

2 May 2018

General Manager
Policy Development
Australian Prudential Regulation Authority

By email to: insurance.policy@apra.gov.au

Dear General Manager

Discussion Paper: Governance, fit and proper, audit and disclosure requirements for private health insurers

Thank you for the opportunity to provide input regarding the APRA consultation on Governance, Fit and Proper and Audit Prudential Standards (February 2018).

HBF is a not-for-profit member-focussed health fund with a strong membership base in Western Australia and a growing national presence. HBF is WA's largest health insurer with over a million members.

Generally, HBF agrees with the principles outlined in the discussion paper. However, in relation to Prudential Standard CPS 520 Fit and Proper, we are concerned about the proposed requirement for an Appointed Auditor to have at least 5 years' experience in the PHI industry. Given our presence in Western Australia, this is likely to limit our capacity to make new locally based appointments. This issue is elaborated further in the Private Healthcare Australia submission and we agree with it.

If you have any queries, please feel free to contact me on (08) 9265 6522 or by email pascal.kasimba@hbf.com.au.

Yours sincerely,



Pascal Kasimba
Group Governance Officer