



**INSURANCE
BROKERS**

**CODE
COMPLIANCE
COMMITTEE**

INSURANCE BROKERS CODE COMPLIANCE COMMITTEE

BENCHMARK REPORT

2020

A benchmark report of self-reported breach and complaints data from subscribers to the Insurance Brokers Code of Practice for the period 1 January to 31 December 2020.

September 2021

About this report

This Benchmark Report (**the report**) has been developed for subscribers to the Insurance Brokers Code of Practice (**the Code**) who participated in the 2020 Annual Compliance Statement (**ACS**) program. The ACS program is the cornerstone of the compliance monitoring program run by the Insurance Brokers Code Compliance Committee (**the Committee**).

Your organisation's benchmark identifier

For comparison purposes, each organisation will have received an email containing individual benchmark identifiers that are based on the number of full-time equivalent staff, combined with self-reported breach and complaints data. These benchmark identifiers will allow organisations to track their performance against similar subscribers and the wider industry in Part F of this report.

Using this report

The report draws on data that has been self-reported by Code subscribers in the 2020 ACS program. It's recommended that subscribers use this targeted information to measure their compliance performance against the industry as a whole and, specifically, against organisations of a similar size.

The ACS is not a form-filling exercise – it is a tool to help Code subscribers assess and fine-tune the robustness of their compliance programs.

The ACS is not a form-filling exercise – it is a tool to help Code subscribers assess and fine-tune the robustness of their compliance programs. Likewise, this report should not be viewed as a simple snapshot of 2020, but rather as catalyst for behavioural change and subscribers should use it to place their performance in an industry-wide context and identify key focus areas for improvement or adjustment over the coming year.

Building a Compliance Culture

All processes and frameworks require maintenance – particularly in an industry as complex as insurance. Self-reporting enables subscribers to demonstrate a clear understanding of their own compliance performance and their willingness to improve, where necessary.

Importantly, benchmarking compliance performance also provides an industry context to assess an organisation's performance levels and helps other Code subscribers identify areas where they may need to improve.

This report looks at self-reported complaints and breaches from 1 January 2020 to 31 December 2020. During this time, more than half (52%) of Code subscribers identified and self-reported complaints, while only 44 per cent did so for breaches.

The fact that self-reported compliance culture amongst Code subscribers appeared to be slightly better than self-reported breach culture may indicate there is an opportunity to better utilise complaints data to identify root causes or systemic breaches that can be addressed across the industry.

Look beyond the data

Subscribers should take care when considering the data and consider it in context. For instance, low levels of reporting are not necessarily a cause for celebration if the underlying reason for this result is that reporting frameworks are not robust enough to effectively detect Code breaches when they occur.

Conversely, a high level of non-compliance is only a problem if an organisation records issues, but subsequently fails to determine the root cause of this issue and enact the changes necessary to prevent a reoccurrence.

Impact of the rise in subscribers

Please note that this year's report provides a high-level comparison to previous years due to a significant rise in Code subscriptions since December 2019, when all Steadfast members became Code subscribers.

Consequently, data in the 2020 report reflects self-reported data from 456 Code subscribers which cannot be meaningfully compared to the 284 Code subscribers in the 2019 report.

This year's report provides a high-level comparison to previous years due to a significant rise in Code subscriptions since December 2019, when all Steadfast members became Code subscribers.

Key publications

This report is the second of three key publications we produce annually to provide Code subscribers with data and analysis relating to their compliance performance throughout the year. I hope you'll read it with interest and find insights to inform your compliance activities over the coming year.

The Committee released our [Annual Report 2020-21](#)¹ in August, and we plan to publish our detailed Annual Data Report 2020 towards the end of this year. This detailed data report will draw on verification conferences with ten per cent of selected Code subscribers to provide further insight into the self-reported data.

We welcome your feedback

We welcome your feedback on this Report to dkirchlind@codecompliance.org.au.

¹ See https://insurancebrokerscode.com.au/app/uploads/2021/08/IBCCC_Annual_Report_2020-21-Aug-2021.pdf

Key Observations

Code subscribers

The Code has 456 subscribers categorised according to the number of full-time equivalent (FTE) staff they employ (Tables 1 and 2). Almost three quarters (73%) of Code subscribers are micro businesses employing less than 20 FTE staff (Table 2).

Around three quarters (76%) of Code subscriber branches are located in New South Wales (31%), Queensland (21%), and Victoria (25%); and Code subscribers that employ more than 100 FTE staff account for around two thirds (59%) of all branches nationally (Table 3). Around one third of Code subscribers have located their head office in each of NSW (33%) and Vic (30%) (Table 2).

The complete list of Code subscribers is available on the Committee's [website](#)².

Compliance Culture

Over the reporting period, self-reported complaint culture amongst Code subscribers was slightly better than self-reported breach culture. Just over half (52.1%) of Code subscribers self-reported complaints, while less than half self-reported breaches (44%) (Chart 12).

This may indicate an untapped opportunity to draw on complaints data as a means of identifying underlying root causes and potential Code breach issues that can then be remedied with long-term changes across the industry, rather than continuing to apply quick fix solutions to individual situations.

Self-reported breach data

Less than half (44%) of Code subscribers self-reported breaches (Chart 12), with the top reasons for self-reported Code breaches (Chart 1) identified as follows:

- Almost half were due to a failure to discharge an insurance broker's duty diligently, competently, fairly, and with honesty and integrity.
- More than one in five included a failure to comply with the law.
- More than one in ten included money handling issues.
- One in twenty were due to bringing the insurance broking profession into disrepute.

Code Service Standards

The highest number of clients were impacted by a failure to comply with legal obligations (7,425), promote the Code (7,006) and acting diligently, competently, fairly and with honesty and integrity (3,095) (Table 4).

By product category

The highest number of clients affected by self-reported breaches were in the General Service category (i.e. no product specified) (Chart 4).

The highest number of self-reported breaches were in the General Service category (i.e. no product specified) (Chart 5).

² See <https://insurancebrokerscode.com.au/about/about-the-code/code-subscriber-register/>

Root causes

Manual error was the root cause affecting the highest number of clients (9,135) in self-reported breaches ([Chart 7](#)).

The most common root cause of self-reported breaches was process and procedure not being followed (1,112) and manual error (986) ([Chart 8](#)).

Financial Impact

Self-reported breaches of the Code Service Standards with the highest financial impacts were a failure to provide adequate claims handling services (St5) (\$307,861), followed by a failure to provide adequate insurance broking services (St5) (\$294,618) and a failure to comply with legal obligations (St1) (\$21,697) ([Table 4](#)).

Products with the highest financial impact relating to self-reported breaches included small business (\$279,017), wholesale (\$92,276) and public liability insurance (\$89,109) ([Chart 3](#)).

Self-reported breaches that failed to specify and/or identify a particular root cause accounted for the highest financial impact to client (\$496,475) ([Chart 6](#)).

Remedial action

Breaches where no particular **immediate remedial action** was specified were the most common (887), followed by recommendations for training (694), and the review of and changes to process (531) ([Table 5](#)).

Training (988) was identified as the most popular **long-term remedial action** for self-reported breaches ([Table 6](#)).

Note: Data contained in the tables and charts relating to Self-Reported Breach Data are indicative only, as not all Code subscribers provided conclusive information for each category.

Self-reported complaints data

Slightly more than half (52.1%) of Code subscribers identified and self-reported complaints over the year ([Chart 12](#)). While this represented a drop from 60% in 2019, the actual number of self-reported complaints rose from 1,292 in 2019 to 1,778 this year ([Table 7](#)).

Just under three quarters (68%) of complaints were resolved within 21 days (up almost 10% on the previous year) and nearly one in three complaints were resolved with an apology.

One in five complaints involved a commercial insurance product (e.g. small business or motor vehicle) ([Chart 9](#)) and almost half of all complaints related to service, claims handling, or general service ([Chart 10](#)).

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Part A: Code subscribers' details

Table 1: Categorisation of Code subscribers by size of business

up to 2018 ACS		from 2019 ACS onwards	
large	over 100 FTE ³ staff	Category A	over 100 FTE staff
medium	31-100 FTE staff	Category B	51-100 FTE staff
		Category C	31-50 FTE staff
small	21-30 FTE staff	Category D	21-30 FTE staff
micro	0-20 FTE staff	Category E	0-20 FTE staff

Table 2: Number of Code subscribers⁴ by state (head office) and size of operation⁵

As at 30 June 2021	ACT	NSW	NT	QLD	SA	TAS	VIC	WA	Total	In %
Category A	-	15	-	2	1	-	16	3	37	8%
Category B	-	9	-	1	-	1	6	5	22	5%
Category C	-	11	-	4	3	-	9	7	34	7%
Category D	-	9	-	9	1	1	9	3	32	7%
Category E	2	104	1	59	22	9	97	37	331	73%
Total	2	148	1	75	27	11	137	55	456	
In %	<1%	33%	<1%	16%	6%	2%	30%	12%		

- Three quarters of Code subscribers are micro organisations with less than 20 FTE staff.
- One third of Code subscribers' head offices are located in each of NSW and Vic.

Table 3: Number of branches (including head office) by state and size of operation

As at 30 June 2021	ACT	NSW	NT	QLD	SA	TAS	VIC	WA	Total	In %
Category A	21	366	17	262	88	13	273	133	1,173	59%
Category B	3	29	1	19	2	62	29	3	148	7%
Category C	1	43	1	25	4	-	48	23	145	7%
Category D	-	27	-	28	2	4	15	4	80	4%
Category E	6	155	1	86	29	11	122	42	452	23%
Total	31	620	20	420	125	90	487	205	1,998	
In %	2%	31%	1%	21%	6%	5%	24%	10%		

- Nearly two thirds of branch representation reflect large organisations (over 100 FTE staff).
- Most branch representation with at least one quarter each is located in NSW, Qld and Vic.

³ FTE – full time equivalent.

⁴ Code subscribers are counted by Australian Financial Service Licence (AFSL).

⁵ **Note:** For the purpose of the return of the Annual Compliance Statement (ACS), some Code subscribers provided one return for all their Australian Financial Service Licences. This was considered when analysing the percentage ratio of returns for specific categories. The Committee also granted seven exemptions for completion of the 2020 ACS due to specific circumstances regarding the individual business.

Part B: Self-reported breach data

B.1 Key findings of self-reported breach data

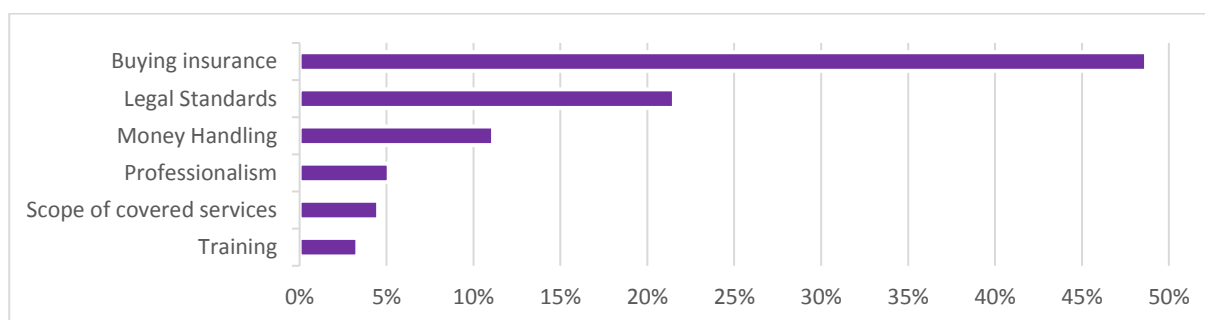
- 3,328 self-reported Code breaches, up from 2,006 in 2019.
- 44% Code subscribers self-reported Code breaches, down from 51% in 2019.
- 238 Code subscribers (56%) self-reported nil Code breaches, including 215 Cat E subscribers and 3 Cat A subscribers.
- 20,740 clients impacted.
- About \$652,000 financial impact to clients (pre-remediation).
- 21 breaches reported to Australian Securities and Investments Commission ([ASIC](#)) and five to the Office of the Australian Information Commission ([OAIC](#)).

