

Case study 1:

Making customers aware of the Code

The following is a case study based on a matter considered by the Life Code Compliance Committee (Life CCC). The matter was self-reported to the Life CCC and was assessed under its Acknowledgement pathway. No formal Determination was issued. In order to share the learnings with all subscribers, the Life CCC has converted the matter into a case study on a de-identified basis.

The Code requirement

Under Code section 11.1, subscribers promise to make customers aware of the Code, by providing information on “our website” and in relevant marketing material. This obligation is important because it enables consumers to find out what the Code is, whether their life insurer is a subscriber, and how to make a Code breach allegation.

The matter

Reviewing subscribers’ websites for compliance with section 11.1, the Committee found that one subscriber had not mentioned the Code, or that it was a subscriber, on its website – a breach of section 11.1.

In discussing the breach and its remedial action with the Committee, the subscriber identified that it was also in breach of the section 9.3 requirement to provide information about complaints on its website. The subscriber remediated this of its own accord and self-reported the breach to the Committee.

The Committee’s expectation

That subscribers will have a dedicated page(s) on their own website - that is easily reached from the home page or life insurance page of the subscriber with clearly labeled links, that clearly provides information to customers about the Code, about the subscriber’s adoption of and adherence to the Code, and about the process by which a customer may make a complaint and how the subscriber will handle any complaints received.

Not having a dedicated website is not an excuse for not meeting obligations 11.1 or 9.3 – subscribers need to find ways to make Code information clear, easy to find and available online.

The Life Code Compliance Committee

The Life CCC is the independent body responsible for the administration and enforcement of the Life Insurance Code of Practice (the Code). It acts in accordance with the Life CCC Charter, which sets out the powers, duties, functions and responsibilities of the Committee, subject to any provisions in the Code.