

ANNUAL REPORT 2024/2025



Independent
Review Office



Acknowledgement of Country

The Independent Review Office (IRO) acknowledges and pays respects to the Traditional Custodians of the lands that we work and live on. We recognise, honour and celebrate Aboriginal and Torres Strait Islander peoples' ongoing culture, their connection to the land, waterways and sea. We acknowledge and pay our respects to their ancestors, and Elders past, present and emerging, and recognise those who protect and promote Aboriginal and Torres Strait Islander cultures across NSW.

We extend this acknowledgement to all Aboriginal and Torres Strait Islander peoples that are employed by the IRO and in the NSW Government Customer Service portfolio of which we are a part and recognise the unique and vital contributions they provide to our work.



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Independent
Review Office

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The Hon. Jihad Dib MP
Minister for Customer Service and Digital Government
Parliament House
Macquarie Street
SYDNEY NSW 2000

31 October 2025

Dear Minister,

I am pleased to submit the Independent Review Office 2024–25 Annual Report for your presentation to the NSW Parliament.

The Annual Report has been prepared in accordance with the *Government Sector Finance Act 2018*, Schedule 5 of the *Personal Injury Commission Act 2020*, and, having self-assessed as a group 1 agency, the NSW Treasury Policy and Guidelines – Annual Reporting Requirements TPG25–10a.

This report includes the operations and performance of the Independent Review Office (IRO), together with the audited financial statements for the period 1 July 2024 to 30 June 2025.

Yours sincerely,

Samantha Taylor PSM
Independent Review Officer





Overview

1.1 Message from the Independent Review Officer

It is my pleasure to present the 2024-25 Annual Report of the Independent Review Office (IRO). I was appointed as the Independent Review Officer on 3 February 2025 and am privileged to have the opportunity to build on the IRO's track record supporting people who are injured at work and on our roads to get fair and just access to the entitlements and benefits they have a right to.

I thank the staff of the IRO for their commitment to the work of the Office and for welcoming me so warmly.

There is no doubt that the strength of the IRO lies in the expertise and dedication of its people. As a small team of around 80, every staff member has contributed to the results for this year and directly or indirectly made a difference to the thousands of people we supported either with an enquiry, a complaint or by funding an Approved Lawyer to assist them.

I particularly thank Mr Jeffrey Gabriel who so capably led the Office in the year prior to my appointment. His knowledge of workers compensation and Compulsory Third Party (CTP) insurance law is extraordinary as is his commitment to getting justice for the people who seek our services. It is a privilege to have him as part of the IRO Executive.

The IRO is an integral part of the NSW workers compensation and CTP schemes. We work closely with the State Regulatory Insurance Authority (SIRA), Safework NSW, the Personal Injury Commission (the Commission), and the Department of Customer Service (DCS), and our complaints and dispute resolution activities provide a vital window into people's experience of these schemes.

In 2024-25 we received the highest number of contacts ever in a single financial year, handling 17,286 enquiries and complaints, and receiving 29,561 new funding requests. We have maintained strong operational performance through this period, finalising 98% of complaints within two weeks and exceeding our service delivery target of 30 days for the vast majority of matters.

The 2025-26 NSW Budget allocated an additional \$20m per annum to us from the workers compensation fund to meet the projected costs of the Independent Legal Assistance and Review Service (ILARS) program identified through the current ILARS Demand and Forecast Model. A key priority for me this year was to commence review of that model to get to the bottom of what drives our costs and to improve the efficacy and value for money of the program, taking a broader scheme view.

From listening to stakeholders and my staff over these first months, it is clear to me that there are many other opportunities to strengthen the way the IRO works – amplifying our influence and impact, improving the experience of people who are injured who seek our support, and in turn contribute to the sustainability of the workers compensation and CTP schemes through early resolution of disputes. My priorities for 2025-26 include:

- A new IRO Strategy for 2025-30 that focusses on providing exemplary customer service, early solutions and taking a system level approach to our functions, so we have maximum impact.
- Enhancing operational processes and practices so we operate efficiently, use the expertise of our people to best effect, and collaborate with our key stakeholders to embed a practice of achieving early solutions to disputes.

- Building our data and digital capabilities, taking advantage of the available technology within the Customer Service portfolio.
- Streamlining our channels for engagement and support of the community and our partners, including developing information for people with claims to assist in taking their disputes forward.
- Updating our management and administration of the ILARS program to reflect contemporary grant management practices and actuarial principles.

In March 2025, the NSW Government introduced the draft *Workers Compensation Legislation Amendment Bill 2025* (the draft Bill) proposing amendments to the workers compensation enabling legislation, as well as to the functions of the IRO under the PIC Act, amongst other things. Any changes that I make to the operation of the IRO within the current statute will need to be cognisant of the potential for legislative change in the future.

I acknowledge and thank the Minister for Customer Service and Digital Government, the Hon Jihad Dib MP for his interest in the work of the IRO and his support of my early directions to improve the service we offer the citizens of NSW.

Last, but in no way least, I acknowledge and thank the thousands of people who have put their trust in us during the year, and the staff of the IRO who have responded to their needs with such care and skill. I look forward to continuing to work with our partners and stakeholders across the workers compensation and CTP schemes to get just and fair outcomes for people injured at work and on the roads in NSW.

Samantha Taylor PSM
Independent Review Officer

1.2 Our Minister

The Hon Jihad Dib MP, as Minister for Customer Service and Digital Government, had ministerial responsibility for the Independent Review Office for the entire reporting period.

1.3 Accountable Authority

The Accountable Authority was Mr Jeffrey Gabriel, Acting Independent Review Officer for the period 1 July 2024 to 2 February 2025 and Ms Samantha Taylor PSM, Independent Review Officer from 3 February 2025.

1.4 Accountabilities

As a NSW Government entity with the Customer Services portfolio, the IRO is accountable under the *Government Sector Employment Act 2013*, the *Government Sector Finance Act 2018*, and Schedule 5 of the *Personal Injury Commission Act 2020* (the PIC Act).

We operate as an independent agency within the NSW Government Customer Services portfolio.

The IRO is funded from the NSW Workers Compensation Operational Fund and the NSW Motor Accidents Operation Fund.

1.5 IRO Functions and Powers

Our Purpose

We work with people injured at work or in motor vehicle crashes, their insurers, industry regulators, unions and the legal profession to find solutions to complaints and disputes about a claim.

We are a leading authority on workers compensation and motor crashes insurance practice, contributing to NSW policy by using data and insights to highlight trends and emerging issues detrimentally affecting the rights of people with a claim under workers compensation legislation or the *Motor Accident Injuries Act 2017*.

Our Functions

The Independent Review Officer was established as an independent statutory office under Schedule 5 of the PIC Act on 1 March 2021. The Office replaced the Workers Compensation Independent Review Officer (WIRO), originally established in 2012 under the *Workplace Injury Management and Workers Compensation Act 1998* (NSW) (the WIM Act).

The functions of the Independent Review Officer, set out in clause 6 of Schedule 5 of the PIC Act, include:

- dealing with complaints by people who have been injured at work or in motor vehicle crashes, about the acts or omissions of their insurers;
- managing and administering the Independent Legal Assistance and Review Service (ILARS), which provides funding to Approved Lawyers to provide legal advice and assistance to people injured at work about decisions of insurers or disputes about their workers compensation entitlements;
- inquiring into and reporting to the Minister for Customer Service and Digital Government on any matters arising in connection with the operation of the PIC Act, and workers compensation and motor vehicle accident legislation; and
- encouraging the establishment by insurers and employers' complaint resolution processes for complaints arising under the enabling legislation.

We work closely with other agencies with a role in workers compensation and motor vehicle accidents scheme administration such as the State Insurance Regulatory Authority (SIRA), the Personal Injury Commission (the Commission) and Insurance and Care NSW (icare).

Complaint Handling

We manage complaints from people with a workers compensation or motor vehicle crash claim in connection with disagreements or disputes they have with their insurer about their claim. Any person with a workers compensation or CTP claim can complain to us about any act or omission (including a decision or a failure to decide) of an insurer that affects their rights and entitlements. We take complaints about icare claims service providers, the Treasury Managed Fund, self-insurers and specialised insurers. When handling a complaint we can provide information about rights and entitlements, guidance on how to raise a complaint with an insurer or to seek a review of a decision they have made, or we can contact a person's insurer on their behalf to get a solution to their issue.

We have a complaints management policy that explains how we manage complaints.

Funding for Legal Support and Representation

We fund Approved Lawyers to provide legal support and representation to people injured at work to assist them with disputes with their insurers. We approve lawyers with the necessary qualifications and experience in workers compensation legislation to undertake this work. The *ILARS Funding Guidelines* set out how we will administer this program, the requirements to become an Approved Lawyer and the costs that are payable if we decide to provide funding.

Undertaking Inquiries and Promoting Good Complaints Handling Practice

In the course of our work, we identify trends or issues that affect the experience of people injured at work or in motor vehicle crashes. We can inquire into issues to help inform improvements to the workers compensation and motor accidents schemes. We can also inquire into specific matters which need investigation beyond our complaint handling powers. Where we inquire into matters arising in connection with the PIC Act, these inquiries will relate to our responsibilities. We can also inquire into matters arising under the *Workers Compensation Act 1987*, the *Workplace Injury*

Management and Workers Compensation Act 1998 and Motor Accident Injuries Act 2017. These inquiries will generally deal with the conduct of insurers, and the experience of people who have been injured. We can use the inquiry power to promote better complaints handling practices by insurers and employers.

Information Gathering Powers

We can require insurers to provide us with specific information for the purpose of our functions. We use these powers to assist in responding to complaints, or in understanding how insurers are responding to emerging trends that we might observe through our complaint and ILARS data.

1.6 Organisational Structure and Executive Leadership

Our Organisational Structure

The Independent Review Officer is an independent statutory officer appointed for a fixed term of five (5) years. The staff of the Independent Review Office enable the Independent Review Officer to exercise the Officer’s functions.



Independent Review Officer

Samantha Taylor PSM

Samantha Taylor was appointed as the Independent Review Officer on 3 February 2025. Samantha brings more than 20 years executive experience in senior roles in both NSW and Commonwealth governments. She has dedicated her public sector career to roles that uphold the rights of people in the community who need assistance to exercise those rights. Her experience spans policy, regulation and operations with a focus on social policy, customer service, and driving positive outcomes for citizens through large-scale system reform. She has held key leadership roles with the National Disability Insurance Agency, the National Disability Insurance Scheme Quality and Safeguards Commission, the NSW Department of Family and Community Services, and the former NSW Department of Premier and Cabinet. Samantha was awarded a public service medal in 2017 for leading reform of disability services in NSW.

IRO Executive Team

Jeffrey Gabriel

Acting IRO (1 July 2024 to 2 February 2025)
Director Solutions

Jeffrey Gabriel is a practising solicitor with more than 20 years' experience in the workers compensation system in a range of roles in the NSW Government and private practice. Jeffrey is an accredited specialist in personal injury law and holds a Bachelor of Arts and Bachelor of Laws from Macquarie University. He has acted for both people who have been injured at work and insurers in a range of personal injury jurisdictions in NSW. Jeffrey has held a range of roles across the IRO and has been with the organisation since it was established as the WIRO in 2012.

Phil Jedlin

Director ILARS

Phil Jedlin has worked in the IRO since 2013, heading ILARS and broader operations. Prior to joining the then WIRO, Phil worked for many years at the Commonwealth Bank of Australia. Phil holds a Bachelor of Economics and a Bachelor of Laws from Macquarie University.

Lucas Kolenberg

Acting Director, Strategy, Policy and Support (to June 2025)

Lucas Kolenberg was the Acting Director SPS and filled the role from February 2025 to early June 2025. Lucas came to IRO with experience across the Department of Customer Service, as a leader experienced in policy, risk and strategy.

Lucas replaced Ms Melissa Hirst who left the IRO in December 2024.

Liz Geddes

Acting Director Solutions

Liz Geddes was the Acting Director Solutions from April 2025. Prior to joining IRO Liz was with the NSW Telco Authority leading the delivery of policy reforms to enhance telecommunications and digital connectivity.





Strategy

2.1 Results Against our Direction

The IRO Direction 2023-2025 sets out the strategies and associated priorities that guide IRO in the performance of its functions under the PIC Act during this period. It highlights how IRO supports people injured at work or on the road to exercise their rights, so they get fair and timely resolution of disputes. It identifies how IRO supports the delivery of the NSW Government's priorities for a fair, efficient and trusted personal injury system.

2.1.1 Achieving Early Solutions

IRO adopts a proportionate approach to managing complaints with the objective of getting an early solution to a disagreement or dispute. The main approach to complaints management is for IRO to act as an intermediary between the person and their insurer.

We introduced new approaches to achieving early solutions in ILARS matters during 2024-25. We can decide not to fund a matter through ILARS and instead, to direct a matter

to our Solutions team to attempt to resolve a claim or dispute. This can include matters where an insurer has failed to respond to a claim, or we may request the insurer review a decision. Where we can successfully negotiate an outcome, a worker may have the benefit of faster access to the relevant benefit and potentially avoid adversarial legal processes.

Early Solutions: Medical Disputes

We concluded a Medical Disputes Early Solutions Pilot Program, which operated from September 2023 to October 2024. The pilot was initiated after we identified that a high number of matters were being funded where the only issue was a medical dispute. These cases often resulted in success for injured workers, suggesting that insurers were not always giving proper attention to considering liability before the matter reached the Commission.

We engaged with SIRA, icare and the Commission on this pilot and concluded an evaluation in March 2025, which demonstrated that although there was very modest uptake, there are opportunities to amplify early solutions in this context which we will continue to explore.

Case Study 1: No Response to Claim - Updated PIAWE calculation with back pay of almost \$21,000 for the injured worker

Mr K's representative contacted the IRO because his insurer had failed to respond to a request for review of his pre-injury average weekly earnings (PIAWE).

Without a response, his weekly benefits could not be properly adjusted. The IRO issued a Notice of No Response to Claim (NRTC) to the insurer and requested urgent action.

On the same day, the insurer reviewed Mr K's PIAWE, acknowledged an error in their earlier calculation, and provided a revised assessment. This resulted in back pay of almost \$21,000 and an increase in Mr K's ongoing weekly benefits.

Resolving Failures to Respond to Claims

In 2024-25 we introduced a new approach to supporting people injured at work where their insurer fails to respond to their claim. We handled more than 589 'No Response to Claim' (NRTC) matters during the year.

Our new approach allows for more consistent identification of matters where an Approved Lawyer seeks funding to commence action to address failures by an insurer to respond to claims in legislative timeframes. In those matters, we engage with the insurer directly with a view to determining whether they had failed to respond to the claim as required under the legislation. The outcome of our management of these matters can be either a decision by the insurer that circumvents the need for legal action, or a confirmation that funding will be required for an Approved Lawyer.

Taking a Systemic Approach to Complaints Handling

We introduced a new approach to engaging with insurers where we identified issues where they potentially incorrectly applied the legislation when making decisions about people's claims. These engagements involve alerting senior leaders to these trends and requesting information about the issues we were observing compared to their internal complaints experience. In 2025-26 we will accelerate this approach contributing to an uplift in complaints handling practices and addressing systematic issues more effectively.

2.1.2 Enabling Injured Workers' Access to Appropriate Legal Assistance

IRO manages and administers ILARS, providing funding to Approved Lawyers for legal and associated costs to represent workers who need legal advice, support or representation about decisions of insurers about workers compensation matters.

The availability of ILARS means that workers do not have to find and personally fund specialist legal expertise to support them with a claim or dispute.

Acting on the Recommendations of the 2022 ILARS Review

During 2024-25 we substantively completed work against the recommendations of the 2022 ILARS Review which had been initiated by the former IRO Mr Simon Cohen.

Connected to the recommendations of the 2022 Review, we will review the arrangements for determining Approved Lawyers and Barristers who provide services through ILARS during 2025-26, so that workers benefiting from ILARS have confidence that legal practitioners delivering legal assistance and representation are suitably qualified and experienced.

The remaining observations in the 2022 review will provide context for a further review of the ILARS program during 2025-26.

Improving Our Guidelines

Although the 2022 ILARS Review found no substantive issues with the *ILARS Funding Guidelines* themselves, feedback from Approved Lawyers and worker representatives indicated that more work was required to provide clarity on certain provisions and for consistent decision making.

IRO published a series of policies and practice notes to supplement the *ILARS Funding Guidelines* in 2024-25 with assistance from the Approved Lawyer User Group, covering topics such as requirements to seek extension of funding, requirements for Stage 1 funding, reasonably necessary disbursements, and an Appeals Funding Policy.

Medical Report Provider (MRP) Arrangements

The Medical Report Provider (MRP) panel was introduced by the former WIRO to supply medical reports directly to Approved Lawyers. These reports are used to support claims and dispute resolution in workers compensation matters.

The IRO finalised agreements with eight (8) new providers in 2024-25, bringing the total number of Medical Report Providers on the IRO panel to 19.

We also conducted a review of our approach to payment of service fees to MRPs and ceased paying MRP service fees for any services requested after 31 October 2024. From this date, Approved Lawyers are required to pay service fees themselves should they choose to use MRP services.

MRP arrangements will be reviewed again in 2025-26.

Approved Lawyer User Group

Our Approved Lawyer User Group was established following the 2022 Review of the ILARS program. The User Group has eight (8) Approved Lawyer members representing the NSW Law Society (Injury Compensation Committee), the Australian Lawyers Alliance, and a selection of the Approved Lawyer community – including metropolitan, regional, experienced and newer Approved Lawyers.

The Approved Lawyer User Group met on four (4) occasions in 2024-25, providing the IRO with expert advice and feedback on the application of the *ILARS Funding Guidelines* and assisting IRO with developing best practice and procedures for ILARS decision-making and application of the *ILARS Funding Guidelines* and development of practice notes to supplement the Guidelines.

ILARS Demand and Forecast Model

We commenced a review of the ILARS Demand and Forecast Model in April 2025.

The current ILARS Demand and Forecast Model, developed in 2021, projects ILARS demand, forecast expenditure and determines the contingent liability of future funding based on open cases. It relies on historical demand and expenditure to predict future costs considering factors such as injury types, timeframes for disputes and claims data.

A revised Demand and Forecast Model will incorporate the environmental factors that influence demand, based on claims trends within the workers compensation scheme.

Taylor Fry was engaged to undertake this work which is expected to be completed by the end of 2025.

2.1.3 Contributing to Improvements in Injury Compensation Schemes

Under Part 3 of Schedule 5 to the PIC Act, the IRO can inquire into and report to the Minister on any matters arising in connection with the operation of the enabling legislation as the Independent Review Officer considers appropriate.

The new Independent Review Officer will determine priorities for inquiry as part of the IRO 2025-2030 Strategy.

Improving our Customer Service

We have a rolling customer experience survey mechanism so that feedback is collected from people who use IRO services to assess their satisfaction and inform improvements. The IRO uses this information to inform changes to our performance, policy and practice, and to identify areas for staff training and development.

