



Customer
Service

Restructure Management Plan

State Insurance Regulatory Authority

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2. Background and Reasons for the Organisational Change

1.1 Scope

This Restructure Management Plan (RMP) applies to all ongoing non-executive roles within the State Insurance Regulatory Authority (SIRA). The executive restructure process is being run in parallel and is not part of this RMP. The RMP process will realign SIRA's functions and resourcing by using the current FTE budget envelope.

This RMP also includes the 9 x SIRA inspectorate roles which has been approved to transition to SafeWork NSW through a separate cabinet process as part of the SafeWork NSW reform agenda.

1.2 Context

SIRA was established on 1 September 2015 under the *State Insurance and Care Governance Act 2015* as the regulator of compulsory insurance schemes in NSW. In doing this, the Government intended to achieve improved regulation of schemes, stronger supervision, better regulatory capability, and increased efficiencies so that the agency can easily adapt to current and future challenges across schemes.

Since then, SIRA has been subject to multiple realignments and/or structural modifications but had always had its regulatory functions primarily organised by scheme.

In 2024 SIRA developed its regulatory framework that sets out a consistent regulatory approach across the schemes SIRA regulates. It aimed to ensure regulatory action is consistent, proportionate, and targeted towards achieving SIRA's regulatory objectives and outcomes. In January 2025, SIRA launched its strategy SIRA2028, that sets out the strategic priorities and goals.

SIRA engaged an independent consultant (CorbettPrice) to engage with staff to understand the strategic and operational challenges in the current state, and to develop a target operating model that would best deliver on the strategy, regulatory framework and legislative responsibilities.

The current state themes, challenges and opportunities were:

Themes	Identified Challenges and Opportunities for Improvement include
Regulatory alignment, structure and functions	<ul style="list-style-type: none">• Different cultures, approaches and ways of working• Limited flexibility in resourcing to deliver priorities• Challenges for cross scheme teams to work effectively
The role of enabling areas	<ul style="list-style-type: none">• Integration between regulatory functions and enabling teams• Optimising shared services
Data and digital capabilities	<ul style="list-style-type: none">• Enhance use of data to support evidence-based decision making• Capability and interoperability of legacy systems
Governance	<ul style="list-style-type: none">• Support for clear decision making and accountability• Priority overload

Internal capabilities	<ul style="list-style-type: none"> • Building of enterprise-wide capabilities (business analysis, business case development, planning, project management etc.)
Knowledge management	<ul style="list-style-type: none"> • Improve knowledge management and sharing across teams
Customer Experience maturity	<ul style="list-style-type: none"> • Improving Customer Experience maturity
Stakeholder engagement	<ul style="list-style-type: none"> • Strengthen stakeholder engagement for scheme outcomes

As a result, it was agreed that SIRA should adopt a hybrid-functional target operating model, that allows the organisation to be flexible and dynamic, while retaining scheme specific expertise.

This RMP sets out the proposed SIRA structure for consultation with impacted staff and relevant unions. The intention of the RMP is to place as many ongoing staff as possible in the new SIRA structure. This RMP outlines the arrangements for the consideration of placement of the ongoing staff at SIRA.

2.3 Objectives

This RMP process ensures that SIRA is set up to deliver on its strategy, provide consistent regulatory approach across the schemes it regulates, to increase SIRA's ability to ensure NSW insurance schemes protect and support the people who need them, now and in the future.

This process forms part of the evolution of SIRA to align the organisation's structure and functions to best deliver on SIRA's strategy, regulatory framework and its legislative responsibilities. This best positions SIRA to be a risk-based, intelligence-led, customer-centred regulator.

There are also proposed reforms across the three schemes that SIRA regulates: the workers compensation scheme, home building regulation compensation and motor accidents insurance scheme. SIRA must establish an organisational structure that is robust and agile to meet the evolving demands of the community, policy holders, people with an injury or claim, regulated entities, stakeholders, representative groups and others.

The restructure will:

- Enhance customer focus by increasing Executive Leadership Team (ELT) visibility and driving greater customer maturity across SIRA.
- support succession planning and career development across SIRA, foster cross-functional learning, and build deep expertise.
- create flexible opportunities to manage workload peaks, encourage collaboration across schemes, reduce reliance on individuals by pooling resources, and further embed good governance throughout SIRA.
- prioritise resourcing for supervision directorates and enhance consistency and maturity in supervision and enforcement.
- align SIRA's approach with best practice regulatory standards and reinvest efficiencies into core regulatory functions.

