the Financial Requirements for our Community, some of the member sought changes have been realized with more to be decided on.

SISA hopes that with the changes it has made this year in member engagement and value-added services, it will enhance its ability to advance the cause of and represent Self-Insurers. It appears to be a challenging few years ahead for many stakeholders and businesses and we will be agile and forthright in our responses and on your behalf.

**Rachel Webber**

*General Manager*

## SISA Executive Committee 2023–24

### CHAIR

**Stevie Sanders**

*LGA Workers Compensation Scheme*

### ACTING CHAIR

**Sue Wolstenholme**

*Philmac Pty Ltd*

### DEPUTY CHAIR

**Ian Hutchinson**

*ISS World*

### ACTING CHAIR

**Jed Shearer**

*Eldercare*

### TREASURER

**Sue Wolstenholme**

*Philmac Pty Ltd*

### ACTING TREASURER

**Matt Barton**

*LGA Workers Compensation Scheme*

### MEMBER

**Amanda Apap**

*Accolade Wines Australia Ltd*

### MEMBER

**Dorota Clausen**

*Pernod Ricard Winemakers*

### MEMBER

**Barb Terreu**

*Coles*

### MEMBER

**Jed Shearer**

*Eldercare*

### MEMBER

**Melissa Verhage**

*Westpac Group*

**Carolyn Laffin**

*Westpac Banking Corporation*

### MEMBER

**Amanda Jones**

*Accolade Wines*

### MEMBER

**Clare Konecny**

*Schneider Electric Pty Ltd*

### MEMBER

**Melody Scroggs**

*LGAWCS\* No Voting Rights*

**Matt Barton**

*LGA Workers Compensation Scheme*

### MEMBER

COMMENCED FEB 2023

**Rian Carter**

*Office of the Commissioner  
for Public Sector Employment*

**Christine Mazomenos**

*Office of the Commissioner for  
Public Sector Employment on behalf  
of all Crown Agencies and entities*

### MEMBER

COMMENCED FEB 2023

**Ian Hutchinson**

*ISS World*

**Andrew Ward**

*ISS Facility Services*

## Executive Committee meeting attendance 2023–24

	<b>Meetings</b>	<b>Attended</b>
Dorota Clausen	11	10
Jed Shearer	11	10
Melody Scroggs	3	3
Ian Hutchinson	9	5
Amanda Apap	11	9
Clare Konecny	11	6
Stevie Sanders	10	9
Matt Barton	8	8
Barb Terreu	3	0
Zanny Pierce	11	8
Sue Wolstenholme	11	9
Rian Carter	9	7
Carolyn Laffin	11	7
Andrew Ward	1	1
Christine Mazomenos	2	2

# Report of progress towards our constitutional objectives

**The SISA constitution sets objectives for the Association. Here is a report on our progress under the objectives.**

## **To be the recognised representative body for self-insurance in South Australia.**

2023–24 saw a continuation of the highly constructive relationship between ReturnToWorkSA and SISA. The Corporation continues to consult SISA on relevant matters and provides important information directly to self-insurers, an efficient arrangement that SISA supports.

SISA is and will remain the recognized representative body for its Full and Associate Members, and has been consulted by other bodies, including industry associations. SISA's expertise in workers' compensation is acknowledged by the rest of the organised business community.

## **To provide networking, information, support and guidance to self-insurers with regard to:**

- Their rights and obligations under the South Australian workers' rehabilitation and compensation scheme and relevant work health and safety legislation.
- Events and developments of interest to members.

Throughout the year, SISA has provided its members with information and advice on emerging issues, and the collection of members' views on those matters. Issues covered in 2023–24 included:

- The Return to Work Act 2014, and its supporting regulations and instruments
- Review of the Self Insured Financial Requirements, ongoing
- Review of the Impairment Assessment Guidelines, ongoing
- Review of the Injury Management Standards
- Review of the WHS Standards
- Consultation and discussion papers issued by State and Federal regulators
- Emerging products and technology in relevant fields
- Conferences and seminars
- SISA bi-monthly Forums from Shopov Giourgas, Work Gain, Sparke Helmore, KJK Lawyers, Melino Legal, Finlaysons, Work Gain.
- Our professional development sessions for members covered many topics, updating and informing members on developments and present speakers on a range of informative and relevant topics.



### **To be a financially strong and growing association that:**

- Includes all eligible Self-Insurers in its membership.
- Ably represents its members in, and directs its members' funds towards, the development of an environment that is conducive to the role of self-insurance in the State's economic and social well-being.
- Is legally compliant and managed to the required prudential standards.
- Is respected by regulators, Government, employer and employee associations.

In 2023–24, all but 4 South Australian private sector Self-Insurers were members of SISA. We have welcomed several New Associate Members.

