

# Industry Action Plan: Improving Outcomes For Insurance Customers

Insurance Council of Australia

| Insurance Council of Australia Projects                            | Jan - Jun 2025 | Jul - Dec 2025 | Jan – Jun 2026 | Jul-Dec 2026 |
|--------------------------------------------------------------------|----------------|----------------|----------------|--------------|
| VULNERABILITY FRAMEWORK                                            |                |                |                |              |
| Phase 1 Stakeholder consultation period                            | Complete       |                |                |              |
| Phase 2 Stakeholder consultation period                            |                |                | To do          |              |
| Publication of framework <sup>1</sup>                              |                |                |                | To do        |
| GOVERNANCE AND RE-WRITE OF THE CODE OF PRACTICE                    |                |                |                |              |
| Stakeholder consultation and drafting                              | Progressing    |                |                |              |
| Code lodged with ASIC for approval                                 |                |                |                | To do        |
| CLAIMS HANDLING AND COMPLAINTS                                     |                |                |                |              |
| Collaboration with ANZIIF to design insurer training modules       |                |                | Progressing    |              |
| DISASTER RESPONSE                                                  |                |                |                |              |
| Publication of ICA Disaster Response Playbook                      | Complete       |                |                |              |
| PRODUCT DESIGN (MAINTENANCE AND WEAR/TEAR)                         |                |                |                |              |
| Engagement with ACCC, lodgment of application and consultation     |                |                | Progressing    |              |
| Development of public education campaign and guidance for insurers |                |                | Progressing    |              |
| REPORTING AND TRANSPARENCY                                         |                |                |                |              |
| Engagement with ASIC on reporting recommendations                  |                |                | Progressing    |              |
| Small Business Averaging Provisions Fact Sheet                     |                |                | Progressing    |              |
| AFFORDABILITY OF INSURANCE                                         |                |                |                |              |
| Work with the HIP on mitigation measures                           | Progressing    |                |                |              |

<sup>1</sup> The Vulnerability Framework will be delivered concurrently to the re-draft of the General Insurance Code of Practice.

INSURANCE COUNCIL OF AUSTRALIA – DASHBOARD ON ICA-LED COMMITMENTS

| THEME                                                                                                                                                                                                                                                                                                                          | RECOMMENDATION                                                                                         | STATUS         | IMPLEMENTATION UPDATE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Enhancing preparedness for natural disasters</b></p> <p>The industry will continue to make improvements to their planning, communications and operations to build in resilience to disasters.</p>                                                                                                                        | <p>Flood Inquiry: 30, 34. <i>Closed</i>: 28, 29, 65*</p> <p>Code Review: 65</p>                        | <p>Ongoing</p> | <p>The Insurance Council supports ongoing collaboration via the Hazard Insurance Partnership and has shared Policy in Force data to support the Government’s work in understanding the market.</p> <p>The Insurance Council, on behalf of members continues to support the coverage of riverine flood studies included in NFID. In 2025, there were 3 updates released which covered refinements across 10 regions.</p> <p>The Insurance Council also organised 23 policyholder engagements between August 2024 and August 2025 in disaster affected areas and has partnered with Weather Watch, a meteorological service, to get early warnings of severe weather events. This facilitates proactive coordination of insurer disaster response.</p> <p>Annually, the Insurance Council produces fact sheets before each Higher Risk Weather Season (HRWS). These fact sheets detail the fundamentals of the insurance claims process. The ICA also has tailored fact sheets for First Nations peoples.</p> |
| <p><b>Vulnerability</b></p> <p>The industry will develop a vulnerability framework that supports insurers to consistently identify and better support those in need.</p> <p>Vulnerability will continue to feature in the General Insurance Code of Practice to embed considerations in insurers’ dealings with customers.</p> | <p>Flood Inquiry: 35, 37-40.</p> <p>Code Review: 2-13, 15-17, 19-24, 26-27, 28, 29, 30-36, 43, 91.</p> | <p>Ongoing</p> | <p>The Insurance Council is refining the vulnerability framework with members, with consideration of the Code re-draft.</p> <p>The Insurance Council is exploring the role of interpreting services in supporting vulnerable consumers as part of their vulnerability framework.</p> <p>The ICA has worked with ANZIIF to ensure their training program <i>Creating Good Outcomes for Customers Experiencing Vulnerability</i> aligns with the ISO standards on vulnerability.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

Please note this dashboard provides information only on the implementation progress of the Insurance Council of Australia (ICA) led commitments. It does not cover how individual members of the ICA will implement insurer-led commitments, in line with their business requirements. Individual insurers will report on the progress for insurer-led commitments within their own business.