During 2024-25, over half of respondents strongly felt that IRO understood their enquiry or their complaint, that they received the right level of information, or assistance, and were clear on next steps. Satisfaction remained stable in 2024-25 over the previous year.

Customers reported higher satisfaction when IRO was able to answer their enquiry or complaint directly. The majority of respondents reported that they were 'extremely satisfied or satisfied' with the support provided by IRO, however, 10% of respondents indicated that they were 'not at all satisfied'. This was mainly because we needed to redirect them to other organisations and were unable to resolve their issue.

For people who were satisfied with our services, the helpfulness and knowledge of staff was cited as the main contributing factor.

In 2025-26 we are working on resources for people that cover the most frequently requested information so that people can quickly and easily find the advice they need.

Contributing to External Reviews

IRO regularly contributes to NSW Government and Parliamentary reviews related to personal injury compensation schemes.

In June 2025 the Independent Review Officer appeared at the NSW Parliamentary Hearing on the Inquiry into the *Workers Compensation Legislation Amendment Bill 2025*.

The Acting IRO, Mr Gabriel, gave evidence to a statutory review of complaints handling by SIRA in late 2024.

IRO Inquiry: Delay in Determining Liability

We published a supplementary report into the causes of delays in making liability determinations on workers compensation claims (*Delay in Determining Liability Update Report*) in December 2024. This report follows the *Delay in Determining Liability Inquiry Report* completed in June 2021 which explored the causes of complaints to IRO on this issue, highlighted the physical, financial and psychological effects on injured workers caused by delays and made recommendations to address these issues.

The *Delay in Determining Liability Update Report* gives an overview of the complaints IRO has received between July 2020 and June 2024. In workers compensation, insurers in NSW have a 21-day timeframe to make a decision on an injured worker's claim for liability. However, IRO data along with the several external reviews undertaken by SIRA and the Standing Committee on Law and Justice into aspects of the NSW Workers Compensation system confirmed that some insurers are continuing to take longer, adversely affecting outcomes for people injured at work.

Case study 2: Solutions intervention followed by proceedings in the Commission

Ms N injured her foot and consequently aggravated both knees. Her weekly payments were suspended and then terminated by the insurer due to alleged non-compliance with return to work (RTW) provisions. However, Ms N had been in an abusive relationship which was the reason for why she failed to obtain a certificate of capacity (COC). She later changed medical practices and obtained new COCs. A dispute notice denying liability was issued but withdrawn after IRO's intervention. Despite further evidence, the insurer still denied payments for the period when she was managing her domestic situation. We approved funding for an Approved Lawyer to commence proceedings in the Commission, which went to a conciliation/arbitration hearing with a barrister assisting. The case was resolved with the insurer agreeing to pay for the period Ms N was unable to comply with RTW provisions due to her domestic situation.

2.1.4 Fostering the Wellbeing of the IRO Team

The NSW People Matters Employee Surveys (PMES) give us insights into what our staff value about working at IRO, and areas for improvement. We have an active program in place to address the PMES and during 2024-25 introduced new initiatives to build on the things that staff value most.

As a small independent agency within the Customer Service portfolio, we leverage Department of Customer Service (DCS) human resource supports and policies. This enables us to adopt a range of policies and resources to benefit our staff consistent with the rest of the NSW Public Sector of which we are a part.

People Matters Employee Survey (PMES)

The 2024 IRO People Matters Employee Survey (PMES) saw an 83% participation score.

IRO staff reported positively on the flexible working arrangements available to them, their job purpose and enrichment, and ethics and values.

Our 2024-25 PMES Action plan focused on communication, change management, staff recognition and robust and transparent decision making.

A staff Working Group with representation from across the IRO was introduced in March 2025. This staff led forum reports directly to the Independent Review Officer.

We deployed the 2025 PMES Pulse Survey in April 2025 to check in with staff about how we were going against the plan. The PMES results showed an increase in positive sentiment for working in the IRO and indicated support for the changes we are making to improve communication and ways of working.

IRO Flexible Working Policy

We consulted with staff on a new Flexible Working Policy which came into effect in February 2025 to deliver on the NSW Government workplace presence circular. The policy provides our staff with a range of flexible working arrangements including hybrid working options. The policy embeds the importance of coming together in our workplace as a contributor to productivity, workplace safety, wellbeing and development, and flexibility for our staff enhances their effectiveness in serving the NSW community.

IRO Code of Ethics and Conduct

To align with the NSW Public Service Commission Code of Ethics and Conduct, the IRO Code of Ethics and Conduct came into effect in December 2024. The new IRO Code was introduced to provide our staff with a Code that was clearer and more accessible, giving guidance on a broader range of foundational topics essential for ethical decision-making and behaviours for work in the public sector.

The updated Code also aligns with reforms introduced under the *Public Interest Disclosures Act 2022*.

All IRO staff attested to comply with the new Code following its introduction.

Staff Wellbeing Check-ins

Many of our staff work with members of the community who are experiencing trauma both as a result of their injury, and often due to the failure of their insurer to adequately handle their claim. Our staff listen carefully to the issues that people raise, and approach their work with care and skill, and a strong sense of empathy for the people they support every day.

The accumulated contact from supporting many hundreds of people every week with significant and traumatic experiences can take its toll on even the most experienced complaints officers. To provide an added support to assist with maintaining the psychological health and wellbeing of these staff we provided a bespoke service for regular staff wellbeing check-ins which commenced from 1 July 2025. We also routinely provide training opportunities to our teams to support them to better support the people who access our services.

2.1.5 Improving How We Work

The IRO commenced a Continuous Improvement project in 2023 to implement recommendations from a Business Process Review completed in 2022. During 2024-25 the Continuous Improvement project delivered a range of changes to Resolve (our case management software), and associated processes, including:

- update to Resolve to streamline ILARS funding application management.
- updating operational workflows, including automated templates to improve consistency in communications about grant outcomes.
- improving the performance of the Centralised Email Management processes introduced last year to better match incoming correspondence from Approved Lawyers with the grant record within Resolve.
- introduced a trial Triage process to support the ILARS program by improving application processing times. Triage was independently reviewed in June 2025.

The Continuous Improvement project was

closed in June 2025. The IRO will commence work in 2025-26 to develop a new Operating Model which will align with a new IRO Strategy 2025-2030.

Data and Insights

Through the Continuous Improvement project, IRO has enhanced Resolve to address gaps in the data and information we collect and strengthen data quality, while introducing new reporting capabilities that make information more accessible and strategic for both internal and external stakeholders. These improvements are supported by updated data governance and security frameworks so that the data we hold is well-managed, accurate, and safeguarded.

We published a half yearly Performance Report in January 2025 and will develop a new data governance and reporting framework in 2025-26.

2.2 Stakeholder Engagement and Relationships

The needs and experience of people who are injured at work or on the roads and who need our support are central to how we approach our work. The network we operate within has a common focus of improving outcomes by upholding the rights and entitlements of people with claims.

We actively engage with a range of stakeholders including people who are injured and their representatives, their insurers, medical and health providers, legal providers, and other NSW Government agencies and tribunals in the NSW. IRO also regularly engages with other complaints handling bodies across NSW.

NSW Government Agency Partners

We continuously engage with SIRA, the Commission and icare to address issues for individuals where we have shared responsibility, as well as to examine and make improvements to address current and emerging issues in the schemes we oversee.

We updated our Memorandum of Understanding (MOU) with SIRA in February 2025. The MOU is an agreement about how information will be exchanged so that IRO and SIRA can each meet our legislative obligations. The MOU sets out the roles, responsibilities, and shared expectations between the two agencies, about how we exchange information and data to exercise our functions, respecting the independence of each entity.

Workers Compensation and Compulsory Third Party (CTP) Insurers

We work with insurers in both the NSW workers compensation and CTP schemes to negotiate outcomes to complaints and disputes. We also work with insurers where we identify issues in how they are handling and responding to issues raised by claimants and provide feedback based on insights identified through our functions.

The IRO is aiming to strengthen its organisational capability to undertake investigations and inquiries into matters affecting people injured at work under enabling legislation.

IRO Education

Throughout 2024-25, IRO engaged with key stakeholders representing workers, lawyers and insurers including Unions NSW and affiliate members, the NSW Self-Insurers Association, the Law Society of NSW's Injury Compensation Committee, Australian Lawyers Alliance and individual legal firms and insurers.

In March 2025, we conducted a series of seminars in Penrith, Wollongong, Newcastle and Orange, and an online seminar available to practitioners in other regional areas.

The Seminar Program offered educational content on case law, our operations, and associated observations of the experience of people injured at work and in motor vehicle crashes where disputes over claims and entitlements arise, and briefings on Trauma Informed Care to assist legal practitioners and insurer case workers in their engagement with people who have had traumatic workplace accidents. The seminars were attended by more than 500 stakeholders.

IRO also presented at external events such as the Legalwise Workers Compensation and Motor Accident Claims Conference in November 2024, and the Self Insurers Annual General Meeting in October 2024.

Publications

We published a series of resources during 2024-25 providing information on significant cases within the field of workers compensation to legal professionals who are engaged in representing or advising on the rights and entitlements of people injured at work. These Alerts target Approved Lawyers and the insurers we oversee. We published 27 *IRO Alerts and IRO News* in 2024-25.

In May 2025 we launched a new video that explains who we are, what we do, and how we can assist people with claims. The video is a practical resource for members of the community who may be unsure about where to turn for support. By making this information more accessible, we aim to give people greater confidence in navigating personal injury schemes and contacting us for assistance when they need it.

2.3 Corporate Governance

The Independent Review Officer is appointed by the Governor of NSW. The Independent Review Officer is responsible for ensuring that IRO and its staff operate in accordance with all legislative and government sector requirements.

IRO has an Executive Leadership Team to oversee the activities of the agency.

The IRO Audit and Risk Committee (ARC) is an independent advisory body that advises the IRO on financial and performance reporting, risk management, and internal controls. During this year the ARC has focused on financial reporting and risk identification and management strategies, including advising IRO on updates to our risk management framework and the development of a new risk improvement plan.

2.3.1 Internal Audit and Risk Management

IRO has adopted the DCS Risk Management Policy, Framework and Guide, as well as the DCS Compliance Management Policy and Framework. We also participate in the DCS Risk and Compliance Community of Practice.

The DCS provides IRO with internal audit services.

From February 2025 we commenced work to enhance the IRO Risk Management Framework. This includes establishing the foundation for a refreshed Risk Improvement Plan, assessing the IRO risk rating and risk appetite for each enterprise risk, and clearly delineating acceptable risks from those requiring active monitoring or mitigation.

An annual policy compliance review assesses whether current practices align with legislative requirements and internal governance standards. This is reviewed by the ARC.

For the Internal Audit and Risk Management Attestation Statement for 2024-25 for the IRO see Appendix 7.2.

Health Information Management and Security Audit (HIMSA)

As part of our 2024-25 Internal Audit Plan our management of health information was audited. We hold health information about people where we fund legal representation to address their disputes, and where they provide this information to us to assist them in managing a complaint with their insurer.

The 2024 Health Information Management and Security Audit identified a number of improvements to the way in which we handle, store and dispose of health information. This audit led to the establishment of a project to specifically uplift our records and information management systems and processes, particularly outside the Resolve system. We also commenced an active strategy to reduce health and personal information held outside Resolve.

A follow up audit on privacy management will be finalised in 2025-26 and will consider factors from the Health Privacy Principles (HPP) under the *Health Records and Information Privacy Act (2022)* related to collecting, storing, using and disclosing health information.

2.3.2 Cyber Security

IRO leverages the DCS Cyber Incident Response Plan and the DCS Information Security Management System (ISMS) as part of our shared services agreement. We manage cyber security risks, with DCS assistance, in a manner consistent with the Mandatory Requirements set out in the NSW Cyber Security Policy. IRO has undertaken significant governance uplift work in 2024-25 to improve our information management and security, mitigating the risks arising from any cyber security threats, particularly focused on our external interfaces, and our crown jewel system, Resolve, including:

- implementing a new IRO website with more secure server and hosting arrangements and undertaking penetration testing on the website.
- implementing ReCAPTCHA on the online IRO Complaints Form.
- formalised Resolve access and onboard/offboard policy and procedures.
- implementing a monthly Resolve log review to identify any suspicious log-in behaviour.

IRO also reviews its Business Continuity Plan (BCP) plan annually, which includes a cyber security threat response.

For the Cyber Security Annual Attestation Statement for the 2024-2025 Financial Year for the Department of Customer Service (Secretary – Department of Customer Service) see the Appendix 7.1.

2.3.3 Information Management

IRO manages personal and health information in accordance with the NSW Privacy and Health Privacy Principles (IPPs and HPPs), ensuring transparency, security, and respect for individual rights.

IRO has compliant mechanisms in place to safeguard our information and data through secure storage, limited retention, and appropriate disposal, aligning with the State Records Act and NSW Cyber Security Policy.

Personal and health information is used strictly for its intended purpose or with consent, and staff are trained annually on information handling and privacy requirements. These practices reflect IRO's obligations under the *Privacy and Personal Information Protection Act 1998* and the *Health Records and Information Privacy Act 2002*.

To support IRO's ongoing efforts in information management, a standalone retention schedule tailored to IRO's operations to mitigate personal information risks and support disposal compliance is being developed. This will help support long-term exposure to potential data breaches.

We commenced a project to review and enhance information and records management in March 2025 which will be fully implemented in 2025-26.







Operations & Performance

3.1 Methodology

This year's performance data has been prepared using an updated methodology and refined data queries to align with changes made in 2024-25 to Resolve. As a result, some figures in this report relating to previous years may show minor variations when compared with earlier publications. These adjustments reflect improvements in data accuracy and consistency and establish the new baseline against which our future performance will be measured.

3.2 Our Financial Performance

The IRO budget represents around 1.5% of total workers compensation scheme costs. In any given year the IRO supports thousands of people who have been injured at work or on the roads, through complaints, enquiries or funding for legal representation.

IRO has received budget enhancements from the Workers Compensation Fund of \$35m (2024-25 budget) and a further \$20m

(2025-26 budget). These uplifts have reflected the projected costs for ILARS based on the current demand and forecast model.

As at 30 June 2025 the IRO expenditure was \$115m against a budget of \$125.7m. The budget for 2025-26 is \$148.2m, which includes an operating budget of \$18.6m, and \$129.6m for grants under the ILARS Program.

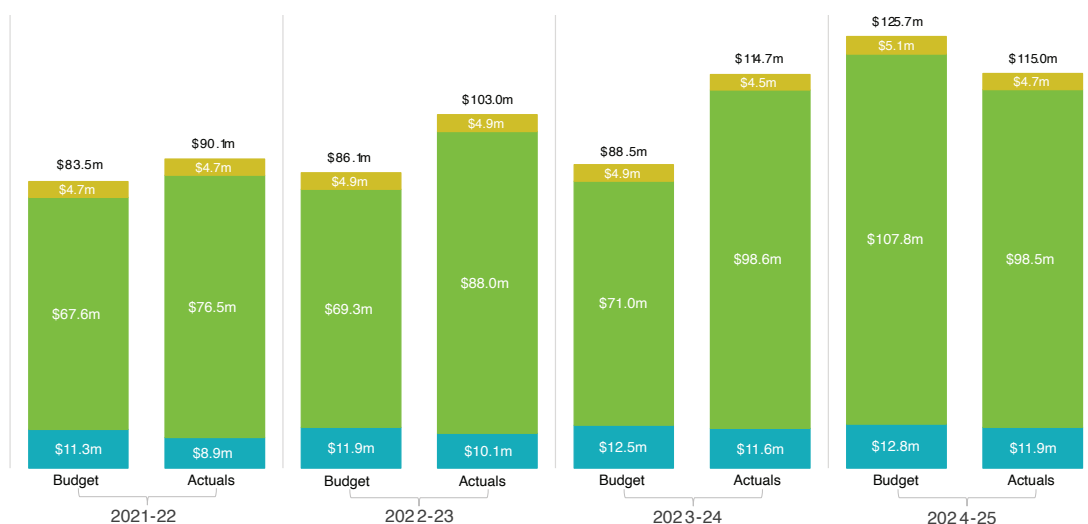
IRO operating costs represent around 3.7% of the total IRO budget.

3.3 Solutions

IRO takes complaints from people injured at work or in motor vehicle crashes. IRO officers carefully examine each person's claim to determine whether IRO can provide assistance through direct engagement with their insurer before escalating the matter to a legal dispute. IRO Solutions staff have deep knowledge of workers compensation law and extensive expertise in complaint handling, enabling them to quickly assess whether an insurer may have, for example, misinterpreted relevant legislative provisions or failed to meet their responsibilities in managing the claim.

Figure 1: Budget vs. actual expenditure by financial year

■ Employee ■ ILARS ■ Operational Expenditure



3.3.1 Complaints and Enquiries

In 2024-25, IRO received a total of 17,286 complaints and enquiries. This includes 10,241 combined workers compensation and CTP complaints and 7,045 combined workers compensation and CTP enquiries.

9,369 complaints were received from or on behalf of people injured at work, an increase of 13% compared to 2023-24 (8,303).

There has been a steady year-on-year increase in complaints and enquiries over the past four (4) years with complaints increasing by 47% since 2021-22. There has been no change in the IRO resourcing to handle complaints and enquiries during this time.

In 2024-25, the most common enquiry type across both the workers compensation and CTP schemes was how to make a claim (19%), followed by denial of liability (17%) and general case management (16%).

Table 1: Top Issues - All Enquiries in 2024-25

Enquiry Type	Proportion (%)
How to make a Claim	19%
Denial of liability	17%
General Case Management	16%
Query about Benefits	11%
Weekly Benefits	6%

The increase in complaints appears to reflect the overall increase in workers compensation claims in NSW, and an increasing awareness about the services provided by the IRO.

Table 2: Workers Compensation (WC) Enquiries and Complaints received by IRO 2021-22 to 2024-25

Financial Year	Enquiries Received	Complaints Received
2021-22	7,501	6,936
2022-23	7,680	7,615
2023-24	6,941	8,303
2024-25	6,776	9,369

CTP complaints represent 9% of the total complaints received in 2024-25. The types of complaints raised by people injured in motor vehicle crashes are similar to those raised by people injured at work, and include insurer delay in determining claims and requests, errors in weekly payments, and case management quality.

Of the complaints received in 2024-25, 872 were received from or on behalf of people injured in motor vehicle crashes, an 8% increase from 801 in the previous year. 269 enquiries were responded to this financial year, which is a reduction of 51% from 550 enquiries in 2023-24 (see Table 3).

The decrease in CTP enquiries may be attributed to legislative changes which came into effect on 1 April 2023.

Table 3: Compulsory Third Party (CTP) Enquiries and Complaints Received by IRO 2021-22 to 2024-25¹

Financial year	CTP Enquiries received	CTP Complaints received
2021-22	472	923
2022-23	983	892
2023-24	550	801
2024-25	269	872

¹ Note: IRO has no statutory obligation to report all enquiries or complaints to affiliated government entities, including those with which formal reporting arrangements are in place.

