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A VIABLE SOLUTION
FOR BOTH
INSURED AND INSURER
IS KEY

SUBMISSION TO ASBFEO's

Discretionary Mutual Fund Review

Interim Report

20 October 2021

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Preamble

This document has been prepared in response to the Ombudsmen's request seeking feedback to the interim report, "The Show Must Go On", that explores whether a Discretionary Mutual Fund (DMF) can be a solution acceptable by councils and showground managers.

Numbered reference footnotes provided in this document are references to the ASBFEO, "The Show Must Go On" interim report. Other reference footnotes are provided in full to other reports and sources

A Viable solution for both

The agreed goal has to be to create a solution for the members *("insured")* and the chosen solutions *("insurer")* that proves to be a viable proposition for both.

With a common risk and reward theme where:

- the insured seek to have insurance that covers them for significant risks that may jeopardise their business and livelihood, that their insurer will remain financially solvent and meet all future contractual obligations; while
- the insurer seek to provide insurance, pay claims as agreed and receive a financial reward (profit) for the capital that has been put at risk to ensure that all contractual obligations to policyholders are met

both insured and insurer require each other to create a solution that can overcome "market-failure"; one that provides long-term stability and avoids the volatility of cyclical peaks and troughs of "hard" and "soft" insurance markets.

Whatever option is pursued as the best value for money viable solution, it is evident from the Interim Report that it will require some form of interaction with the broader insurance market, especially if the DMF-like solution is to follow the form of a "Hybrid model". [1]

[1] 5.2.6.5

1. Market failure

ABSEFO's December 2020 Insurance Report included the statement [2] that

> *General insurers decide the risks they are prepared to insure and the industries and locations they are prepared to offer insurance to.*
> *This higher risk may mean an insurance company withdraws from that market and no longer offers that insurance.*

The DMF Interim Report includes two interesting statements:

1. The "Problem to be Solved" is introduced as, *"The lack of available or affordable insurance is not the fault of the amusement, leisure, and recreation industry."* [3]; and
2. Market failure reflects *"market dysfunction … unable to access affordable insurance that supports their ability [small business] to operate"* [4]

Does either statement really reflect the root-cause of the perceived "market failure"? The Ombudsman's December 2020 Report indicates that "risk" has a major role to play yet the DMF Interim Report does not.

"No-fault" of the industry that there is a Market failure; really?

Where an insurer declines to offer insurance, does this suggest that "the risk" is viewed as an unviable commercial proposition for the insurer. Why offer insurance when it is likely that "the risk" and its future losses will threaten the financial solvency and wellbeing of the insurer?

When a business is offered insurance at "competitive" premiums that subsequently prove to be too low as future claims become apparent, the insurer teeters to insolvency, is unable to meet its obligations and the insurance purchased previously is of no value to policyholders.

Where the insurer's fails to properly recognise and "price the risk", should the insurer subsequently increase prices on renewal to recoup and regain the financial solvency that allows the insurer to continue to offer insurance and meet its obligations of existing and future claims?

The underlying issue to the current "market failure" and any future solution has to be identifying a Pricing & Risk Strategy that provides pricing stability and consistency of insurance cover and terms. This is where a Discretionary Mutual Fund **(DMF)** may represent a solution where Fund Members and commercial insurers acknowledge the nature, form and extent of the insurable risk and strike the "optimal" balance between risk and reward that proved viable for both.

A DMF-like arrangement could provide the flexibility and forward-planning to "avoid" the peaks and troughs of "hard" and "soft" insurance markets and the final denouement of "Market Failure".

[2] Page 12, ASBFEO, Insurance Inquiry Report, December 2020
[3] 4.1.1
[4] 4.2.1

2. Claims Experience

Whether the solution be with commercial insurers, a DMF or others, understanding the risk is crucial to avoiding the "market failure" as experienced by those seeking to renew insurance on inadequate terms and/or with substantial price hikes.

