



24 September 2020

Committee Secretary
Education, Employment and Small Business Committee

By email to: eesbc@parliament.qld.gov.au

Dear Committee Secretary

Re: Workers' Compensation and Rehabilitation and Other Legislation Amendment Bill 2020

Thank you for the opportunity to provide further feedback on the proposed Bill. The Royal Australian and New Zealand College of Psychiatrists (RANZCP) is the principal organisation representing the medical specialty of psychiatry in Australia and New Zealand and is responsible for training, educating and representing psychiatrists in policy issues. The Queensland Branch (RANZCP Queensland Branch) currently has 852 Fellows and 317 trainees.

As outlined in the Bill's explanatory notes, myself and representatives from the RANZCP met with the Office of Industrial Relations to provide advice on this issue in July 2020. As indicated at the time, the RANZCP Queensland Branch is supportive of legislative reform which presumes that first responders with specified injuries such as PTSD are deemed work-related unless evidence to the contrary.

In 2018, the [RANZCP made a submission](#) to the Australian Federal Government Inquiry into the role of Commonwealth, State and Territory Governments in addressing the high rates of mental health conditions experienced by first responders, emergency service workers and volunteers. The RANZCP emphasised the increased awareness of and concern for the possible consequences of prolonged and repeated exposure to trauma. Evidence shows that large numbers of emergency workers experience symptoms of post-traumatic stress disorder (PTSD) and will be at risk for other mental health conditions. Our recommendations included streamlining workers compensation claims and we are pleased to see Tasmania, the Northern Territory and now the Queensland government making efforts to address these processes.

Psychiatrists are well placed to provide support and expert advice for the management of trauma exposure, particularly the diagnosis and treatment of post-traumatic stress disorder (PTSD). We support the proposed Bill which requires the robust diagnosis by a registered psychiatrist. Many of our members in Queensland already provide assessments for work cover claims related to mental health injury and would be prepared to support the requirements of the Bill. The RANZCP Queensland Branch does wish to note our view on diagnostic manuals as the proposed legislation requires a PTSD diagnosis be made in accordance with the *Diagnostic and Statistical Manual of Mental Disorders (DSM-5)*.

In the [RANZCP position statement 77 on diagnostic manuals](#) we do not provide an opinion on the content or application of specific diagnostic manuals. However, it is mentioned that there are limitations to its use and that many clinicians argue that the complexity of patients' presentations cannot be adequately summarised by limited diagnostic codes. PTSD is a clinical diagnosis arrived at following the understanding of a patient's full history and a Mental State Examination (MSE). While diagnostic manuals and test like the DSM are useful to support a diagnosis, they do not make a diagnosis.

For example, the RANZCP recently endorsed Phoenix Australia's [Guidelines for the Prevention and Treatment of Acute Stress Disorder, Posttraumatic Stress Disorder and Complex PTSD](#). We would encourage our members to refer to these guidelines when considering making a PTSD diagnosis, alongside the use of the DSM if deemed appropriate in their clinical judgement. Therefore, our suggestion to the Education, Employment and Small Business Committee would be for the Bill to provide for psychiatrists to make a diagnosis of PTSD based on their extensive training and clinical experience in which a number of factors, standards and guidelines are considered.

Please do not hesitate to contact me if you would like to discuss the contents of our submission further. I can be contacted via the RANZCP Policy Manager, Amelia Rhodes at amelia.rhodes@ranzcp.org or on (03) 9601 4921.

Yours sincerely



Professor Brett Emmerson AM
Chair, RANZCP Queensland Branch Committee