- promote continuous improvement and accountability, strengthen strategic intelligence and stakeholder engagement functions.
- enable standardisation of tools and methods to share best practices across the organisation.
- improve the use of data for evidence-based decision-making, support holistic system planning across functions and ensure that digital investments are aligned with strategic outcomes.

1.4 Stakeholder/Customer Priorities

The priorities of our stakeholders and customers are summarised as follows:

Stakeholder	Priorities
Impacted employees	Consistent and transparent communication and consultation is provided to support our people through the process.
Non-impacted employees	Maintain engagement whilst supporting and being conscious of those impacted employees.
Customers (policy holders and people with an injury/claim and their family/carer, and regulated entities and stakeholders)	Minimal disruption to services to ensure a continued seamless experience.
Department of Customer Service	Increase centralised shared services with minimal operational disruption.
Relevant unions	Consult and inform

2. Change Management Approach and Principles

The following principles underpin the approach to managing staff throughout the change:

- Minimal disruption to delivery of SIRA services;
- Placement of existing ongoing, at-grade staff where staff have demonstrated capability, and SIRA will look to maximise opportunities for employee job matching and redeployment;
- Regular, open consultation with staff and unions;
- Adherence to public sector policy and legislation;
- Implementation of fair, transparent and accountable processes;
- Appropriate information and support mechanisms for staff to both assist their understanding of and transition through the process.
- The structure is aligned with the DCS Design Principles.

3. Approval

The Secretary, Department of Customer Service (DCS) and Chief Executive of SIRA, will approve the implementation of the RMP following consultation with unions and staff.

4. Employee Communication Strategy

Staff engagement and communication will continue to be important to the successful implementation of this RMP. The SIRA Executive Leadership Team and SIRA's Functional Review team will act as dedicated points of contact for staff. The SIRA Executive Leadership Team will be the final decision makers.

The Executive Leadership Team and the Senior Leadership Team is committed to:

- Explaining the reasons for change to staff who are directly and indirectly affected, by communicating with them on an ongoing basis until the changes are implemented and fully digested by staff and the organisation;
- Delivering formal communication, including ongoing divisional briefings and team meetings with all employees to discuss issues and answer questions relating to the restructure;
- Ensuring all staff can directly contact the executive team, the functional review team, and People and Culture, with questions relating to the restructure;
- Clearly communicating the impact of the change and ensuring the transition arrangements are regularly communicated to staff, and
- Consulting with the union in relation to issues raised by staff.

The core elements of the communications strategy to support the RMP are as follows:

- Conduct staff briefings outlining the major elements of the RMP and implementation;
- Give all staff who are affected by the RMP access to the appropriate documentation, as it relates to the changes;
- Give all staff the opportunity to ask questions relating to the RMP and opportunity to provide feedback, and
- Maintain the current mechanism to consult with the respective union on all elements of the RMP.

Feedback from staff and the union will be actively sought during the consultation period. This feedback will be carefully considered, and any necessary adjustments will be made to the final structure and to this RMP before final approval is sought from the DCS Secretary for implementation.

Information will be available to staff via the Functional Review Intranet Hub.

5. Employee Support Services

DCS is committed to providing comprehensive support services to staff impacted by the change, both at a personal and organisational level. Ongoing support from the SIRA Executive Leadership Team, SIRA Functional Review team, and People & Culture will continue on an as required basis. In addition, the support program to staff will include:

- DCS Employee Assistance Program, a telephone and face-to-face confidential counselling available to both staff and their immediate families;
- Training and resources aimed at building capability in preparing CVs and cover letters for applications for roles. This includes the NSW Public Service Commission Capability tools to assist with job applications.

- Resources for people leaders to use to promote and support their teams through change. This includes resources from the recent IPAA change training, and setting aside a dedicated calendar time to allow people to apply for roles.
- Resilience training including Black Dog Institute workshops on building resilience to workplace stress, and DCS resilience training via MyCareer.
- A dedicated Resources & Support page on SIRA's Functional Review Intranet Hub to provide staff with all the latest information pertaining to the restructure;
- other support services identified as appropriate during the consultation will be provided.

6. Consultation

The SIRA Executive Leadership Team is committed to ensuring that all parties are consulted as part of the RMP communication and approval process, and that such consultation would be conducted prior to the RMP being approved by the Secretary, DCS.

Implementation of the new structure will proceed after consultation has occurred with staff and the respective unions, any amendments are considered, and approval to implement has been received by the Secretary, DCS. the DCS People & Culture team will manage consultation around the RMP and its implementation.