3.3.2 Providing an Accessible Complaints and Enquiries Service

IRO does not provide a face-to-face complaint and enquiries handling service. As a small agency providing support to anyone in NSW, we rely on phone, email and website channels to enable contact with us. Our channels for contact are accessible and enable people with more complex communication needs to engage with us.

Most people contact us by phone.

Table 4: Top Three (3) Contact Channels for All Enquiries and Complaints in 2024-25

Contact Channels For:	Proportion (%)
Enquiries	
Telephone	82%
Email	11%
Website	7%
Complaints	
Telephone	43%
Email	29%
Website	28%

We aim to resolve complaints as quickly as possible, and within the 30-day timeframe required under the PIC Act.

Most complaints we receive are resolved within two (2) weeks from the date that we took the complaint. This includes the time that it takes for us to contact the insurer, seek any information we may require from the insurer to assist in assessing their response to the complaint, providing recommendations and instructions to the insurer, and determine a final response and communicate this back to the person who made the complaint.

Where a complaint takes longer than the 30-day timeframe, this is due to the complexity of the matter and the need to obtain further information from a person or their insurer which may not be available within the timeframe required for us to resolve the complaint.

Table 5: Resolution Times – All Complaints in 2024-25

Includes resolution times for the top five common complaint types in conjunction with all CTP complaint types aggregated together.

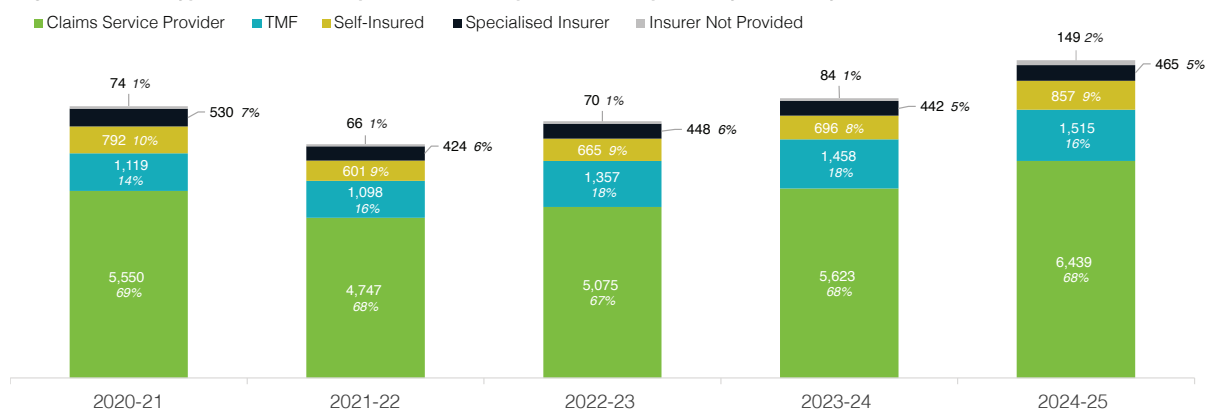
Complaint Type	Same Day	Next Day	Within Two Weeks	Between 14 and 30 Days	More than 30 Days
Delay in Determining Liability	4%	4%	79%	12%	1%
Delay in Payment	2%	3%	80%	13%	2%
Denial of Liability	18%	12%	61%	7%	2%
General Case Management	13%	9%	66%	10%	2%
Request for Documents	2%	5%	83%	8%	2%
All CTP Complaints	7%	7%	73%	11%	2%

3.3.3 Workers Compensation and CTP Insurers

The majority of complaints we deal with relate to insurers who are Claim Service Providers of icare. This reflects the structure of the workers compensation scheme in NSW and the volume of claims managed by these insurers.

The proportion of complaints and enquiries relating to each insurer group has not significantly changed in the 2024-25 period from previous years.

Figure 2: Insurer type breakdown of open workers compensation complaints by financial year



* Complaints marked 'Insurer Not Provided' usually result from phone hearing issues or fall outside IRO's statutory functions.
* Percentages are rounded up; totals may not equal 100%.

Table 6: Workers Compensation (WC) Enquiries and Complaints by Insurer Type in 2024-25*

Insurer Type	Proportion of Enquiries (%)	Proportion of Complaints (%)
Claims Service Provider	50%	68%
TMF	13%	16%
Self-insured	7%	9%
Specialised Insurer	4%	5%
Insurer Not Provided	26%	2%

Table 7: Compulsory Third Party (CTP) Enquiries and Complaints by Insurer in 2024-25*

Insurer	Proportion of Enquiries (%)	Proportion of Complaints (%)
NRMA	18%	34%
QBE	12%	28%
Allianz	7%	12%
GIO	6%	11%
AAMI	6%	10%
icare (CTP Care & Lifetime Care)	3%	3%
Youi	< 1%	1%
Insurer Not Provided	48%	2%

* As enquiries entail general advice and information, an insurer name is not always provided.

3.3.4 Common Types of Complaints – Workers Compensation

Delays by insurers in determining liability for claims and requests continues to be the most common type of workers compensation complaint received by IRO, accounting for 30% of all complaints received in 2024-25, consistent with the previous four (4) years.

This was followed by delays by insurers in making payments (20%), general case management experience (12%) and the insurer's denial of liability (11%).

In 2024-25, 53% of total complaints relating to delays in payment and 34% of complaints regarding delays in determining liability were resolved with outcomes favourable to the person making the complaint. 76% of complaints about general case management were resolved through the provision of information. Providing information typically involves facilitating communications with the insurer or advising the injured person on how to escalate their concern directly with the insurer.

Table 8: Top Five (5) Workers Compensation (WC) Complaint Types Received by IRO 2021-22 to 2024-25

Complaint Type	2021-22	2022-23	2023-24	2024-25
Delay in Determining Liability	26%	27%	30%	30%
Delay in Payment	21%	19%	23%	20%
Denial of Liability	10%	9%	10%	11%
General Case Management	11%	13%	9%	12%
Request for Documents	11%	10%	10%	10%

Case Study 3: Claim accepted following IRO intervention

Mr E's lawyer requested a review of his insurer's decision to apply a reasonable excuse to Mr E's claim. The insurer argued there was enough medical evidence to suggest Mr E's injury wasn't work-related, even though the certificate of capacity (COC) deemed his serious health issue to be the result of his employment. The insurer had made errors in their reasonable excuse advice. We contacted the insurer to address this and as a result of our intervention, the insurer agreed to start weekly benefits from the first day Mr E was unable to work.

Delay in Determining Liability

Delays by insurers in determining liability for workers compensation claims remain the most common subject of complaints to IRO, accounting for 30% of all complaints in 2024-25. While this has remained unchanged from the previous reporting period, it has continued to be the largest single issue for people accessing our services each year, growing from 26% in 2021-22 to 30% in 2023-24 to 2024-25 (see Table 8). This trend signals opportunities to improve claims management and enhance communication as well as the need for the review of medical treatment requests and approval of weekly benefit payments.

These complaints are also most commonly resolved following our intervention. Many claims are accepted after we engage with an insurer. This financial year IRO was able to resolve 34% of these complaints with a benefit to the complainant and 45% with information. This highlights the importance of timely information exchange and clearer communication between insurers, workers and employers to prevent unnecessary disputes.

Case Study 4: Employer failing to pass on weekly payments agreed by the insurer

Mr C called us because he had not been paid his workers compensation entitlements and was facing eviction from his home. He had complained to his employer and his insurer and had no result. Mr C's insurer had accepted the claim months earlier and released more than \$20,000 in entitlements to his employer. However, the employer had withheld payment as it did not agree with the insurer's decision to accept liability. We contacted the insurer and requested urgent action be taken to pay Mr C. As a result of our intervention, the employer released the payment to Mr C on the same day.

Delays in Payment

Delays in payments accounted for approximately 20% of all complaints in 2024-25. IRO was able to attain a benefit for complainants in 53% of workers compensation complaints in 2024-25. In addition, over 35% of these cases were resolved upon further information being provided or clarified.

Case Study 5: Weekly benefits increased by over \$1,000 a week

Ms F reached out to us after her insurer decided to stop weekly payments because she had work capacity for suitable work in her second job. We asked her insurer if her secondary employment was factored into their Pre-Injury Average Weekly Earnings (PIAWE) calculations. Although Ms F had provided payslips from her second job, the insurer had only used her primary job in the calculation. As a result of our intervention, the insurer recalculated her PIAWE and her weekly benefits increased by over \$1,000 a week.

Weekly Benefits complaints

Weekly benefits complaints were relatively consistent year-on-year, totaling 728 complaints in 2024-25 compared to 734 in the prior financial year (2023-24). IRO was able to resolve the majority of these (51%) with further information being provided to an insurer. The main reasons for this included insurer administrative error, reasonable excuse withdrawn after we raised the complaint or an employer error identified after the insurer took over payment of the benefits.

Complaints related to injury type

Complaints and inquiries about workplace injuries affecting the body are the highest volume of contacts received by IRO, and have been consistently the highest category of matters for the past four (4) years. There has been a steady growth in complaints relating to claims about psychological injury with these complaints increasing from 15% in 2020-21 to 22% in 2024-25, however this equates to only approximately 195 additional cases per year. Trauma to joints and ligaments fluctuated between 10% and 15%, whilst claims pertaining to fractures ranged from 3% to 4% indicating no consistent upward or downward trend.

Case Study 6: Acceptance of Liability with weekly benefit payments and medical and related treatment

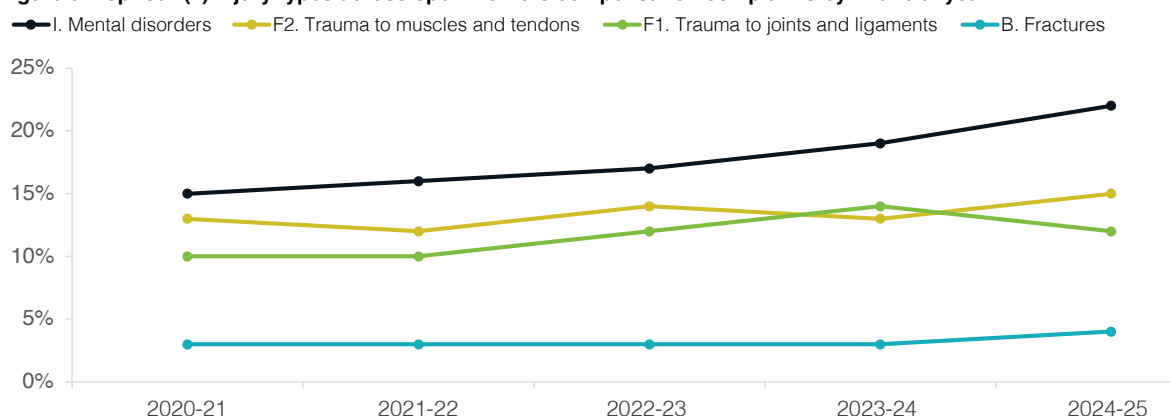
Mr J's Approved Lawyer contacted ILARS requesting funding to make an application to the Commission after Mr J received section 78 notice declining liability for his workplace injury. The insurer had also raised a late notification of injury as a reason to dispute the claim. Although the insurer later modified its decision after a review which was also instigated by the Approved Lawyer, it maintained the dispute on late notification grounds.

In assessing the Approved Lawyer's application for funding, we identified that the insurer had failed to apply the correct deeming provisions for Mr J's injuries. The insurer had incorrectly recorded Mr J's date of injury as the date he started employment, several years before his incapacity began.

The insurer accepted liability for the claim following our intervention, avoiding the need for the commission proceedings, which would have significantly delayed Mr J receiving weekly benefits and medical and related treatment that he was entitled to, and funding through the ILARS program.

The following figure illustrates the breakdown of complaints and enquiries about workplace injuries relating to psychological injury and each of the type of injuries relating to the body.

Figure 3: Top four (4) injury types across open workers compensation complaints by financial year



* Injury types are not recorded consistently across all complaints. This graph shows percentage proportions only for complaints where the injury type was provided.

3.3.5 Common Types of Complaints – CTP

The most common CTP complaint issue handled by IRO concerned the person's treatment and care (27%), which often related to an injured person needing to seek approval or reimbursement for treatment or care services from their insurer. This issue is closely followed by complaints about access to income support and weekly payments (24%).

When a person is injured in a motor vehicle crash and experiences a loss of earnings, they may be entitled to income support, which compensates them for some of the income they have lost due to time off work. Complaints arise if payments are varied or stopped entirely without the insurer providing clear reasons for the change.

Issues with the quality of CTP case management accounted for 12% of complaints and included challenges in accurately calculating pre-accident weekly earnings (PAWE) or not commencing weekly payments in a timely manner.

Table 9: Top Three (3) Compulsory Third Party (CTP) Complaint Types Received 2022-23 to 2024-25

Complaint Type	2021-22	2022-23	2023-24	2024-25
Treatment and Care	17%	16%	29%	27%
Income Support/Weekly Payments	16%	21%	25%	24%
Case Manager	11%	20%	12%	12%

Case Study 7: Declined claim overturned following intervention by IRO

Mr B was injured in a car accident as a pedestrian. He submitted a claim and completed a search to identify the at-fault vehicle at his insurer's request. Mr B requested urgent physiotherapy and other treatment, but his claim was denied. He requested an internal review of that decision by his insurer, but the decision to deny the claim was upheld. We made representations to his insurer pointing out that they were required to determine the claim within two (2) months of being notified. Following our intervention, the insurer amended their decision and accepted the claim for up to 52 weeks.

3.3.6 Intervention to Avoid Legal Representation Costs

IRO actively redirects applications for funding for legal representation where it is identified that an earlier solution may be possible.

The most common type of early solution matters for 2024-25 were no response to claim (NRTC) matters, where an ILARS grant is sought to commence proceedings to the Commission, on the basis that the insurer has failed to respond to a claim or review a request within the required legislative timeframes. In 2024-25, there was a relative decline in the matters suitable for early intervention and resolution compared to 2023-24. The decrease which has occurred for three consecutive financial years, can in large part be attributed to IRO raising awareness of these issues with insurers.

Table 10: IRO NRTC Matters Received in 2021-22 to 2024-25

Financial Year	NRTC Matters Received
2021-22	729
2022-23	614
2023-24	599
2024-25	589

Table 11: No Response to Claim (NRTC) Issues for Matters Closed in 2024-25

The 'Other' category includes Workplace Injury Management, Initial Notifications, and Work Capacity Decisions.

NRTC Issue	Proportion
Section 66	39%
Section 287A	33%
Section 60	9%
Weekly Benefits	7%
Delay in Determining Liability	6%
Denial of Liability	5%
Other	1%

In this table:

Section 66 refers to: entitlements to lump sum compensation for permanent impairment.

Section 287A refers to relates to the process for resolving disputes about permanent impairment compensation.

Case Study 8: Provisional payments commenced, treatment approved and IME appointment scheduled closer to home

Mr H contacted us because there were delays with the insurer determining their claim and because the insurer requested he attend an Independent Medical Examination (IME) more than 600 km from his home. We raised a complaint with the insurer and were able to get the insurer to accept liability for the injury, commence provisional payments and approve treatment. The insurer also arranged an IME close to Mr H's home and covered transport to and from the appointment.

3.3.7 Positive Outcomes

In 2024-25, 97% of complaints finalised were resolved in the year they were received (and the vast majority well within the 30-day period required). There were 23% where the worker received a benefit (for example, approval of treatment or payments of compensation), 23% in which information was provided and 15% that resulted in additional action by the insurer (for example, cancelling or moving a medical examination).

Table 12: Workers Compensation (WC) Outcomes in 2024-25

Outcome Achieved	Proportion
Resolved – Information Provided	38%
Resolved – Benefit	23%
Resolved – Action	15%
Resolved – Referred to Appropriate Entity	12%
Not Resolved	12%

Table 13: Workers Compensation (WC) and Compulsory Third Party (CTP) Complaints Outcomes by Insurer Type for 2024-25

Outcome Achieved	Claims Service Provider	TMF	Self-Insurer	Specialised Insurer	CTP Insurer
Resolved – Information Provided	39%	37%	41%	40%	24%
Resolved – Benefit	26%	23%	24%	27%	13%
Resolved – Action	11%	10%	14%	9%	17%
Resolved – Referred to Appropriate Entity	12%	15%	10%	11%	33%
Not Resolved	12%	15%	11%	13%	12%

3.3.8 Complaints Made But Not Finalised in 2024-25

The PIC Act requires IRO to report annually on the number and type of complaints made but not dealt with in each financial year. There were 285 workers compensation and 20 CTP complaints made during 2024-25 that remained open as at 1 July 2025. The vast majority of these complaints had been received during June 2025.

3.4 Independent Legal Assistance and Review Service (ILARS)

IRO manages and administers ILARS to provide funding through Approved Lawyers for legal and associated costs for workers who need legal advice, support or representation regarding decisions of insurers, or pursuing a claim and assistance in finding solutions for disputes between a worker and their insurer.

Only lawyers who have been approved by the Independent Review Officer are able to apply for funding and provide assistance to eligible workers under compensation legislation.

We approve funding for matters that comply with the parameters for ILARS as prescribed under the PIC Act where:

- reasonable steps have been taken to resolve matters with insurers (such as following an internal review);
- insurer responses have been sought where claims have not been addressed within legislated timeframes;
- there is a demonstrated need for an Approved Lawyer to undertake detailed investigation and negotiation on behalf of the person; and
- there are demonstrated prospects of success in a matter, including evidence that it is reasonably necessary to fund the proposed medico-legal and other reports to support the dispute.

3.4.1 Demand for ILARS Funding

During 2024-25, IRO received 29,561 grant applications from Approved Lawyers. This represents a 17% increase in new applications from 2023-24.

Table 14: Number of New ILARS Grant Applications Received by IRO 2021-22 to 2024-25*

Financial Year	Grant Applications Received
2021-22	20,153
2022-23	22,642
2023-24	25,345
2024-25*	29,561

**The above historical figures are consistent with previously published data, although minor variances arise from the application of the FY24-25 data methodology outlined at the start of this report.*

Demand for ILARS is strongly influenced by factors external to IRO including:

- the complexity of workers compensation legislation which means people need advice about their rights and entitlements,
- insurer decisions to proceed with legal representation to deny a claim or entitlement, and
- increases in activity in the workers compensation scheme, such as more workers on weekly payments, more claims and increased major claims.

This financial year, the majority of applications for ILARS funding requests relate to disputes about permanent impairment.

People seeking advice about their rights and prospects of pursuing a dispute in the Commission represents the most prevalent type of ILARS grants. Grants for legal advice, which vary in cost from \$800 to \$1,200, accounted for a high volume of these applications this financial year at 41%.

Most ILARS grants are finalised without the need to proceed to the Commission (43%), either because the claim does not go ahead or because it is resolved before reaching a formal dispute.

Case Study 9: No Response to Claim - Updated PIAWE calculation with back pay of almost \$21,000 for the injured worker

Mr K's representative contacted the IRO because his insurer had failed to respond to a request for review of his pre-injury average weekly earnings (PIAWE).

