

Insurance in Superannuation Code of Practice Transition Plan



TelstraSuper has committed to the Insurance in Superannuation Code of Practice. This document outlines our current compliance with the Code and our plans to meet full compliance.

Compliant				
Section	Code requirements	Transition status	Description	Additional information
<i>Benefit design, appropriate and affordable cover</i>	4.2 - 4.8, 4.12, 4.13, 4.16, 4.17	Complete	<p>We provide appropriate and affordable insurance cover that takes our member's likely insurance needs into consideration.</p> <p>Our Insurance Strategy explains how our automatic insurance cover was designed.</p>	To read our Insurance Strategy visit telstrasuper.com.au/insurancepolicy
<i>Cancelling insurance cover</i>	4.19 – 4.21	Complete	<p>Instructions for cancelling or reducing cover is available in our welcome pack, as part of our disclosure information and on our website.</p> <p>If a member cancels their cover, we confirm in writing when it has ceased, along with a clear explanation of the impact this will have on obtaining cover or making a claim in future.</p>	See how to cancel or reduce your cover at telstrasuper.com.au/changingcover
<i>Helping members to make informed decisions</i>	5.2 - 5.13, 5.16, 5.19 – 5.23	Complete	<p>We review our communications to ensure they are consistent and appropriate for our members. The terms we use align with legislated definitions and our insurer's interpretation of those terms. We explain any differences between the two.</p> <p>We publish industry standard Key Fact Sheets for insurance, and provide insurance information on our website and in welcome packs.</p>	You can find our Key Fact Sheets at telstrasuper.com.au/insurancecode
<i>Supporting vulnerable consumers</i>	6.1 – 6.12, 12.2	Complete	<p>We recognise that members can have unique needs. We have policies to help identify these needs, processes that provide assistance and staff trained to support our members.</p>	To see this policy go to telstrasuper.com.au/support
<i>Handling claims</i>	7.1 - 7.16, 7.18 – 7.31, 7.34, 7.35	Complete	<p>Our claim case managers treat members with compassion and respect, and when a claim is made, act as the member's advocate in the claims process. We ensure claims are handled promptly and in accordance with the Code.</p> <p>We have governance arrangements to oversee the claims process and decisions made by the Trustee and our insurer.</p>	For information about making a claim or to read our claims philosophy go to telstrasuper.com.au/claims
<i>Premium adjustments</i>	8.1 - 8.5	Complete	<p>TelstraSuper does not receive money or other material benefits (other than claims payments for our members and related costs) from our insurer or reinsurer. The premium paid by members is directly for the cost of insurance, and avoids any conflict of interest between our members and our insurer.</p>	

Compliant

Section	Code requirements	Transition status	Description	Additional information
<i>Promoting our insurance cover</i>	9.1 – 9.4	Complete	We only promote insurance that is appropriate, clearly detailed and not misleading to our members.	
<i>Changes to cover</i>	10.1, 10.3 – 10.17	Complete	<p>We let members know of any changes to their premiums or cover.</p> <p>When a request is made by a member to change to their cover, we make sure they are informed about their duty of disclosure and the consequences of changing cover.</p> <p>We let the member know the outcome, any conditions that might apply and review any decisions made by the insurer. Members have the right to make a complaint if they are unhappy with the outcome.</p>	Find out about changing your cover at telstrasuper.com.au/changingcover
<i>Refunds</i>	4.22, 11.1-11.3	Complete	<p>We will refund premiums when a member:</p> <ul style="list-style-type: none"> opts-out of automatic cover within 14 days of being notified of joining/receiving the cover. is unable to claim on cover with TelstraSuper due to having automatic cover with another fund (for the period of overlapping cover, up to 6 years) is entirely ineligible to claim on automatic cover from the start of the cover has cover that ceases as a result of a claim being accepted (for the period after they become eligible to claim). 	
<i>Staff and service providers</i>	12.1 – 12.9, 12.11	Complete	<p>We ensure our staff are appropriately skilled and trained to provide their services competently and to deal with members professionally.</p> <p>We review agreements with our insurers at least every three years and require them to satisfy us as to their expertise, experience, integrity, qualifications and licensing.</p>	
<i>Making enquiries and complaints</i>	13.1 – 13.2, 13.4 – 13.13, 13.16 – 13.20	Complete	<p>Members can request information or make enquiries about their cover, premiums and previous communications and decisions.</p> <p>Members can make a complaint if unsatisfied with our (or our insurer's) responses or conduct.</p> <p>We handle enquiries and complaints in accordance with the Code.</p>	For enquiries and complaints go to telstrasuper.com.au/contact
<i>Promoting, monitoring and reporting on the Code</i>	14.1, 14.3 – 14.9	Complete	We undertake an external audit of our Code compliance and assess and report on our compliance annually.	

