



25 November 2016

Mr Anthony Lean
Chief Executive
State Insurance Regulatory Authority
SYDNEY NSW 2000

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

RE: INSURER CLAIMS HANDLING AND DISPUTE RESOLUTION IN COMPULSORY THIRD PARTY (CTP) MOTOR ACCIDENT INSURANCE – DISCUSSION PAPER

Executive Summary

Suncorp welcomes the opportunity to comment on SIRA's proposals relating to claims handling and dispute resolution in the NSW CTP scheme.

Suncorp has been an active participant in this debate and has made a number of submissions, attended roundtable discussions with the Independent Reference Panel and contributed to Insurance Council of Australia submissions.

We support the position put forward by the Insurance Council of Australia in their submission and make the following additional points.

First Party Arrangements

Suncorp has long held the view that customer outcomes, including claims handling and dispute resolution, will be vastly improved with the introduction of first party arrangements. First party schemes can provide customers with a guarantee that the insurance company they choose will manage the personal injury claims of anyone in their vehicle, including the driver.

That guarantee cannot be provided with the current at-fault scheme, because all claims are managed by the insurance company of the driver who caused the accident. A no-fault, first party scheme would allow insurers to compete on the basis of their personal injury claims service, as currently occurs in other classes of insurance.

If insurance companies are directly responsible for their client's rehabilitation, there is a natural incentive to expedite their recovery. There would need to be new sharing arrangements or recovery processes between insurers, however this already occurs in relation to Comprehensive Motor policies.

Support and Advocacy Service

Suncorp supports the creation of a Support and Advocacy Service, or a statutory ombudsman that covers both CTP and workers compensation, to assist claimants and to encourage resolution over legal proceedings. We believe such an independent statutory officer within SIRA that reports directly to the CEO would be the most effective option. This service will allow claimants to seek resolution for common grievances and facilitate quick decisions on a set of prescribed minor dispute matters.



One Company
Many Brands



Dispute Resolution

Suncorp supports the model proposed by the Insurance Council of Australia which has previously been provided to the Independent Reference Panel.

Conclusion

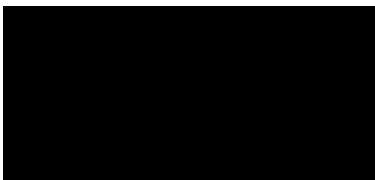
Suncorp welcomes this review but urges SIRA and the Government to focus on the underlying structural health of the scheme.

Reforming the scheme through the implementation of defined benefits, no-fault cover and first party arrangements will result in more certainty and better claimant outcomes.

Motorists deserve a scheme that is affordable, provides full cover and incentivises injured people to recover quickly, we believe these policy settings will achieve these aims.

Should you wish to discuss any of the points raised in this submission, please contact Jonathan Davies, Manager, Public Policy on [REDACTED] or [REDACTED].

Yours faithfully



Matthew Kayrooz
**Head of Accident and Trauma
Insurance Australia**

ATTACHMENT A: Suncorp White Paper – *Chronic Condition*