➤ *Less than half of Code subscribers self-reported breaches.*

B.2 Areas of concern by Code Service Standard (any area representing over 2%)

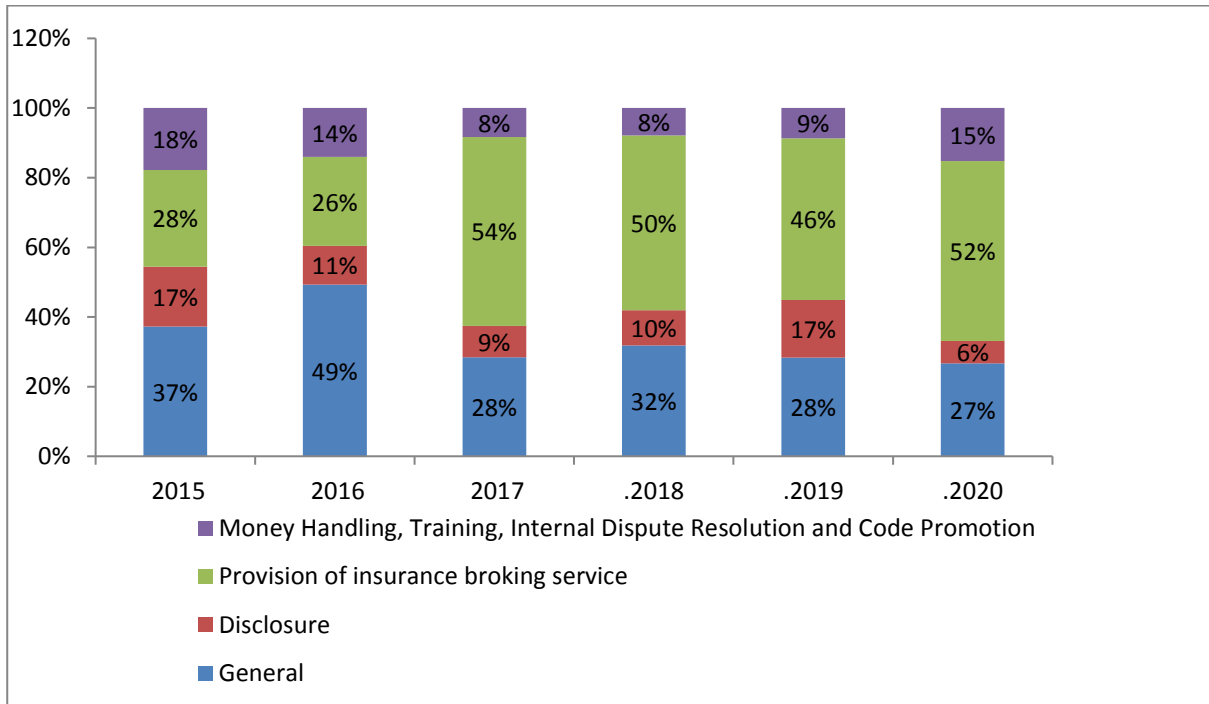
- Buying insurance (Service Standard 5): 48.6% of self-reported Code breaches, up from 43% in 2019.
- Legal obligations (Service Standard 1): 21.6% of self-reported Code breaches, down from 23% in 2019.
- Money handling (Service Standard 7): 11.1% of self-reported Code breaches, up from 7% in 2019.
- Professionalism (Service Standard 12): 5.2% of self-reported Code breaches, similar to 5% in 2019.
- Scope of covered Services (Service Standard 4): 4.5% of self-reported Code breaches, down from 13% in 2019.
- Training (Service Standard 8): 3.3% of self-reported Code breaches, up from 2% in 2019.

Chart 1: Top six self-reported Code breaches in 2020



- *Half of all self-reported matters are due to failure to discharge an insurance broker's duty diligently, competently, fairly and with honesty and integrity.*
- *One in five self-reported matters included failure to comply with the law.*
- *One in ten self-reported matters included money handling issues.*
- *One in twenty self-reported matters brought the insurance broking profession into disrepute.*

Chart 2: Self-reported Code breaches by general categories since 2015



B.3 Impact by Service Standard

➤ Numbers in table and charts from B.3 to B.6 are indicative, as not all Code subscribers provided conclusive information for each category.

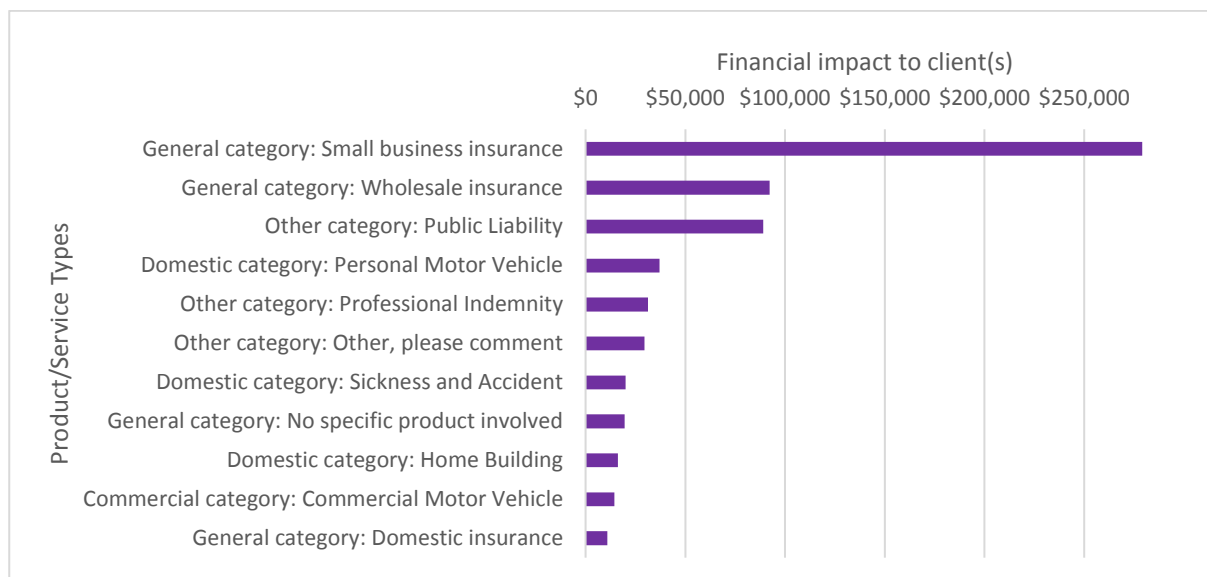
Table 4: Impact of self-reported breaches by Code Service Standard

	<i>Number of Client(s) impacted</i>	<i>Financial impact to client(s)</i>
St1 Legal standards	7,425	\$21,697
St2 Conflict of interest	8	\$0
St3 Who we act for	262	\$0
St4 Scope of covered services	301	\$5,693
St5 Buying insurance	3,095	\$294,618
St5 Claims handling	106	\$307,861
St5 Acting for insurer	28	\$0
St6 Remuneration	197	\$5,208
St7 Money handling	449	\$10,447
St8 Training	441	\$0
St9 Disasters	0	\$0
St10 Dispute resolution	233	\$0
St11 Promotion of Code	7,006	\$0
St12 Professionalism	1,189	\$6,067
Grand Total	20,740	\$651,592

- Highest number of clients were impacted by failure to promote the Code, complying with legal obligations and acting diligently, competently, fairly and with honesty and integrity.
- Highest financial impact was caused by failure to provide adequate claims handling service, followed by failure to provide adequate insurance broking service, and compliance with legal obligations.

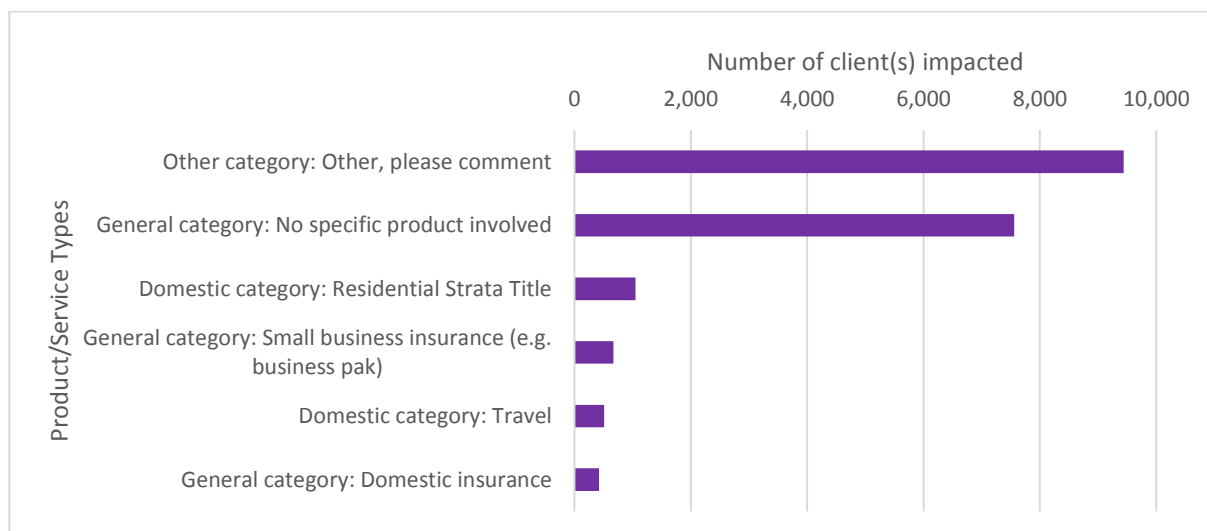
B.4 Impact by Product/Service Types

Chart 3: Financial impact⁶ to client(s) by Product/Service Types



- Highest financial impact of self-reported breaches included small business, wholesale, and publication liability insurance.

Chart 4: Number of client(s)⁷ impacted by Product/Service Types

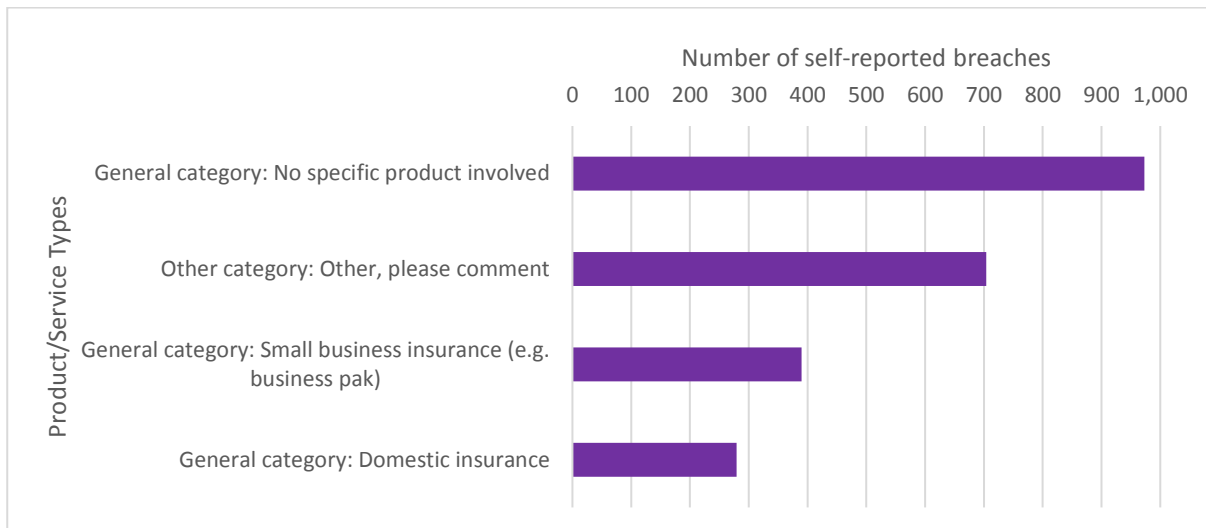


- Highest number of clients affected by self-reported breaches included general service (e.g. no product specified).

⁶ Including Product/Service Type with over \$20,000 financial impact.

⁷ Including Product/Service Type with over 1,000 clients impacted.

