



14 August 2019

Submission from [REDACTED] on SIRA's Proposed License Conditions – Customer Service Conduct Principles

Thank you for the opportunity of providing a submission regarding proposed Customer Service Conduct Principles.

[REDACTED] are strongly opposed to over burdensome regulation and this latest intention to add further regulation to a scheme which is already over regulated is very concerning.

Further the premise of the proposal appears to be fundamentally flawed. SIRA, as a Regulator, has no customers and is poorly placed to develop customer service principles. The only customers of ICARE and specialised insurers are employers who pay for the indemnity they provide. The principles that should apply to the service of these customers are really a matter for ICARE and the specialised insurers rather than for SIRA.

Incidentally, the best way to drive improved customer service is increased competition so the restricting of claims management to one (or even 2) scheme agents is difficult to understand. [REDACTED] have no true customers as such.

The reference in the proposal to people who make claims is misconceived as claimants are not customers and would not wish to be considered as customers.

In any event, the interaction with claimants are already over regulated by guidelines, regulations and standards of conduct.

In these circumstances, SIRA should not be involved at all in the development, implementation and enforcement of customer service principles.

As to the proposed principles we would comment as follows:

Principle 1

We have no information to suggest that any [REDACTED] are anything other than efficient and early to engage.

Issues of clear communication and reduced complexity are adequately addressed by [REDACTED] to the extent this is possible in the context of extremely complex legislation and multiple layers of regulation and guidelines.

Principle 2

Our experience is that [REDACTED] always act fairly, with empathy and respect. Claimants (who are not customers) are treated fairly and consistently (unlike employers/insurers who are almost always treated unfairly and inconsistently). As [REDACTED] are dealing with [REDACTED] (often as co-workers), compassion, understanding, and dignity, empathy and respect is always a given.

Principle 3

The goals of recovery and resolution are at the core of how [REDACTED] operate despite the legislation and system failing to facilitate these objectives.

Principle 4

The current regulations, guidelines and standards already impose (unnecessarily) the requirement for these systems to be in place and there is no evidence we know of that they are not operating effectively.

Principle 5

The legislation already has clearly defined processes that ensure accountability and, quite frankly, the concept of imposing requirements for apology in these proceedings is bizarre and ridiculous.

In summary we strongly urge you to refrain from imposing further regulation in these customer conduct principles. If you insist on proceeding down this flawed path, then we request that you specifically [REDACTED] from their operation.