Where issues remain unresolved during or after the consultation phase, DCS and the respective unions will use existing dispute resolutions procedures.

7. Workforce Planning Needs and Impact on Services and Functions

The proposed key activities for each of the proposed future state functions includes:

Function/Division	Designated Activities
Regulatory Strategy & Stewardship	<ul style="list-style-type: none"> • Design schemes (WC, CTP, HB, including Premium and Markets, RTW and Health) • Research Translation of insights from customers, stakeholders and data • Strategic Intelligence • Scheme Performance • Regulatory Risk
Regulatory Operations	<ul style="list-style-type: none"> • Licensing • Supervision (WC insurer, CTP insurer, HB insurer, Employer, Provider) • Enforcement (WC, CTP, HB) • Premium filings, prudential regulation and monitoring of insurer premium market practices.

	<ul style="list-style-type: none"> • Innovation
Enterprise Enablement and Support	<ul style="list-style-type: none"> • Enterprise Data & Analytics • Digital • Communications • Stakeholder Engagement • Customer Resolution & Advisory • Enterprise Risk • Strategy and Governance • People
Customer Support	<ul style="list-style-type: none"> • Customer experience and operational support • Fatality support • Contact centre
Finance & Procurement	<ul style="list-style-type: none"> • Finance • Procurement
Transformation Office	<ul style="list-style-type: none"> • Transformation • Reform implementation • Operations excellence

8. Changes to Organisational Design

SIRA's operating model is changing to a hybrid-functional model, while retaining scheme specific expertise, to address scheme complexity and risk. The key shifts bring together like functions into three proposed divisions:

- Regulatory Strategy and Stewardship
- Regulatory Operations
- Enterprise Enablement and Support

The changes to the proposed structure are:

- The proposed structure will result in 439 roles and will have a decrease in 9 roles when the SIRA inspectorate roles are transitioned to SafeWork.
- There will be high impacts to approximately 160 staff, either because the role description has fundamentally changed, or because there are fewer roles than people in specific teams.
- To develop the proposed structure, SIRA considered the DCS organisational design principles, the Public Service Commission (PSC) Role Description Guidelines, and the NSW Public Sector Capability Framework.

- Where possible and appropriate, role descriptions from the DCS Role Description Library have been used. New role descriptions are in the process of being evaluated and will be made available to staff for feedback.
- The roles in the proposed structure are listed below:

Clerk Grade	Roles in the current structure	Roles in the new structure	Variance (FTE)
11/12	92	82	-10
9/10	145	149	4
7/8	107	101	-6
5/6	69	71	2
3/4	35	36	1
TOTAL	448	439	-9

9. Proposed Means for Filling Roles

Roles will be filled in accordance with the prevailing rules and protocols in place under the *Government Sector Employment Act 2013 (GSE)*, the *Government Sector Employment Rules 2014* and relevant transitional arrangements, including the NSW Government Workforce Mobility Placement Policy (WMP).

Under the GSE Act, employees do not own a 'role'. Instead, employees are initially employed in a classification (kind) of work and level (e.g. grade 5/6) and thereafter may be assigned to roles based on organisational needs and their capabilities.

Roles will be filled concurrently for each function. However, all relevant flexibility will be applied to implement the approved restructure management plan where there is a business benefit and no disadvantage to affected employees.

Employees cannot rely upon expired appointments or assignments. They must be current as at the time of the launch of the final RMP.

9.1 Filling Roles

The following stages will be followed for the filling of roles:

RMP Stage 1 – Direct Assignment

Ongoing non-executive SIRA employees who have been assigned to an existing role under the *Government Sector Employment Act 2013* may be directly assigned to roles in the new structure where there is minimal change to their role or the number of roles in the new structure. These employees will not need to submit an expression of interest (EOI). Employees who will be directly assigned will be advised by their managers and will be issued with direct assignment letters.

RMP Stage 2 – Suitability Assessment (EOI)

- Ongoing non-executive SIRA employees who have not been assigned to a role during RMP Stage 1 will be invited to express an interest in being suitability assessed for remaining at-grade roles. Eligible employees will be assessed for assignment against all suitable roles within a grade.
- A merit assessment in line with the Assessment Standards will be undertaken and candidates will be ranked accordingly as to best fit for each role. If requested, the Hiring Manager of the assessment panel must provide feedback to the unsuccessful employees for Stage 2, detailing the reasons as to why they were not assigned to a role. Employees will not be advised of their actual ranking.
- Eligible employees will have the opportunity to express their preferences in terms of roles and locations however may also be assessed for assignment against other roles within a grade.