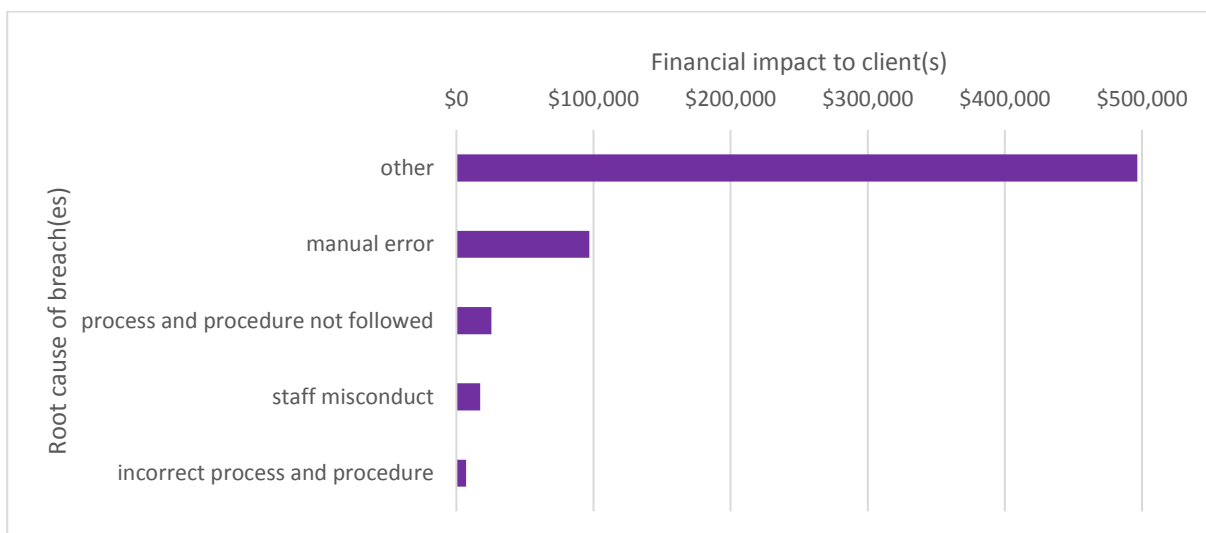
Chart 5: Number of self-reported breach(es)⁸ by Product/Service Type



➤ *Highest number of self-reported breaches included general service (i.e. no product specified).*

B.5 Impact by root cause

Chart 6: Financial impact⁹ to client(s) by root cause of self-reported breach(es)

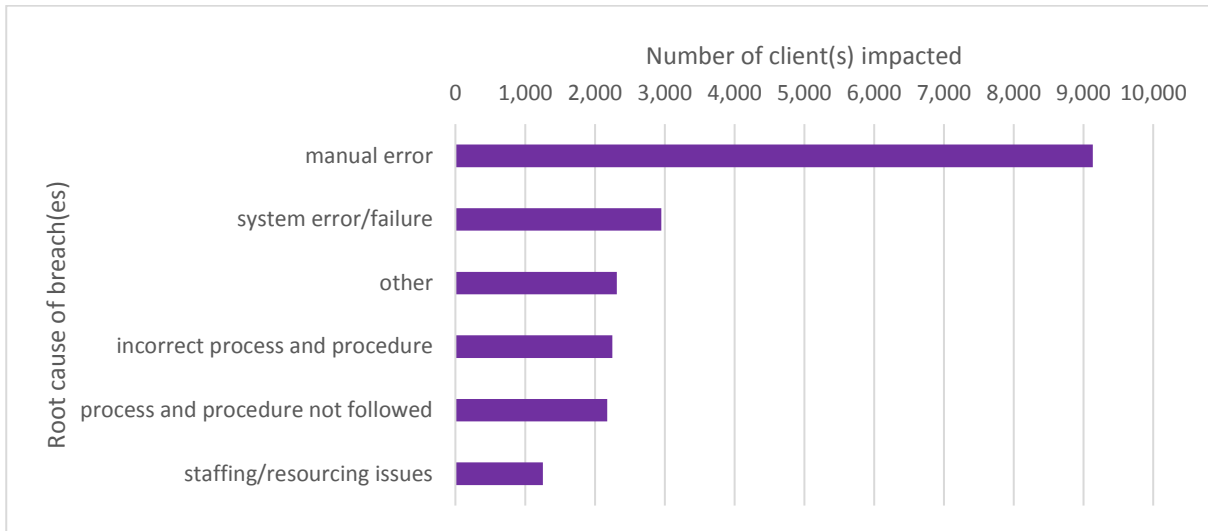


➤ *Highest financial impact of self-reported breaches failed to specify and/or identify a particular root cause.*

⁸ Including Product/Service Type with over 100 self-reported breaches.

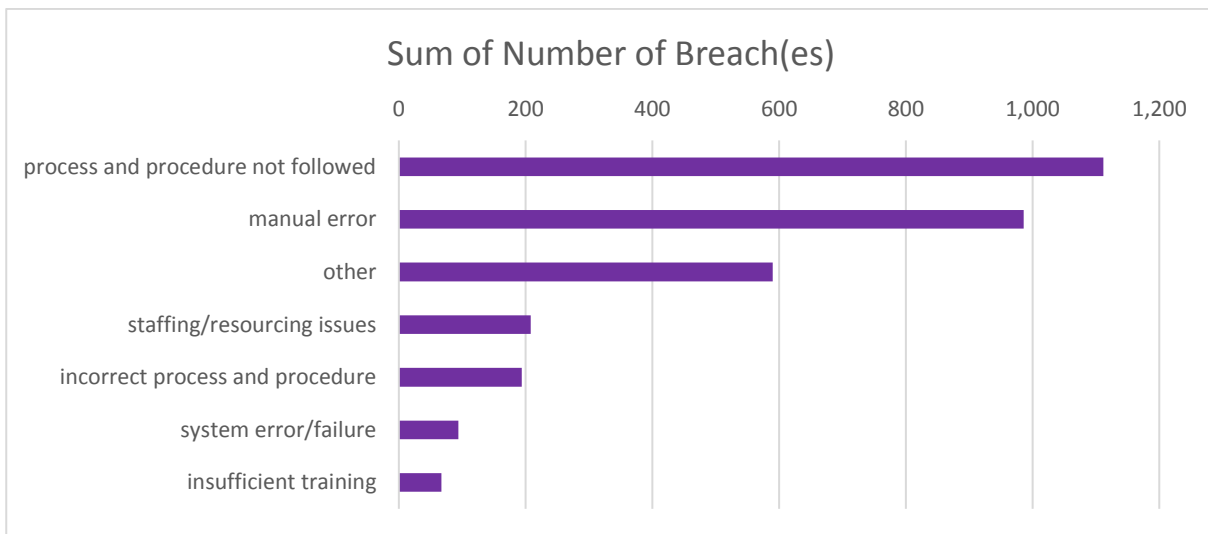
⁹ Including root causes with over \$5,000 financial impact.

Chart 7: Number of client(s)¹⁰ impacted by root cause of self-reported breach(es)



➤ Highest number of clients affected by self-reported breaches included manual error.

Chart 8: Number of self-reported breach(es)¹¹ by root cause



➤ Highest number of self-reported breaches included processes and procedures not followed, and manual error.

¹⁰ Including root causes with over 1,000 clients impacted.

¹¹ Including root causes with over 50 self-reported breaches.

B.6 Timeframe for remediation

Table 5: Number of breach(es) by timeframe for immediate remedial action(s)

Remedial Action	same day	48 hours	1 week	2 weeks	1 month	1 to 3 months	3 to 6 months	6 to 12 months	>1 year	other	Total
other	333	94	85	58	110	28	11	1	1	166	887
training	335	97	88	26	56	58	23	3	1	7	694
review of and changes to process	118	193	31	49	82	42	1	1	-	14	531
apology	325	40	38	16	12	4	-	4	-	5	444
undertaking	82	8	4	7	7	4	-	2	-	47	161
refund of premium	26	7	17	1	1	-	1	-	-	-	53
refund of fees/charges	16	4	12	2	1	-	1	1	-	-	37
ex-gratia payment	4	4	2	2	3	11	5	-	-	-	31
review and changes to terms and conditions	7	4	3	2	6	2	-	-	-	-	24
premium adjustment	5	1	-	1	1	1	-	2	-	1	12
Total	1,251	452	280	164	279	150	42	14	2	240	2,874

➤ *Self-reported breaches that did not specify a particular immediate remedial action were the most common, followed by those that recommended training, and a review of and changes to processes.*

Table 6: Number of breach(es) by timeframe for long term remedial action(s)

Remedial Action	within 1 month	1 to 3 months	3 to 6 months	6 to 12 months	other	Total
training	583	270	16	12	107	988
other	190	34	10	7	280	521
review of and changes to process	228	94	17	60	83	482
apology	66	4	1	-	8	79
undertaking	30	15	1	-	18	64
refund of fees/charges	2	2	21	-	1	26
refund of premium	6	-	-	-	-	6
premium adjustment	4	-	1	-	1	6
review and changes to terms and conditions	2	1	2	-	-	5
ex-gratia payment	-	1	-	-	1	2
Total	1,111	421	69	79	499	2,179

➤ *Training was the most common long term remedial action recommended.*

Part C: Self-reported complaints data

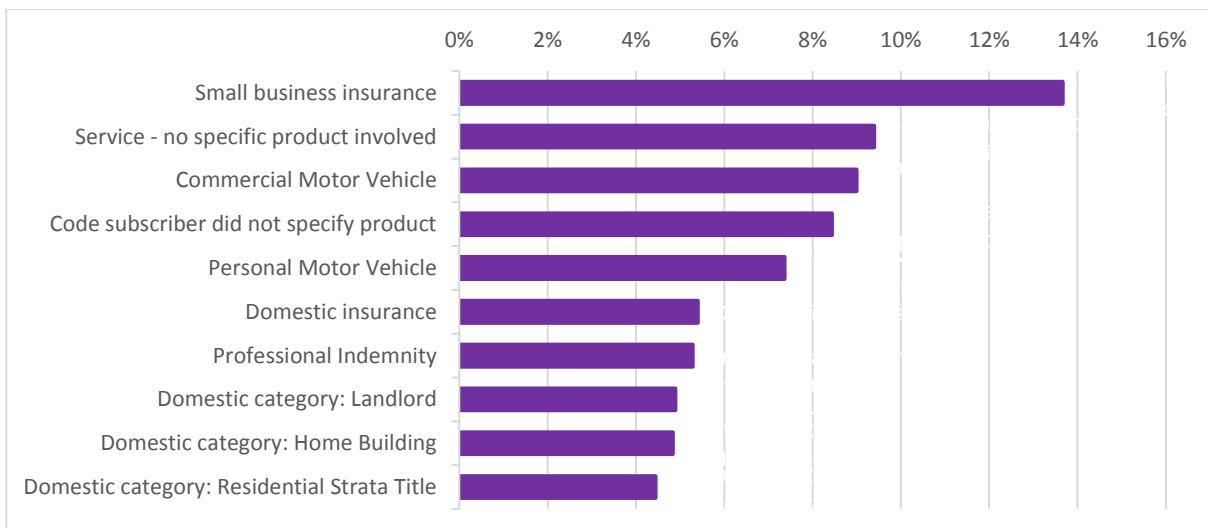
C.1 Key findings of self-reported complaints data

- 1,778 self-reported complaints, up from 1,292 in 2019.
- 52% Code subscribers self-reported complaints, down from 60% in 2019.
- 208 Code subscribers (48%) self-reported nil complaints, including 1 Cat A subscriber and 190 Cat E subscriber.
- 68% of complaints resolved within 21 days, up from 59% in 2019.
- The 2020 ACS re-defined and introduced some new categories, so comparison to 2019 data might not always be feasible.

C.2 Complaints by categories (areas representing over 3%)

- Top products involved (in % of self-reported complaints):
 - 16.4% involved motor vehicle policies (split between 7.4% for personal and 9.0% for commercial motor vehicle), down from 18% in 2019.
 - 13.7% involved small business policies, down from 24% in 2019.
 - 9.4% no specific product identified, general issue (new category in 2020).
 - 5.4% involved domestic insurance in general (new category on 2020).
 - 5.3% involved Professional Indemnity, up from 4% in 2019.
 - 4.9% involved Landlord policies (new category in 2020).
 - 4.8% involved Home Building policies, down from 7.8% in 2019.
 - 4.4% involved Residential Strata Title, down from 7.0% in 2019.