SISA has a strong track record in advocating for the interests of its full members at all levels up to and including State Parliament.

SISA is fully compliant with all relevant legislation including the State Associations Incorporation Act, the Work Health & Safety Act and State and Commonwealth taxation laws. Annual external audits assist in monitoring compliance.

In general, SISA enjoys a relationship of mutual respect with representative associations of all descriptions.

**To promote the highest levels of achievement in work health and safety and injury management both within the SISA membership and to the broader community.**

The SISA annual conference Closing the Loop is now well recognized as a quality event with interesting and challenging topics and speakers. It attracts a wide range of industry participants from both premium paying employers and self-insurers, along with a diverse group of event sponsors.

The association is a strong supporter of the Collaborative Partnership for Workplace Health and Wellbeing in South Australia. We also sponsor events that contribute to better understanding of return to work and work health and safety.

**To ensure that self-insurers' views are known when legislation and policy development are under consideration.**

During the year, SISA has provided reports, advice, responses, submissions and lobbying regarding the following:

- Draft Impairment Assessment Accreditation Scheme review.
- Injury Management Standards review
- Impairment Assessment Guidelines 3rd Edition
- A review of NIHL practices and practitioners
- South Australian Employment Tribunal Rules.

SISA communicates as needed with Members of the South Australian Parliament and other peak organizations to ensure that we can provide input to Parliamentary debates on matters of interest to our members.

**To facilitate the delivery of relevant, high quality and cost-effective education and training to self-insurers.**

In 2023–24, very successful professional development sessions were held at SISA offices and online on the topics mentioned earlier in this report.

## **To provide support and advice to organisations seeking self-insurer status under the South Australian legislation.**

SISA has provided on request active support and advice to organisations considering or seeking self-insurance during 2023–2024. This has included meetings with management, technical and environmental advice and establishing peer networks for them to allow them to discuss the process with other applicants and self-insurers. Interest in self-insurance remains high.

The Self-Insurer Insolvency Contribution Aggregate (SIICA) was previously known as the Exempt Employer Reserve Account (EERA) and the Self-Insured Employer Reserve Account (SIERA).

What was originally the Exempt Employer Reserve Account commenced on 1 January 1996. It was renamed the SIICA in 2007 after the then WorkCover revised the arrangements based on legal advice. Its purpose is to protect the Compensation Fund from losses stemming from shortfalls in financial guarantees in the event of a self-insurer becoming insolvent. The aggregate consists of \$2.5 million initially contributed by the then WorkCover, the accumulated contributions of self-insurers and the investment earnings of those contributions.

RTWSA have determined that the SIICA fund has reached the level of security to ensure adequate coverage in the event of a catastrophic emergency relating to a self-insured employer, as such has ceased the requirement for the contribution of 1% from each of the private self-insured employers.

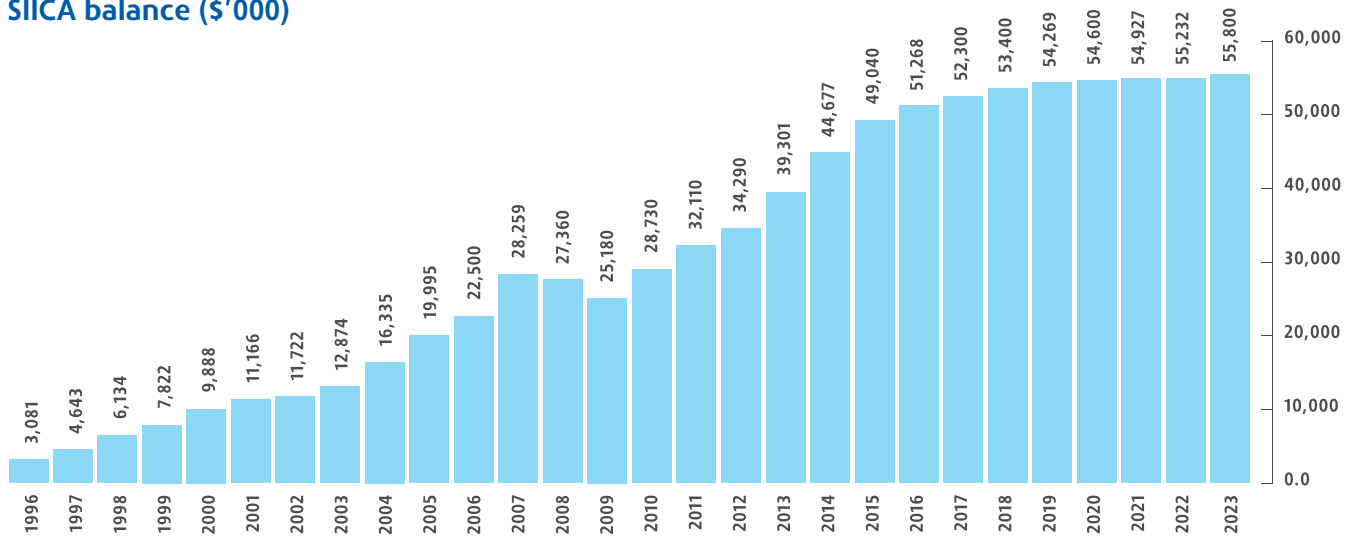
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SIICA balance (\$'000)