Planned implementation

Section	Code requirements	Transition status	Description	Additional information
<i>Insurance statement</i>	4.18, 4.31, 5.1, 5.17, 10.2	2019	<p>We are working to implement an insurance statement, which will provide members with ongoing confirmation of their insurance cover and include information about cancelling and reducing cover, as well as information about cover held outside TelstraSuper.</p> <p>This statement will be provided annually and any time cover is changed.</p>	
<i>Benefit design</i>	4.9 - 4.11, 4.14, 4.15	2019	We are assessing the impact of the Protecting Your Super legislation on our benefit design to ensure the product is affordable for younger members, those with low or infrequent contributions, and low account balances.	
<i>Cancelling insurance cover</i>	4.18	June 2019	We are working with our insurer to allow members to manage their insurance online.	
<i>Communicating to you about your lack of contributions/reinstatement of cover</i>	4.24 - 4.30	1 July 2019	These Code requirements will be superseded by the Protecting Your Super legislation, which TelstraSuper will be implementing effective 1 July 2019. We anticipate an update to the Code to align with the legislation and will reassess our compliance when this is available.	For updates on the Protecting Your Super legislation visit telstrasuper.com.au/pys
<i>Helping members to make informed decisions</i>	5.14, 5.15, 5.18	2019	<p>We are working to provide members with an insurance statement that will keep them informed of their cover on a regular basis, including when any changes are made.</p> <p>We are also working to ensure members are automatically notified if their cover ceases due to age.</p> <p>We will assess the headings we use for our Total and Permanent Disability definitions after further standardisation work is completed by the Superannuation Working Group Technical Committee.</p>	
<i>Handling claims</i>	7.32, 7.33	2019	We are working with our insurer to enhance our management of IP claims. The aim is to identify ways to support the claimant's recovery, ensure that information requested by the insurer is reasonable and to oversee decisions that relate to continuing and stopping payments.	
<i>Staff and service providers</i>	12.10	June 2019	We are working with our insurer to establish reporting processes relating to those aspects of the Code that we require them to uphold.	
<i>Promoting, monitoring and reporting on the Code</i>	14.2	March 2019	We are working to expand our internal capability to identify breaches of the Code and will include this as part of an annual Code compliance report on our website.	

Partially compliant

Section	Code requirements	Transition status	Description	Additional information
<i>Handling claims</i>	7.17	Partially compliant	<p>The Code prescribes the following timeframes for claim queries.</p> <p>We will respond to claim queries that are made while the claim is being assessed:</p> <ul style="list-style-type: none"> a) with an acknowledgment by the next business day b) with a full response within 10 business days. <p>We acknowledge claim queries by phone, email or online by the next business day.</p> <p>We respond to all claim queries, including those by mail, within 5 business days.</p>	
<p><i>Generally, TelstraSuper resolves complaints in shorter timeframes than those specified by the Code. Our complaint processes are based on the Australian Financial Complaints Authority (AFCA) timeframes, which permit longer timeframes for complaints that need more time to resolve. The exceptions to the Code are noted below.</i></p>				
<i>Making enquiries and complaints</i>	13.3	Partially compliant	<p>We will respond to enquiries:</p> <ul style="list-style-type: none"> • with an acknowledgment by the next business day • with a full response within 10 business days. <p>For complaint enquiries our response timeframes follow AFCA timeframes. We are otherwise compliant with this Code requirement.</p>	
<i>Making enquiries and complaints</i>	13.14	Partially compliant	<p>Progress updates are provided at least every 20 business days (unless a different timetable is agreed upon). If, for any reason, the assessment of a claim is delayed, we will let the complainant know.</p> <p>On average, complaints at TelstraSuper are resolved and a full response provided within 30 days. If a complaint is likely to exceed 30 days, then we provide regular updates until it is resolved.</p>	
<i>Making enquiries and complaints</i>	13.15	Partially compliant	<p>We will provide a final response to a complaint in writing within 45 calendar days of receiving the complaint. In exceptional cases, where more time is needed to investigate and respond, we will tell the complainant that we need more time, and will clearly communicate our revised expected timeframe, which will not exceed 90 calendar days.</p> <p>Our complaint processes are aligned to the AFCA timeframes, which permit a 90 day deadline for resolving complaints.</p> <p>Final responses are generally provided within the 45 days specified by the Code, and members are provided with regular updates until the response is provided.</p>	