At grade employees who do not express an interest in being assessed may still be considered for matching to any remaining role after the above reviews.

Eligibility for Stages 1 and 2

Ongoing impacted non-executive SIRA employees at the relevant grade for role(s).

Mobility Process for employees not assigned in Stages 1 or 2.

- Ongoing SIRA employees who have not been directly assigned to a role in Stages 1 or 2 will be impacted and referred to the NSW Government Workplace Mobility Placement Program.
- The Government Sector Employment Act 2013 and the Government Sector Employment Rules 2014 provide a number of mobility provisions to support employees and employers as they respond to workforce needs. As such, ongoing employees are assigned to a specific role however they may also be assigned to other roles at the same classification within the agency. This is also referred to as at-grade mobility.

NSW Government Workforce Mobility Placement Policy (WMP)

- a) The premier's memorandum on the NSW Government Workforce Mobility Placement policy came into effect on 18th December 2023. The WMP will deliver on the NSW Government's commitment to retain experienced public servants within government when their roles are impacted by change. DCS has now applied this policy and has aligned the mobility approach accordingly.

- b) The key features of the Placement Policy include:
- An eight-week 'placement process period' for employees whose roles are at risk to be matched to vacant roles within the government sector, prior to agencies and departments commencing redundancy/redeployment programs
 - The Workforce Mobility Placement Team (the WMP Team) within Premier's Department coordinates a whole-of-government approach to cross-sector mobility and to oversee the application of the Placement Policy
 - The requirement for consultation to occur between departments and agencies, impacted employees and the WMP Team, during the stages of the placement process
 - A centralised placement process for identifying and placing employees into other roles in the government sector
 - A five-day matching process period in which roles within the sector are not advertised externally until a matching process is undertaken for impacted employees
- c) Employees who are impacted by change will be formally notified that they are impacted and mobility placement process will commence the 8-week placement process:
- Impacted employees will then be assigned to a dedicated DCS Mobility Advisor, who will look for opportunities within DCS and work with the Workplace Management Placement Team (WMP) team to find suitable roles across the sector.
 - The DCS Mobility Advisor will also provide tailored information, advice and support including access to learning and development opportunities and support services based on individual needs.
 - If a role is not identified at the end of eight weeks, the employee may then be declared excess in line with the Managing Excess Employees Policy and will be offered the choice of either voluntary redundancy, or an additional 3 months of mobility support to find another role.

What does support look like for DCS impacted employees?

DCS has a dedicated Mobility Team to support our excess and impacted employees, providing customised guidance and assistance as they navigate change. Our DCS mobility team will work with the WMP team to identify suitable opportunities for DCS employees across the sector and with our Talent Acquisition team to identify suitable opportunities within DCS.

The DCS Mobility Advisors will offer 1:1 support to ongoing employees who have received formal notification that their roles are impacted. These advisors will work closely with each eligible individual to create a customized mobility support plan, aiming to facilitate a smooth transition and assist in securing their next role within the organisation or within the sector.

In addition to supporting the recruitment process, our Mobility Advisors will offer guidance, resources, and advice on job applications, career development, and skill enhancement.

RMP Stage 3 – Mobility

- a) Employees who are unsuccessful at Stages 1 or 2 are considered impacted and will enter the 8-week WMP.
- b) Remaining roles that have not been filled in Stages 1 or 2 will be made available to impacted and excess employees prior to further recruitment. The DCS Mobility team will coordinate this.
- c) DCS employees who are in talent pools may be considered at this stage.
- d) At-grade non-impacted DCS staff may be considered for subsequent assignments.
- e) Impacted and excess employees at a higher grade may also be considered at this stage, should they wish to be assigned to a lower graded role pursuant to section 46 (4) of the GSE Act. This will only occur after employees at the usual (substantive) role level have been considered.
- f) Eligible temporary employees that have been comparatively assessed and employed in the role for a continuous period of 12 months may be assigned to a role at grade during this stage, only after the roles have passed through mobility. Temporary employees who believe they are eligible should speak with their appropriate people leader.

RMP Stage 4 – Recruiting remaining vacancies

If roles are not filled via Stages 1, 2 and 3, roles that have the appropriate approval will then progress to external advertisement via a GSE compliant recruitment process.