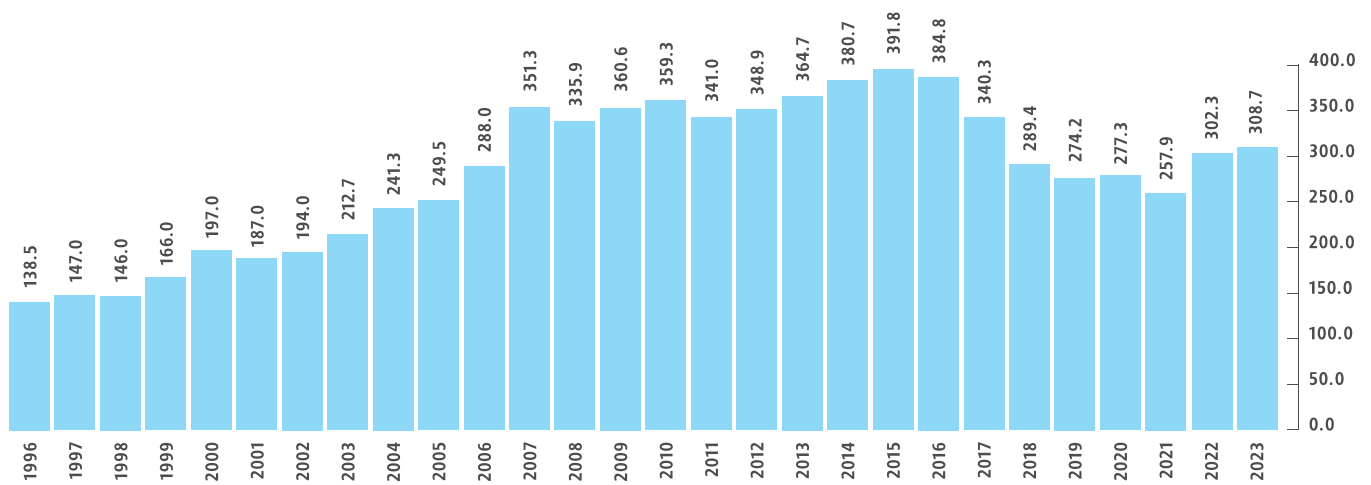


# Self-insurer Financial Guarantees

In addition to the SIICA funds, at 30 June 2023, ReturnToWorkSA held financial guarantees from private sector self-insurers in excess of \$309,000.00.

Public sector self-insurers are not required to provide financial guarantees because the Crown is its own insurer of last resort. The public sector represents about half of all self-insurance in South Australia. Self-insurance in total accounts for about 39% of the scheme by remuneration. This means that ReturnToWorkSA is exposed to contingent liabilities from private sector self-insurers representing about 19% of the scheme by remuneration.

Financial Guarantees held by RTWSA (\$m)



## Full Members: SISA membership as at 30 June 2023

Accolade Wines Australia Ltd	Inghams Enterprises Pty Ltd	Tasmea (formerly Equity & Advisory Limited)
ACH Group	Intercast & Forge Pty Limited	Teys Australia Naracoorte Pty Ltd
ACHA Health	ISS Facility Services	The University of Adelaide
Adbri Ltd	Kalyra Communities (James Brown Memorial Trust)	Thomas Foods International Pty Ltd
Adelaide SkyCity	Kimberly-Clark Australia	Toll Group
Advertiser Newspapers Pty Limited	Little Company of Mary Health Care	Treasury Wine Estates Vintners Ltd
Ahrens Group Pty Ltd	Local Government Association Workers Comp Scheme LGAWCS	Uniting SA (formerly Uniting Care Wesley Port Adelaide)
AnglicareSA	Lutheran Homes Group	Uniting Communities
Arnott's Biscuits Limited	Nyrstar Port Pirie Pty Ltd	University of South Australia
ASC Pty Ltd	Office of the Commissioner for Public Sector Employment on behalf of all Crown Agencies and entities	Utilities Management Pty Ltd
BAE Systems BHP Group Ltd	OneSteel Manufacturing Pty Limited (GFG Alliance)	Ventia Ltd
BlueScope Limited	Pernod Ricard Winemakers	Veolia
Bridgestone Australia Ltd	Philmac Pty Ltd	Viterra Pty Ltd
Catholic Church Endowment Society Inc	Programmed Maintenance Services	Westpac Banking Corporation
Coles	RAA Inc	Woolworths
Competitive Foods	Resthaven Incorporated	
Hungry Jack's	SA Water Corporation	
Detmold Packaging Pty Ltd	Samuel Smith & Son	
Drakes Supermarkets	Santos Ltd	
ECH Inc	Schneider Electric (Aust) Pty Ltd	
Eldercare Inc	Silver Chain Group	
ElectraNet Pty Ltd	SMR Automotive Australia Pty Limited	
Electrolux Home Products	Southern Cross Care (SA&NT)	
Estia Health	St Andrew's Hospital	
Eldercare		
Flinders University		
Healthscope		
Helping Hand Aged Care		
Holcim (Australia) Pty Ltd		