Without a response, his weekly benefits could not be properly adjusted. The IRO issued a Notice of No Response to Claim (NRTC) to the insurer and requested urgent action.

On the same day, the insurer reviewed Mr K's PIAWE, acknowledged an error in their earlier calculation, and provided a revised assessment. This resulted in back pay of almost \$21,000 and an increase in Mr K's ongoing weekly benefits going forward.

In 2024-25, 93% of all grant applications for initial grant of funding were approved (4% decrease from 97% in 2023/24), with 95% of grants approvals processed within 14 days.

Average grant process time was within 6 days of receipt (60% increase from 3.3 days in 2023-24)

This modest increase in processing times is due to higher volumes of ILARS grant applications in comparison to the previous year.

A notable proportion of ILARS matters received by the IRO relate to disputes about claims for trauma to joints and ligaments. This accounted for 32% of grant applications received in 2024-25.

Table 15: ILARS Grant Approvals by Top Dispute Types 2021-22 to 2024-25

Dispute Type	2021-22	2022-23	2023-24	2024-25
Stage 1 Funding	4,384	5,411	6,534	11,160
Permanent Impairment	6,573	7,119	7,368	6,074
Advice Only	3,898	4,254	4,717	3,037
Denial of Liability	1,250	1,574	1,983	2,434
Medical Treatment	1,300	1,369	1,591	1,939

Case study 10: Medical evidence not supportive

The insurer denied liability for Ms M's claim, asserting that her workplace injury did not arise from her employment nor contribute to it.

Ms M engaged an Approved Lawyer who sought funding to challenge this decision. We approved the funding to enable the Approved Lawyer to investigate the claim. The lawyer arranged the necessary examinations and reviewed the claim material, the report from an independent medical assessor found no symptoms before the worker ceased employment and that Ms M's symptoms were secondary to her job loss and inability to find subsequent work.

The Approved Lawyer provided advice to Ms M that there were no reasonable prospects of success in challenging the insurer's liability decision. Costs were paid by IRO for investigation by the approved lawyer and the grant was closed.

3.4.2 Outcomes

Resolutions of disputes achieved as a result of access to legal representation increased from 15,574 in 2021-22 to 21,978 in 2024-25, a growth of about 41% over four years.

While the absolute number of final outcomes has risen, their proportion has steadily declined from 56% to 47% over the same period. In contrast, matters with 'no final outcome' now represent the majority of cases, increasing from 44% in 2021-22 to 53% in 2024-25.

A valid reason for providing funding under ILARS is to assist a worker with legal advice

to determine whether a claim or dispute is available to the worker. Workers compensation law is complex. Determining whether a dispute has prospects is often not a straightforward matter and requires comprehensive examination of a person's claim and a range of evidence that may be necessary to validate those prospects, including medical evidence.

Therefore, a 'no final outcome' in the current reporting framework does not indicate that the purpose of the funding has not been achieved.

IRO will be reviewing its reporting framework in 2025-26 to better reflect the impact of its investment in ILARS for people who are injured at work.

Table 16: Resolutions Achieved for All Finalised ILARS Grants 2021-22 to 2024-25

Financial Year	Final Outcome Achieved		No Final Outcome Achieved	
	Finalised ILARS Grants	Proportion (%)	Finalised ILARS Grants	Proportion (%)
2021-22	8,728	56%	6,846	44%
2022-23	10,005	52%	9,319	48%
2023-24	10,543	52%	9,874	48%
2024-25	10,321	47%	11,657	53%

Over the past four years, the split between matters resolved at the Commission or other jurisdiction and through pre-proceedings has remained relatively consistent, with the majority of matters consistently resolved through pre-proceedings. However, there has been a slight

shift over time, with pre-proceeding resolutions decreasing from 57% in 2021-22 to 55% in 2024-25, while resolutions at the Commission or other court or tribunal have increased from 43% to 45%.

Table 17: Outcome Types for Finalised ILARS Grants 2021-22 to 2024-25

Financial Year	Commission or Court		Pre-Proceedings		Other Outcome	
	Finalised ILARS Grants	Proportion (%)	Finalised ILARS Grants	Proportion (%)	Finalised ILARS Grants	Proportion (%)
2021-22	3,743	43%	4,981	57%	4	< 1%
2022-23	4,582	46%	5,416	54%	7	< 1%
2023-24	4,876	46%	5,660	54%	7	< 1%
2024-25	4,662	45%	5,647	55%	12	< 1%

Table 18: Top 5 ILARS Grant Applications Received in 2024-25 by Nature of Injury

Nature of Injury	Proportion (%)
Trauma to joints and ligaments	32%
Mental disorders	25%
Trauma to muscles and tendons	12%
Nervous system and sense organ diseases	12%
Wounds, lacerations, amputations, and internal organ damage	4%

3.5.3 Funding to Approved Lawyers

As at 30 June 2025, there were 943 lawyers approved to apply for grants of funding under ILARS. In addition, there were 203 barristers approved by IRO to represent people injured at work in the Commission or other court or tribunal.

We publish a list of law firms engaging Approved Lawyers that received funding during the year, reflecting our transparency obligations under the NSW Government's Grants Administration Framework. For more detail, please refer to Table 41 in Appendix 7.3.

IRO has Practice Standards which represent the minimum standards expected of Approved Lawyers. These standards also aim to help injured workers understand what they can expect from their lawyer.

Although the IRO approves Approved Lawyers as individual practitioners, these Approved Lawyers are themselves engaged by legal firms. It is these firms that the IRO pays. The funding that is payable for each matter is determined at the conclusion of the legal relationship between the Approved Lawyer and the person they are representing, or when an outcome is achieved.

Fees paid include professional fees, and disbursements.

Where an Approved Lawyer is dissatisfied with a funding decision, they may seek a review of the decision.

In 2024-25, we received 147 applications for reviews of funding decisions, of which 82% were upheld (no change in decision), and 18% resulted in a new decision. Additionally, we received 16 applications for reviews of decisions of the Director ILARS by the Independent Review Officer. Of those reviews, 11 were upheld.

The following tables show the total grants and disbursements paid to legal firms where Approved Lawyers were engaged.

Table 19: Top Grant-Related Expenses Paid to Law Firms in 2024-25*

Note, that this includes both direct payments and invoiced expenses related to grants administered by the law firms. The amounts paid reflect grants that were approved and processed from 1-July-2024 to 30-June-2025, based on data from IRO's internal case management system. There may be discrepancies compared to financial system (SAP) records due to timing differences between system updates. These are reviewed and resolved as a part of regular financial reconciliation processes.

Law Firm	Total Matters	Total Amount Paid
Turner Freeman Lawyers	3,196	\$12.4m
Law Partners Personal Injury Lawyers	2,288	\$9.2m
Industrial Deafness Australia	1,442	\$4.0m
Carroll & O'Dea	1,235	\$5.2m
Longton Compensation Lawyers	1,090	\$1.8m
Walker Law Group	824	\$4.2m
Brydens Lawyers	738	\$2.5m

**Amounts have been rounded to the nearest thousand or million, with one decimal place shown where relevant.*

Table 20: Top Disbursement Amounts Paid to Law Firms in 2024-25*

The values in this table include both direct payments and invoiced expenses related to grants administered by the law firms. The amounts paid reflect grants that were approved and processed from 1-July-2024 to 30-June-2025, based on data from IRO's internal case management system. There may be discrepancies compared to financial system (SAP) records due to timing differences between system updates. These are reviewed and resolved as a part of regular financial reconciliation processes.

Law Firm	Disbursement Type			Total Amount Paid
	Medico-Legal	Barrister Fees	Ancillary Costs	
Turner Freeman Lawyers	\$5.3m	\$530,000	\$65,700	\$5.9m
Law Partners Personal Injury Lawyers	\$4.0m	\$363,800	\$71,000	\$4.5m
Industrial Deafness Australia	\$1.4m	\$22,400	\$12,600	\$1.4m
Carroll & O'Dea	\$1.8m	\$318,800	\$50,100	\$2.2m
Longton Compensation Lawyers	\$6.2m	\$55,500	\$31,500	\$0.71m
Walker Law Group	\$1.7m	\$256,300	\$38,600	\$2.0m
Brydens Lawyers	\$1.0m	\$93,700	\$43,700	\$1.2m

*Amounts have been rounded to the nearest thousand or million, with one decimal place shown where relevant.

Table 21: Top Professional Fee Amounts Paid to Law Firms in 2024-25*

The value in this table includes both direct payments and invoiced expenses related to grants administered by the law firms. The amounts paid reflect grants that were approved and processed from 1-July-2024 to 30-June-2025, based on data from IRO's internal case management system. There may be discrepancies compared to financial system (SAP) records due to timing differences between system updates. These are reviewed and resolved as a part of regular financial reconciliation processes.

Law Firm	Professional Fee Type		Total Amount Paid
	Professional Fees	Appeals**	
Turner Freeman Lawyers	\$6.4m	\$75,500	\$6.5m
Law Partners Personal Injury Lawyers	\$4.6m	\$53,500	\$4.7m
Industrial Deafness Australia	\$2.6m	\$6,500	\$2.6m
Carroll & O'Dea	\$2.9m	\$57,500	\$3.0m
Longton Compensation Lawyers	\$1.0m	\$7,000	\$1.1m
Walker Law Group	\$2.01m	\$18,500	\$2.2m
Brydens Lawyers	\$1.03m	\$7,000	\$1.3m

*Amounts have been rounded to the nearest thousand or million, with one decimal place shown where relevant.

**The cost of appeals is determined by IRO's Appeals Policy.

3.4.4 Fair Outcomes

In 2024-25, 21,978 ILARS grants were finalised, representing a 10% increase from the previous year when 20,047 grants were finalised.

19% of matters progress to resolution within the Commission. Of those matters that did proceed to the Commission, overwhelmingly there was a finding in favour of the worker – that is, the worker received a benefit that was not available to them prior to hearing.

The relatively small proportions of instructions withdrawn (6%), ILARS funding withdrawn (3%), and appeals (1%) indicates that once a grant proceeds beyond the preliminary stage, the majority of cases have prospects and are effectively supported through to resolution.

ILARS works effectively in promoting early closure of matters while having a strong success rate of more complex matters being referred to the Commission.

Table 22: ILARS Grant Outcomes in 2024-25

ILARS Outcome	Proportion (%)
Not Proceeding After Preliminary Grant	44%
Resolved Prior to Commission	27%
Resolved in Commission	19%
Instructions Withdrawn	6%
ILARS Funding Withdrawn	3%
Appeals	1%



Four

MANAGEMENT & ACCOUNTABILITY



Management & Accountability

4.1 Corporate Information Reporting

4.1.1 Privacy

There were no internal reviews conducted by IRO under the *Privacy and Personal Information Protection Act 1998* (NSW) (PPIPA) in 2024-25.

During the reporting period, we participated in 2025 Privacy Awareness Week, provided staff with training on privacy awareness, and continued to have privacy champions across IRO.

The IRO Privacy Management Plan (PMP) and Agency Information Guide (AIG) are available on the IRO website.

An IRO Privacy Breach register is maintained to support staff in responding to and recording data breaches at IRO. No eligible data breaches under the NSW Mandatory Notification of Data Breach (MNDB) Scheme were reported or notified in 2024-25.

4.1.2 Right to Information

The *Government Information (Public Access) Act 2009* (the GIPA Act) provides members of the public with the right to access government information.

During the 2024-25 reporting period, we received five (5) GIPA applications.

We also facilitated access to information requested informally from a number of members of the community (principally in relation to information about their own matters or complaints).

The information required to be reported under the GIPA Act for this reporting period is set out below.

Table 23: Number of applications by type of applicant and outcome 2024-25

Applicant type	Access granted in full	Access granted in part	Access refused in full	Information not held	Information already released	Refuse to deal with application	Refuse to confirm/ deny information held	Application withdrawn
Media	-	-	-	-	-	-	-	-
Member of Parliament	-	-	-	-	-	-	-	-
Private sector business	-	-	-	-	-	-	-	-
Non-for-profit organisation or community group	-	-	-	-	-	-	-	-
Member of the public (application by legal representative)	-	-	-	-	-	-	-	-
Member of the public (other)	3	-	-	-	-	-	-	-

Note: More than one decision can be made in respect of a particular access application. If so, a recording must be made in relation to each such decision. This also applies to Table 24.

Table 24: Number of applications by type of application and outcome 2024-25

Applicant type	Access granted in full	Access granted in part	Access refused in full	Information not held	Information already released	Refuse to deal with application	Refuse to confirm/ deny information held	Application withdrawn
Personal information applications	3	-	-	-	-	-	-	-
Access applications (other than personal information applications)	-	-	-	-	-	-	-	-
Applications that are partly personal information applications and partly other applications)	-	-	-	-	-	-	-	-

Note: A personal information application is an access application for personal information (as defined in section 4 of the GIPA Act) about the applicant (the applicant being an individual).

Table 25: Invalid applications 2024-25

Reason for invalidity	Number of applications
Application does not comply with formal requirements (section 41 of GIPA Act)	2
Application is for excluded information of the agency (section 43 of GIPA Act)	0
Application contravenes restraint order (section 110 of GIPA Act)	0
Total number of invalid applications received	2
Invalid applications that subsequently became valid applications	0

Table 26: Conclusive presumption of overriding public interest against disclosure: matters listed in Schedule 1 to the GIPA Act 2024-25

Reason	Number of times consideration used
Overriding secrecy laws	0
Cabinet information	0
Executive Council information	0
Contempt	0
Legal professional privilege	0
Excluded information	0
Documents affecting law enforcement and public safety	0
Transport safety	0
Adoption	0
Care and protection of children	0
Ministerial Code of Conduct	0
Aboriginal and environmental heritage	0
Information about complaints to Judicial Commission	0
Information about authorised transactions under <i>Electricity Network Assets (Authorised Transactions) Act 2015</i> (NSW)	0
Information about authorised transactions under <i>Land and Property Information NSW (Authorised Transaction) Act 2016</i> (NSW)	0

Table 27: Other public interest considerations against disclosure: matters listed in table to section 14 of GIPA Act 2024-25

Reason	Number of occasions when application not successful
Responsible and effective government	0
Law enforcement and security	0
Individual rights, judicial processes and natural justice	0
Business interests of agencies and other persons	0
Environment, culture, economy and general matters	0
Secrecy provisions	0
Exempt documents under interstate Freedom of Information legislation	0

Table 28: Timelines 2024-25

Timeframe	Number of applications
Decided within the statutory timeframe (20 days plus any extensions)	1
Decided after 35 days (by agreement with applicant)	2
Not decided within time (deemed refusal)	0
Total	3

Table 29: Number of applications reviewed under Part 5 of the GIPA Act (by type of review and outcome) 2024-25

Review type	Decision varied	Decision upheld	Total
Internal review	0	0	0
Review by Information Commissioner	0	0	0
Internal review following recommendation under section 93 of GIPA Act	0	0	0
Review by NSW Civil and Administrative Tribunal	0	0	0
Total	0	0	0

Table 30: Applications for review under Part 5 of the GIPA Act (by type of applicant) 2024-25

Applicant	Number of applications for review
Applications by access applicants	0
Applications by persons to whom information the subject of access applications relates (see section 54 of the GIPA Act)	0

Table 31: Applications transferred to other agencies under Division 2 of Part 4 of the GIPA Act (by type of transfer) 2024-25

Type of transfer	Number of applications transferred
Agency initiated transfers	0
Applicant initiated transfers	0

4.1.3 Public Interest Disclosures

IRO has adopted the Department of Customer Service Public Interest Disclosure (PID) Policy. This Policy provides guidance for staff on the process for making public interest disclosures, as well as advice on the support and protections available to them when making a disclosure.

IRO has an arrangement with DCS under Section 81 of the *Public Interest Disclosure Act 2022* (the PID Act) for DCS to exercise PID functions on behalf of IRO.

The DCS Investigations and Corruption Prevention team receives reports of fraud, corruption and maladministration matters, which are assessed and investigated as required, including Public Interest Disclosures. The team also advises management on corruption prevention, risk and improvements, and facilitates referrals to the Independent Commission and the NSW Ombudsman.

The arrangement IRO has with DCS is published on our website.

4.1.4 Consultants

Table 32: Use of consultants 2024-25

Consultant	Category	Purpose	Amount (\$)
Protiviti	Management Service	Professional Service Fees for the IRO Privacy Review of Exchanging Health Information	\$59,333*
Taylor Fry	Management Service	ILARS Demand and Forecast model – Analysis and report	\$113,120
Total			\$172,453

*This was an internal audit related cost

The total cost of producing this report was \$5,835.

4.1.5 Consumer Response: Complaints and Compliments

The best source of information about the quality of our services is from the people who use them. Further to gathering feedback through the ongoing user experience surveys covered earlier in this Annual Report, we also gathered insights in the form of complaints, feedback or compliments about us. The receipt and management of complaints, feedback and compliments is informed by the IRO Complaints and Compliments Policy and the IRO Unreasonable Conduct Policy and Procedure. IRO handles complaints and enquiries in accordance with the IRO Complaint Handling Protocol (Protocol). These policies and the Protocol are available on our website.

IRO received 14 complaints and 30 compliments from 1 July 2024 to 30 June 2025.

Complaints and compliments received in this financial year have assisted us in identifying areas for further improvement in our procedures and service delivery.

These policies will be reviewed in 2024-25 as will our Internal Review protocols.

Table 33: IRO complaints received by outcome and type for 2024-25

Complaint type						
		Practice, policy or procedure	Aspect of our service	Staff behaviour or conduct	Internal Review of decision	Total
Complaint outcome	Complaint sustained	0	0	1	0	1
	Complaint sustained in part	0	2	4	0	6
	Complaint not sustained	0	1	2	4	7
	Total	0	3	7	4	14

4.2 Employment and Senior Executive Statistics

4.2.1 Senior Executives and Salaries by Band for 2024-25

IRO had three senior executive positions as at 30 June 2025. The details of the levels of the IRO executive positions and corresponding remuneration are shown below.

Following the resignation of one female Band 1 staff member in January 2025, all Band 1 positions are male as of 30 June 2025.

The Independent Review Officer is a statutory role, remunerated in accordance with determinations of the Statutory and Other Officers Remuneration Tribunal and is not included in the figures below.

Table 34: Senior executive salaries 2024-25

Employment Category	Female	Male	Range \$	Average Range \$
Band 3	0	0	\$361,301- \$509,250	-
Band 2	0	1*	\$287,201 - \$361,300	-
Band 1	1	3	\$201,350- \$287,200	-
Total	1	3	-	-

Note: * SEB 1 – Acting Up Role - IRO

4.2.2 Employee Relations Policies and Practices

As at 30 June 2025, there were 87 people below the senior executive level working for the IRO on an ongoing and temporary basis in either a full time or part time capacity. There were eight (8) contractors.

