



14 April 2026

Submission to the Victorian Parliament Legal and Social Issues Committee

Inquiry into Claims Made Through the
Transport Accident Commission (TAC)

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Informed by ARPA Victorian Council and Members

www.arpa.org.au

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Mr. Joe McCracken MP

Chair

Legal and Social Issues Committee

Parliament of Victoria

14 April 2026

Dear Chair,

The **Australian Rehabilitation Providers Association (ARPA)** is the national peak body representing workplace rehabilitation providers across Australian personal injury schemes, including workers compensation and transport accident/compulsory third-party schemes. ARPA members deliver vocational rehabilitation, functional assessment, return to work planning, care coordination and allied health services to injured workers and road-users across all jurisdictions, including Victoria.

This submission is provided by ARPA and is informed by the experience and input of ARPA's Victorian Council and members operating within the TAC scheme.

ARPA welcomes this inquiry. Our members interact daily with the TAC scheme and with injured road users navigating the processes that the committee has been asked to examine. We welcome the opportunity to appear before the committee.

Executive Summary

The Australian Rehabilitation Providers Association (ARPA) supports the ongoing effectiveness of the TAC scheme in delivering early and appropriate rehabilitation outcomes for injured road users.

This submission identifies opportunities to strengthen system performance through:

- Increased transparency of claims expenditure and rehabilitation investment
- Stronger use of provider performance data to drive outcomes
- Alignment of return-to-work obligations with the WorkSafe Victoria (WorkSafe) framework
- Enhanced strategic engagement between TAC and rehabilitation providers

ARPA considers these reforms will strengthen recovery outcomes, improve return to work rates, and support the long-term sustainability of the TAC scheme.

A. Rehabilitation is focus for the TAC Function

The objectives of the Transport Accident Commission [1] include providing compensation in the most “*socially and economically appropriate manner as expeditiously as possible*” and reducing the cost to the Victorian community of transport accident injury. The TAC Act's definition of loss of earning capacity in section 7(c) explicitly requires the TAC to have regard to the *potential for rehabilitation and the person's ability to undertake rehabilitation* when assessing a claimant's entitlements.

Under section 12, it is the TAC's duty to design and promote, *so far as possible*, a program designed to secure the early and effective medical and vocational rehabilitation of persons injured as a result of transport accidents [2].

ARPA national membership experience indicates that the TAC is broadly fulfilling these legislative functions. The TAC has recently updated its expectations of vocational rehabilitation providers. The panel of providers have clearer expectations about the role they serve supporting recovery, independence, and return to work of injured road users.

The TAC has also improved the referral process from their internal teams, so vocational rehabilitation is initiated for the injured person within three to four weeks from date of injury.

The new vocational rehabilitation panel process includes monthly and quarterly claims operational dialogue. ARPA recognises this as a positive development, though the opportunity for TAC and ARPA to meet semi-regularly to discuss strategic opportunities to improve the wellbeing of injured road users would strengthen system-wide focus on claimant outcomes and strategic opportunities such as allied health skills development.

Recommendation 1:

A six-monthly strategic dialogue with ARPA’s Victorian leadership and national representatives would help canvas and explore issues more fully, such as occur with WorkSafe Victoria.

Given the current structure of the 2026 TAC vocational rehabilitation panel, there are many ARPA members who do not have access to TAC’s claims performance, nor the comparative investment into vocational rehabilitation over other treatment. For the general transparency of the TAC – as a government-owned monopoly scheme – ARPA recommends that the TAC provide a greater level of transparency to its claim’s costs. A model for how this could look is the NSW State Insurance Regulatory Authority’s Open Data Dashboard [3], which breaks down 16 heads of claims costs.

Gross payment by classification		
Classification	Gross Payment (\$)	Proportion (%)
Future Economic Loss (Common Law)	\$461,096,172	25.9%
Non Economic Loss	\$364,572,582	20.5%
Treatment	\$321,283,650	18.0%
Loss of Income (Stat Benefits)	\$246,804,134	13.9%
Past Economic Loss (Common Law)	\$117,433,040	6.6%
Claimant Legal	\$87,310,663	4.9%
Insurer Legal	\$68,891,090	3.9%
Rehabilitation	\$47,798,425	2.7%
Insurer Investigation	\$41,536,478	2.3%
Care	\$31,548,729	1.8%
Insurer Medico Legal	\$18,924,957	1.1%
Funeral	\$7,249,838	0.4%
Funds Management	\$5,294,387	0.3%
Home/Vehicle Modifications	\$1,467,219	0.1%
Uncategorised	(\$4,032)	0.0%
Recoveries (Non Sharing)	(\$39,712,893)	-2.2%
Total	\$1,781,494,440	100.0%

Example 1: SIRA Open Dashboard for Motor Accident Injuries Insurance (accessed via sira.nsw.gov.au/CTP-open-data)

Recommendation 2:

The TAC public facing website publish claims cost breakdowns by service type and heads of damage. The committee should consider whether a public-facing actuarial review could also be published to assist providers and the Victorian public better understand the performance of the TAC supporting injured road users.

B. Strengthening return to work obligations and incentives

ARPA believes the contribution our members make to injured road users returning to independence and employment, supports the wellbeing of the individual, their family, and the broader community. Designing the mechanism of the delivery of this support is important to ensure that providers of vocational rehabilitation are incentivised but also held to a common standard. There is an opportunity for the TAC to further leverage vocational payments data to match performance outcomes across providers and regions. Currently this data is self-reported, which may limit the reliability of comparative performance insights between providers. ARPA understands TAC is progressing toward this approach to manage provider performance.

Recommendation 3:

TAC utilises vocational rehabilitation providers' payment data to benchmark performance and promote effective rehabilitation services.

C. Supporting injured road users through rehabilitation performance

Finding suitable duties for workers injured in the workplace is a requirement of Victoria's workers compensation scheme, but currently not a requirement under the TAC Act. Aligning these requirements to be the same as the WorkSafe standard would provide a better environment for a motor vehicle accident client to return to their workplace, with the consequential benefits to their health and life. ARPA acknowledges the potential impact this has on employers who have no control over employees experiencing motor vehicle accident and considers this change would promote better recovery outcomes for injured Victorians.

Where there are no suitable duties or it is difficult to support a worker to return to their pre-TAC accident workplace, there should be the option for stronger incentives and easier deployment of incentives for new employment services.

Recommendation 4:

Employers return to work obligations under the TAC Act should align with those under the WorkSafe Victoria Legislative Framework to give the injured road user the best chance to recover and return to pre-injury circumstances.

Summary

This submission reflects ARPA's national perspective, informed by member experience within the Victorian TAC scheme. Overall, ARPA submits that vocational rehabilitation under the TAC, vocational rehabilitation is functioning as an essential, legislatively grounded pillar of the TAC scheme. Our recommendations are intended to help the TAC seize the full system value that our members believe is not yet fully realised. Greater transparency in claims expenditure, more systematic use of rehabilitation performance data, and closer alignment with work participation settings in the workers compensation system would strengthen outcomes for injured road users and deliver better value for the Victorian community. Ongoing strategic engagement between TAC and vocational rehabilitation provider will be critical to ensuring the scheme continues to meet its statutory objectives in a socially and economically sustainable way.

Your sincerely

Nat Davey
Chief Executive Officer
Australian Rehabilitation Providers Association (ARPA)

[1] According to section 11 of the *Transport Accident Commission Act 1986*

[2] TAC Act, sections 12(3)-(4).

[3] Available via: <https://www.sira.nsw.gov.au/CTP-open-data> accessed 7 April 2026.