Inadequate pricing, indemnity cover too broad and poor risk management are all features linked to claims experience. It is a pity that Claims Experience Analysis and Actuarial Modelling was not available for ASBFEO to review the DMF proposal for the Interim Report.

Industry data, analysis and actuarial evaluation have a key role to play in developing a DMF-like solution (or any other solution) for the industry and its members. The hope would be that a solution based on industry data would diversify individual member risk and, by representing the broad membership, open access to the industry's collective economy of scale.

Though the Interim Report indicates that a Group Insurance Scheme option has already been explored [5]

> *"the fact they have not been able to secure insurance … highlights the issue of market failure, strengthening the proposal for a DMF as a viable alternative".*

It is unclear what the nature and extent the investigation was undertaken by the industry to investigate the Group Insurance option.

Given that no detail DMF proposal was available to review, ASBFEO should look to better understand why a Group Insurance option and pooled resources failed to be attractive to an insurer. Was the group too small? Was there insufficient data?

The ABSEFO should consider re-visiting and affirming its understanding as to why this option is not considered viable. This may also inform the deficiency or advantages of a DMF-like option and other proposed solutions.

[5] 5.2 2

3. Legislative Liability

The Interim Report does mention issues surrounding the legal requirement, contractual obligations and the need for a DMF to be recognised as "insurance" to enable members to operate.

It is interesting that although Local Government councils are a key stakeholder for the Australian Amusement, Leisure, and Recreation Association (AALRA), Showmens Guild and their members, that the Interim Report authors chose to only mention Civic Risk Mutual (New South Wales) and not review the DMF and Mutual local government insurance arrangements that are well established across Australia.

ASBFEO should note that, for example, the South Australian State Government has previously updated legislation to recognise the Public Liability "insurance" arrangement used by South Australian local government councils.

S142, South Australia Local Act 1999 provides for a "**Duty to insure against liability**" where

(1) A council must take out and maintain insurance to cover its civil liabilities at least to the extent prescribed by the regulations.
(2) A regulation cannot be made for the purposes of this section except after consultation with the LGA.
(3) Membership of the ***Local Government Association Mutual Liability Scheme*** **constitutes insurance for the purposes of this section.**

Threshold Issue & Timeframe

The ASBFEO Report recognises that if the states and territories are unable or unwilling to amend their legislation to accept DMF membership in lieu of insurance, the DMF members will be in breach of their regulatory obligations. The Report identifies this is a "**threshold issue**" [6] for the successful operation of a DMF-like solution.

Though the Interim Report indicates that a DMF may be created in 3 months and that 6 months is a more realistic timeframe; how long will it take for the relevant legislation, regulations and contract clauses to be updated to resolve this "threshold issue"?

Does ASBFEO have a role to play to facilitate and expedite discussion with Commonwealth, State Governments, Local Government Associations and local councils that would be helpful to AALRA and the Showmens Guild?

If legislation is updated, it should allow a DMF membership in lieu of insurance to be a permanent alternative. There should be no need to design a "declaration of insurance market failure" provision to trigger acceptance of membership in-lieu of insurance; both insurance product and DMF membership should be allowed to co-exist in the market, year-on-year. Each can then stand on their relative competitive merits for the sector to decide which option best meets its needs and requirements.

[6] 7.8.3.7

The sub-text to this; should the DMF-like solution become the dominant market-player and establish a "monopoly" where insurers no longer seek to compete for the business, how do you reduce the likelihood of a DMF "market failure"?

The Key would be in the design of the DMF-like solution with Pricing and Risk Strategy, financial and governance structures that maintain the Fund's capacity and capability to meet and fulfill its members legislative and contractual obligations.

Durability: be aware, respond and remain relevant

There should be an expectation that the solution identified will evolve over time and continue to respond and remain relevant to the industry, its members and their operating environment.

For example, if there was a future increase in the Indemnity Cover limit from $20,000,000 to $25,000,000, a durable solution would not be surprised. Instead, the solution would have the capacity to take the change in its stride and continue to offer it members a relevant and appropriate solution.