## Associate Members: SISA membership as at 30 June 2024

Allied Universal and Compliance	JLT Risk Pty Ltd	Sparke Helmore Lawyers
Acumen Health	Jones Harley Toole	St John Ambulance SA
Adaptive Workplace Solutions	Jones Radilology	TAFE
ARPA	KJK Legal	The International Spine Centre
Australian Specialist Hub	Konekt Pty Ltd	Thomson Geer
ASC Training & Development Systems Australia Ltd	Lawson Risk Management	Thrive Ability
Australian Specialist Hub	Leap Forward	Vybe Consulting
Beneficent Bradbrook Lawyers	Living Life	WCD Workers Compensation Solutions
Brett & Watson Pty Ltd	Local Government Association	WorkGain Solutions Pty Ltd
Bunnings Group Limited	Locktons Australia	
City of Adelaide Council	Melino Legal	
Corporate Health Group Pty Ltd	Mills Oakley	
Dr Jones & Partners Medical Imaging	MIcoa	
Dr Marty Ewer	MPOT Pty Ltd	
DW Fox Tucker	nb&a Pty Ltd	
Lawyers EML	Next Generation Occupational Medicine	
eReports Pty Ltd	Octagen Pty Ltd	
Finity Consulting Pty Ltd	PeopleVision	
Finlaysons Lawyers	Pinnacle Workplace Consultants Pty Ltd	
G4S Compliance & Investigations	Procure Group	
Gallagher Bassett Services	QBE Insurance Rehab Management	
Gilchrist Connell	Recovery Partners Recovre	
Guardian Exercise Rehabilitation	Rehab Management	
Hall & Wilcox	RGF Staffing	
Healthmarq Pty Ltd	RSL Care RDNS Ltd T/A Bolton Clarke	
Henderson Horrocks Risk Services	SA Health	
HSI Donesafe	Sedgewick Australia	
Innovate Mental Health Workplace Solutions	Shopov Giourgas	
IPAR Rehabilitation	SLP Consulting	
	Solv Solutions	

### SISA membership numbers 2023–24

#### Full members

As at 30 June 2023 69

As at 30 June 2024 68

#### Associate members

As at 30 June 2022 47

As at 30 June 2023 56

As at 30 June 2024 69

# SISA wishes to thank our sponsors for their generous support in 2023–24

The International Spine Centre  
mlcoa  
Finlaysons Lawyers  
Lawson Risk Services  
Gallagher Bassett  
eReports  
WorkGain Solutions

KJK Legal ReturnToWorkSA  
DW Fox Tucker Lawyers  
nb&a Group  
Skytrust QHSE  
Mediation ERS  
Procure

PeopleVision  
Donesafe  
Guardian Exercise  
Rehabilitation  
IPAR



# The Collaborative Partnership for Workplace Health and Wellbeing in South Australia



**SISA is a proud member of the Collaborative Partnership for Workplace Health and Wellbeing in South Australia together with State government bodies, industry, statutory insurers, academics and unions reflecting a commitment towards improving workplace health, safety and wellbeing across South Australia.**

We are also a signatory to the *South Australian Workplace Health and Wellbeing Charter*.

The *Healthy Workplaces* website is a trusted site for South Australian employers and workers to access information and practical tools to support workplace health and wellbeing. The website brings together cross-sector information including a range of practical tools and resources to help create a healthy workplace.

With the rates of chronic disease and mental health conditions in the workplace on the rise, it is imperative that we work together to create a coordinated and innovative response to support industries and workplaces to thrive. The website provides business leaders and workers with the information they need to create a healthy workplace which contributes to greater productivity outcomes, fewer work-related injuries and illnesses, positive workplace culture and improved health and wellbeing outcomes for workers.

SISA encourages everyone to visit the *Healthy Workplaces* website and make use of its *tools and resources*.

**Self Insurers of South Australia**  
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