Table 35: Number of employees by employment category

Employment Category	Number of Employees in 2024-25	Number of Employees in 2023-24
Grade 11/12	31	29
Grade 9/10	8	6
Grade 7/8	19	14
Grade 5/6	23	18
Grade 3/4	6	2

No exceptional movements in wages, salaries or allowances were made in 2024-25.

In 2024-25 IRO participated in the NSW Government Graduate Program. The program involves graduates rotating into IRO for a term of six months, providing them with structured and rewarding experiences to develop capabilities relevant to working across the business, as well as skills relevant to their professional discipline and organisational needs. Two (2) graduates were placed with IRO during this period.

4.3 Risk and Insurance Reporting

4.3.1 Business Risk Insurance

During 2024-25, IRO insurance coverage was provided through icare.

4.3.2 Liability Management Performance

IRO's demand and expenditure forecast model for ILARS, includes a calculation of the contingent liability for all open ILARS grants. The model has been run at the end of each quarter of the reporting period.

The model run for quarter 4 of 2024-25 reflected a contingent liability amount of \$149.87m and the total open grants was 40,575 as at 30 June 2025.

In line with the disclosures in the accounts, that this contingent liability represents a hypothetical maximum and it is unlikely that the full amount will be realised, as not all open IRO grants will result in a payment and actual outcomes may be significantly lower.

4.3.3 Account Payable Performance

IRO aims to pay all its invoices within 30 days unless legislatively required to pay earlier.

IRO uses purchase cards (PCards) for the payment of low dollar-value transactions. PCards are also used for other IRO expense categories where transactions are \$10,000 or less in value and are not subject to a contractual requirement for a Purchase Order.

IRO aims to pay law firms and medical report providers for legal grants and disbursements managed by ILARS within 30 days. Law firms are not designated as small businesses in the payments system by IRO.

During 2024-25, there were no instances where penalty interest was paid for the late payment of invoices.

Table 36: Aged accounts payable analysis at the end of each quarter (for 2024-25):

Quarter	Current	Less than 30 days overdue	Between 30 and 60 days overdue	Between 61 and 90 days overdue	More than 90 days overdue	Total
All vendors						
Quarter 1 (July-Sept 24)	\$23,687,844	\$601,612	-	-	-	\$24,289,456
Quarter 2 (Oct - Dec 24)	\$26,484,107	\$842,414	-	-	-	\$27,326,521
Quarter 3 (Jan-March 25)	\$27,295,876	\$2,554,287	\$880	-	-	\$29,851,043
Quarter 4 (April – June 25)	\$25,184,261	\$899,192	-	\$3,779	-	\$26,087,232
Small business vendors						
Quarter 1 (July-Sept 24)	\$891,987	-	-	-	-	\$891,987
Quarter 2 (Oct - Dec 24)	\$847,136	\$81,810	-	-	-	\$928,946
Quarter 3 (Jan-March 25)	\$1,281,656	\$229,825	-	-	-	\$1,511,481
Quarter 4 (April – June 25)	\$755,222	\$207,240	-	-	-	\$962,462

Note: A small business is defined as a NSW business with less than 20 employees that supply to participating NSW Government agencies (www.smallbusiness.nsw.gov.au/what-we-do/our-work/faster-payment-terms). IRO's payment system does not distinguish law firms that are small businesses when making payments on approved invoices to acquit ILARS Grants of Funding, and invoices from the law firms are therefore not included in the 'small business vendors' report.

4.3.4 Accounts Due or Paid Within Each Quarter

Table 37: Accounts due or paid by per quarter in 2024-25; all vendors

Measure	Quarter 1 (July-Sept 24)	Quarter 2 (Oct - Dec 24)	Quarter 3 (Jan-March 25)	Quarter 4 (April – June 25)
Number of invoices due for payment	4,453	5,182	5,787	5,678
Number of invoices paid on time	4,447	5,173	5,308	5,667
Percentage of invoices paid on time (based on number of invoices)	99.87%	99.83%	91.72%	99.81%
Amount due for payment	\$24,289,456	\$27,326,521	\$29,851,043	\$26,087,232
Amount paid on time	\$23,687,844	\$26,484,107	\$27,295,876	\$25,184,261
Actual percentage of accounts paid on time (based on \$)	97.52%	96.92%	91.44%	96.54%
Number of payments for interest on overdue accounts	-	-	-	-
Interest paid on late accounts	-	-	-	-

4.3.5 Small Business Vendors

Table 38: Small business vendors

Measure	Quarter 1 (July-Sept 24)	Quarter 2 (Oct - Dec 24)	Quarter 3 (Jan-March 25)	Quarter 4 (April – June 25)
Number of invoices due for payment	16	13	19	15
Number of invoices paid on time	16	11	15	13
Percentage of invoices paid on time (based on number of invoices)	100%	84.62%	78.95%	86.67%
Amount due for payment	\$891,987	\$928,946	\$1,511,481	\$962,462
Amount paid on time	\$891,987	\$847,136	\$1,281,656	\$755,222
Actual percentage of accounts paid on time (based on \$)	100%	91.19%	84.79%	78.47%
Number of payments for interest on overdue accounts	-	-	-	-

Note: The report does not include payments made to employees, or payments related to payroll and superannuation. All numbers are reported as at 30 days from receipt of a correctly rendered invoice. IRO's payment system does not distinguish law firms that are small businesses when making payments on approved invoices to acquit ILARS Grants of Funding, and invoices from the law firms are therefore not included in the 'small business vendors' report.







Sustainability

5.1 Economic and Social Impacts

The IRO plays a vital role in supporting fair and equitable outcomes for people navigating workers compensation and CTP complaints and disputes. Through the administration of the ILARS program, funding decisions are made on clear merit principles, ensuring access to legal support where there are prospects of a positive resolution under the enabling legislation. By identifying systemic issues through enquiries and providing regular insights on disputes and complaint trends to SIRA, IRO contributes to the long-term sustainability and integrity of the workers compensation scheme.

- continued a program to make available high-value courses that would support team members to develop their careers. Several team members were funded to undertake courses in public sector leadership, mediation and process improvement methods.
- sponsored attendance by team members at various stakeholder conferences, and online seminars on topics broaching managing psychological injury and psychosocial hazards.
- ran events to promote wellbeing and keeping staff connected, including face-to-face and online catch ups. The feedback received from staff indicated they enjoyed the opportunity to engage with their colleagues.

5.2 Our Sustainability Performance

5.2.1 Work Health and Safety (WHS)

IRO is committed to providing a safe, equitable and productive working environment for our staff which supports the requirements of the *Work Health and Safety Act 2011* (NSW). During the reporting year, IRO undertook the following activities to strengthen WHS arrangements:

- provided access to Employee Assistance Program services for all employees.
- worked to maintain and build on our flexible working arrangements and to support the wellbeing of our team during this period.
- continued with the two-tranche program provided by Telus, which included a general wellbeing check-in and the second component offered to staff who wished to take it up, was a counselling service.

5.2.2 Disability Inclusion Action Plan and Multicultural Action Plan

IRO recognises that fostering an inclusive workplace and building a workforce that reflects the diversity of the NSW community helps us deliver more effective services and better outcomes for the people we serve.

While IRO is not required to have our own Disability Inclusion Action Plan (DIAP) and Multicultural Plan (MP), we are committed to leveraging off DCS, DIAP and MP and leveraging our position within the Customer Service Portfolio.

The DCS Disability Inclusion Action Plan 2020-2025 outlines the Portfolio's commitment to improving access to services and employment opportunities for our people, customers, stakeholders and suppliers with disability.

Table 39: Trends in the representation of workforce diversity groups

Workforce diversity group	Benchmark	2022	2023	2024	2025
Women ²	50.0%	71.0%	70.4%	65.3%	66.7%
Aboriginal and/or Torres Strait Islander people ³	3.3%	0.0%	4.3%	2.0%	0.0%
People whose first language spoken as a child was not English ⁴	23.2%	16.1%	34.3%	37.4%	34.5%
People with disability ⁵	5.6%	1.60%	7.1%	5.6%	10.5%
People with disability requiring work-related adjustment ⁵	N/A	0.0%	3.5%	2.1%	1.4%

Note:

Statistics are based on NSW Public Service Commission Workforce Profile census data as of 22 June 2023, 20 June 2024 and 19 June 2025.

The benchmark of 50% for representation of women across the sector is intended to reflect the gender composition of the NSW community.

The NSW Public Sector Aboriginal Employment Strategy 2019–2025 takes a career pathway approach in that it sets an ambitious target of 3% Aboriginal employment at each non-executive grade of the public sector by 2025.

A benchmark from the Australian Bureau of Statistics (ABS) Census of Population and Housing has been included for 'People whose first language spoken as a child was not English'. The ABS Census does not provide information about first language but does provide information about country of birth. The benchmark of 23.2% is the percentage of the NSW general population born in a country where English is not the predominant language.

In December 2017, the NSW Government announced the target of doubling the representation of people with disability in the NSW public sector from an estimated 2.7% to 5.6% by 2027. More information can be found at: *Jobs for People with Disability: A plan for the NSW public sector*. The benchmark for 'People with disability requiring work-related adjustment' was not updated.

Table 40: Trends in the Distribution Index for workforce diversity groups

Workforce diversity group	Benchmark	2022	2023	2024	2025
Women	100	N/A	102	102	100
Aboriginal and/or Torres Strait Islander people	100	N/A	N/A	N/A	N/A
People whose first language spoken as a child was not English	100	N/A	101	105	101
People with disability	100	N/A	N/A	N/A	N/A
People with disability requiring work-related adjustment	N/A	N/A	N/A	N/A	N/A

Note:

A Distribution Index score of 100 indicates that the distribution of members of the Workforce Diversity group across salary bands is equivalent to that of the rest of the workforce. A score less than 100 means that members of the Workforce Diversity group tend to be more concentrated at lower salary bands than is the case for other staff. The more pronounced this tendency is, the lower the score will be. In some cases, the index may be more than 100, indicating that members of the Workforce Diversity group tend to be more concentrated at higher salary bands than is the case for other staff.

The Distribution Index is not calculated when the number of employees in the Workforce Diversity group is less than 20 or when the number of other employees is less than 20.

5.2.3 Modern Slavery Act 2018 (NSW) Reporting

In 2024-25, no operational issues were raised by the NSW Anti-slavery Commissioner concerning the operations of IRO.

To ensure that goods and services procured by and for IRO during this financial year were not the product of modern slavery within the meaning of the *Modern Slavery Act 2018* (NSW), all IRO staff involved in procurement activities undertook an online training module which provided an introduction to modern slavery and their obligations.

In accordance with the NSW Anti-slavery Commissioner's *Guidance on Reasonable Steps*, IRO adopts a 'shared responsibility' approach and works with DCS to ensure that modern slavery risks are actively monitored, mitigated and remediated.

5.2.4 Climate Reporting

We acknowledge the upcoming requirements for climate disclosures in the Annual Report and are actively working with DCS to prepare for future climate reporting requirements.



6.1 Independent Auditors Report



INDEPENDENT AUDITOR'S REPORT

Office of the Independent Review Officer

To Members of the New South Wales Parliament

Opinion

I have audited the accompanying financial statements of the Office of the Independent Review Officer (the Office), which comprise the Statement by the Independent Review Officer, the Statement of Comprehensive Income for the year ended 30 June 2025, the Statement of Financial Position as at 30 June 2025, the Statement of Changes in Equity and the Statement of Cash Flows for the year then ended, and notes to the financial statements, including a Statement of Material Accounting Policy Information, and other explanatory information.

In my opinion, the financial statements:

- have been prepared in accordance with Australian Accounting Standards and the applicable financial reporting requirements of the *Government Sector Finance Act 2018* (GSF Act), the *Government Sector Finance Regulation 2024* (GSF Regulation) and the Treasurer's Directions
- present fairly the Office's financial position, financial performance and cash flows.

My opinion should be read in conjunction with the rest of this report.

Basis for Opinion

I conducted my audit in accordance with Australian Auditing Standards. My responsibilities under the standards are described in the 'Auditor's Responsibilities for the Audit of the Financial Statements' section of my report.

I am independent of the Office in accordance with the requirements of the:

- Australian Auditing Standards
- Accounting Professional and Ethical Standards Board's APES 110 'Code of Ethics for Professional Accountants (including Independence Standards)' (APES 110).

Parliament promotes independence by ensuring the Auditor-General and the Audit Office of New South Wales are not compromised in their roles by:

- providing that only Parliament, and not the executive government, can remove an Auditor-General
- mandating the Auditor-General as auditor of public sector agencies
- precluding the Auditor-General from providing non-audit services.

I have fulfilled my other ethical responsibilities in accordance with APES 110.

I believe the audit evidence I have obtained is sufficient and appropriate to provide a basis for my audit opinion.

Independent Review Officer's Responsibilities for the Financial Statements

The Independent Review Officer is responsible for the preparation and fair presentation of the financial statements in accordance with Australian Accounting Standards, the GSF Act, GSF Regulation and Treasurer's Directions. The Independent Review Officer's responsibility also includes such internal

control as the Independent Review Officer determines is necessary to enable the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Independent Review Officer is responsible for assessing the Office's ability to continue as a going concern, disclosing as applicable, matters related to going concern and using the going concern basis of accounting.

Auditor's Responsibilities for the Audit of the Financial Statements

My objectives are to:

- obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error
- issue an Independent Auditor's Report including my opinion.

Reasonable assurance is a high level of assurance, but does not guarantee an audit conducted in accordance with Australian Auditing Standards will always detect material misstatements. Misstatements can arise from fraud or error. Misstatements are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions users take based on the financial statements.

A description of my responsibilities for the audit of the financial statements is located at the Auditing and Assurance Standards Board website at: www.auasb.gov.au/auditors_responsibilities/ar4.pdf. The description forms part of my auditor's report.

The scope of my audit does not include, nor provide assurance:

- that the Office carried out its activities effectively, efficiently and economically
- about the assumptions used in formulating the budget figures disclosed in the financial statements
- about the security and controls over the electronic publication of the audited financial statements on any website where they may be presented
- about any other information which may have been hyperlinked to/from the financial statements.



David Daniels
Director, Financial Audit

Delegate of the Auditor-General for New South Wales

8 October 2025
SYDNEY

6.2 Financial Statements

Office of the Independent Review Officer

STATEMENT BY THE INDEPENDENT REVIEW OFFICER

Pursuant to Section 7.6 (4) of the *Government Sector Finance Act 2018* ('the Act'), I state that these financial statements:

- have been prepared in accordance with the Australian Accounting Standards and the applicable requirements of the Act, the Government Sector Finance Regulation 2024 and the Treasurer's directions, and
- present fairly the Office of the Independent Review Officer's financial position as at 30 June 2025, and financial performance and cashflows for the year ended 30 June 2025.



Samantha Taylor
Independent Review Officer

Date: 7 October 2025

Office of the Independent Review Officer

FINANCIAL STATEMENTS

STATEMENT OF COMPREHENSIVE INCOME

FOR THE YEAR ENDED 30 JUNE 2025

		Budget 2025 \$	Actual 2025 \$	Actual 2024 \$
	Notes			
Expenses excluding losses				
Employee related expenses	2(a)	12,848,000	11,864,833	11,578,154
Operating expenses	2(b)	5,075,000	4,697,138	4,530,217
Grants and subsidies	2(c)	107,809,000	98,465,519	98,575,117
Total expenses excluding losses		125,732,000	115,027,490	114,683,488
Revenue				
Grants and other contributions	3(a)	125,732,000	114,710,188	114,422,315
Acceptance by the Crown of employee benefits and other liabilities	3(b)	-	317,272	261,173
Other income		-	30	-
Total revenue		125,732,000	115,027,490	114,683,488
Operating result		-	-	-
Net result		-	-	-
Total other comprehensive income		-	-	-
TOTAL COMPREHENSIVE INCOME		-	-	-

The accompanying notes form part of these financial statements.

Office of the Independent Review Officer
FINANCIAL STATEMENTS
STATEMENT OF FINANCIAL POSITION
 AS AT 30 JUNE 2025

	Notes	Budget 2025 \$	Actual 2025 \$	Actual 2024 \$
ASSETS				
Current assets				
Cash and cash equivalents	4	7,156,000	24,926,075	5,648,287
Receivables	5	2,608,000	700,983	4,155,210
Total current assets		9,764,000	25,627,058	9,803,497
Non-current assets				
Total non-current assets		-	-	-
Total assets		9,764,000	25,627,058	9,803,497
LIABILITIES				
Current liabilities				
Payables	6	6,105,000	22,813,173	6,284,045
Provisions – Employee ¹	7 (a)	3,659,000	1,311,582	1,243,953
Provisions – Other ¹	7 (b)	-	1,478,713	2,254,557
Total current liabilities		9,764,000	25,603,468	9,782,555
Non-current liabilities				
Provisions - Employee	7 (a)	-	23,590	20,942
Total non-current liabilities		-	23,590	20,942
Total liabilities		9,764,000	25,627,058	9,803,497
Net assets		-	-	-
EQUITY				
Accumulated funds		-	-	-
Total equity		-	-	-

The accompanying notes form part of these financial statements.

¹ The original budget papers include a single figure for all provisions. For financial reporting, the provisions figure has been classified into employee and other provisions.

Office of the Independent Review Officer

FINANCIAL STATEMENTS

STATEMENT OF CHANGES IN EQUITY

FOR THE YEAR ENDED 30 JUNE 2025

	Accumulated Funds	Total Equity
	\$	\$
Balance at 1 July 2024	-	-
Net result for the year	-	-
Other comprehensive income	-	-
Total comprehensive income for the year	-	-
Balance at 30 June 2025	-	-

	Accumulated Funds	Total Equity
	\$	\$
Balance at 1 July 2023	-	-
Net result for the year	-	-
Other comprehensive income	-	-
Total comprehensive income for the year	-	-
Balance at 30 June 2024	-	-

Office of the Independent Review Officer

FINANCIAL STATEMENTS

STATEMENT OF CASH FLOWS

FOR THE YEAR ENDED 30 JUNE 2025

	Notes	Budget 2025 \$	Actual 2025 \$	Actual 2024 \$
CASH FLOW FROM OPERATING ACTIVITIES				
Payments				
Employee related		12,848,000	11,404,346	11,196,000
Suppliers for goods and services ²		-	3,997,176	5,179,352
Grants and subsidies		107,809,000	94,531,983	96,901,328
Other cash payments ²		5,075,000	-	-
Total payments		125,732,000	109,933,505	113,276,680
Receipts				
Grants and contributions		125,732,000	129,168,745	112,929,122
Other cash receipts		-	42,548	11,682
Total receipts		125,732,000	129,211,293	112,940,804
NET CASH FLOWS FROM OPERATING ACTIVITIES	8	-	19,277,788	(335,876)
CASH FLOWS FROM INVESTING ACTIVITIES		-	-	-
NET CASH FLOWS FROM INVESTING ACTIVITIES		-	-	-
CASH FLOWS FROM FINANCING ACTIVITIES		-	-	-
NET CASH FLOWS FROM FINANCING ACTIVITIES		-	-	-
NET INCREASE/(DECREASE) IN CASH AND CASH EQUIVALENTS		-	19,277,788	(335,876)
Opening cash and cash equivalents		7,156,000	5,648,287	5,984,163
CLOSING CASH AND CASH EQUIVALENTS	4	7,156,000	24,926,075	5,648,287

The accompanying notes form part of these financial statements.