Is a future increase in limits possible? Yes, look to South Australia and the local government council sector's legislated minimum level of cover being significantly increased.

In 2017, the South Australian State Government, amended Regulation 24 of the SA LOCAL GOVERNMENT (FINANCIAL MANAGEMENT) REGULATIONS 2011 where:

> *"For the purposes of section 142(1) of the Act, a council must take out and maintain insurance to cover its civil liabilities at **a minimum level of cover of $300 million**."*

Regulation 24 had previously required that "…. a council must take out and maintain insurance to cover its civil liabilities at a minimum level of cover of $50 million" [7]

Given the Interim Report's observations of the Coversure product and the challenge of providing insurance cover for $20,000,000, a DMF-like solution should remain vigilant and be aware of maintaining its relevance, suitability and "stickability" for members.

[7] Version: 1.7.2013 South Australia Local Government (Financial Management) Regulations 2011 under the Local Government Act 1999

4. Efficiency

The Interim Report mentions that with a **"perceived conflict of interest of brokers acting as the mutual manager"** [8] and, given the views expressed in ASBFEO's December 2020 report, this could detract from members wishing to join a DMF-like solution.

Yes, a weakness of a new "insurance like" solution is the lack of expertise of the management board, with a reliance on buying-in the expertise to design, develop and deliver the solution to members.

There are perhaps a few different approaches to creating a viable DMF-like solution.

a. Rather than agreeing to pay commissions and fees as set percentage of member contributions or a fixed fee, commission and fees should be "at risk" with a performance target as a condition.

   For example, 75% of commission and fees could be paid as each member joins and pays their contribution. When the annual financial report and results are finalised, where the Fund delivers to the agreed performance targets of $500,000 member contributions and is solvent, the remaining 25% commission and fees are paid 30 days following the finalisation of the audited financial statements.

b. Where the Association (and ASBFEO) are considering the DMF-like solution and tender for mutual manager services, in addition to the proposed fees of the mutual manager, the Association could include in the tender specification (or when assessing other solutions) a question of any proposer and/or mutual fund manager:

   "How much of a member's contribution is in the Fund to pay claims?"

The Size of the Pie

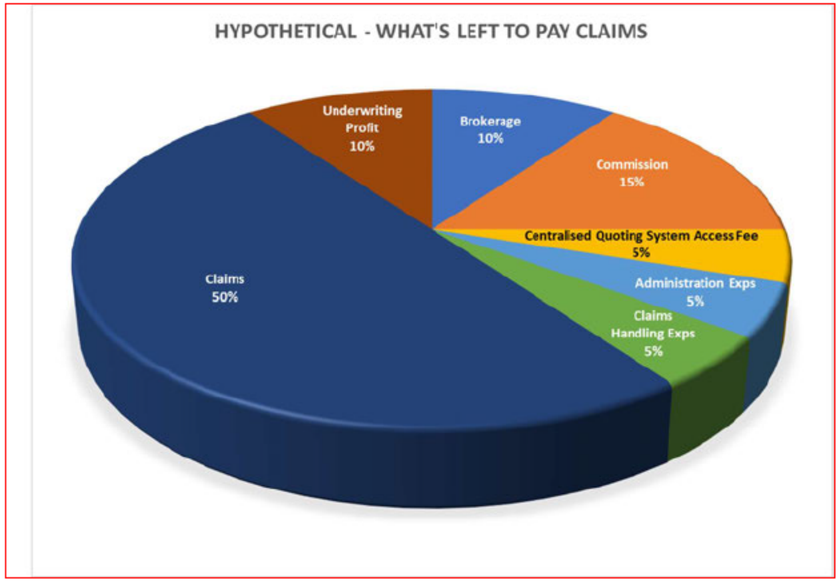
The Interim Report and the December 2020 reports highlighted the surprise of how much may be paid to brokers by insurers etc.