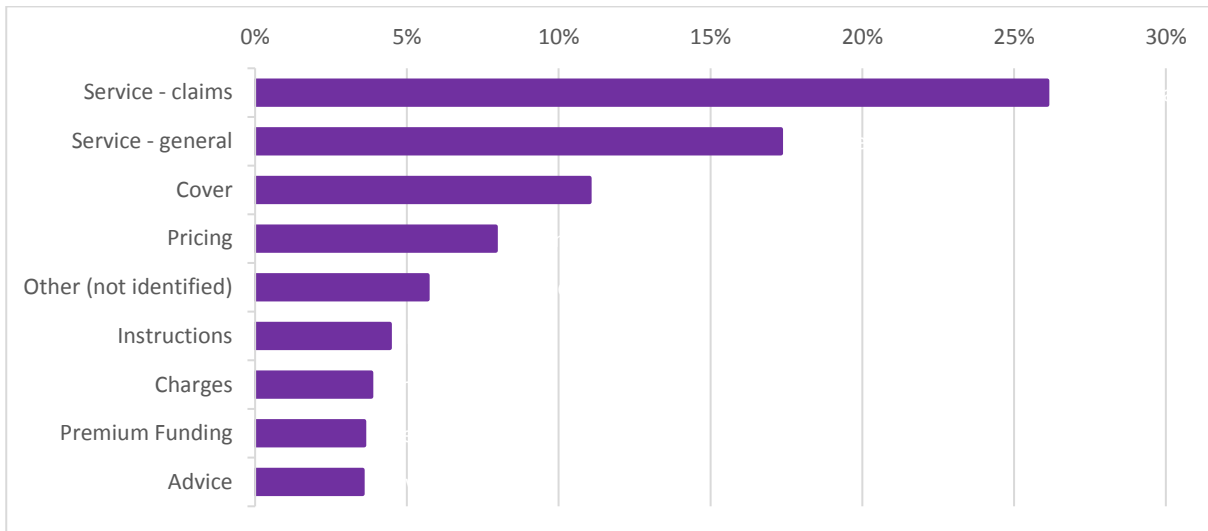
Chart 9: Top products involved in self-reported complaints in 2020



- Top issues involved (in % of self-reported complaints):
 - 26.1% concerned poor claims service, similar to 35.9% in 2019.
 - 17.3% concerned poor general service, similar to 17.5% in 2019.
 - 11.0% concerned cover (new category on 2020).

- 7.9% concerned pricing (new category 2020).
- 5.7% concerned other non-identified issues, down from 6.7% in 2019.
- 4.4% concerned instructions, down from 7.2% in 2019.
- 3.8% concerned charges, down to 7.1% in 2019.
- 3.6% concerned premium funding (new category 2020).
- 3.5% concerned advice, down from 8.9% in 2019.

Chart 10: Top issues involved in self-reported complaints in 2020



- Top outcomes involved (in % of self-reported complaints):
 - 28.7% resolved by apology, explanation and/or acknowledgement of feedback, up from 18% in 2019.
 - 18.4% resolved in favour of client (17.3% via IDR, 1.1% via EDR) down from 26.5% in 2019.
 - 13.7% identified as complaint against insurer (new category in 2020).
 - 8.2% resolved in favour of insurance brokers (6.3% via IDR, 1.9% via EDR).
 - 6.2% withdrawn by client/client did not respond.
 - 4.4% client took business elsewhere.

- Only half of Code subscribers identified and self-reported complaints.
- Just under three quarters of complaints were resolved within 21 days.
- One in five complaints involved a commercial insurance product (e.g. small business or motor vehicle).
- Nearly half of complaints related to service, claims handling or general service.
- Nearly one in three complaints resolved with an apology.

Part D. Trends and relationships in breach and complaints data

Chart 11: Trends and relationships in breach and complaints data

Self-reported by all Code subscribers over the past five years to the Committee.

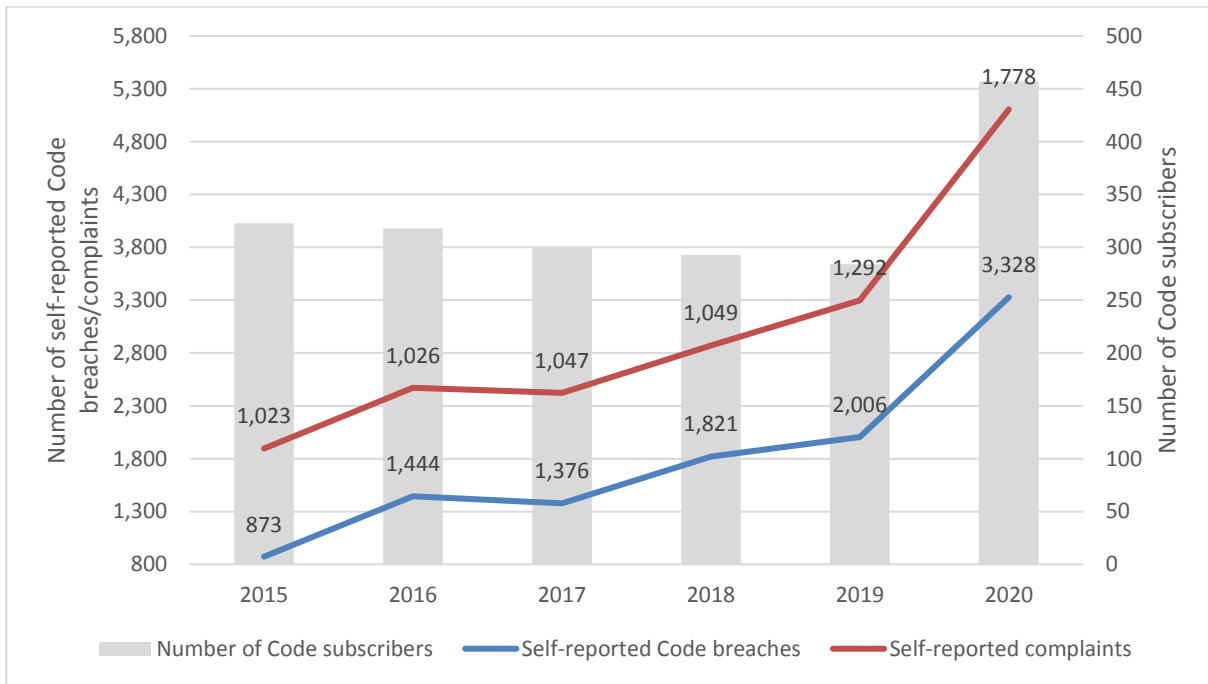
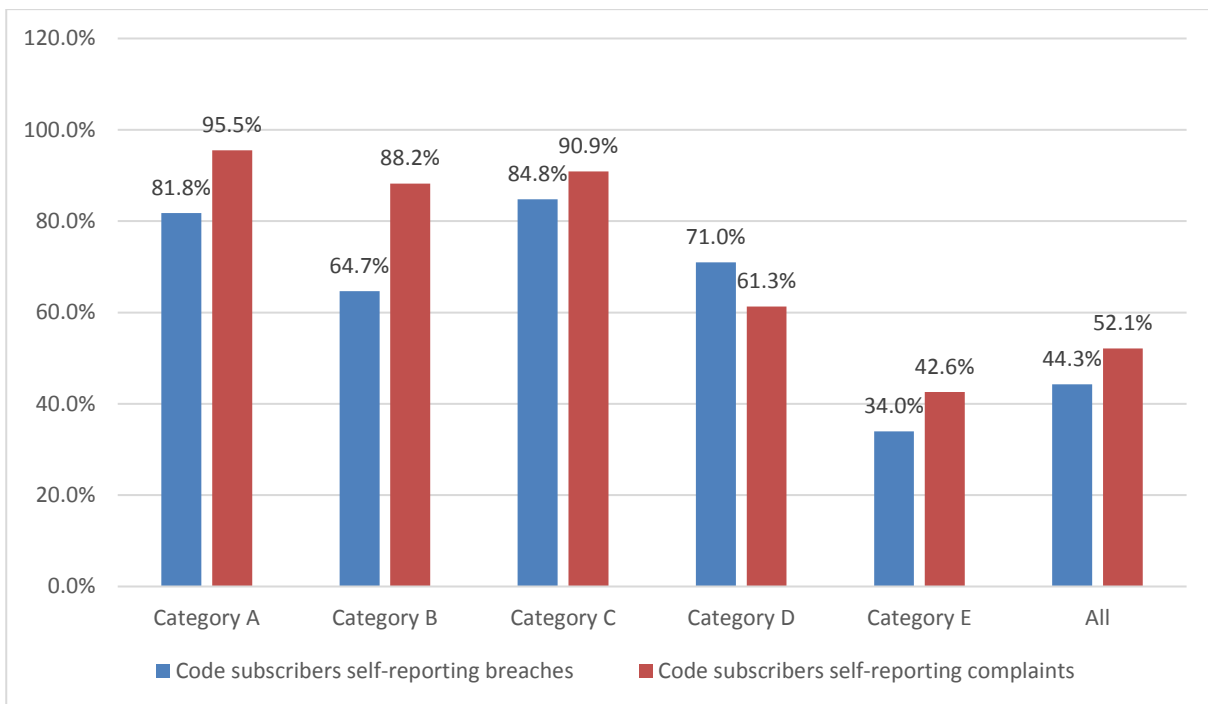


Chart 12: Self-reporting culture in 2020



- *Self-reporting complaint culture improved slightly compared to self-reporting breach culture.*
- *This might highlight the missing link to use complaints data to identify underlying root cause and potential Code breach issues which should be remedied with long term solutions rather than the quick fix with the individual client.*

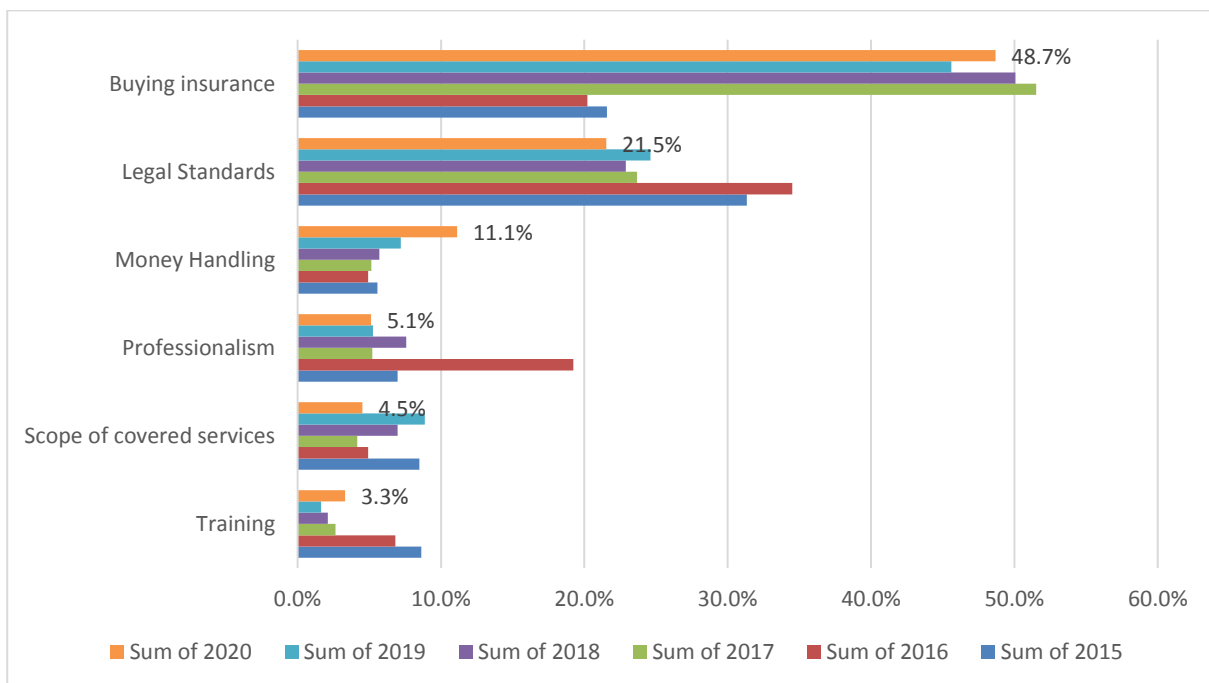
Part E. Data trends

E.1 All Code subscribers

Table 7: Industry summary (all Code subscribers)