² Budget for suppliers for goods and service is zero, as the original Budget Papers reports this as other cash payments.

Office of the Independent Review Officer

NOTES TO THE FINANCIAL STATEMENTS

FOR THE YEAR ENDED 30 JUNE 2025

1. STATEMENT OF MATERIAL ACCOUNTING POLICY INFORMATION

(a) Reporting Entity

The Office of the Independent Review Officer (OIRO) is a NSW Government agency and is controlled by the State of New South Wales, which is the ultimate parent entity. OIRO is a not-for-profit entity (as profit is not its principal objective) and it has no cash generating units.

These financial statements for the period 1 July 2024 to 30 June 2025 have been authorised for issue by the Independent Review Officer on 7 October 2025.

(b) Basis of Preparation

OIRO's financial statements are general purpose financial statements which have been prepared on an accrual basis and in accordance with:

- Applicable Australian Accounting Standards (AAS) (which include Australian Accounting Interpretations).
- The requirements of the *Government Sector Finance Act 2018* (GSF Act) and the Government Sector Finance Regulation 2024 and in Treasurer's Directions issued under the GSF Act.

Financial statement items are prepared in accordance with the historical cost convention except where specified otherwise.

The financial statements are prepared on the assumption that OIRO is a going concern as at 30 June 2025 and will continue its normal operating activity for the foreseeable future. Reasons for this include:

- The OIRO's functions are prescribed by legislation (under Schedule 5 to the *Personal Injury Commission Act 2020*).

Section 35 of the the *Workplace Injury Management and Workers Compensation Act 1998* (WIMA) provides for payments from the Workers Compensation Operational Fund (WCOF), for specified purposes including the remuneration of the Independent Review Officer and OIRO staff, and the costs incurred in connection with the exercise of the functions of the Officer arising under the Workers Compensation Acts.

- Management has considered and discussed the possibility of a full realisation of contingent liabilities on any given date and notes that the Exchange of Letters between the OIRO and the State Insurance Regulatory Authority (SIRA) detail that the liability will be funded in accordance with legislative requirements.

Judgements, key assumptions, and estimations that management have made are disclosed in the relevant notes to the financial statements.

All amounts are rounded to the nearest dollar and are expressed in Australian currency, which is the OIRO's presentation and functional currency.

Office of the Independent Review Officer

NOTES TO THE FINANCIAL STATEMENTS

FOR THE YEAR ENDED 30 JUNE 2025

(c) Statement of Compliance

The financial statements and notes comply with the AAS, which include Australian Accounting Interpretations.

(d) Equity – Accumulated Funds

OIRO does not have accumulated funds, as its operations are fully funded by the WCOF (*Workplace Injury Management and Workers Compensation Act 1998* section 35(2)(c)) and the MAOF (*Motor Accidents Injuries Act 2017* section 10.12(3)(b1)) resulting in nil operating results in its Statement of Comprehensive Income.

(e) Comparative Information

Except when an AAS permits or requires otherwise, comparative information is presented in respect of the previous period for all amounts reported in the financial statements.

(f) Changes in accounting policies, including new or revised Australian Accounting Standards

i. Effective for the first time in financial year 2025:

The accounting policies applied in financial year 2025 are consistent with those of the previous financial year. There are no material impacts on the financial statements from the new or revised Australian Accounting Standards that have been applied for the first time in 2025 financial year.

ii. Issued but not yet effective

NSW public sector entities are not permitted to early adopt new Australian Accounting Standards unless NSW Treasury determines otherwise.

OIRO has determined that the standards issued but not yet effective are unlikely to have a material impact on the financial statements for the 30 June 2025 reporting period. AASB 18 Presentation and Disclosure of Financial Statements (AASB 18) was issued on 14 June 2024 and will replace AASB 101 Presentation of Financial Statements when first adopted for the financial year ending 30 June 2029. The impact of applying the new standard will be limited to changes to the presentation and disclosure of items in the financial statements.

Office of the Independent Review Officer

NOTES TO THE FINANCIAL STATEMENTS

FOR THE YEAR ENDED 30 JUNE 2025

2. EXPENSES EXCLUDING LOSSES

(a) Employee related expenses

	2025	2024
	\$	\$
Salaries and wages (including annual leave)	9,828,815	9,673,970
Payroll tax and Fringe Benefit Tax	598,454	567,170
Superannuation - defined contribution plans	1,033,663	955,966
Superannuation - defined benefit plans ³	664	496
Workers' compensation insurance	60,151	60,379
Long service leave ³	316,608	260,677
Long service leave on-costs	26,478	59,496
Total	11,864,833	11,578,154

(b) Operating expenses

	2025	2024
	\$	\$
Advertising	-	578
Auditor's remuneration -Audit of the financial statements	122,210	118,650
Books and periodicals	686	1,814
Computer expenses	1,668,810	1,508,283
Conference	22,796	79,456
Consultants	172,453	226,336
Contractors	862,317	576,765
Corporate cost allocation	463,778	515,481
Fees and charges	89,803	189,483
Host fees	-	20,500
Legal	7,956	13,228
Marketing	10,143	6,534
Minor equipment	-	3,794
Network operating costs	48,687	34,256
Occupancy	972,239	916,579
Other operating expenses	29,458	31,696
Insurance	39,163	37,713
Postage and telephone	55,002	57,483
Printing and stationery stores	2,842	4,968
Training	124,918	176,424
Travel expenses	3,877	10,196
Total	4,697,138	4,530,217

³ Long service leave and Superannuation – defined benefit plans assumed by the Crown. NSW Treasury's discount factor at reporting date is used to calculate the present value of expected future payments in respect of services provided up to the reporting date.

Office of the Independent Review Officer

NOTES TO THE FINANCIAL STATEMENTS

FOR THE YEAR ENDED 30 JUNE 2025

Recognition and Measurement

Operating expenses generally represent the day-to-day running costs incurred in the normal operation of OIRO. All expenses are recognised as incurred, refer note 2(b).

Computer expenses

Computer expenses include all computer and software related costs, such as Resolve system enhancements, IT support costs from DCS, hosting fees and OIRO website support fees.

Consultants

The consultancy services pertain to the fee incurred from the professional service for the OIRO privacy review of exchanging health information, and the review and consultation of OIRO Independent Legal Assistance and Review Service (ILARS) demand and forecast model.

Contractors

This includes the fees for current contract employees. The Contractors' expense is the cost of engaging any individual or organisation (other than a consultant) to undertake work that would or could be regarded as normally undertaken by an employee, but internal expertise is not available.

Corporate Cost Allocation

This includes corporate services provided to OIRO by the Department of Customer Service (DCS). Some of the functions provided include finance, procurement, workplace & facilities, governance, risk & performance, Internal audit, information security, ICT, people & culture, and the Office of the Secretary.

The corporate cost allocation model is based on the service catalogue for direct costs, and the indirect allocation is based on head count and on a project basis.

Fees and Charges

This includes fees for interpreting, GovConnect NSW recovery fees, the employee assistance program fees and the Fiftyfive5 ongoing complaints/enquiries program and stakeholder perception study fees.

Occupancy

This includes the internal accommodation charge from DCS to OIRO. The DCS is responsible for adhering to the tenancy schedule in place with Property NSW (PNSW). As a result, DCS settles occupancy charges and seeks reimbursement from OIRO. Occupancy cost is charged by DCS and includes both rental costs and the OIRO office refurbishment depreciation.

Insurance

The OIRO's insurance activity is conducted through the NSW Treasury Management Fund Scheme of self-insurance for government entities. The expense (premium) is determined by the fund manager based on past claims experience. Premiums are paid for workers compensation, dust diseases and SIRA levies, public liability, and miscellaneous insurance.

Office of the Independent Review Officer

NOTES TO THE FINANCIAL STATEMENTS

FOR THE YEAR ENDED 30 JUNE 2025

(c) Grants and subsidies

	2025	2024
	\$	\$
Disbursements	42,564,600	41,099,822
Approved Lawyer Professional Fees	55,900,919	57,475,295
Total	98,465,519	98,575,117

Independent Legal Assistance and Review Service (ILARS) Grants

ILARS grants managed and administered by the OIRO, allows Approved Lawyers to apply for funding (grants) to provide injured eligible workers legal advice about, and assistance to pursue, workers compensation rights and entitlements. Disbursements costs include medical report fees, and the cost of other disbursements and Professional fees include counsel's fees, approved lawyer professional service fees and incidental expenses reasonably necessary to investigate a claim or pursue a dispute about a claim, including where a claim progresses to the Personal Injury Commission or higher courts, where appropriate.

OIRO recognised grant expenditure during the financial year 2024-25 as follows:

1. When invoices are received and processed in the Resolve Case Management System and SAP Accounting system.
2. A grant accrual is processed based on invoices received but not yet processed in the Resolve and SAP systems at the balance date. As at 30 June 2025 OIRO recognised accruals for Approved Lawyer professional fees and disbursements of \$2.33m (FY2024 \$3.29m); and Medical Report Provider (MRP) disbursements of \$2.80m (FY2024 \$1.49m), refer to note 6.
3. A provision is estimated for MRP services received but invoices not yet received as at 30 June 2025. As at 30 June 2025 OIRO recognised a current provision for MRP disbursements of \$1.48m (FY2024 \$2.25m), refer to note 7.

OIRO estimated a contingent liability using the ILARS demand and forecast model for the open grants at the end of the reporting period. As at 30 June 2025 OIRO recognised the Contingent Liability of \$149.88m (FY2024 \$150.96m), refer to note 11.

Office of the Independent Review Officer

NOTES TO THE FINANCIAL STATEMENTS

FOR THE YEAR ENDED 30 JUNE 2025

3. REVENUE

(a) Grants and other contributions

	2025	2024
	\$	\$
Workers Compensation Operational Fund (WCOF)	114,046,771	113,700,263
Motor Accidents Operational Fund (MAOF)	663,417	722,052
Total	114,710,188	114,422,315

The operations of OIRO are fully funded by the WCOF (*Workplace Injury Management and Workers Compensation Act 1998* section 35(2)(c)) and the MAOF (*Motor Accidents Injuries Act 2017* section 10.12(3)(b1)). These funds are managed by the State Insurance Regulatory Authority (SIRA).

Recognition and Measurement

Grants and Contributions income is recognised when received.

(b) Acceptance by the Crown of employee benefits and other liabilities

The following liabilities have been assumed by the Crown:

	2025	2024
	\$	\$
Long service leave - crown accepted ⁴	316,608	260,677
Superannuation - crown accepted	664	496
Total	317,272	261,173

4. CURRENT ASSETS - CASH AND CASH EQUIVALENTS

	2025	2024
	\$	\$
Cash at Bank	24,926,075	5,648,287
Total	24,926,075	5,648,287

For the purposes of the Statement of Cash Flows, cash and cash equivalents include cash at bank and cash on hand. Cash and cash equivalent assets recognised in the statement of financial position are the same as cash and cash equivalents assets recognised in the statement of cash flows.

⁴ The long service leave adjustment is based on the present value calculation provided by NSW Treasury.

Office of the Independent Review Officer

NOTES TO THE FINANCIAL STATEMENTS

FOR THE YEAR ENDED 30 JUNE 2025

5. CURRENT ASSETS – RECEIVABLES

	2025	2024
	\$	\$
Debtors	4,773	-
GST Receivable	568,964	611,482
Prepayments	127,246	107,412
Supplementary ILARS Funding (funded from the WCOF)	-	3,436,316
Total	700,983	4,155,210

Section 35 of the *Workplace Injury Management and Workers Compensation Act 1998* provides for the costs incurred in connection with the exercise of functions by the Independent Review Officer arising under the Workers Compensation Act to be paid from the Workers Compensation Operational Fund (WCOF).

Any variances between the funds received from SIRA and OIRO expenses are reported in the Statement of Financial Position as either a payable or receivable, such that any surplus funds may have to be returned to SIRA, or additional funding may be requested by OIRO and advanced by SIRA to meet any deficit.

Details regarding credit risk of trade receivables that are neither past due nor impaired, are disclosed in note 9.

Recognition and Measurement

Receivables are initially recognised at fair value plus any directly attributable transaction costs.

OIRO is not exposed to credit risk, as most of its receivable counter parties are government entities.

Subsequent measurement

The entity holds receivables with the objective to collect the contractual cash flows and therefore measures them at amortised cost using the effective interest method, less any impairment. Changes are recognised in the net result for the year when impaired, derecognised or through the amortisation process.

Supplementary ILARS Funding

As at 30 June 2024, an additional \$3.44m in funding from SIRA was required to close the expenditure gap and to bring the Net Cost of Service to zero.

Office of the Independent Review Officer

NOTES TO THE FINANCIAL STATEMENTS

FOR THE YEAR ENDED 30 JUNE 2025

6. CURRENT LIABILITIES – PAYABLES

	2025	2024
	\$	\$
Accrued Salaries Wages & On Costs	287,129	214,191
Unearned Income	11,022,241	-
Corporate credit card	1,575	11,214
Trade Payables ⁵	5,921,791	1,035,757
ILARS - Professional fees and Disbursements accruals	2,332,717	3,293,084
ILARS - Medical Report Provider (MRP) accruals	2,798,797	1,485,723
Sundry accruals	448,923	244,076
Total	22,813,173	6,284,045

Recognition and Measurement

Payables represent liabilities for goods and services provided to OIRO. Short-term payables with no stated interest rate are measured at the original invoice amount where the effect of discounting is immaterial.

Payables are financial liabilities at amortised cost, initially measured at fair value, net of directly attributable transaction costs. These are subsequently measured at amortised cost using the effective interest method.

OIRO recognises ILARS approved grant professional fees and disbursements as accruals based on invoices received but not entered in the accounting system. Similarly, MRP invoices received but not processed prior to 30 June 2025 are accrued.

Unearned Income (Budget Surplus)

As at 30 June 2025, OIRO's actual expenditure was less than the agreed budget amount from SIRA. This has resulted in a budget surplus of \$11.02m which is recognised as a payable to SIRA (Unearned Income). In FY2024, OIRO's actual expenditure was greater than the funding advanced by SIRA, consequently a budget supplementation was required.

⁵ Trade payables as at 30 June 2025 is \$5.92m (\$1.04m FY2024) and is mainly comprised of ILARS invoices (both professional fees and disbursements) of \$5.07m as well as other trade payables of \$0.85m.

Office of the Independent Review Officer
NOTES TO THE FINANCIAL STATEMENTS
 FOR THE YEAR ENDED 30 JUNE 2025

7. CURRENT / NON-CURRENT PROVISIONS

(a) Provisions - Employee	2025	2024
	\$	\$
Current		
Annual Leave provision (including on-costs)	1,006,154	963,083
Long service leave provision on-costs ⁶	212,311	188,481
Paid parental leave provision (including on-costs)	93,118	92,389
Total	1,311,582	1,243,953
Non-current		
Long service leave provision on-costs ⁶	23,590	20,942
Total Non-Current Provisions	23,590	20,942
Aggregate employee benefits including on-costs		
Provisions – current	1,311,582	1,243,953
Provisions – non-current	23,590	20,942
Total	1,335,172	1,264,895
Provisions expected to be settled within 12 months from reporting date		
Annual leave provision (including on-costs)	794,556	730,055
Paid parental leave provision (including on-costs)	93,118	92,389
Total	887,674	822,444
Provisions expected to be settled in more than 12 months from reporting date		
Annual leave provision (including on-costs)	211,598	233,028
Long service leave provision on-costs	235,900	209,423
Total	447,498	442,451
(b) Provisions - Other	2025	2024
	\$	\$
Current		
ILARS - MRP provision	1,478,713	2,254,557
Total	1,478,713	2,254,557

Other Provisions are expected to be settled within 12 months from reporting date.

⁶ Long service leave (LSL) on-cost provision is calculated annually as advised per NSW Treasury communication.

Office of the Independent Review Officer

NOTES TO THE FINANCIAL STATEMENTS

FOR THE YEAR ENDED 30 JUNE 2025

Employee benefits and related on-costs

Salaries and wages, annual leave, and sick leave

Salaries and wages (including non-monetary benefits) and paid sick leave that are expected to be settled wholly within 12 months after the end of the period in which the employees render the service are recognised and measured at the undiscounted amounts of the benefits.

Annual leave is not expected to be settled wholly before twelve months after the end of the annual reporting period in which the employees render the related service. As such, it is required to be measured at present value in accordance with AASB 119 Employee Benefits (although short-cut methods are permitted).

Actuarial advice obtained by NSW Treasury has confirmed that using the nominal annual leave balance plus the annual leave entitlements accrued while taking annual leave (calculated using 8.4 percent of the nominal value of annual leave) can be used to approximate the present value of the annual leave liability. The entity has assessed the actuarial advice based on the entity's circumstances and has determined that the effect of discounting is immaterial to annual leave. All annual leave is classified as a current liability even where the entity does not expect to settle the liability within 12 months as the entity does not have an unconditional right to defer settlement.

Unused non-vesting sick leave does not give rise to a liability as it is not considered probable that sick leave taken in the future will be greater than the benefits accrued in the future.

Consequential costs to employment are recognised as liabilities and expenses where the employee benefits to which they relate have been recognised. This includes outstanding amounts of payroll tax, workers' compensation insurance premiums and fringe benefits tax.

Long service leave and Superannuation

The entity's liabilities for long service leave and defined benefit superannuation are assumed by the Crown. The entity accounts for the liability as having been extinguished, resulting in the amount assumed being shown as part of the non-monetary revenue item described as acceptance by the Crown of employee benefits and other liabilities.

Long service leave is measured at present value based on the application of certain factors (specified in TPG 24-23) to employees with five or more years of service, using current rates of pay. These factors were determined based on an actuarial review to approximate present value.

Paid parental Leave

Paid parental leave (up to 16 weeks) can be accumulated for up to 24 months and the provision is recognised when an employee becomes eligible. The provision is valued based on parental leave yet to be paid.

Other provisions

The MRP provisions (ILARS Disbursements) are estimated using invoice averages over the last 3 months. However, in instances, where data is not available, other approaches are taken to ensure reliable estimates are established. These calculations are either based on 3 months historical data or on actual confirmation from service providers.

Office of the Independent Review Officer

NOTES TO THE FINANCIAL STATEMENTS

FOR THE YEAR ENDED 30 JUNE 2025

8. RECONCILIATION OF CASH FLOWS FROM OPERATING ACTIVITIES TO NET RESULT

	2025	2024
	\$	\$
Net cash flows from operating activities	19,277,788	(335,876)
Increase / (decrease) in prepayments and other assets	(3,454,227)	1,466,827
Decrease / (increase) in payables	(16,529,128)	(1,635,091)
Decrease / (increase) in provisions	705,567	504,140
Net result	-	-

9. FINANCIAL INSTRUMENTS

OIRO's principal financial instruments are outlined below. These financial instruments arise directly from OIRO's operations or are required to finance OIRO's operations. OIRO does not enter or trade financial instruments, including derivative financial instruments, for speculative purposes.

