06.3



Thematic Review: Consumer protection issues in travel insurance

EIOPA Insurance & Reinsurance Stakeholder Group meeting Frankfurt, 7 February 2018

Introduction



- Why is the topic on the agenda?
 - o BoS decided to launch a thematic review on consumer protection issues in travel insurance
- What is expected from the IRSG?
 - o Feedback on key issues
- Next steps
 - o IRSG to provide additional feedback
 - o EIOPA to draft Issues Note
 - o Launch to market in Q2

Reported consumer protection issues



Sources

- o Consumer trends reports
- o Retail risk indicators
- o Stakeholders

Recurring issues

- o Complaints relating to claims handling
- o Low claims ratios
- o High commissions

Emerging issues

o New distribution channels and business models

Key issues considered (I)



Product design

- o Characteristics: cover, exclusions, etc.
- o Sources of consumer detriment: e.g. poor product design, value for money or product offerings

Distribution

- o Relative importance of existing distribution channels
- o Differences: Commission levels, claims, complaints, etc.

Key issues considered (II)



Sales

- Misleading selling practices: e.g. misleading information, issues related to add-ons and cross-selling, insufficient care of demands and needs
- o Consumer behaviour: e.g. no "shopping around"
- o IDD implementation: steps taken to comply with requirement on distribution via exempted ancillary insurance intermediaries
- New distribution channels and business models
 - o Digital and remote: online travel specialists (e.g. Trivago)
 - New (non-insurance, non-travel) players in distribution: business originators setting business terms (e.g. commission levels) incl. GAFAs & retail chains

Next Steps



- EIOPA/CCPFI
 - o Draft Issues Note
 - o Draft Industry Questionnaire for launch in Q2
- IRSG
 - o Follow up on input provided during discussion on possible topics