	2015	2016	2017	2018	2019	2020
Number of Code subscribers ¹²	323	318	300	293	284	457
Number of branches (including head office)	n/a	n/a	n/a	1,550	1,471	1,998
Total of self-reported Code breaches	873	1,444	1,376	1,821	2,006	3,328
Mean of self-reported Code breaches	2.7	4.4	4.7	6.2	7.1	7.8
% of Code subscribers self-reporting Code breaches	32%	42%	41%	43%	51%	44.3%
Total of self-reported complaints	1,023	1,026	1,047	1,049	1,292	1,778
Mean of self-reported complaints	3.2	3.2	3.6	3.6	4.5	4.1
% of Code subscribers self-reporting complaints	52%	54%	57%	61%	60%	52.1%

Chart 13: Top six categories of Code breaches self-reported since 2015



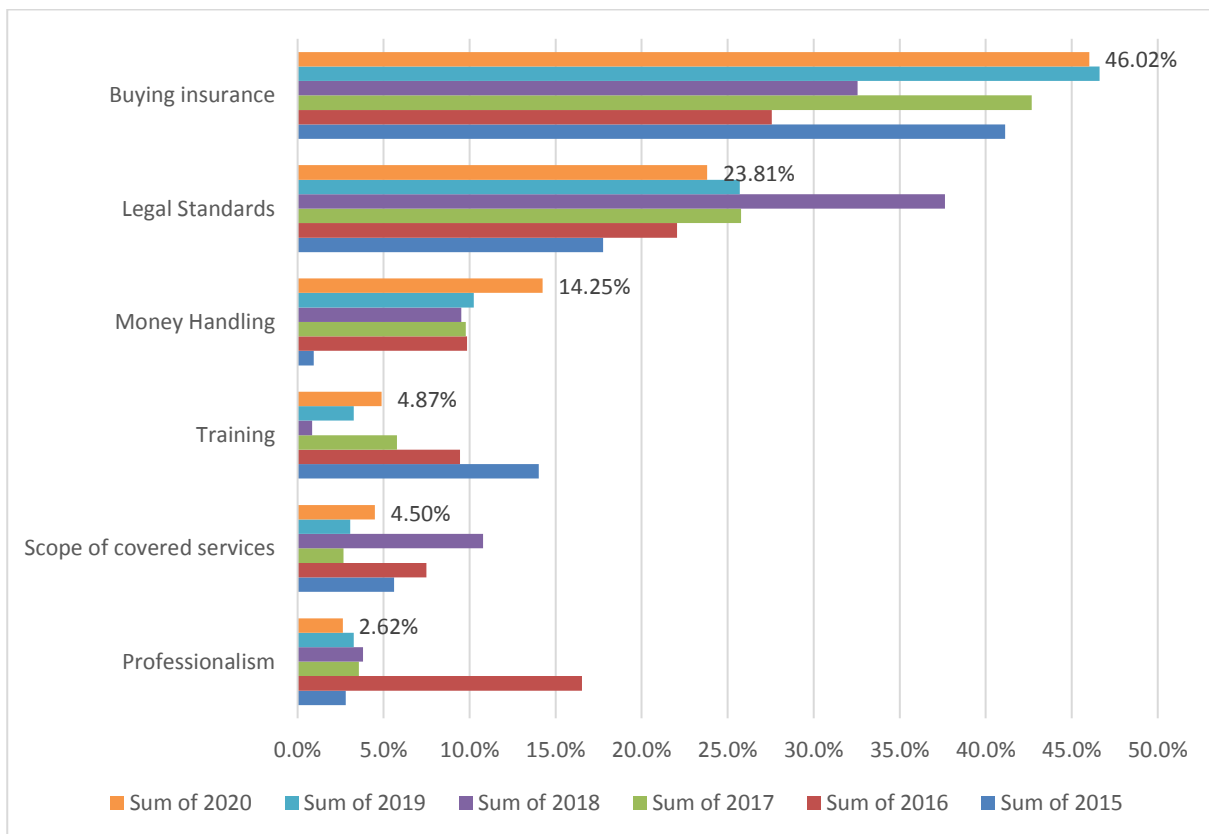
¹² Code subscribers are counted by Australian Financial Service Licence (AFSL), not counting the new Steadfast members who became Code subscribers effective 1 December 2019 and were not involved in the 2019 ACS Program. Some Code subscribers are represented by more than one AFSL.

E.2 Category A

Table 8: Sector summary (Category A)

	2015	2016	2017	2018	2019	2020
Number of Code subscribers	13	25	21	26	29	37
Number of branches (including head office)	n/a	n/a	n/a	933	955	1,173
Total of self-reported Code breaches	44	302	190	397	454	1,067
Mean of self-reported Code breaches	8.8	11.7	10.8	15.3	15.7	48.5
% of Code subscribers self-reporting Code breaches	59%	52%	94%	72%	85%	81.8%
Total of self-reported complaints	52	311	410	300	554	522
Mean of self-reported complaints	14.2	12.4	24.1	11.5	19.1	23.7
% of Code subscribers self-reporting complaints	88%	68%	100%	94%	90%	95.5%

Chart 14: Top six categories of Code breaches self-reported since 2015 in Category A

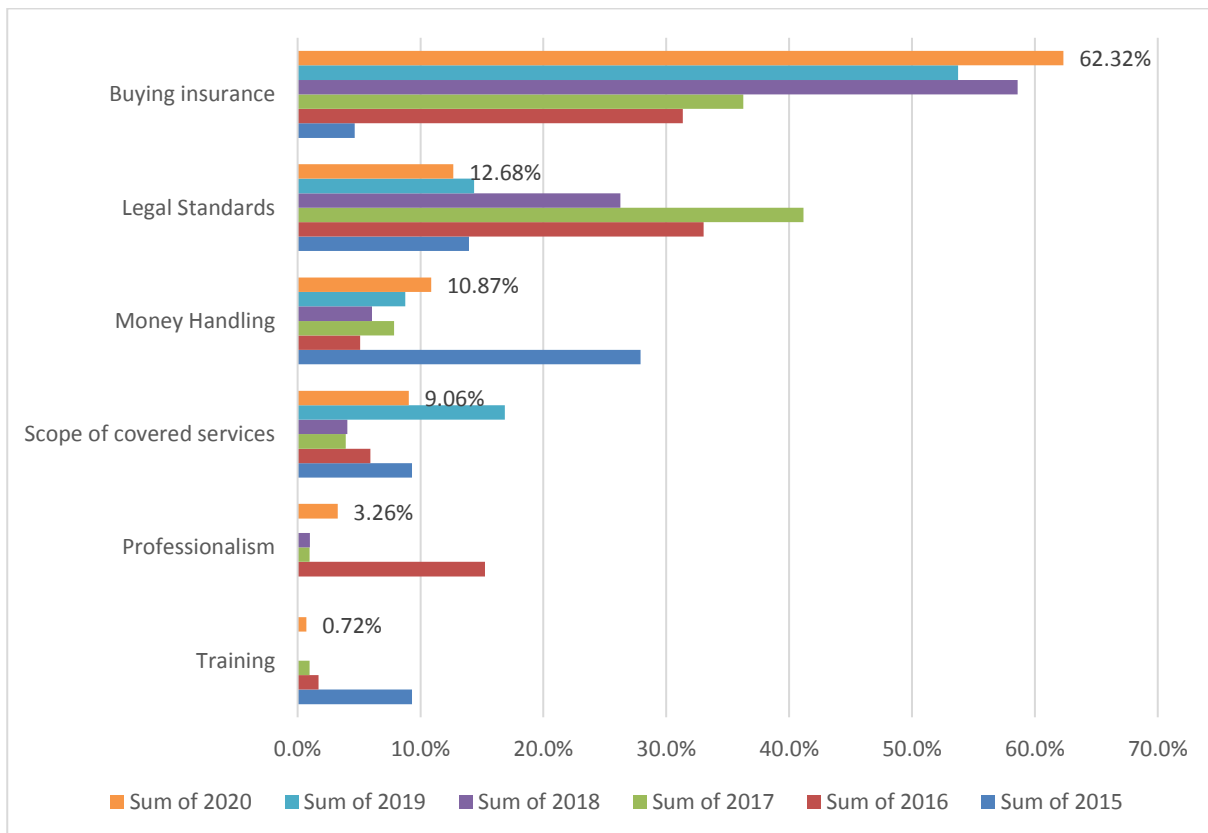


E.3 Category B

Table 9: Sector summary (Category B)

	2015	2016	2017	2018	2019	2020
	Cat B&C	Cat B&C	Cat B&C	Cat B&C	Cat B	Cat B
Number of Code subscribers	26	49	46	52	18	22
Number of branches (including head office)	n/a	n/a	n/a	240	76	148
Total of self-reported Code breaches	113	383	305	372	155	278
Mean of self-reported Code breaches	4.4	7.6	6.6	7.2	8.6	16.4
% of Code subscribers self-reporting Code breaches	50%	69%	50%	59%	64%	64.7%
Total of self-reported complaints	143	204	225	275	88	133
Mean of self-reported complaints	6.4	4.2	4.9	5.3	4.9	7.8
% of Code subscribers self-reporting complaints	83%	83%	91%	82%	86%	88.2%

Chart 15: Top six categories of Code breaches self-reported since 2015 in Category B

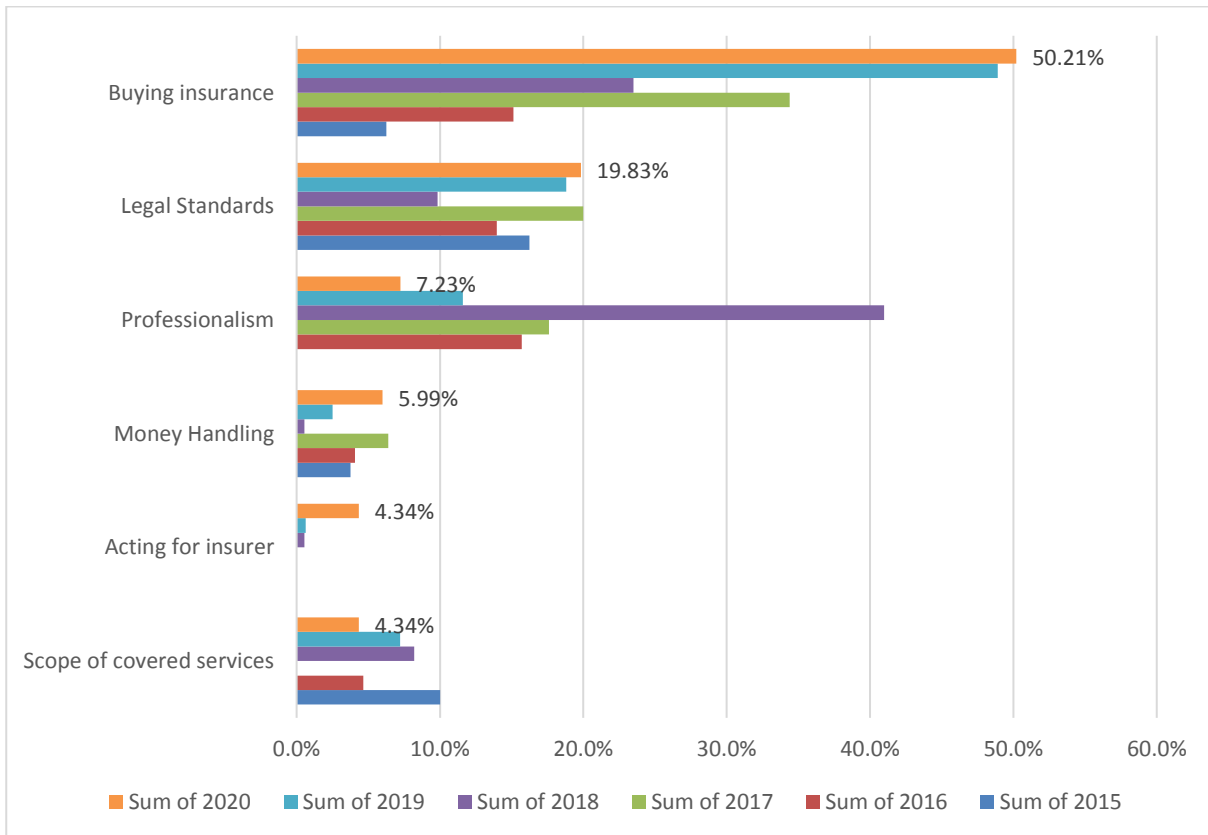


E.4 Category C

Table 10: Sector summary (Category C)

