

Chief Data Officer
Technology and Data Division
Australian Prudential Regulation Authority.

Via: dataconsultations@apra.gov.au

22 May 2024

Dear [REDACTED],

Consultation on enhancements to quarterly insurance publication suite

The Council of Australian Life Insurers (CALI) welcomes the consultation on proposed enhancements to the content and presentation of the quarterly insurance publications. CALI's mission is to ensure Australians view life insurance and the industry as accessible, understandable, and trusted. We believe better data visualisation and clearer presentation of datasets is paramount to fostering greater trust and understanding between insurers, regulators, and customers.

CALI and our members see the benefits of dynamic data visualisation of tables and charts and are supportive of the proposed changes the Australian Prudential Regulation Authority (APRA) suggests. The dashboard-style presentation of statistics is helpful, as it offers a concise and intuitive way to comprehend complex data sets.

Below I outline some considerations that APRA should make in developing and implementing the improvements to data visualisation.

Product Group dimension

In relation to the publication specifications for life insurance, we believe having the Product Group dimension with an option to break data down to institution level is not appropriate as it may cause confusion, impact competition, and affect compliance with certain disclosure requirements.

It may prove difficult to interpret results because profitability is not directly comparable between companies. It may also risk providing more information than is otherwise currently available to competitors and may create an unfair advantage. For example, a competitor could see another's poor profitability in a particular line and may be less inclined to be as competitive in their offers than they otherwise might be.

Current practice is for statistical entities not to publish data that could be identified to a particular entity, with emphasis on ensuring data is not released ahead of existing ASX disclosure requirements. CALI and our members would therefore welcome confirmation that APRA remains mindful of this, and that the Product Group dimension will not include an option to break down data further to an individual institutional level.

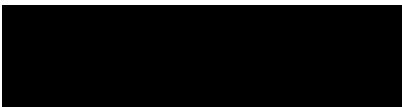
User guide

We see merit in providing a user guide to accompany the new dashboards. The user guide could provide an explanatory comparison between the new and old formats. It could also help guide users on how they use the information in the new view to understand the performance of the products/business lines. For example, the guide could explain Balance Sheet and Profits & Losses under IFRS17 (which may not be familiar terms for some) in a simple way to help users interpret some of what the line items imply about business performance.

Trend analysis

APRA could also provide commentary each quarter about trends and their general appetite against how the industry is moving. For example, given the recent consultation of LPS117 and the extensive changes, including for offshore reinsurance, APRA commentary on the trends regarding total industry's use of offshore reinsurers versus locally registered entities could be useful. It could give stakeholders confidence around the amount of exposure (or assets) that has prudential oversight by APRA and the level of use of offshore reinsurers in the market.

Kind regards,



Chief Executive Office
Council of Australian Life Insurers