There are a range of "transaction costs" that any solution is expected to pay. Costs can include brokerage fees, commissions, promoter fees, fronting fees, salaries, wages, marketing, administration etc. Ultimately how much of member contributions are left after expenses to be available to pay claims?

The following hypothetical "pie chart" is an attempt to demonstrate how the pie could be split.

[8] 10.1.2

REDPATH CATHCART



Of the broad range of solutions mentioned in the Interim Report, a responsible management board should seek to optimise the solution's efficiency, with the aim that the more money available for member claims, the better for members.

It is unclear from the Interim Report if this consideration featured in the evaluation of options.

"Underwriting Profit"

The illustration above includes an "Underwriting Profit" and though a Mutual member body may not have a profit motive, it should be reasonable to expect that a DMF like solution is going to seek to generate an annual surplus. Why?

Generating and accumulating annual surpluses would have two primary purposes. One, is the ability to meet the unexpected, the other is to accumulated fund and utilise that to the benefit of members in future.

5. Mutuality

The Interim Report does mention that AALARA considered a number of possible solutions to its member's public liability insurance crisis and, with its insurance advisers, AALARA considers a Discretionary Mutual Fund for the sector to be its best path forward.[9]

Of concern though is that a DMF-like solution "**will need to set strict entry requirements**" [10] , as the DMF is only as robust as its weakest member.

This "selection" approach seems to mirror the ASBFEO's December 2020 observation that

> *General insurers decide the risks they are prepared to insure and the industries and locations they are prepared to offer insurance to. This higher risk may mean an insurance company withdraws from that market and no longer offers that insurance.*

Given the Office's Reports, the concerns surrounding "Market failure" and the inability to obtain insurance, can a DMF-like solution seek to abandon "members" that fail to seek "strict entry requirements".

There is a danger that this approach could alienate "members" and create a perception that the DMF-like solution is a "mate's club".

This is an issue that, had the Office been provided with a full detailed DMF proposal to review, may have been explained and confirmed the membership strategy, governance, risk management and risk-rating "pricing" of member contributions.

Risk management needs to be in the foundation of a DMF. [11]

The Interim Report does highlight that by understanding members risks, helping them identify and mitigate risk, that a DMF like solution could be steered to provide effective cover to its members' needs.

Does the existence of AALARA's Safety Standards and the Showmen's Guild Safety Management System Standards mean that the potential membership is likely to meet "strict entry requirements" and that member "selection" is unlikely to preclude any member from joining?

Risk-rating & Pricing

If members are not precluded by "strict entry requirements", a Risk-rating pricing model to calculate a member's contribution would be more relevant.

Again, had a full DMF-like proposal been submitted for review, an actuarial assessment review may have addressed this "risk rating" & pricing option of member contributions.

[9] 5.1.1
[10] 8 3.1
[11] 6 21.3

For any future DMF-like solution, the Office's review should consider a "risk rating" & pricing option to determine member contributions. A "flat-rate" contribution applicable to all members should be avoided, particularly if there are concerns by AALARA that not all members have the same proven risk management performance.

Future Risk Management Performance

The Interim Report mentions the question of "stickability", retaining members and developing other services. The digitalisation of Safety Management Systems is an initiative that a DMF like solution could lead and deploy across members.

Using existing mobile technology and software apps that have been developed and continue to be developed, the DMF like solution could lead the standardisation as to how members monitor Safety Management and Risk Management, conduct and record maintenance inspections, plant servicing, incident reporting, first-aid, record keeping etc.

The additional benefit is that the DMF like solution can demonstrate to insurers how its members are mitigating risk and articulate the risk management and mitigation strategies. With confidence negotiating cover with commercial insurers and achieving stability when calculating members' annual contributions and "digitalised" risk management platform would provide a "stickiness" and durability to the DMF like solution.

Member Frustrations with existing insurance market

Mutuality may provide the opportunity to overcome the frustrations and observations noted in the Office's Reports.