	2015	2016	2017	2018	2019	2020
	Cat B&C	Cat B&C	Cat B&C	Cat B&C	Cat C	Cat C
Number of Code subscribers	26	49	46	52	35	34
Number of branches (including head office)	n/a	n/a	n/a	240	170	145
Total of self-reported Code breaches	113	383	305	372	469	495
Mean of self-reported Code breaches	4.4	7.6	6.6	7.2	13.4	15.0
% of Code subscribers self-reporting Code breaches	50%	69%	50%	59%	74%	84.8%
Total of self-reported complaints	143	204	225	275	250	238
Mean of self-reported complaints	6.4	4.2	4.9	5.3	7.1	7.2
% of Code subscribers self-reporting complaints	83%	83%	91%	82%	91%	90.9%

Chart 16: Top six categories of Code breaches self-reported since 2015 in Category C

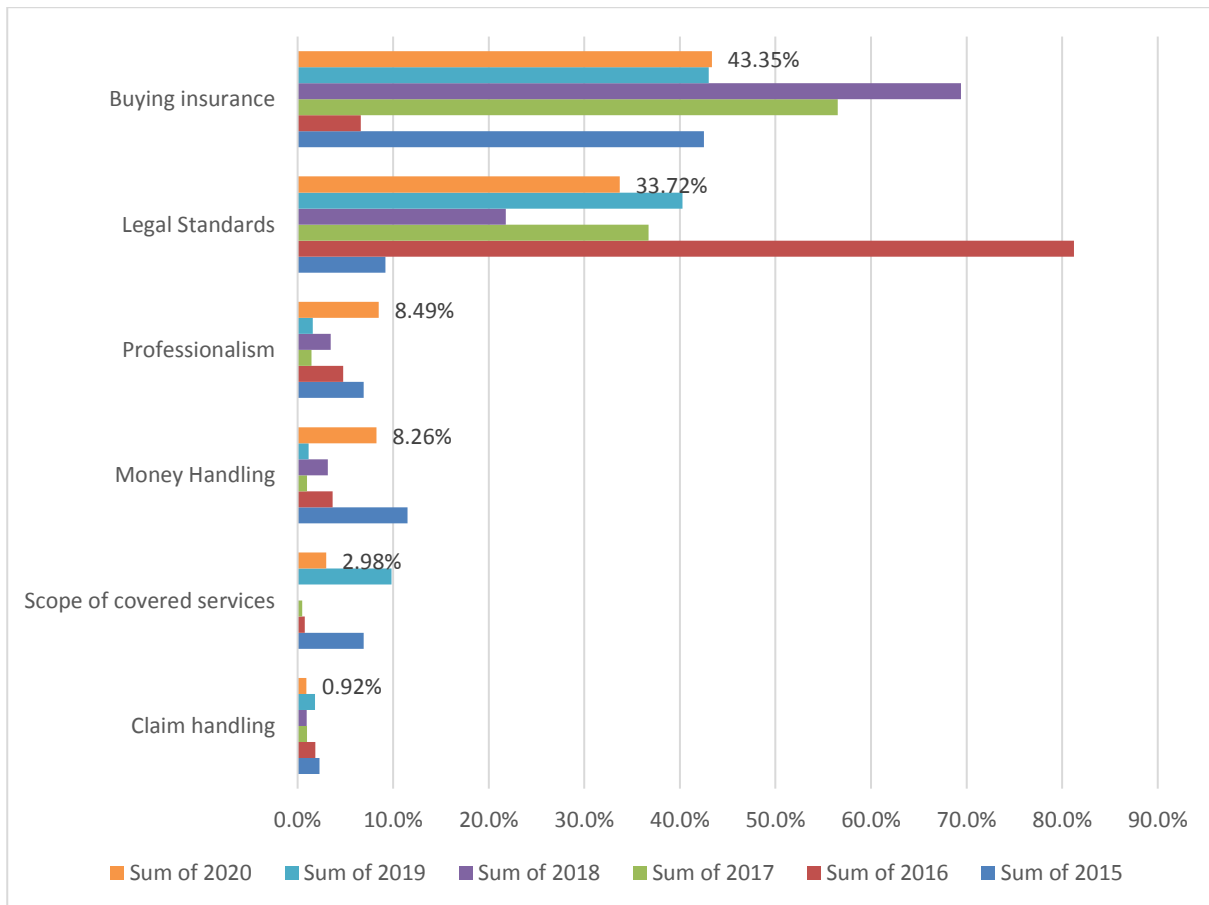


E.5 Category D

Table 11: Sector summary (Category D)

	2015	2016	2017	2018	2019	2020
Number of Code subscribers	35	28	39	32	25	32
Number of branches (including head office)	n/a	n/a	n/a	117	55	79
Total of self-reported Code breaches	87	249	177	375	376	436
Mean of self-reported Code breaches	1.9	8.6	5.9	11.7	15.0	14.1
% of Code subscribers self-reporting Code breaches	37%	57%	53%	50%	60%	71%
Total of self-reported IDR complaints	102	184	93	119	88	205
Mean of self-reported IDR complaints	3.2	6.6	3.1	3.7	3.5	6.6
% of Code subscribers self-reporting IDR complaints	80%	59%	63%	81%	64%	61.3%

Chart 17: Top six categories of Code breaches self-reported since 2015 in Category D

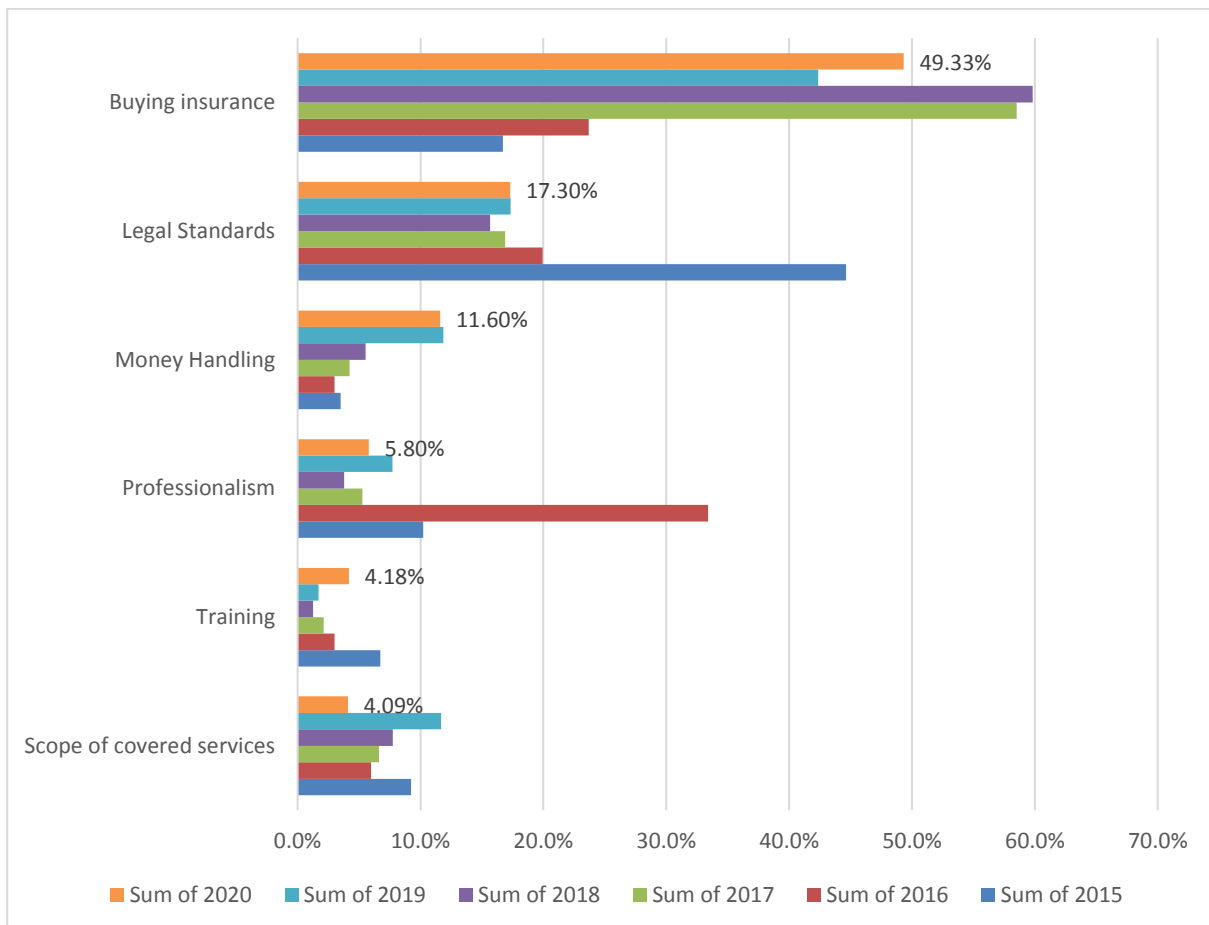


E.6 Category E

Table 12: Sector summary (Category E)

	2015	2016	2017	2018	2019	2020
Number of Code subscribers	249	216	194	183	177	332
Number of branches (including head office)	n/a	n/a	n/a	260	215	462
Total of self-reported Code breaches	629	510	704	677	549	1,052
Mean of self-reported Code breaches	2.3	2.3	3.5	3.7	3.1	3.2
% of Code subscribers self-reporting Code breaches	28%	33%	33%	35%	41%	34%
Total of self-reported IDR complaints	726	327	319	355	309	680
Mean of self-reported IDR complaints	2.2	1.5	1.6	1.9	1.7	2.1
% of Code subscribers self-reporting IDR complaints	39%	45%	44%	49%	47%	42.6%

Chart 18: Top six categories of Code breaches self-reported since 2015 in Category E



Part F. Benchmark data

F.1 Benchmarking of breach data

Chart 19 to **Chart 23** compare the number of self-reported Code breaches per category of Code subscriber regarding size of business. Charts include ‘*Industry*’¹³ and ‘*Sector*’¹⁴ mean figures.

