

[Tuesday 30 June 2009 - email submission received from Bob Barron, Council on the Ageing]

We did have a few comments regarding the Code of Practice as follows.

1. *The Terms of Reference must be addressed by those offering comments.*
2. *The document mentions "Since the codes inception..." on page 1 - under Foreword- BUT there is no date anywhere to indicate whether it is current. it is also desirable to indicate period of currency ie expected review date.  
Recommend that this be suggested.*
3. *Text will need to be amended- at least to reflect consolidation of IOS into FOS- mentioned in Terms of reference for this review.*
4. *Item 1.3- refers to" after we have adopted this code'- presumably for an individual insurer ? Rather than the Insurance Council.  
Needs clarity, as the code has been available to those who are prepared to voluntarily adopt it, but a consumer will need to do some research to find out whether this has been done , and whether their particular policy is covered by the 1994 General Insurance Code of practice mentioned in 1.2 or by the new Code.  
Also- Can this opportunity be taken to clarify whether those policies taken out BEFORE the new Code was adopted are covered OR excluded. [ What constitutes a NEW policy- if cover is amended? parties change ? new disclosures etc]*
5. *Note 6. on page 3- Says : "Ask us.." but no contact details are offeredand it is unclear whether one should ask one's Insurer or the Insurance Council.  
Can wording be amended to clarify ?*
6. *Section 3. Item 3.4.3 says: " You will have access to information about you ...."  
Is there any time limit on this availability or is it kept, and remains available, indefinitely ?  
c.f. para 3.6.8 on page 7- which mentions "at least five years " in the case of employee training records.*
7. *Notes 15 & 16, on page 12 refer to: 'External dispute resolution' and 'For further information on the external dispute resolution scheme..'  
I believe this footnote-  
(a) requires more prominence  
(b) needs amplification by drawing on some of the terms applicable to that scheme- eg is there a requirement to make first contact?  
(c) clarify whether there are any time limits which may not be apparent in this document and may result in loss of opportunity to seek resolution  
NB The online form- ie to register a dispute- which I accessed is brief, but it was not apparent to me whether I could have printed a copy or whether a copy would be sent to me etc.*

*In short - is there an opportunity to expand Section 6 - External dispute resolution ?*

Could you please forward them to the appropriate place.

Regards,  
Bob Barron