Renewal Notice
For example, instead of a DMF like solution working to the minimum statutory renewal notice of 14 days for insurance contracts, a DMF like solution could decide that it will operate by providing members with 30 days' notice.

Terms and conditions
The noted lack of confidence of small business through the difficulty of understanding terms and conditions, is one that a DMF solution could work with members over time to improve.

Transparency may prove to be the key to the success of a DMF like solution. Overcoming members' frustrations with "plain English" communication, explanation could take various forms, including website content such as that of the Local Community Insurance and their Public and Products Liability.

There may be a limit to how successful adopting a "plain English" approach can be. The complexity surrounding Liability insurance and the litigious nature of claims and incidents require that documentation etc. should be robust and able to respond to legal challenge.

6. Governance

It is reassuring that, although a DMF is not subject to APRA regulation, the legal structure being considered is that of a mutual entity as a company limited by guarantee, incorporated under the Corporations Act 2001.

Though the Interim Report does provide Capricorn Mutual as an example, the Office should again look to the Australian local government sector where there is StateCover Mutual Limited.

StateCover is a specialised licensed workers compensation insurer to over 100 NSW councils. It is regulated by both the NSW Government's State Insurance Regulatory Authority (SIRA) and APRA. The company constitution, its corporate governance has evolved over the past 20 years, covering:

- Member rights, entitlement and obligations
- Fund Governance and Administration
- On behalf of the collective member interests

Unlike Civic Risk Mutual and Capricorn Mutual who reference APRA prudential benchmarks, StateCover is regulated and supervised by APRA.

Transparency

In the interest of transparency, a DMF like solution as a company limited by guarantee should consider how to maintain and uphold the transparency of its operation.

- The should be frequent rotation of Board members
- No Board member should serve for more than 10 years
- Mutual management agent service contracts should be frequently subject to open market, competitive tender
- Mutual management appointments should be no longer than 5 years
- Any promoter receiving remuneration directly or indirectly from the DMF should be disclosed members in renewal documentation, annual reports and annual financial statements

Why mention indirectly? With corporate structures, it is common for an entity to be identified as the service provider and shareholders may subsequently receive a remuneration as a distribution of the profit (or surplus) providing services to a client. In such an instance, disclosure directed by the Management Board of a DMF like solution would provide transparency and eliminate members surprise as to who may be receiving an income.

The aim should always be to maximise the proportion of the Mutual's Member Contributions that remain in the fund to pay claims. The Claim slice of pie is crucial to a DMF like or any other solution becoming a "market failure".

Communication

It would a positive outcome for a DMF like solution or other solution if AALARA were able to overcome the small business perception that insurance is adversarial and opaque as observed in ASBFEO's December 2020 report:

The last year has thrown the need for adequate insurance into stark relief. .... affected by the 2019 bushfires ... immediately went into battle with insurance companies to secure payments.

The insurance market is opaque and small businesses desperately need help navigating it.

The insurance industry's service and practice standards set by voluntary codes of practice [12] *are rarely enforced and are not taken seriously by industry.*

Conflicted remuneration for insurance brokers should be banned with a phased transition period.

Insurance product documentation is so complicated, opaque and difficult to navigate, that small businesses purchase unsuitable policies and obtain inadequate cover.

Small businesses can be left in limbo while insurers assess their claim, leading to uncertainty of business survival and reduced resilience. Decisions about claims should be shortened [13]*.*

[12] General Insurance Code of Practice and Insurance Brokers Code of Practice
[13] *Recommendation 12*

7. Regulatory

Although ASBFEO December 2020 report included references and comments such as

> *Insurance product documentation is so complicated, opaque and difficult to navigate, that small businesses purchase unsuitable policies and obtain inadequate cover.*
>
> *Small businesses can be left in limbo while insurers assess their claim, leading to uncertainty of business survival and reduced resilience. Decisions about claims should be shortened* [14]*.*

Is it comforting that the Interim Report recognises that a DMF like solution is "a complex, highly technical and specialised operation, and industry leaders, however capable, cannot be expected to be knowledgeable about the details and should not be put in a position where they may make unsound decisions". [15]

ASIC

The complexity of liability insurance, the nature of contract disputes and the contradictory views of regulators "that that the discretionary nature of a DMF will lead to valid claims being denied" and industry source opinion that "claims are rarely denied" [16], highlight the importance of ASIC and its AFSL framework to any DMF like solution.