Chart 19: Benchmarking of 2020 self-reported breaches per organisation in Cat A

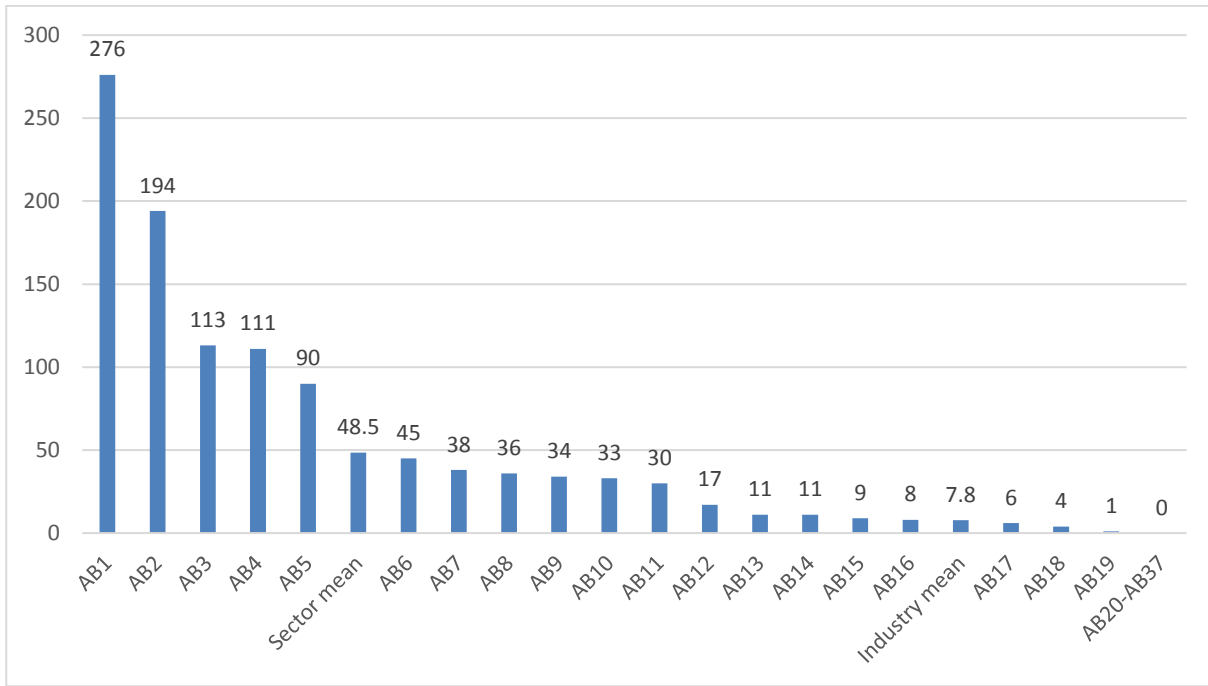
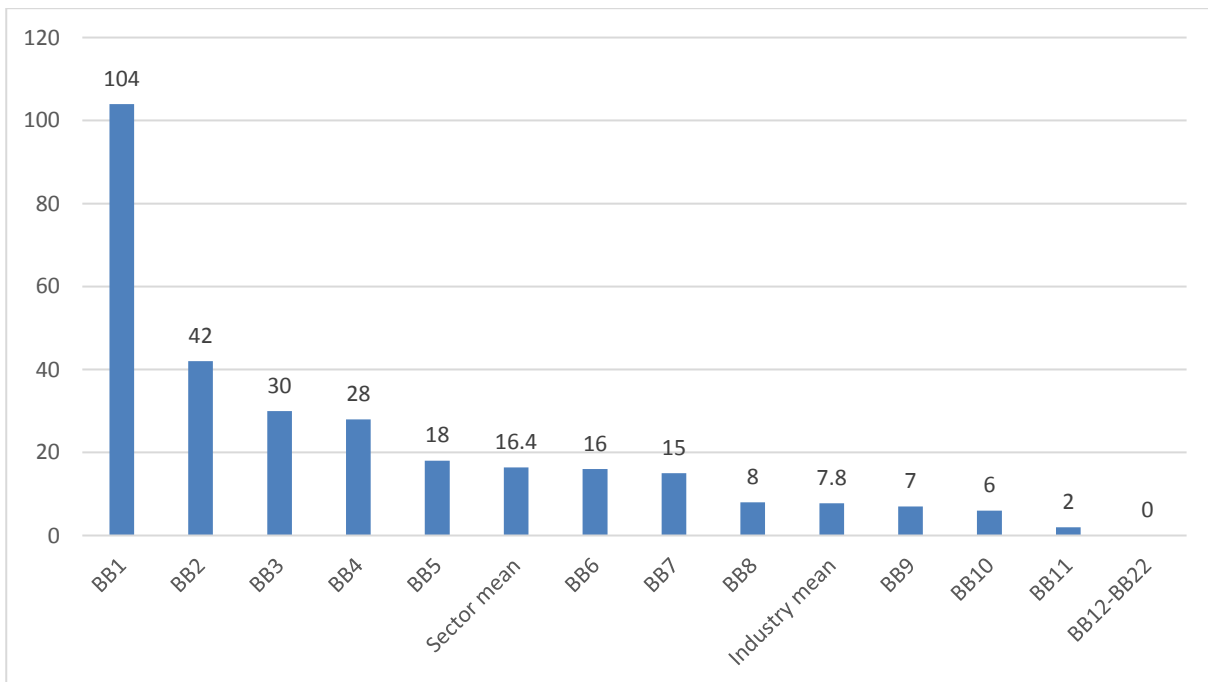


Chart 20: Benchmarking of 2020 self-reported breaches per organisation in Cat B



¹³ The ‘*industry*’ figure is calculated using the total number of breaches self-reported to the Committee by the total number of insurance brokers. This indicates the overall industry performance.

¹⁴ The ‘*sector*’ figure is calculated using the total number of breaches self-reported to the Committee by the total number of insurance brokers within that size of business. This provides a benchmark for comparison purposes.

Chart 21: Benchmarking of 2020 self-reported breaches per organisation in Cat C

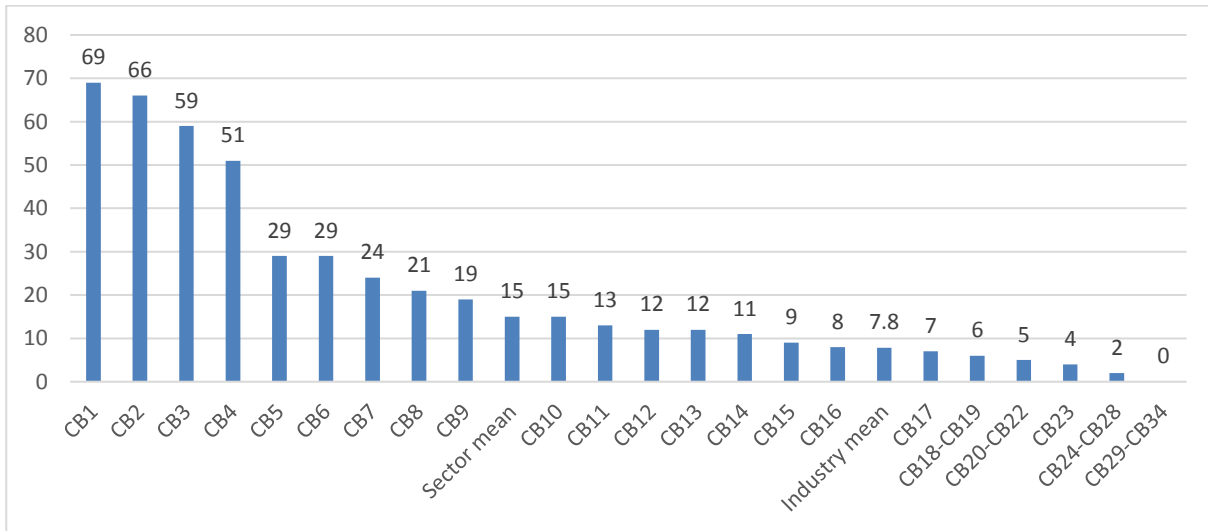


Chart 22: Benchmarking of 2020 self-reported breaches per organisation in Cat D

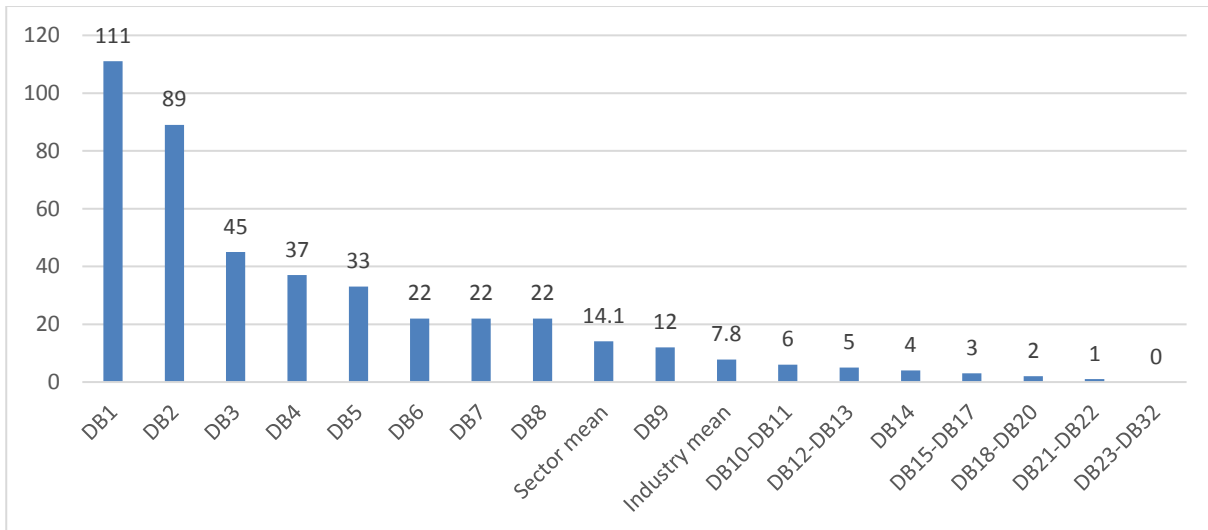
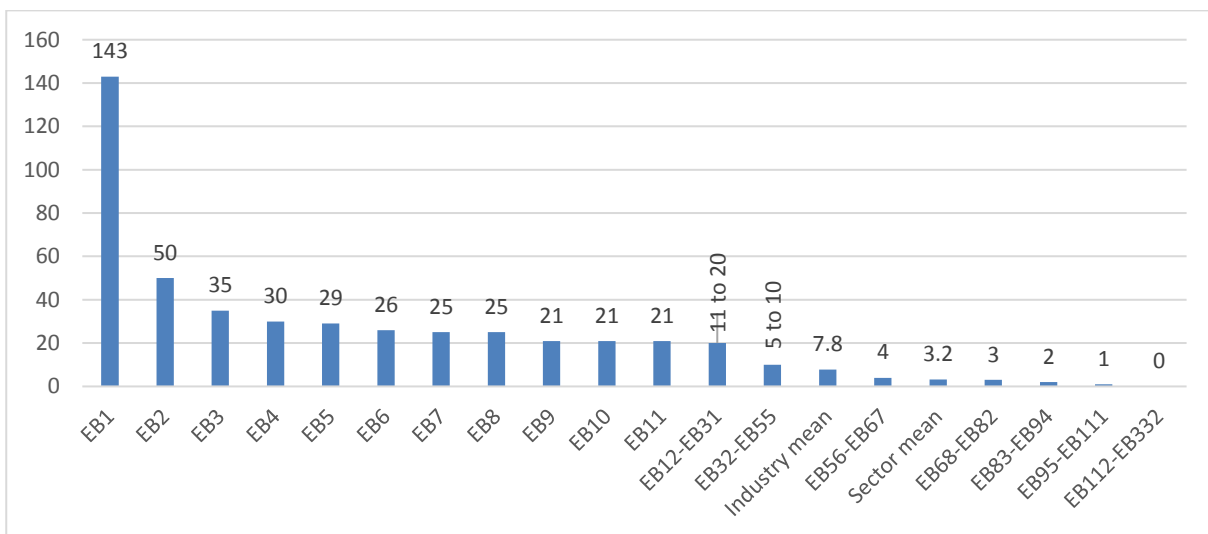


Chart 23: Benchmarking of 2020 self-reported breaches per organisation in Cat E



F.2 Benchmarking of complaints data

Chart 24 to **Chart 28** compare the number of self-reported complaints per category of Code subscriber regarding size of business. Charts include ‘*Industry*’¹⁵ and ‘*Sector*’¹⁶ mean figures.

Chart 24: Benchmarking of 2020 self-reported complaints per organisation in Cat A

