



**Actuaries
Institute.**

12 June 2026

Manager, Supervisory Data
General Insurance and Banking Division
Australian Prudential Regulation Authority
GPO Box 9836 SYDNEY NSW 2001

Email: <mailto:DataConsultations@apra.gov.au>

Dear Manager,

Response to APRA consultation on NCPD non-confidentiality determination and refreshed publication format

The Actuaries Institute ('the Institute') welcomes the opportunity to provide feedback on APRA's refreshed publication format for the National Claims and Policies Database (NCPD).

The Institute is the peak professional body for actuaries in Australia. Our members work in a wide range of fields including insurance, superannuation and retirement incomes, enterprise risk management, data science and AI, climate change impacts and government services, and many are extensive users of APRA's insurance statistics.

The comments made in this submission are guided by the Institute's Public Policy Principles, that any policy measures or changes should promote public wellbeing, consider potential impacts on equity, be evidence-based and support effectively regulated systems.

Support for the confidentiality proposal

The Institute is supportive of APRA's proposals. The NCPD is a uniquely valuable resource about the Australian general insurance industry, providing insights and transparency for insurers, purchasers of insurance, policymakers and researchers that is not available from any other source. The Institute commends APRA's ongoing commitment to improving public accessibility and transparency of insurance statistics that supports a healthy, sustainable private commercial market.

Support for the refreshed publication format

The Institute supports the move to a downloadable spreadsheet format for NCPD publications which will make the statistics easier to access and use.

The proposed cross-sectional outputs for policy statistics, claims statistics and facilities statistics broadly align with the existing structure, which our members consider appropriate. We support the continuity of existing dimensions and levels of aggregation, subject to the comments below.

Cyber insurance and management liability - publication template

The Institute welcomes the inclusion of cyber insurance and management liability as separately published product categories. We note, however, that the consultation does not include a draft template or worked example of the proposed publication outputs for these two new product classes.

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Given that cyber insurance has different structural characteristics to other classes - for example, policy limits tend to be materially different from those typical of professional indemnity or public liability - the Institute requests that APRA share a draft template or data specification for the proposed cyber and management liability publications prior to finalising the format. This would allow stakeholders to identify any significant omissions or adjustments that may be needed to ensure the data is meaningful and usable.

Lloyd's publications

The Institute notes APRA's proposal to continue publishing separate Lloyd's publications with reduced dimensions and measures, consistent with prior practice. We understand this reflects limitations in APRA's data collection arrangements with Lloyd's syndicates under the relevant reporting standards.

Lloyd's underwriters represent a material share of the insurance classes included in the NCPD data collection and the omission of Lloyd's in the NCPD represents a gap in the information collection, including for several industry sectors where there are current affordability/availability issues. The Institute encourages APRA to consider, over time and to the extent that reporting standards and regulatory arrangements permit, moving towards greater alignment between the granularity of Lloyd's and non-Lloyd's publications. This would support a more complete analysis of the general insurance market.

Timeliness of publication

The Institute encourages APRA to consider reducing the lag between the data collection period and public release of NCPD statistics. Historically, there has been approximately a one-year lag between the data date and availability to external users. Given the NCPD is a key resource for monitoring emerging trends in the general insurance market, more timely release would significantly increase its value to industry, policymakers and researchers.

We note that APRA releases other insurance statistical publications, such as the quarterly general insurance statistics, within a much shorter timeframe, without compromising data accuracy.

Development triangles

The Institute requests that APRA publish the full development pattern in claims statistics (subject to existing masking protocols to protect the commercial confidentiality of individual insurers), rather than grouping later development periods (for example, grouping 10+ years from policy issue). Presenting the complete emergence of claims over time supports understanding full claims development patterns which is important for reserving and pricing specifically and more generally for strategic decision-making.

We note that the new spreadsheet format should readily support this enhancement and encourage APRA to adopt full development reporting from the outset of the refreshed publication approach.

Opportunities to enhance the value of the NCPD

The Institute acknowledges and supports APRA's proposal to preserve the existing scope and granularity of the non-confidentiality determination. We see opportunities to increase the value of the statistics published from existing data collections and encourage APRA to consider these as part of future consultation on the NCPD.

Specifically, the Institute suggests APRA consider the following enhancements:

- Granularity of occupation and industry groups: The current publication aggregates occupation and industry information at a relatively high level. Where confidentiality considerations permit, the Institute encourages APRA to explore whether greater occupation and industry granularity could be incorporated into regular NCPD publications.

- Information on claim type and/or cause of claim: For example, the distinction between property damage and bodily injury claims is important in reserving and pricing for liability while worker to worker claims are a specific type of bodily injury claim which have been problematic and contributed to reserving issues. The Institute encourages APRA to consider incorporating information on the type of claims into standard NCPD publications on a regular basis.
- Company size data: The Institute notes the value of data segmented by insured size (micro, small, medium, corporate and large), particularly for understanding the insurance experience of small and medium enterprises (SMEs). SME access to affordable insurance is a significant public policy issue, and this dimension of the NCPD data would support better-informed analysis of affordability and availability trends. The Institute specifically highlights the value of company size segmentation for cyber insurance, where understanding SME take-up rates would assist the industry and policymakers.
- Thematic or ad hoc reports on emerging issues: The standard NCPD cross-sections do not readily allow users to answer specific questions about emerging market dynamics - for example, the impact of nervous shock claims in medical indemnity, or the trajectory of professional indemnity claims by occupation. The Institute encourages APRA to consider whether it could publish periodic thematic reports drawing on more detailed NCPD data to address industry-relevant questions. Such releases would be of significant value to actuaries, insurers, purchasers of insurance and policymakers.

The Institute notes that any enhancements to the granularity of published data should continue to be subject to APRA's existing masking protocols for high-granularity combinations, to protect the commercial confidentiality of individual insurers.

Conclusion

The Institute supports APRA's proposals for the NCPD non-confidentiality determination and refreshed publication format. The move to downloadable spreadsheets, the addition of cyber insurance and management liability as separate product categories, and the preservation of existing granularity are all positive steps that will improve the accessibility and utility of the NCPD.

The Institute encourages APRA to progress the current proposals without delay, recognising the benefit of the refreshed publications as soon as practicable. We also encourage APRA to consider the enhancements identified in this submission as part of future consultation, consistent with APRA's stated intention to seek additional feedback 6–12 months after publication.

If you would like to discuss any aspect of this submission, please contact the Institute via (02) 9239 6100 or public_policy@actuaries.asn.au.

Yours sincerely

(Signed) Elayne Grace
Chief Executive Officer