

11 June 2026

Manager, Supervisory Data
General Insurance and Banking Division
Australian Prudential Regulation Authority

Via email: dataconsultations@apra.gov.au

Dear Sir/Madam

National Claims and Policies Database (NCPD) non-confidentiality determination and refreshed publication format

The Insurance Council of Australia (Insurance Council) welcomes the opportunity to provide a submission on behalf of our members in response to the Australian Prudential Regulation Authority's (APRA) proposed changes to the '*National Claims and Policies Database (NCPD) non-confidentiality determination and refreshed publication format*'.¹

The Insurance Council is the representative body of Australian general insurers. Our members account for approximately 90 per cent of total premium written by general insurers and reinsurers. As a foundational component of the Australian economy, the general insurance industry writes 90 million policies a year, paying out \$58.9 billion in claims.

We note that APRA is updating how NCPD statistics are delivered to external users and proposes to provide a smaller, defined set of publication outputs as downloadable datasets, with the continued use of aggregated outputs only. We understand that, aside from the addition of cyber insurance and management liability as standalone categories, the proposed changes do not alter existing data content, dimensions, or aggregation levels.

The Insurance Council supports proposals that maintain current levels of data aggregation and do not increase granularity. Where any increase in granularity is proposed in future, we recommend it be accompanied by appropriate safeguards to ensure individual insurers cannot be identified.

Cyber insurance and Management Liability as standalone categories

We note that some insurers do not offer cyber insurance as a standalone product, with coverage instead embedded within management liability policies. This may create practical challenges in consistently reporting cyber insurance and management liability as separate product lines.

With the inclusion of these products as separate categories, we recommend APRA consider any risks that individual insurers could become identifiable, particularly for smaller segments with limited participation, or risks that commercially sensitive entity-level data may become non-confidential.

To assist with the above, APRA could consider clear and standardised product definitions or classification approach, and, if required, an appropriate transition period to support system and reporting change.

Conclusion

¹ Australian Prudential Regulation Authority (APRA) (May 2026), '[NCPD non-confidentiality determination and refreshed publication format](#)' consultation.



The Insurance Council encourages APRA to ensure that any published NCPD outputs are provided on a consistent, transparent and predictable basis over time.

Thank you for the opportunity to provide feedback as part of APRA's consultation process. If you have any questions or comments in relation to our submission, please contact me or [REDACTED]

Yours sincerely,



General Manager, Regulatory and Consumer Policy