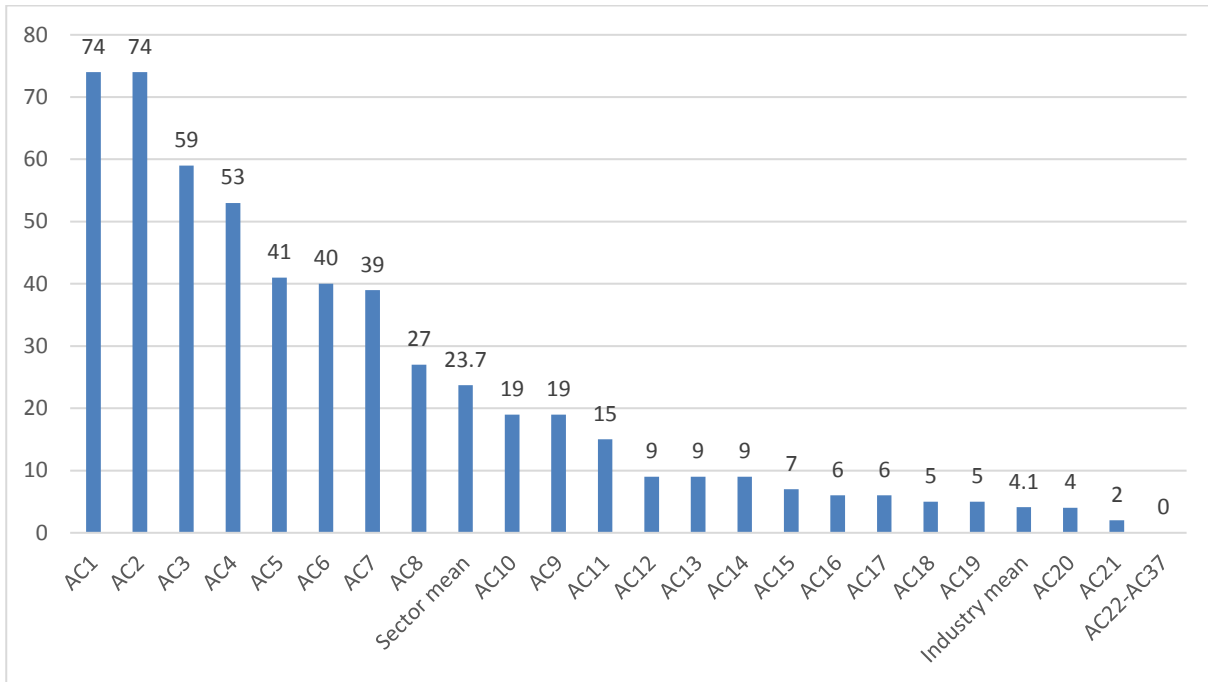
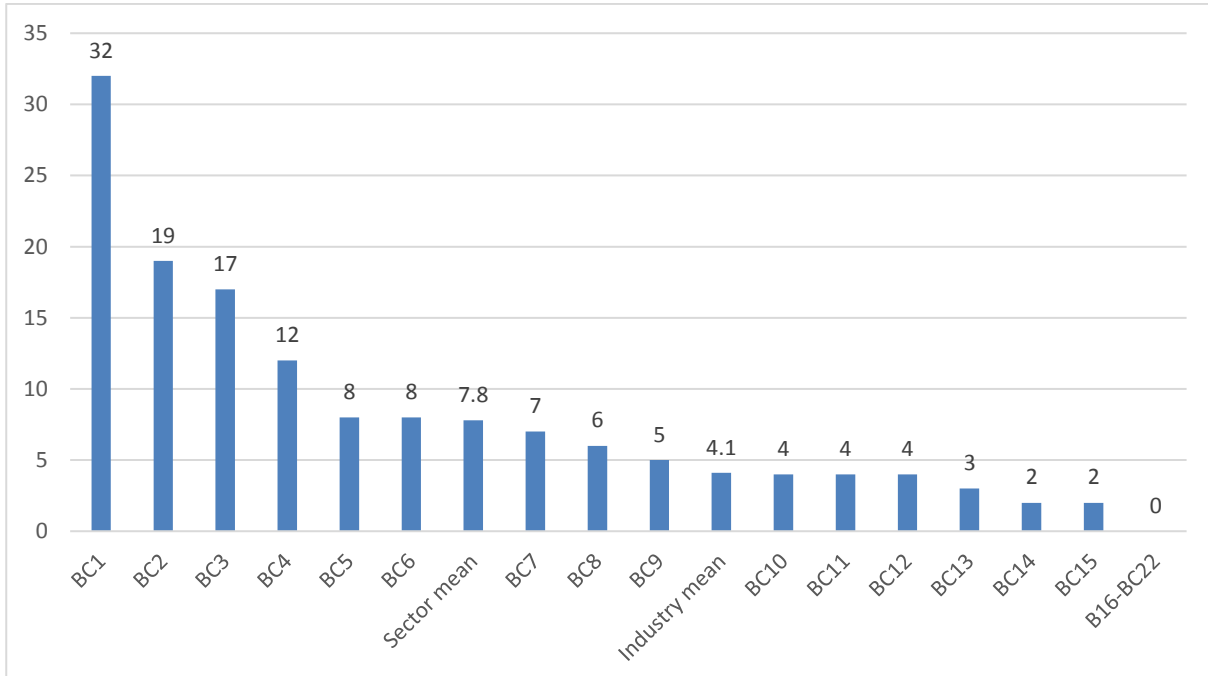


Chart 25: Benchmarking of 2020 self-reported complaints per organisation in Cat B



¹⁵ The ‘*industry*’ figure is calculated using the total number of complaints self-reported to the Committee by the total number of insurance brokers. This indicates the overall industry performance.

¹⁶ The ‘*sector*’ figure is calculated using the total number of complaints self-reported to the Committee by the total number of insurance brokers within that size of business. This provides a benchmark for comparison purposes.

Chart 26: Benchmarking of 2020 self-reported complaints per organisation in Cat C

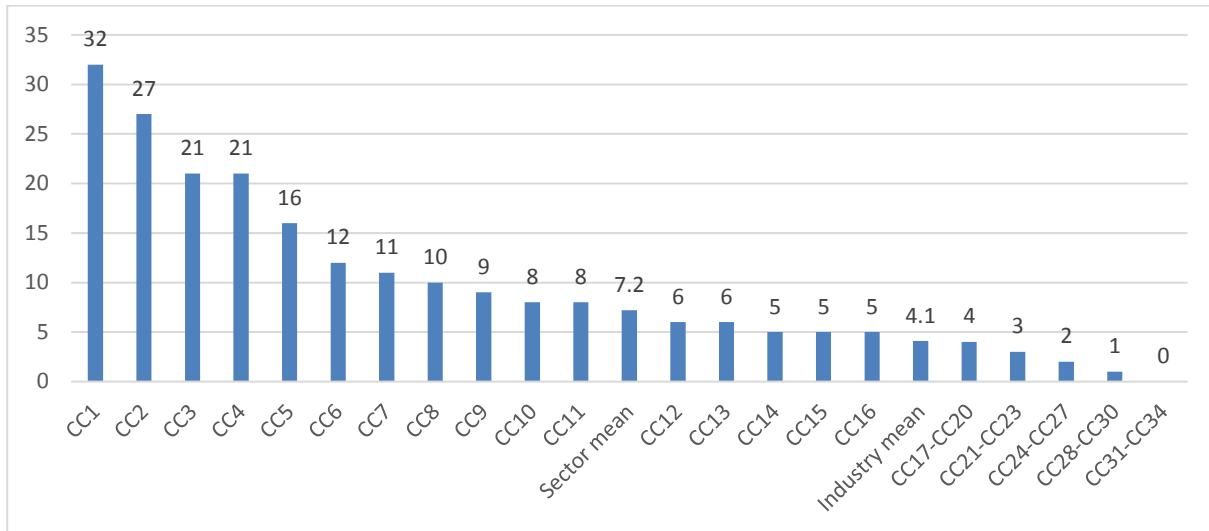


Chart 27: Benchmarking of 2020 self-reported complaints per organisation in Cat D

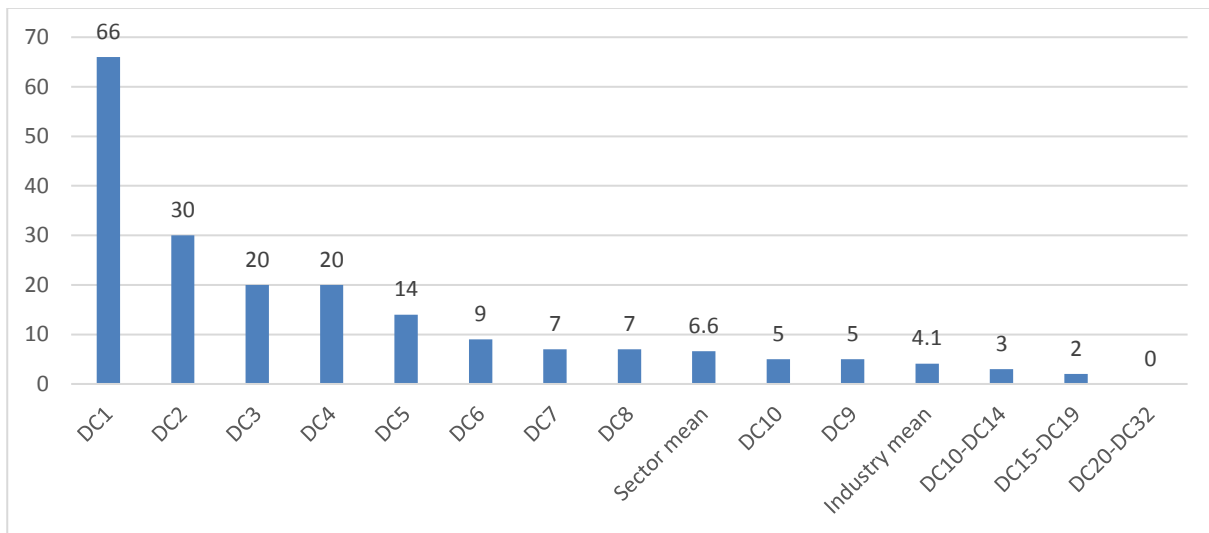
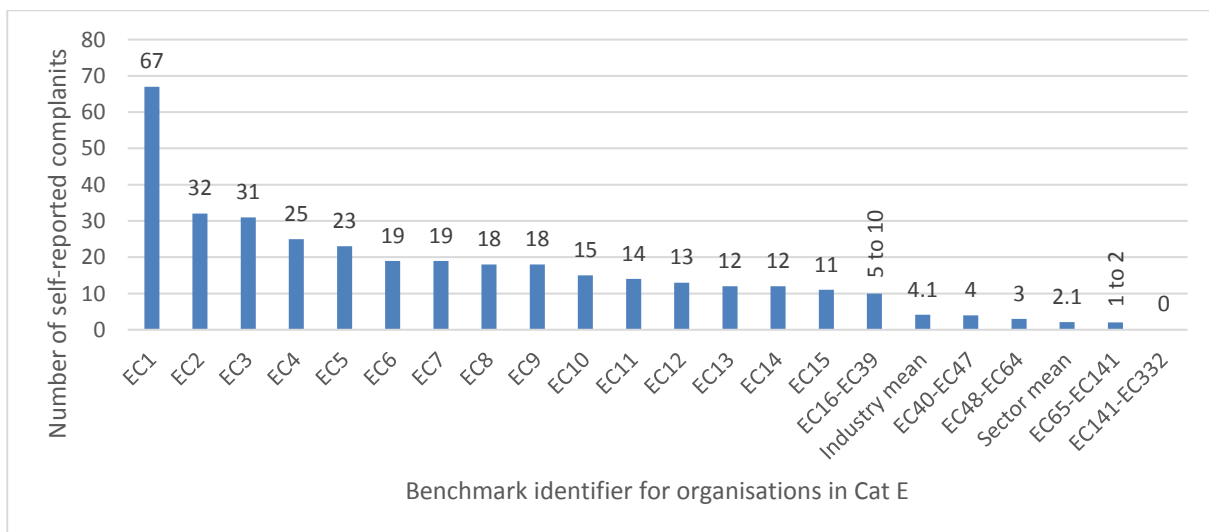


Chart 28: Benchmarking of 2020 self-reported complaints per organisation in Cat E



About the Code

The 2014 Code sets standards of good industry practice for the insurance brokers that have agreed to follow its standards when dealing with current and prospective individual and small business clients. The Code is owned and published by the National Insurance Brokers Association ([NIBA](#)) and forms an important part of the broader national consumer protection framework and financial services regulatory system.

The Code contains 12 key service standards that apply to all insurance broking services delivered to individuals and small businesses by Code subscribers across Australia. By subscribing to the Code, insurance brokers have committed to continuously improving their standards of practice and service in their sector; promoting informed decision-making about their services; and acting fairly and reasonably in delivering those services.

The Code is currently [under review](#).

About the Committee

The Committee is an independent compliance monitoring body established under the Code and the Code Compliance Committee Charter (the Charter). It comprises an independent chair, a person representing the interests of the insurance broking sector and a person representing the interests of consumers (including small businesses). The Code and Charter entrusts the Committee with several functions and responsibilities.

The Committee independently monitors compliance and provides guidance to stakeholders about the Code to enhance professionalism and maintain high standards of practice and service and appropriate behaviour in the insurance broking industry.

About the Compliance Manager

The Australian Financial Complaints Authority ([AFCA](#)) provides Code monitoring and administration services as Compliance Manager to the Committee and NIBA by agreement. AFCA has appointed a dedicated team of staff (Code Team) within its office to undertake that task.

Definitions

For ease of reference when reading this report:

- ‘the Code’ means the 2014 Code unless otherwise stated.
- ‘consumers’ or ‘clients’ includes individuals or small businesses that are current and prospective customers of Code subscribers.
- ‘Code subscribers’ means insurance brokers that subscribe to the Code.

For more information about the Code, the Committee and the Compliance Manager, please visit www.insurancebrokerscode.com.au.