

# Conduct for fair customer outcomes



**over**  
AND ABOVE

## The Duty of Disclosure and the Insurance Claims Register

### The Duty of Disclosure

- All information provided to insurers must be correct and complete. This includes all information related to the policy, or any claim, including the answers to any questions we ask.
- The information must be correct and complete whether provided by the customer, or by someone else on their behalf such as a broker.
- If an insurer is given incorrect, incomplete or false information, or a customer's claim is fraudulent in any way, the insurer may be entitled to decline their claim and avoid or cancel their policy. This can have serious consequences for customers including limiting their access to insurance products.

### How can our brokers and intermediaries help?

- Brokers and intermediaries can support our mutual customers by helping them to understand their duty of disclosure and the importance of providing correct and complete information to their insurer.

### The Insurance Claims Register (ICR)

- The **ICR is a database of insurance claims** that helps reduce the risk of insurance fraud (and ultimately reduce the cost of insurance), by enabling insurance companies to share details of claims.
- Information on the ICR is retained for 10 years and in the case of a fraud flag, indefinitely.
- Whilst the ICR is a useful industry tool, the risks to customers arising from the ICR are potentially significant, and can be heightened for customers experiencing vulnerability.
- If a customer gives us incorrect or incomplete information, or if information is withheld, and the claim is declined or we avoid the policy, we may share this information with other insurers through the ICR. Risks to customers from having this information on the ICR include:
  - Having their claim declined
  - Having their policies avoided or cancelled. This might extend to other policies held with the customer's insurer as the insurer may decline to renew them.
  - Not being able to obtain insurance in future. The likelihood of getting insurance cover from another company can be affected by a customer's history on the ICR.
  - Having their mortgage cancelled by their bank and the home being sold to repay the loan. Inability to get insurance impacts on a person's ability to own property, as a bank will not lend to someone who is not insured.
  - Being unable to obtain finance to buy a car as they can no longer obtain motor insurance.



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