\* Closed indicates complete or integrated into business as usual

## INSURANCE COUNCIL OF AUSTRALIA – DASHBOARD ON ICA-LED COMMITMENTS

| THEME                                                                                                                                                                                                                                                                                                                           | RECOMMENDATION                                                                                                                          | STATUS  | IMPLEMENTATION UPDATE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Claims and Complaints</b><br><br>Claims processes will be reviewed and adjustments made available to improve responsiveness and the customer experience in the General Insurance Code of Practice.<br><br>Transparency will be enhanced around what customers can expect during the life of a claim in the Code of Practice. | Flood Inquiry: 5, 6, 9-12, 14-15, 20-21, 31, 33-34, 57.<br><br>Closed: 9<br><br>Code Review: 38-39, 45, 55, 60-63, 66-68, 79-83, 85-87. | Ongoing | <p>The ICA has worked with consumer advocates and ASIC to update its Cash Settlement Fact Sheet template guidance for insurers, to enhance and uplift communications to consumers.</p> <p>The ICA has worked with its members to provide guidance on how to appoint internal consumer advocates.</p> <p>The ICA has engaged with Engineers Australia to support the development of guidelines for hydrologists.</p> <p>ANZIIF now offers training that meets the standards outlined by the Parliamentary Flood Inquiry addressing trauma and vulnerability. The ICA continues to engage with ANZIIF and insurers to design training for experts engaged by insurers.</p>                                                                                                                     |
| <b>Transparency</b><br><br>The industry will explore the best mechanisms for communicating risks to consumers to enhance understanding on insurance premiums.<br><br>Support to ASIC and the Code Governance Committee to report on meaningful indicators.                                                                      | Flood Inquiry: 23-24, 27, 51, 56, 58.<br><br>Closed: 27<br><br>Code Review: 37.                                                         | Ongoing | <p>As part of the ICA's ACCC application to standardise maintenance wear and tear, an education campaign is being designed to improve consumer awareness about property maintenance expectations (which will be implemented subject to the application being authorised by the ACCC).</p> <p>The Insurance Council has worked with NIBA to develop a fact sheet on Averaging Provisions to improve awareness of these provisions, how they work and why they are used by insurers.</p> <p>The Insurance Council continues to collaborate with the Government via the Hazard Insurance Partnership to explore ways of supporting consumers to better understand and reduce their risks.</p> <p>The Insurance Council is also contributing to ASIC's publication of breach reporting data.</p> |

*Please note this dashboard provides information only on the implementation progress of the Insurance Council of Australia (ICA) led commitments. It does not cover how individual members of the ICA will implement insurer-led commitments, in line with their business requirements. Individual insurers will report on the progress for insurer-led commitments within their own business.*

## INSURANCE COUNCIL OF AUSTRALIA – DASHBOARD ON ICA-LED COMMITMENTS

| THEME                                                                                                                                                                                                                                                                                                       | RECOMMENDATION                                                                                   | STATUS  | IMPLEMENTATION UPDATE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|---------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Product Design</b><br><br>Industry will engage with key consumer advocates to design communication materials to enhance consumer understanding of products and their rights/obligations.                                                                                                                 | Flood Inquiry: 1-3, 9, 17-18, 21, 25.<br><br>Closed: 9<br><br>Code Review: 37, 56-59, 74-75, 77. | Ongoing | The Insurance Council has submitted a further draft application to the ACCC seeking to standardise maintenance wear and tear clauses. This includes a supporting education campaign that will support consumers to understand their responsibilities.<br><br>The Insurance Council has also worked with ASIC to update its cash settlement fact sheet which will provide consumers greater detail about their rights when a cash settlement is offered.<br><br>The Insurance Council has engaged AiBEC on the development of scopes of work guidelines.                                                                                                                                                                                                                |
| <b>Governance</b><br><br>The industry will explore how small business can be better supported in the General Insurance Code of Practice.                                                                                                                                                                    | Flood Inquiry: 46-47.<br><br>Closed: 47<br>Code Review: 42, 44-54, 76, 78, 84, 93-95, 98-101.    | Ongoing | The Insurance Council is continuing to consider small businesses with the redraft of the General Insurance Code of Practice.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Affordability</b><br><br>The industry will continue to work collaboratively with governments at all levels to support solutions that address the protection gap and ensure effective investment in mitigation. The industry will remain flexible to respond to cumulative impacts of action on premiums. | Flood Inquiry: 76, 78- 79.<br><br>Closed: 78                                                     | Ongoing | The Insurance Council continues to support the Government via the Hazard Insurance Partnership to support consumers to better understand their risks.<br><br>The Insurance Council has advocated for reform to the Compensation Scheme of Last Resort to avoid placing upward pressure on premiums.<br><br>The Insurance Council has supported the expansion of the Resilient Building Council's Bushfire Rating App to multi perils, which can be used by insurers to apply mitigation discounts.<br><br>In October 2025, the Insurance Council published the report <i>A Sustainable Public Liability Insurance Market in Australia: The Case for Civil Liability Reform</i> , which outlines options that could help reduce premiums for civil liability insurance. |

Please note this dashboard provides information only on the implementation progress of the Insurance Council of Australia (ICA) led commitments. It does not cover how individual members of the ICA will implement insurer-led commitments, in line with their business requirements. Individual insurers will report on the progress for insurer-led commitments within their own business.