OIRO's main risks arising from financial instruments are outlined below, together with OIRO's objectives, policies, and processes for measuring and managing risk. Further quantitative and qualitative disclosures are included throughout the financial statements.

The Independent Review Officer (IRO) has overall responsibility for the establishment and oversight of risk management and reviews and agrees policies for managing each of these risks. Risk management policies are established to identify and analyse the risks faced by OIRO, to set risk limits and controls and to monitor risks. Compliance with policies is reviewed by OIRO on a continuous basis.

As at 30 June 2025

Class	Note	Category	Carrying amount \$
Financial Assets			
Cash and cash equivalents	4	Amortised Cost	24,926,075
Receivables ⁷	5	Amortised Cost	4,773

Financial Liabilities

Payables ⁸	6	Financial liabilities measured at amortised cost	11,733,464
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As at 30 June 2024

Class	Note	Category	Carrying amount \$
Financial Assets			
Cash and cash equivalents	4	Amortised Cost	5,648,287
Receivables ⁷	5	Amortised Cost	3,436,316

Financial Liabilities

Payables ⁸	6	Financial liabilities measured at amortised cost	6,228,473
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⁷ Excludes statutory receivables and prepayments (i.e., not within scope of AASB 7).

⁸ Excludes statutory payables and unearned revenue (i.e., not within scope of AASB 7).

Office of the Independent Review Officer

NOTES TO THE FINANCIAL STATEMENTS

FOR THE YEAR ENDED 30 JUNE 2025

Derecognition of financial assets and financial liabilities

A financial asset (or, where applicable, a part of a financial asset or part of a group of similar financial assets) is derecognised when the contractual rights to the cash flows from the financial assets expire; or if the entity transfers its rights to receive cash flows from the asset or has assumed an obligation to pay the received cash flows in full without material delay to a third party under a 'pass-through' arrangement; and either:

- the entity has transferred substantially all the risks and rewards of the asset; or
- the entity has neither transferred nor retained substantially all the risks and rewards of the asset but has transferred control.

When the entity has transferred its rights to receive cash flows from an asset or has entered a passthrough arrangement, it evaluates if, and to what extent, it has retained the risks and rewards of ownership. Where the entity has neither transferred nor retained substantially all the risks and rewards or transferred control, the asset continues to be recognised to the extent of the entity's continuing involvement in the asset. In that case, the entity also recognises an associated liability.

The transferred asset and the associated liability are measured on a basis that reflects the rights and obligations that the entity has retained.

Continuing involvement that takes the form of a guarantee over the transferred asset is measured at the lower of the original carrying amount of the asset and the maximum amount of consideration that the entity could be required to repay.

A financial liability is derecognised when the obligation specified in the contract is discharged or cancelled or expires. When an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as the derecognition of the original liability and the recognition of a new liability. The difference in the respective carrying amounts is recognised in the net result.

(a) Credit risk

OIRO is not exposed to credit risk, as its receivables counter parties are all government entities.

Credit risk arises from the financial assets of OIRO, including cash at bank and receivables. No collateral is held by OIRO. OIRO has not granted any financial guarantees.

(b) Cash and cash equivalents

Cash comprises bank balances. OIRO does not earn interest on its daily bank balances.

Office of the Independent Review Officer

NOTES TO THE FINANCIAL STATEMENTS

FOR THE YEAR ENDED 30 JUNE 2025

(c) Market risk

Market risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices.

OIRO is not exposed to market risk.

(d) Interest rate risk

Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates.

GSF agencies are required to place all government money into a banking account linked to the Treasury Banking System (TBS).

In 2015-16, NSW Treasury introduced cash management reforms that now apply to OIRO. Under the reforms, interest earned on a TBS banking account must be paid to the Treasurer, or to any other entity nominated by the Treasurer, unless an exemption has been granted in accordance with TD 23-18. OIRO has not been granted an exemption.

OIRO did not have exposure to interest rate risk as it did not have funds in interest earning investments.

(e) Liquidity risk

Liquidity risk is the risk that an organisation will be unable to meet its payment obligations when they fall due. OIRO manages its risk by obtaining funds from SIRA to support its operations and working to ensure, wherever possible, that expenses are contained within budget.

OIRO has agreed funding arrangements with SIRA outlining funding arrangements for OIRO. Where OIRO has insufficient cashflow to meet its expenditure during the financial year:

- OIRO may seek a cash advance where the insufficient cashflow arises from a timing issue, and OIRO is otherwise within budget, by writing to SIRA seeking the advance. SIRA will advance the funding, subject to funding availability and will adjust the remaining budget, in consultation with OIRO.
- OIRO may seek a budget supplementation where the insufficient cashflow is a budgetary issue, by writing to SIRA seeking budget supplementation.

In addition, OIRO has developed a Cash Funding Management Policy.

As at 30 June 2025, there were no default or breaches on any loans payable. No assets have been pledged as collateral. OIRO does not have any loans or assets that could be pledged as collateral.

OIRO's exposure to liquidity risk is deemed insignificant based on current assessment of risk.

The table below summarises the maturity profile of the entity's financial liabilities based on contractual undiscounted payments, together with the interest rate exposure.

Office of the Independent Review Officer

NOTES TO THE FINANCIAL STATEMENTS

FOR THE YEAR ENDED 30 JUNE 2025

			Interest rate exposure			Maturity dates		
	Weighted Average Effective Int. Rate %	Nominal Amount ⁹	Fixed Interest Rate	Variable Interest Rate	Non-interest bearing	< 1 year	1 to 5 years	> 5 years
2025 Payables ¹⁰	N/A	\$11,733,464	-	-	\$11,733,464	\$11,733,464	-	-
2024 Payables ¹⁰	N/A	\$6,228,473	-	-	\$6,228,473	\$6,228,473	-	-

(f) Fair Value Measurement

Fair value compared to carrying amount.

OIRO does not hold financial assets and financial liabilities where the fair value differs from the carrying amount.

10. CAPITAL COMMITMENT

OIRO has no outstanding capital commitments at balance date.

11. CONTINGENT LIABILITIES AND CONTINGENT ASSETS

	2025	2024
	\$	\$
Contingent Liabilities - ILARS	149,877,000	150,958,000

As at the 30 June 2025 there were 40,575 open cases (FY2024 35,588), and a contingent liability of \$149,877,000 (FY2024 \$150,958,000) was estimated excluding any accruals and provisions recognised in the financial statements.

According to AASB 137 Provisions, Contingent Liabilities and Contingent Assets, a contingent liability must be disclosed in OIRO's financial statement rather than recognised as a provision because the economic outflow is not "probable" or cannot be reliably quantified until the grant is finalised.

The contingent liability has been estimated utilising a demand and expenditure forecasting model developed by OIRO utilising case management data from FY2013 onwards. The contingent liability estimation has been based on historical ILARS grant data from 2020-2025 financial years grouped by the high-level primary injury category and outcome mix. The cost estimate is based on the historical proportions between different outcomes.

⁹ The amounts disclosed are the contractual undiscounted cash flows of each class of financial liabilities based on the earliest date on which the entity can be required to pay. The amounts include both interest and principal cashflows and therefore will not reconcile to the amounts disclosed in the statement of financial position.

¹⁰ The amounts disclosed here exclude statutory payables and unearned revenue (not within scope of AASB 7).

Office of the Independent Review Officer

NOTES TO THE FINANCIAL STATEMENTS

FOR THE YEAR ENDED 30 JUNE 2025

The model uses the average cost to finalise per outcome less average cost already spent based on the case mix of open cases. For disbursements, as at 30 June 2025, an indexation rate of 4.50 percent was applied for FY2026 based on the SIRA fee increase. From FY2027 onwards, a rate of 2.50 percent was used, based on the NSW Treasury economic forecast rate for disbursements only.

In the forecast model, there is an assumption that professional fees indexation of 10 percent be applied each 3 years (commencing from FY2027). Changes to ILARS professional fees, including indexation, will be determined through review of the ILARS Funding Guidelines and determined by the Independent Review Officer consistent with schedule 5 section 10 of the Personal Injury Commission Act 2020. A discount rate of 3.45 percent was applied to the model based on 3 years Commonwealth bond rate. The SIRA funding arrangements for contingent liabilities were explained in detail at note 1(b).

12. RELATED PARTY DISCLOSURES

Key management personnel

	2025 \$	2024 \$
Short-term employee benefits:		
Salaries	869,923	1,339,000
Post-employment benefits	94,089	139,000
Termination benefits	2,881	45,000
Total Remuneration	966,893	1,523,000

OIRO did not enter into any transactions with key management personnel, their close family members, and controlled or jointly controlled entities of key management personnel.

As at 30 June 2025, other related party transactions include:

- Grants and contributions received from SIRA \$114,710,188 (FY2024 \$114,422,315).
- Long Service Leave and Superannuation – defined benefit assumed by Crown \$317,272 (FY2024 \$261,173).
- Payments for audit services to Audit Office \$122,210 (FY2024 \$118,650).
- Payments for the provision of corporate services to DCS \$463,778 (FY2024 \$515,481).
- Payments for iCare workers' compensation insurance and other liability and miscellaneous \$99,314 (FY2024 \$98,092).
- Payments to DCS for rental charges and other Customer Services support charges \$972,239 (FY2024 \$916,579).
- Payments for DCS pass through charges mainly related to the Fee for service, Software and Hardware, GovConnect charges \$998,324 (FY2024 \$775,344).

13. EVENTS AFTER THE REPORTING PERIOD

There are no events after the reporting period which would give rise to a material impact on the reported results or financial position of OIRO as at 30 June 2025.

Office of the Independent Review Officer

NOTES TO THE FINANCIAL STATEMENTS

FOR THE YEAR ENDED 30 JUNE 2025

14. BUDGET REVIEW

The budgeted amounts are drawn from the original budgeted financial statements presented to Parliament in respect of the reporting period. Subsequent amendments to the original budget (e.g., adjustment for transfer of functions between entities as a result of Administrative Arrangements Orders) are not reflected in the budgeted amounts. Major variances between the original budgeted amounts and the actual amounts disclosed in the financial statements are explained below.

Employee Related

Employee related expenses report a favourable variance to Budget as the full complement of staff has not been recruited throughout the financial year. The favourable variance is offset to some extent by Contractor expenses incurred and not budgeted for supporting the workforce needs of the OIRO.

Grants and Contributions

Grants and contributions is under budget because the grants and subsidies expense consisting of Disbursements and Approved Lawyer Professional Fees, collectively known as ILARS Grants continued to drop due to a slow grants closure rate. In comparison, there is a steady increase in incoming applications for ILARS grants from Approved Lawyers, particularly for legal advice. Demand for ILARS reflects events and trends in the workers compensation system, such as the volume of workers compensation claims, the nature of the injuries sustained by workers, and the performance of workers compensation insurers in handling complaints and disputes about those claims. ILARS costs reflect the stage of the legal support, the complexity of the injury and the dispute, and the ability to attain early resolution through mediation between injured workers and insurers.

Total Expenditure

Total actual expenditure as of 30 June 2025 is \$115.03m, compared to the approved budget of \$125.73m. This results in a 9% favourable variance, primarily attributed to an underspend in ILARS costs, against the available budget for 2024-25 which included a \$35.00m budget uplift.

Net result

The actual net result is equal to zero as OIRO is a Zero Net Cost of Service agency.

Assets and liabilities

The net assets as at 30 June 2025 is equal to zero as the OIRO is a Zero Net Cost of Service agency and does not hold any retained funds or equity in the entity.

Cash flows

The cash balance of \$24.93m was over the budget of \$7.16m due to the budget uplift of \$35.00m for grants and subsidies from SIRA, combined with lower than budgeted payments in ILARS to date (grants and subsidies).

END OF AUDITED FINANCIAL STATEMENTS





Appendix

7.1 Cyber Security Annual Attestation Statement for the 2024-25 Financial Year

Independent Review Office



Cyber Security Annual Attestation Statement – FY2024/2025

I, Samantha Taylor, attest that Independent Review Office (IRO) has assessed cyber security risks in a manner consistent with the mandatory requirements set out in the NSW Government Cyber Security Policy (NSW CSP). The evidence presented to me as a part of this attestation demonstrates IRO's continued commitment to safeguarding sensitive information and ensuring that public trust in government is maintained.

As of 30th of June 2025 the IRO has no cyber security risks outside of the defined risk appetite. Cyber Security matters are actively addressed through agency risk profile governance forums ensuring appropriate oversight to support informed decision making and ongoing management of cyber security risks.

IRO acknowledges that not all the mandatory requirements defined in the NSW Cyber Security Policy have been met by the agency and that through the cyber security strategy and other uplift initiatives these key requirements will be achieved. IRO acknowledges the residual risk that exists across the entity in scope of this attestation.

Sincerely,

Date: 15/09/25

Samantha Taylor
Independent Review Officer

7.2 Internal Audit and Risk Management Attestation Statement for the 2024-25 Financial Year for Independent Review Office

Internal Audit and Risk Management Attestation Statement for the 2024-2025 Financial Year for Independent Review Office

I, Samantha Taylor, Independent Review Officer, am of the opinion that the Independent Review Office has internal audit and risk management processes in operation that are compliant with the seven (7) Core Requirements set out in the *Internal Audit and Risk Management Policy* for the General Government Sector, specifically:

Core Requirements		For each requirement, please specify whether compliant, non-compliant, or in transition
Risk Management Framework		
1.1	The Accountable Authority shall accept ultimate responsibility and accountability for risk management in the agency.	Compliant
1.2	The Accountable Authority shall establish and maintain a risk management framework that is appropriate for the agency. The Accountable Authority shall ensure the framework is consistent with AS ISO 31000:2018.	Compliant
Internal Audit Function		
2.1	The Accountable Authority shall establish and maintain an internal audit function that is appropriate for the agency and fit for purpose.	Compliant
2.2	The Accountable Authority shall ensure the internal audit function operates consistent with the International Standards for Professional Practice for Internal Auditing.	Compliant
2.3	The Accountable Authority shall ensure the agency has an Internal Audit Charter that is consistent with the content of the 'model charter'.	Compliant
Audit and Risk Committee		
3.1	The Accountable Authority shall establish and maintain efficient and effective arrangements for independent Audit and Risk Committee oversight to provide advice and guidance to the Accountable Authority on the agency's governance processes, risk management and control frameworks, and its external accountability obligations.	Compliant
3.2	The Accountable Authority shall ensure the Audit and Risk Committee has a Charter that is consistent with the content of the 'model charter'.	Compliant

Membership

For the 2024-25 reporting period, the independent chair and members of the Audit and Risk Committee were:

Role	Name	Start Term Date	Finish Term Date*
Independent Chair	Bruce Turner AM	1 March 2021	29 February 2026
Independent Member	Elizabeth Gavey	20 April 2021	19 April 2027
Independent Member	Lee Sullivan	20 April 2021	19 April 2027

*Includes extended term of appointments



Samantha Taylor
Independent Review Officer

Date: 02/09/25

7.3 Grants to Approved Lawyers

Table 41: Overview of Total Amounts Paid to Law Firms in 2024-25*

Law Firm	Total Matters	Total Amount Paid
Turner Freeman Lawyers	2,689	\$12.4m
Law Partners Personal Injury Lawyers	1,744	\$9.2m
Industrial Deafness Australia	1,447	\$4.0m
Carroll & O'Dea	1,157	\$5.2m
Brydens Lawyers	767	\$2.5m
Walker Law Group	733	\$4.2m
Longton Compensation Lawyers Pty Ltd	720	\$1.8m
Slater & Gordon	529	\$2.5m
LHD Lawyers	496	\$2.5m
Stephen Young Lawyers	448	\$1.1m
Wyatts Lawyers & Advisors	431	\$541,000
Fern Lawyers Pty Limited	416	\$874,000
Santone Lawyers	402	\$1.7m
Shine Lawyers	387	\$1.2m
Gerard Malouf and Partners	359	\$2.3m
Whitelaw McDonald Solicitors	355	\$1.2m
McNally Jones Staff	351	\$629,000
PK Simpson & Co	350	\$1.7m
Firths the Compensation Lawyers	341	\$1.3m
Stacks Goudkamp	318	\$1.2m
Nikolovski Lawyers	315	\$1.3m
Masselos & Co Lawyers	274	\$696,000
Alliance Compensation & Litigation Lawyers	273	\$619,000
MRM Lawyers	252	\$835,000
Withstand Lawyers	252	\$883,000
RMB Lawyers	239	\$1.2m
Monaco Solicitors	230	\$724,000
Taylor & Scott Lawyers	214	\$872,000
CMC Lawyers	213	\$847,000
NEW Law Pty Ltd	206	\$806,000
Littles Lawyers Pty Ltd	190	\$688,000
Schofield King Lawyers	177	\$731,000

Law Firm	Total Matters	Total Amount Paid
Hall Payne Lawyers	171	\$467,000
Burke & Mead Lawyers Pty Ltd	155	\$555,000
Bale Boshev Lawyers	148	\$707,000
Benefit Legal Lawyers	144	\$465,000
Turning Point Compensation Lawyers	139	\$400,000
Law Advice Compensation Lawyers	131	\$833,000
Kells The Lawyers	127	\$369,000
Everingham Solomons	122	\$580,000
One Law Group	121	\$433,000
Don Cameron & Associates	112	\$537,000
Kingsley Lawson Lawyers	107	\$149,000
Melinda Griffiths Lawyers	107	\$480,000
AJB Stevens Lawyers	104	\$511,000
Peninsula Law	98	\$363,000
Braye Cragg Solicitors	97	\$293,000
Schreuders Compensation Lawyers	92	\$367,000
Premier Lawyers	90	\$473,000
Michael Evers & Co	85	\$389,000
Somerville Laundry Lomax	84	\$487,000
MBT Lawyers	83	\$418,000
Beilby Poulden Costello	78	\$468,000
Bourke Legal Lawyers	76	\$388,000
Garling & Co Lawyers	75	\$399,000
Marsdens Law Group	74	\$287,000
Coutts Solicitors & Conveyancers	73	\$337,000
Lionheart Lawyers	72	\$376,000
Gajic Lawyers	71	\$320,000
Stacks Law Firm Port Macquarie	70	\$300,000
Sky Injury Lawyers	66	\$117,000
Scarton Law	62	\$153,000
Chris Gall Lawyers	60	\$127,000
HRAC Solicitors	59	\$142,000
Lamrocks Solicitors	59	\$234,000
Walsh & Blair Lawyers	59	\$297,000
Bell Lawyers	58	\$137,000