Although the DMF like solution is an "insurance like" alternative to traditional insurance and does not provide a legal contract of indemnity, the Hybrid model's protection framework rules are important to the governing body of the DMF and its members.

An additional comment would be that the benefit of the Hybrid model involving the commercial insurance market encourages the DMF like solution to follow claims in a very similar way to insurance claims. By embedding insurance in the DMF like solution, the DMF can adhere to ASIC's recognised AFSL framework and regulation. This offers greater protection to members that is more than a discretionary power would necessarily confer.

APRA

Given that APRA does not regulate DMFs and that the Potts Review, Treasury's 2005 Discussion paper, the Financial Sector Legislation Amendment (Discretionary Mutual Funds and Direct Offshore Foreign Insurers) Bill 2007 (DMF and DOFI Bill) and APRA's subsequent decision in 2016 to cease collecting data on the industry, it is unlikely that APRA would seek to become responsible for the regulation of DMF like solutions (perhaps that would change were a DMF like solution to fail?).

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[14] *Recommendation 12*
[15] 6.7.5
[16] 10.3.2

8. Public purse

It is interesting that one possible proposal in the Interim Report is for the Public Purse to provide $5,000,000 [17] to overcome the immediate capital issue that a DMF like solution would have. With no detailed proposal available for review, how was this figure arrived at?

Five million is an amount frequently sought for capital raising ventures and sometimes viewed as the minimum capital required when seeking a form of licence to operate in Australia.

Acknowledging that a DMF like solution is unlikely to have sufficient funds to pay claims in its early years of operation, would AALARA's approach to the Government and the Public Purse as the "insurer of last resort" inspire member confidence that this discretionary product is viable?

The Interim Report suggests that the preferred DMF like solution would be a company limited by guarantee and would follow a "Hybrid" model, probably launched with "90% of the risk covered by reinsurance" [18]. ASBFEO should be encouraging AALARA to identify other mechanisms to build the DMF's capital base and long term financial sustainability.

Capital Levy

As a company limited by guarantee, assuming that members would be issued 1 ordinary share with 1 voting right attached when joining the DMF, the company constitution would allow for a Capital Levy to be paid by members.

A Capital Levy would be in addition to Member Contributions. As Capital it would be separate from general revenue, creating a Capital base for the DMF like company to build its financial resilience and capacity to deal with unexpected situations.

With members currently facing an insurance "market failure" and significant increasing premiums, a DMF like solution has an opportunity to establish a Risk Rated Pricing and Capital Management Strategy that would offer members a solution where Premium" Contributions and Capital Levy are lower than premiums being sought by the "failing" insurance market.

As Capital, members would only be entitled to a return of the Capital Levy on the winding-up or on the "demutualisation" of the company. As "skin in the game" [19], the members' accumulated capital levy could provide a "stickiness" to retain members.

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[17] 1.4.4
[18] 5 2.6.1
[19] 9.1.1.4

Accumulated Surplus

Another Capital source is the accumulation of annual surplus.

Should the DMF like solution design prove successful and achieve annual financial surpluses, the accumulation of annual surpluses would add to the Company's capital base and continue to strengthen its financial resilience.

Immediate Capital Requirement

Recognising that a DMF like solution may require access to meet claims from "day 1", the accumulation of member Capital Levy and annual surplus will take time.

Of other mechanisms that AALARA could consider, one could be a bank guarantee. The cost of the facility could be budgeted for when calculating Member Contributions. Likewise, the arrangement of a loan facility could be planned and budgeted for.

