

## SUBMISSION ON POLICY ISSUES RAISED IN ROUND 6

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Submission for: My Self

Name of other person, business or organisation:

Do you agree to your submission being published: Yes

Do you agree to your full name being published: Yes

Your submission:

From a customer perspective who was the subject of one of the case studies against an Insurer, I submit the following concerning claim practices, compliance and dealings with regulators. It is a high-level wishlist as to how Product Providers should respond to the Royal Commission.

1. Get in front of the curve about re-invigorating customer engagement and lifting customer priority back to where it was in relation to all stakeholders.
2. Treat the Regulators at arms length in all but exceptional cases which should probably be adjudged in a Court setting. Resist the negotiation of fines, watering down of undertakings and orders, stand tall when mistakes are made and welcome the penalties and adverse media publicity as proper responses.
3. Ensure a dynamic compliance culture that actively checks systems and processes such that mistake finding, illegal activity, substandard behavior and breach reporting does not take an average of 4+ years but rather is timely. Welcome increased fines for delays in reporting and remediation knowing the Business will put in the resources to fix issues quickly such that fines for delays should be non-existent.
4. Lead the market in remuneration practices by constantly reviewing them such that no rewards are in conflict with customer priorities.
5. Always know your market segment/niche that you want to engage in and accept the role independent Ratings agencies have in rating your Products against your competitors. Have the resources in place to complete Actuarial re-assessments for product up-grades etc in a timely manner and shift re-insurers if you have to.
6. Train all staff in the dispute resolution teams so they are competent and can act efficiently, honestly and fairly with all complaints. Ensure delegations are based on the best criteria. Eg Even if a claim is small, it may touch a number of other vital areas and organizational practices.
7. Welcome a client best interest duty and a dealing in utmost good faith with every product a Financial Provider has and extend these obligations to every regulator associated with client impacts – Do not let the law set the minimum standard but desire to exceed it based on your own Business Culture and organizational and personal ethics.
8. Encourage transparency at Board Level. Draft Reports, Final Reports, Independent Reports and use of statistics should all be reviewed to ensure Cultural change. Do not restrict Report scope based on cost but broaden the scope to ensure nothing is missed even in these days of information overload.

Thank you

Robert Franklin