

OSHC AUSTRALIA SUBMISSION

1. Is the proposal supported?

We are supportive of the notion of placing caps on payments from insurers to third party agents. We are keen to ensure that the changes do not become unnecessarily burdensome on third parties who actually provide stakeholders with access to impartial and informed choices.

2. Likely impact on purchasing behaviour

We would anticipate a key change in consumer purchasing behaviour if impartiality becomes a more standard practice in the promotion and sale of OSHC policies. Where students are made aware up front of their policy purchase options, we would expect less students would choose to switch their insurance cover during the term on their initial policy purchase. One of the key drivers for this switching behaviour is due to discovering lower priced products that are available to them, and therefore the ability to receive a refund by switching to a lower priced option.

3. Definition of third party agents

We are keen to ensure that the Department creates a clear definition for third party agents that does not inadvertently include legitimate businesses providing genuine value in the OSHC promotion and selection process.

In our case, services that take us well beyond purely transactional and provide genuine value to the consumer include:

- We are a technology business that provides a platform for all OSHC insurers to advertise their OSHC policies.
- Impartiality is central to our value proposition. We provide exposure of all OSHC insurers' core products via our digital marketing investment and our education agent partners globally. Many consumers compare the OSHC providers on our site and then purchase directly with the insurer themselves.
- We have a robust due diligence framework, legal contracting and performance monitoring with all third parties with which we work.
- We play a significant role in the administration work required for cancellations, refunds and extensions of OSHC policies resulting from the full length of visa policy purchase requirements. This significantly reduces the administration burden that would otherwise be managed by the Insurers.