9.2 Assessment Methodology for Stages 1 and 2

The SIRA Executive and Senior Leadership Team, will undertake the direct assignment and internal matching process (direct assignment panel).

Assessment Standard

The assessment standard for both Stages 1 and 2 is that employees must:

- d) Meet the essential requirements of the role as detailed in the role description; and
- e) Be able to perform the focus capabilities to the appropriate standard as detailed in the role description as applied to the nature and context of the work to be performed

Direct Assignment/Internal Suitability Assessment Process

The following process will apply to Direct Assignment/Internal Suitability Assessment:

- f) Employees will be advised of the timing of the direct assignment/internal matching process and will be invited to express an interest in a maximum of two roles;
- g) Employees expressing an interest will be required to submit an application, that being a 1-2 page covering letter plus a resume which includes the name and contact details of one referee, that being the current or previous manager;
- h) The covering letter and resume should address the Assessment Standard (as above) criteria for the role;
- i) Employees may submit a single covering letter for all roles.
- j) Whilst employees can nominate their preferences for roles, they may be considered for all roles within the grade in line with the above assessment standard;
- k) In determining suitability for a role, in either stage, the panel may seek clarification on the various elements of the Assessment Standard from the employee's current manager and/or referee;
- l) Interviews will be undertaken to gain a better understanding of the applicant's capabilities and their suitability for role where:
 - o The panel cannot determine suitability or otherwise of an applicant for the role(s) in question based on the documentation supplied and discussion with either or both the current manager and referee; or
 - o The panel has been unable to match an applicant for a role during Stages 1 and 2.

The SIRA Chief Executive will approve the direct assignment and internal matching recommendations.

9.3 Right of Review

There is no right of review against assignment decisions in either Stages 1, 2 or 3 consistent with Rule 24 of the *Government Sector Employment Rules 2014*.

In respect to a Right of Review for Stage 4, Section 24 of the *Government Sector Employment Rules 2014* provides that a Public Service non-executive employee (the relevant employee) may request a review of a promotional decision.

A request for the review of a promotion decision may only be made on the ground that any part of the selection process for the role concerned was irregular or improper.

The review is not a review of the merit of the relevant employee for the role.

A promotional decision is one where the successful and unsuccessful (seeking the review) candidates are existing Public Service employees and their current remuneration are at a lower level than the role the unsuccessful candidate is seeking the review for.

Section 24 of the GSE Rules provides for a request for the review of a promotion decision:

- a) Must be in writing to the head of the Public Service agency in which the role to which the promotion decision relates and is to be carried out; and
- b) May only be made within the period of 10 business days after the relevant employee is advised of the promotion decision.

If a request for the review of a promotion decision is made, the engagement of the other employee in the role to which the decision relates cannot be implemented until the review has been completed.

10. Voluntary Redundancy Program

A formal Voluntary Redundancy (VR) Program will not be conducted as part of the SIRA restructure.

11. Impact of the Restructure on EEO Groups

Where employees have a disability, consideration for appointment will be consistent with the terms of the *Disability Services Act 1993* and the *Anti-Discrimination Act 1977* or other legislation. Modifications to the assessment process, where necessary, will be made consistent with the requirements of the *Government Sector Employment Act 2013*.

Impact on rural communities/regional locations: SIRA roles are held in Sydney, Gosford and one position in Newcastle location, the proposed RMP has no impact on the regional location or rural communities.

12. Management of Excess Employees

Ongoing employees will be declared 'Excess' when they can no longer reasonably expect to be appointed to a role within the new structure following Stage 2 of the RMP and following mobility support. At this point, they will be declared 'Excess' and managed in accordance with *Managing Excess Employees Guidelines (D2011_007)* and the *Managing Excess Employees Policy (August 2011)*.

The SIRA Chief Executive will determine the date the employee is to be declared 'Excess'. The employee will receive a letter notifying them of their status and options.

13. Timetable for Implementation

Action	Week Commencing Proposed Date
Draft Restructure Management Plan (RMP) approved by SIRA Chief Executive to release for consultation	11 August 2025
Briefings for Employees and Unions	19 August 2025
Consultation period with affected employees and the Unions commences	
Consultation period closes	2 September 2025
RMP finalised and approved for implementation	12 September 2025
Briefings for Employees and Unions	15 September 2025
Stage 1 - Direct Assignment	w/c 15 September 2025
Stage 2 - Suitability Assessments	End of September / October 2025
Stage 3 – Mobility	October 2025
New structure in place with roles confirmed	7 October 2025
Stage 4 - External recruitment commenced	TBC