Draft General Insurance Code of Practice Submission

From: Katrina Shanks

Organisation: ANZIIF

Date: July 2026

ANZIIF

ANZIIF, the Australian and New Zealand Institute of Insurance and Finance, has a long history of supporting professionalism across the insurance and financial services sector through education, training and industry development. Established 142 years ago to build capability and professional standards, ANZIIF has evolved into a leading membership, education and training body for insurance professionals across Australia, New Zealand and the broader region. Its role includes delivering recognised learning programs, supporting continuing professional development, and promoting higher standards of conduct, competence and service across the industry

The Code

We would like to thank the Insurance Council of Australia for the opportunity to provide a submission on the draft Code. Having reviewed the Code, we wish to acknowledge and congratulate the ICA on producing a clear, concise and accessible document.

Submission Details

The table below provides a summary of our submission on the education and training components of the draft Code, highlighting the key areas where we believe appropriate oversight and consistent delivery of training are required for consideration.

Draft GICOP section	Relevant reference
Section 4 – Making a claim **Using an External Expert or Loss Assessor**	70. We will require External Experts to provide their report within 60 Business Days of their appointment. We will notify you if there is a delay. 71. We will comply with, and instruct External Experts to comply with, the Insurance Council of Australia's Guide:

	Use of Expert Reports (as amended, updated or replaced from time to time). 72. We will monitor compliance of our External Experts with paragraph 70 and take action as required. This could include, for example: (a) cancelling our contract with them; (b) taking steps to ensure they are not assigned to our claims in future; or (c) requiring them to go through further **training**.
ANZIIF Response	Training should be tailored and delivered at the appropriate level to ensure standards are met and consistently maintained, especially when using external experts who service and support customers. Currently there is no standard or oversight regarding the quality of training which is being delivered across the sector to ensure compliance to the Guide: Use of Expert Reports. Where further training is required the accreditation of the training can be provided by a qualified 3rd Party training facility. ANZIIF can ensure that relevant training is delivered to ensure compliance to the Guide: Use of Expert Reports.
Section 9 – Standards for our representatives **Training our representatives**	187. We will require our Employees, Distributors, Service Suppliers, and Claims Fulfilment Providers to receive the following **education** and **training** to the extent it is relevant to their role and the services they are authorised to provide: (a) about the Code; (b) about our products and services; (c) on identifying and supporting customers who require Extra Care or are experiencing Financial Hardship; and (d) on identifying Complaints and managing Complaints.
ANZIIF Response	Education and training must be designed and delivered at the appropriate level and be relevant to ensure relevant standards are met and consistently maintained, particularly when Service Suppliers, and Claims Fulfilment Providers are engaged. Where education and training is required the accreditation of the training can be provided by a qualified 3rd Party training facility - ANZIIF to ensure the relevant education and training is delivered to ensure compliance to the Code, identifying and supporting customers who require Extra Care or are experiencing

	Financial Hardship; and on identifying Complaints and managing Complaints.
Section 9 – Standards for our representatives **Training our representatives**	188. We will keep the **education** and **training** records of our Distributors, Service Suppliers, and Claims Fulfilment Providers in accordance with relevant legal requirements or require them to do so.
ANZIIF Response	For individual insurance companies to hold a register of training for their Distributors, Service Suppliers, and Claims Fulfilment Providers is a significant resource commitment for an insurer and significant duplication across insurance companies. Currently ANZIIF has a comprehensive Learning Management System which records individuals learning. It would make sense to have a trusted organisation to have a central register of all relevant education and training for Distributors, Service Suppliers, and Claims Fulfilment Providers.
Section 9 – Standards for our representatives **Training our representatives**	190. We are not required to provide the **training** in paragraph 187 to our Distributors, Service Suppliers, and Claims Fulfilment Providers to the extent that they have already received the necessary **training** - regardless of who provided the **training**.
ANZIIF Response	As per 187 above. Education and training must be delivered at the appropriate level to ensure relevant standards are met and consistently maintained, particularly when Service Suppliers, and Claims Fulfilment Providers are engaged. Currently there is no standard or oversight regarding the quality of education and training which is being delivered across the sector to ensure what is "necessary training". Where education and training is required the accreditation of the training can be provided by a qualified 3rd Party training facility – ANZIIF. ANZIIF can provide an important role to ensure relevant education and training is delivered to ensure compliance to the Code, identifying and supporting customers who require Extra Care or are experiencing Financial Hardship; and on identifying Complaints and managing Complaints.
Section 9 – Standards for our representatives	193. If we are aware that the performance of our Service Suppliers or Claims Fulfilment Providers performance does not meet the relevant standards of the Code, then we will address this, for example, by:

Dealing with concerns about our representatives	(a) cancelling our contract with them; or (b) requiring them to go through further **training**
ANZIIF Response	Training must be delivered at the appropriate level to ensure relevant standards are met and consistently maintained, particularly when Service Suppliers or Claims Fulfilment Providers are engaged to support customers. Currently there is no standard or oversight regarding the training which is being delivered across the sector. Where further training is required the accreditation of the training can be provided by a qualified 3rd Party training facility - ANZIIF to ensure the relevant training is delivered to ensure compliance to the Code.