Questions for public consultation on draft Application Paper on how to achieve fair treatment for diverse consumers

Thank you for your interest in the public consultation on draft application paper on how to achieve fair treatment for diverse consumers. The Consultation Tool is available on the IAIS website.

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| **Please do not submit this document to the IAIS. All responses to the Consultation Document must be made via the Consultation Tool to enable those responses to be considered.** |

Consultation questions

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| 1 | General comments on the Application Paper |
| 2 | Comments on section 1.1 Context and objective |
| 3 | Comments on Box 1: Interpretation of key terms in this paper  |
| 4 | Comments on section 1.2 Related work by the IAIS |
| 5 | Comments on section 1.3 Proportionality and jurisdictional specificities |
| 6 | Comments on section 1.4 Scope of this application paper |
| 7 | Comments on section 2.1 Risk-based pricing and DEI |
| 8 | Comments on section 2.2 Insurer’s autonomy to decide the scope of its business and DEI |
| 9 | Comments on section 3 Risk of unfair treatment of diverse consumers |
| 10 | Comments on section 3.1 What we mean by diverse consumers |
| 11 | Comments on section 3.2 How unfair treatment arises |
| 12 | Comments on Box 2: Examples of diverse consumers excluded from insurance products or encountering difficulties  |
| 13 | Comments on section 4 Implementation of ICP 19 to drive fair treatment of diverse consumers |
| 14 | Comments on section 4.1 Embedding fair treatment of diverse consumers into the business culture |
| 15 | Comments on Box 3: Unconscious biases and stereotypes |
| 16 | Comments on section 4.2 Ensuring the fair treatment of diverse consumers in product design |
| 17 | Comments on section 4.2.1 Identifying whether there are diverse consumers within the targeted consumers |
| 18 | Comments on section 4.2.2 Determining whether the coverage, benefits, disclosures and pricing are aligned to the needs of the diverse consumers amongst the target group |
| 19 | Comments on Box 4: Considerations on technology and data  |
| 20 | Comments on section 4.2.3 Designing appropriate product distribution methods |
| 21 | Comments on section 4.3 Securing appropriate sales and distribution to diverse consumers |
| 22 | Comments on section 4.3.1 Marketing communications and disclosures that account for diverse consumers |
| 23 | Comments on section 4.3.2 Deploying the distribution strategy appropriately |
| 24 | Comments on Box 5: The human approach  |
| 25 | Comments on section 4.3.3 Advice and suitability for diverse consumers |
| 26 | Comments on section 4.4 After-sale servicing, product monitoring and review |
| 27 | Comments on section 4.4.1 Communication and assistance that account for diverse customers |
| 28 | Comments on section 4.4.2 Product monitoring and review that detects and addresses unfair treatment of diverse customers |
| 29 | Comments on section 4.4.3 Claims procedures that are inclusive |
| 30 | Comments on section 4.4.4 Complaints procedures that are inclusive |
| 31 | Comments on section 4.5 Working towards greater inclusion of diverse consumers across the insurance sector |
| 32 | Comments on section 4.5.1 Shaping the supervisory landscape |
| 33 | Comments on section 4.5.2 Facilitating market development |
| 34 | Comments on section 5 Conclusion |