Group Insurance Arrangement

As mentioned previously, the Interim Report does not provide any detail concerning the investigation and reasoning as to why a Group Insurance arrangement has been ruled out.

Given the absence of a detailed DMF proposal for review, the likelihood is that an extensive exercise (including actuarial review) will be conducted to determine the DMF like solution. This exercise may well have information that would merit another assessment of the Group Insurance option.

With the concerns over "day 1" funding and the suggestion to seek significant capital loans, re-visiting the Group Insurance option may be of value. It may overcome the Interim Report's "threshold" and capital funding issues and provide the solution in the timeframe required by AALARA and its members.

9. OTHER SOURCES

In addition to the other sources that the Interim Report provides, ASBFEO should appreciate that insurance market failures are not a new phenomenon. The experience of the local government sector in Australia and Canada are reminiscent of the issues that AALRA, the Showmens Guild and their members face.

Australia

In 2002, the Australian Local Government Association submission to Senate Select Committee on Economics Inquiry into Public Liability and Professional Indemnity Insurance, titled, **"LOCAL GOVERNMENT S CONCERN OVER PUBLIC LIABILITY INSURANCE COSTS** [20] included the following:

- *"Some local authorities and local non-government groups cannot pay the increases in public liability insurance and/or are unable to access public liability insurance for certain types of events/activities*
- *Some local authorities and local non-government groups are cancelling a wide variety of events this erodes 'social capital' and weakens or community cohesion.*
- *For the local authorities and local non-government groups that are able to access and afford public liability insurance coverage, the face costs that mean sacrificing or comprising some existing functions and/or introducing or raising charges on events and activities.*

  Due to the range of activities undertaken by local authorities, they are perhaps more exposed to public liability insurance claims than any other sector of the community. The impact of this risk and the subsequent costs negatively effects the day to day activities of Australians."

Canada

Looking at the Municipal Insurance Association British Columbia web-page, the MAIBC was

> *"formed in 1987 by 144 local governments who could not find reasonable insurance coverage.*
>
> *In the mid-1980s, local governments in this province were facing a crisis. Liability insurance premiums had increased five-fold for many of B.C.'s local governments, deductibles were soaring, and policy limits were falling. Most concerning was the lack of available coverage for certain major liability exposures.*
>
> *It seemed that the only options were either to increase taxes or accept insufficient coverage. Seeing that the solution was not going to emerge from private industry, the communities in B.C. turned to each other for support. The Union of B.C. Municipalities created a task force that returned with the recommendation to establish a self-insurance pooling program, resulting in the creation of the MIABC in 1987.*

[20] Australian Local Government Association (ALGA) submission to Senate Select Committee on Economics Inquiry into Public Liability and Professional Indemnity Insurance July2002

United Kingdom

A review of the UK's Local Government Mutual provides and example of the corporate entity structure where the mutual manager is another corporate entity.

[Local Government UK](#) and [LG Mutual](#) where "The Mutual is owned by, and operated for, the benefit of its members. It does not have shareholders expecting a return on their investment and members have ultimate control over how it is run."

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[GOV UK](#) records indicate that **Regis Mutual Management Limited** own "more than 50% but less than 75%) of shares in **LGM Management Services Limited** and have "ownership of voting rights [of] more than 50% but less than 75%".

The remaining shares and voting rights of "More than 25% but not more than 50%" are held by **LGA Commercial Services Limited** (Company number 10990595), where the **Local Government Association Unlimited** (Company number 11177145) has Ownership of shares – 75% or more.

The legal registered address for **Regis Mutual Management Limited** (registered number 04194000) is 8 Maltings Place 169 Tower Bridge Road London England SE1 3JB

Background

Redpath Cathcart is the registered business name for [redacted]

[redacted] has over 20 years' general insurance market experience in London and Australia, working closely with Insurers, Brokers, Mutuals and Regulators providing Public Liability, Property, Motor Vehicle and Workers Compensation insurance to Public Sector entities.

[redacted]

[redacted]

☎ [redacted]

✉ [redacted]