Law Firm	Total Matters	Total Amount Paid
AC Lawyers Nowra	56	\$226,000
Sher Legal	56	\$227,000
Stacks Law Firm Taree	53	\$286,000
CL Compensation Lawyers	52	\$89,000
Toby Tancred Solicitor	52	\$327,000
Barwick Boitano Lawyers	51	\$272,000
Tony Love Lawyers	51	\$159,000
Frisina Lawyers	49	\$272,000
AC Lawyers	47	\$200,000
Bonura Legal	47	\$239,000
Care Compensation Lawyers Pty Ltd	46	\$97,000
John McGuire & Associates	46	\$214,000
Foye Legal	45	\$162,000
KQ Lawyers	44	\$276,000
McDonnell Schroder	44	\$246,000
Bartley Lawyers	43	\$238,000
Stacks Law Firm Tweed Heads	43	\$312,000
The Law office of Conrad Curry	43	\$142,000
CBD Law	42	\$230,000
Kheir Lawyers	41	\$208,000
Brazel Moore Lawyers	39	\$203,000
Advantage Legal Pty Limited	37	\$124,000
Johnston Legal	37	\$182,000
Grieve Watson Kelly Lawyers	36	\$159,000
State Law Group	35	\$102,000
Acorn Lawyers	34	\$193,000
Star Lawyers NSW	34	\$147,000
Rickards Whiteley Lawyers	33	\$141,000
Harrow Legal	32	\$115,000
Stacks Law Firm Forster	32	\$100,000
Nevin Lenne Gross	31	\$207,000
Gorman Jones Lawyers	30	\$205,000
MCW Lawyers	30	\$179,000
MD Law Group	30	\$99,000
Milicevic Solicitors	30	\$169,000

Law Firm	Total Matters	Total Amount Paid
Philip Banister Solicitors	30	\$244,000
Fort Lawyers Pty Ltd	29	\$91,000
Law Works Compensation Lawyers	29	\$46,000
Norwest Lawyers	29	\$206,000
Carters Law Firm	28	\$233,000
Jameson Law	28	\$76,000
Prominent Lawyers	28	\$99,000
Buttar Caldwell & Co	27	\$153,000
Colin Daley Quinn Solicitors	27	\$165,000
Martin Bell & Co Solicitors	27	\$199,000
Shaw & Bunner Legal	27	\$103,000
Ton Legal	27	\$164,000
Ian Collins Solicitors	26	\$130,000
Owen Hodge Lawyers	26	\$93,000
Sanford Legal	26	\$156,000
Commins Hendriks Solicitors	25	\$90,000
Main Lawyers	25	\$153,000
R.J O'Halloran & Co	25	\$98,000
Cardillo Gray Partners	24	\$175,000
M.D. Di Re Solicitor & Attorney	24	\$70,000
AM Legal	23	\$123,000
Ayoub Lawyers	23	\$107,000
Burgan Lawyers	23	\$141,000
Gilberts Legal Pty Ltd	23	\$74,000
Khan Legal	23	\$131,000
McIntosh McPhillamy & Co	23	\$48,000
Adams & Co Lawyers	22	\$58,000
Benchmark Lawyers	22	\$110,000
Drexler Litigation Lawyers	22	\$92,000
Higgins Lawyers	22	\$111,000
Palazzolo & Associates	22	\$84,000
C&M Lawyers	21	\$222,000
MGL Lawyers	21	\$74,000
John Peisley & Associates	20	\$101,000
Koutzoumis Lawyers	20	\$92,000

Law Firm	Total Matters	Total Amount Paid
Shaheen Legal	20	\$12,000
JFK Legal	19	\$64,000
MTM Legal	19	\$60,000
Neville Hourn + Borg Legal	19	\$90,000
Penrose Lawyers	19	\$123,000
The Firm Law Group	19	\$124,000
Baxter Warne Legal	18	\$81,000
George Rigon Solicitor	18	\$46,000
John C Palmieri Solicitor	18	\$95,000
Watson & Warren Law Group Pty Ltd	18	\$100,000
Kenny Spring Solicitors	17	\$69,000
Aussie Lawyers Pty Ltd	16	\$33,000
EPP Law	16	\$37,000
JP Law Solicitors	16	\$134,000
Mortimer Fox Lawyers	16	\$74,000
W.D. Hunt & Associates	16	\$99,000
WNB Legal Pty Ltd	16	\$30,000
Chambers Russell Lawyers	15	\$40,000
David Legal	15	\$65,000
Keen Lawyers	15	\$62,000
Stephen Spinak	15	\$71,000
Supreme Justice Lawyers	15	\$14,000
Adams & Partners Lawyers	14	\$70,000
Deborah Ens Lawyers	14	\$66,000
Foundation Law Group	14	\$60,000
Lopes Legal	14	\$43,000
Lough & Wells Lawyers	14	\$106,000
McKay Compensation Lawyers	14	\$73,000
Randall & Associates	14	\$49,000
Thurlows Compensation Lawyers	14	\$55,000
Andriano & Associates	13	\$70,000
Harris Kelly & Associates Lawyers	13	\$77,000
NSW Compensation Lawyers	13	\$66,000
Sharah Henville Lawyers	13	\$78,000
Emery Partners	12	\$69,000

Law Firm	Total Matters	Total Amount Paid
J N Zigouras & Co	12	\$57,000
Konstan Lawyers	12	\$83,000
NSW Litigation Lawyers	12	\$82,000
Newling Lawyers	12	\$51,000
Paul A Curtis & Co	12	\$75,000
Penny Waters Armstrong Legal	12	\$50,000
Trump Lawyers	12	\$33,000
CVC Law	11	\$15,000
Culleton Lawyers	11	\$37,000
Marocchi Law	11	\$39,000
Shaun Cockle Legal	11	\$43,000
Brad Corcoran, Solicitors & Associates	10	\$52,000
HY Solicitors	10	\$143,000
Mulcahy Lawyers	10	\$28,000
Veritas Law Firm	10	\$57,000
Adventure Legal	9	\$18,000
Diamond Conway Lawyers	9	\$52,000
E Justice Pty Ltd	9	\$63,000
Ian Roche Lawyers	9	\$53,000
McAuley Lawyers	9	\$36,000
Prolegal	9	\$27,000
Simpson Partners Lawyers Pty Ltd	9	\$20,000
Wall & Williams Lawyers	9	\$55,000
Galluzzo Lawyers	8	\$54,000
Goodman Spring Legal	8	\$23,000
John & Co Lawyers	8	\$26,000
Kennedy & Cooke Lawyers	8	\$40,000
Marshall & Gibson	8	\$42,000
Michael Abboud & Co	8	\$11,000
Rishworth Dodd & Co	8	\$67,000
Robert Bryden	8	\$21,000
Shanahan Tudhope Lawyers	8	\$68,000
BE Legal	7	\$29,000
Bourne's Compensation & Family Lawyers	7	\$41,000
Capitol Legal	7	\$51,000

Law Firm	Total Matters	Total Amount Paid
Court Legal	7	\$27,000
KMC Legal	7	\$41,000
Kassira Law	7	\$44,000
Legal Heroes Lawyers	7	\$22,000
Macken and Company	7	\$32,000
Michael J Corbett Solicitor	7	\$42,000
Parnell Legal	7	\$36,000
Peacockes Solicitors	7	\$41,000
Ryan Legal	7	\$21,000
Tonkin Drysdale Partners	7	\$31,000
Barry F. Cosier & Associates	6	\$29,000
Belinda R Wightley	6	\$14,000
Burston Cole & Associates	6	\$21,000
Chadwick Lawyers	6	\$40,000
GTC Legal Pty Ltd t/as Taylor Rose	6	\$5,000
Gillis Delaney Lawyers	6	\$41,000
Hajjar Legal	6	\$10,000
Infinity Law Group	6	\$41,000
Lindeman Lawyers Pty Ltd	6	\$17,000
MK Allan Lawyers	6	\$7,000
Malleys Lawyers	6	\$25,000
Messenger Cole Solicitors	6	\$38,000
Michael Kreveld Legal	6	\$59,000
North Star Law	6	\$17,000
Walkom Lawyers	6	\$29,000
Amond Legal	5	\$17,000
Bond Legal Pty Ltd	5	\$34,000
Bowrey Lawyers	5	\$35,000
Cater & Blumer	5	\$20,000
Chamberlains Lawyers (formerly Shaw McDonald)	5	\$28,000
Michael Charles	5	\$12,000
Michael Vaughan & Co	5	\$5,000
Mitchell Playford & Radburn	5	\$8,000
Todd Legal	5	\$28,000
Turnbull Hill Lawyers	5	\$16,000

Law Firm	Total Matters	Total Amount Paid
United Legal	5	\$26,000
WKB Lawyers	5	\$13,000
Allsworth Lawyers	4	\$38,000
Attwood Marshall Lawyers	4	\$27,000
BTC Lawyers	4	\$5,000
Bareungil Lawyers Pty Limited	4	\$4,000
Cambria Legal	4	\$8,000
Cathay Lawyers	4	\$9,000
Champion Compensation Lawyers	4	\$10,000
Curtis Gant Betts Solicitors	4	\$9,000
Dalzell Law Pty Ltd	4	\$3,000
Elringtons Lawyers	4	\$17,000
KPL Lawyers	4	\$8,000
Kemp & Co Lawyers	4	\$41,000
RP LAWYER Rita Palazzolo Personal Injury	4	\$3,000
Solve Legal Pty Ltd	4	\$18,000
Stephen Smart & Associates	4	\$30,000
Swan & Associates	4	\$23,000
Wilson Fox Lawyers	4	\$13,000
Ardent Lawyers	3	\$34,000
Caldwell Martin Cox Solicitors	3	\$13,000
City Lawyers and Consultants	3	\$5,000
Hosie and Partners Solicitors	3	\$31,000
John Fasha Solicitors	3	\$16,000
Longton Legal	3	\$45,000
MJ Woods & Co Solicitors	3	\$12,000
Navarro & Associates	3	\$14,000
Parramatta City Legal	3	\$7,000
Philip Watson Pty Ltd	3	\$42,000
Renee Roumanos Legal	3	\$4,000
Stephen Teece Solicitor	3	\$13,000
Terence Stern Solicitor & Attorney	3	\$16,000
Walker Legal & Conveyancing Taree	3	\$4,000
Whiteley Ironside & Shillington	3	\$10,000
Adelsteins Solicitors	2	\$7,000

Law Firm	Total Matters	Total Amount Paid
Albury Legal	2	\$19,000
Australian Presence Legal	2	\$9,000
Bellissimo Lawyers	2	\$28,000
Beswick Lynch Lawyers	2	\$16,000
Boyd House & Partners	2	\$12,000
Burgess Accident and Compensation Lawyers Pty Limited	2	\$7,000
E Lee Lawyers Pty Ltd	2	\$9,000
Everett Evans Solicitors	2	\$16,000
Gergis Solicitors	2	\$22,000
Greylings Attorneys	2	\$12,000
Hanna Lawyers	2	\$6,000
Helen Cook Solicitors	2	\$3,000
Hennikers Solicitors	2	\$25,000
MN Compensation Lawyers	2	\$131,000
MacLarens Lawyers	2	\$13,000
QV Law	2	\$3,000
RK Lawyers	2	\$12,000
S Lloyd Legal	2	\$10,000
Staunton & Thompson Lawyers	2	\$4,000
Thomas Murphy & Co	2	\$12,000
Wilsons Solicitors	2	\$9,000
Arnold Dallas McPherson Lawyers	1	\$3,000
CDG Law	1	\$9,000
Cheney Suthers Lawyers	1	\$1,000
Coetsee Legal	1	\$6,000
Colquhoun Murphy	1	\$11,000
Concord Lawyers	1	\$11,000
Cunningham & Adam Solicitors	1	\$10,000
Farrell Lusher Solicitors	1	\$13,000
Fiona Burns Legal & Mediation Pty Ltd	1	\$11,000
Gianacas Argiris McDonald Solicitors	1	\$9,000
Hennessy Dowd Lawyers	1	\$18,000
Hogan Stanton Lawyers	1	\$4,000
Injury Care Compensation Lawyers Pty Ltd	1	\$19,000
Jack Singh Solicitor & Associates	1	\$11,000

Law Firm	Total Matters	Total Amount Paid
Jacqueline Gore & Associates	1	\$3,000
Joanne Worrad Solicitor	1	\$3,000
Lawandi Lawyers	1	\$8,000
Lawpoint	1	\$11,000
Levitt Robinson	1	\$8,000
Low Doherty & Stratford Lawyers	1	\$7,000
M.A.C Calf Lawyers & Associates	1	\$12,000
MWK Lawyers	1	\$2,000
Maxwell Berghouse & Ives	1	\$5,000
Moresheen Legal	1	\$16,000
Nash Allen Williams & Wotton	1	\$4,000
Parker & Kissane Solicitors	1	\$3,000
Pasifika Legal	1	\$9,000
Pinnacle Lawyers	1	\$5,000
Ray Wehbe & Co Solicitors	1	\$7,000
Remington & Co	1	\$1,000
Riley & Riley Solicitors	1	\$12,000
Susan L Robey	1	\$18,000
TK Legal	1	\$23,000

* Amounts have been rounded to the nearest thousand or million, with one decimal place shown where relevant.

Table 42: Overview of Total Amounts Paid to Medical Report Providers in 2024-25*

Medical Report Provider	Total Matters	Total Amount Paid
UHG	13,681	\$11.3m
Assess	2,058	\$3.5m
Report2U	1,356	\$2.2m
MEDirect Pty Ltd	1,126	\$1.8m
MedAssess Australia	645	\$1.0m
MAG	611	\$967,000
Medicins Legale Pty Ltd	532	\$944,000
Pinnacle Healthcare	362	\$636,000
Prudence Consulting	248	\$454,000
MSBC	238	\$310,000
Clinical Evaluations Pty Ltd	109	\$212,000
Sinergy	91	\$161,000

7.4 Compliance Checklist

Table 43: Compliance checklist – Reporting requirements²

Compliance Disclosure (TPG25-10a)	Section in the IRO Annual Report	Has the requirement been completed? (Yes, No or Not Applicable)
Cover pages		
Access (agency's address, telephone number and the business and service hours)	Page ii	Yes
Acknowledgement of Country	Page ii	Yes
Letter of Submission	Page iii	Yes
Overview		
IRO purpose, vision and values	Section 1.1 Message from the Independent Review Officer Section 1.2 Our Minister Section 1.3 Accountable Authority Section 1.4 Accountabilities Section 1.5 IRO Functions and Powers	Yes
Management and structure	Section 1.6 Organisational Structure and Executive Leadership	Yes
Functions and services	Section 1.5 IRO Functions and Powers	Yes
Strategy		
Strategic objectives and outcomes	Section 2 Strategy	Yes
Current and future strategic plans to accomplish outcomes and objectives	Section 2.1 Results Against our Direction	Yes
Systems and processes to measure target outcomes	Section 2.1 Results Against our Direction	Yes
Resource allocation to implement strategic plans	Section 2.1 Results Against our Direction	Yes
Operations & Performance		
Key services	Section 3 Operations & Performance	Yes
Service delivery methods	Section 3 Operations & Performance	Yes
Summary of significant programs and operations (supported by financial/quantitative information)	Section 3 Operations & Performance	Yes

Compliance Disclosure (TPG25-10a)	Section in the IRO Annual Report	Has the requirement been completed? (Yes, No or Not Applicable)
Operations & Performance		
Performance metrics regarding targeted outcomes	Section 3 Operations & Performance	Yes
Economic or other factors affecting achievement of operational objectives	Section 1.1 Message from the Independent Review Officer	Yes
Use of technology (for example, artificial intelligence, automated decision-making)	Not Applicable	Not Applicable
Approach to innovation and continuous improvement	Section 2.1.5 Improving How We Work	Yes
Infrastructure program	Not Applicable	Not Applicable
Events arising after the end of the annual reporting that significantly affect operations, or the community served	Not Applicable	Not Applicable
Implementation of price determination or recommendation according to section 18(4) of the Independent Pricing and Regulatory Tribunal Act 1992	Not Applicable	Not Applicable
Management & Accountability		
Numbers and remuneration of senior executives	Section 4.2.1 Senior executives and salaries by band for 2024-25	Yes
Average total remuneration package for senior executives in each band at the end of the reporting year, compared with the average at the end of the previous reporting year	Section 4.2.1 Senior executives and salaries by band for 2024-25	Yes
Percentage of total employee-related expenditure in the reporting year that relates to senior executives, compared with the percentage at the end of the previous reporting year.	Section 4.2.1 Senior executives and salaries by band for 2024-25	Yes
Organisational chart indicating functional responsibilities	Section 1.6 Organisational Structure and Executive Leadership	Yes
People (including full time employees and headcount of employees)	Section 4.2.2 Employee Relations Policies and Practices	Yes
Consultants	Section 4.1.4 Consultants	Yes

Compliance Disclosure (TPG25-10a)	Section in the IRO Annual Report	Has the requirement been completed? (Yes, No or Not Applicable)
Management & Accountability		
<i>Privacy and Personal Information Protection Act 1998</i> (PIPP Act) requirements	Section 4.1.1 Privacy	Yes
<i>Government Information (Public Access) Act 2009</i> (GIPA Act) requirements	Section 4.1.2 Right to Information	Yes
<i>Public Interest Disclosure Act 2022</i> (the PID Act) requirements	Section 4.1.3 Public Interest Disclosures	Reporting by IRO not required
Internal audit and risk management policy attestation, including: attestation statement based on the relevant template at Annexure C of TPP20-08	Section 4.3 Risk and Insurance Reporting	Yes
Sustainability		
Climate-related financial disclosures	Not Applicable	Not Applicable
Disability Inclusion Action Plan	Section 5.2.2 Disability Inclusion Action Plan and Multicultural Action Plan	Yes
<i>Modern Slavery Act 2018</i> requirements	Section 5.2.3 <i>Modern Slavery Act 2018</i> (NSW) reporting	Yes
Work health and safety	Section 5.2.1 Work Health and Safety (WHS)	Yes

Compliance Disclosure (TPG25-10a)	Section in the IRO Annual Report	Has the requirement been completed? (Yes, No or Not Applicable)
Workforce diversity	Section 5.2.2 Disability Inclusion Action Plan and Multicultural Action Plan	Yes
Financial Performance		
Summary narrative and analysis of the agency's financial performance during the period	Section 3.2 Our Financial Performance	Yes
Annual GSF financial statements	Section 6.1 Financial Statements	Yes
Controlled entities' financial statements	Not applicable	Not applicable
Audit report concerning the annual GSF financial statements	Section 6.1 Financial Statements	Yes
Costs and benefits associated with machinery of government changes	Not Applicable	Not Applicable
Requirements under Schedule 5 section 13(4) of the Personal Injury Commission Act 2020		
The number, type and source of complaints made under Schedule 5 of the Personal Injury Commission Act 2020	Section 3.3 Solutions	Yes
The number and type of complaints that were made under Schedule 5 of the Personal Injury Commission Act 2020 during the year but not dealt with	Section 3.3.8 Complaints made but not finalised in FY24-25	Yes
Operation of ILARS	Section 3.4 Independent Legal Assistance and Review Service (ILARS)	Yes



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