

Submission by



to the

Ministry of Business Innovation and Employment

on the

Consultation on ACC's Accredited Employers' Programme¹

November 2022

¹ Background information on BusinessNZ is attached as Appendix One.

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BUSINESSNZ SUBMISSION ON THE CONSULTATION ON ACC'S ACCREDITED EMPLOYERS' PROGRAMME

1.0 INTRODUCTION

- 1.1** BusinessNZ welcomes the opportunity to make a submission on the Consultation on ACC's Accredited Employers' (AE) Programme. Background information on BusinessNZ is attached as Appendix One.

2.0 RECOMMENDATION

That, as discussed below, the status quo is retained.

3. DISCUSSION

3.1. Proposal 1: Implement new health and safety assessment requirements

The ACC assessment system has worked satisfactorily to date and it is difficult to see any good reason for the proposed change. ACC is quite as capable of assessing New Zealand workplaces as the proposed assessors and what is being suggested would simply add to business costs at a time when these are already increasing exponentially.

Further, according to its website, WorkSafe's responsibilities include engaging with duty holders – businesses, undertakings and workers, educating duty holders about their work health and safety responsibilities (through guidance), as well as enforcing health and safety law.

It would appear, therefore, the intention is not so much to improve the way ACC functions as to relieve the organisation of its responsibility for subsidising AE audits. That way, its costs are reduced and loaded on to businesses instead. And this is despite the fact that the AE Programme already reduces ACC costs. The options provided have no relevance to worker engagement – there is some evidence that ISO certification does little more than encourage a tick-the-box approach - and for such reasons, the proposed change is not supported.

3.2 Proposal 2. Strengthen the assessment of Claims and Injury Management

The question must be asked whether this is not change for the sake of change. No evidence is presented of any need for change, rather the assumption appears to be that a more prescriptive system will produce a 'better' result. If businesses are to agree that a new C&IM system is needed, information on current concerns should be provided. Further, targeted surveys can document only individual

experiences; they cannot indicate how the system is working generally. Again, there will be little or no effect on worker satisfaction.

3.3 Proposal 3. Performance Monitoring

Surely the point of the AE system is that AE's take responsibility for accident and injury management and are monitored only when there is good evidence of failure to manage the process well. Piling on administrative responsibilities over and above those that already apply is more likely to act as a disincentive to joining the Programme, further increasing ACC's workload. In light of the very differing circumstances under which different businesses operate, an ability to compare one AE with another is not going to make it easier to assess why the one business is managing better than the other.

3.4. Proposal 4. New pricing options for the Partnership Discount Plan

This proposal is one that businesses and employers must assess for themselves but if the proposed change is introduced, businesses and employers generally will need considerably more information and more time to assess what will best suit their particular circumstances.

4. CONCLUSION

The Accredited Employers Programme is essentially a self-insurance scheme allowing employers to manage their own employees' claims for work-related injuries. As such, it should be regulated with a light touch with as little outside interference as possible. Transferring accountability from ACC to employers themselves makes the employers more, not less accountable. In BusinessNZ's view the proposed changes are unnecessary and will do nothing to improve the Programme's current performance.



The BusinessNZ Network is New Zealand's largest business organisation, representing:

- Business groups [EMA](#), [Business Central](#), [Canterbury Employers' Chamber of Commerce](#), and [Business South](#)
- [BusinessNZ](#) policy and advocacy services
- [Major Companies Group](#) of New Zealand's largest businesses
- [Gold Group](#) of medium-sized businesses

[Affiliated Industries Group](#) of national industry associations

- [ExportNZ](#) representing New Zealand exporting enterprises
- [ManufacturingNZ](#) representing New Zealand manufacturing enterprises
- [Sustainable Business Council](#) of enterprises leading sustainable business practice
- [BusinessNZ Energy Council](#) of enterprises leading sustainable energy production and use
- [Buy NZ Made](#) representing producers, retailers and consumers of New Zealand-made goods

The BusinessNZ Network is able to tap into the views of over 76,000 employers and businesses, ranging from the smallest to the largest and reflecting the make-up of the New Zealand economy.

The BusinessNZ Network contributes to Government, tripartite working parties and international bodies including the International Labour Organisation ([ILO](#)), the International Organisation of Employers ([IOE](#)) and Business at OECD ([BIAC](#)).

