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19 August 2019

Theresa Fairman
Chief Customer Officer
Executive Director
State Insurance Regulatory Authority
Locked Bag 2906
Lisarow, NSW 2252

By email: consultation@sira.nsw.gov.au

Dear Theresa,

**Customer Service Conduct Principles Consultation Paper:
Proposed licence conditions for insurers operating in SIRA-regulated schemes**

QBE Insurance (Australia) Ltd (**QBE**) welcomes the opportunity to respond to the Customer Service Conduct Principles Consultation Paper (the **Consultation Paper**), issued by the State Insurance Regulatory Authority (**SIRA**) on 8 July 2019.

QBE is an underwriter of Compulsory Third Party (**CTP**) insurance in New South Wales and all other Australian states where CTP is underwritten by the private insurance market (with the exception of the Australian Capital Territory). QBE also has a major presence in the Australian workers compensation sector providing insurance and specialist agency services in most jurisdictions throughout the country.

We have participated in, and support, the general insurance industry submission by the Insurance Council of Australia (**ICA**). As such, we have not responded on the specific consultation questions but have limited our comments to key issues of principle.

QBE is focused on delivering quality customer outcomes and understands the need to provide affordable and accessible insurance to the community. Accordingly, QBE supports the approach of SIRA's regulation as outlined in the Consultation Paper as aiming "to ensure those who experience injury or loss are supported, and insurance is affordable, well managed and sustainable".

As outlined in the ICA's submission, QBE encourages SIRA to consider the proposed customer service principles together with existing legislative and regulatory requirements to ensure alignment and/or removal of duplication.

Should you have any questions or require further clarification or information on this response, please do not hesitate to contact [REDACTED].

Yours Sincerely,



Vivek Bhatia
Chief Executive Officer
Australia Pacific