Insurance Banana Skins - An Australian Perspective

pwc

About the Insurance Banana Skins survey

This report explores a series of risks (or 'banana skins') faced by the insurance industry, informed by a global survey conducted last year. It provides readers with a snapshot of where the industry has come from, where it is now, and where it is heading.

In the second half of 2023, the survey was conducted with insurance practitioners and close observers of the insurance industry around the world (including many in Australia). The survey explored and compared various risks faced by the insurance sector to gauge how insurers were prioritising and responding.

The survey was conducted from May–August 2023, securing 589 responses from 39 territories. Replies were confidential, but respondents could choose to be identified.

The questionnaire was in three parts:

- First, respondents described, in their own words, their main concerns about the insurance sector over the next 2–3 years.
- Second, respondents ranked a list of potential risks.
- Third, respondents rated the preparedness of insurance institutions to handle these risks.

The survey was the latest round of longitudinal research, conducted every two years since 2007 by the Centre for the Study of Financial Innovation (CSFI). A global report (prepared by the CSFI, which is solely responsible for the content, with support from PwC) is available here: pwc.com.au/insurance/insurance-banana-skins-2023

The Australian report, which you are reading now, has been written by PwC Australia.

1 Introduction

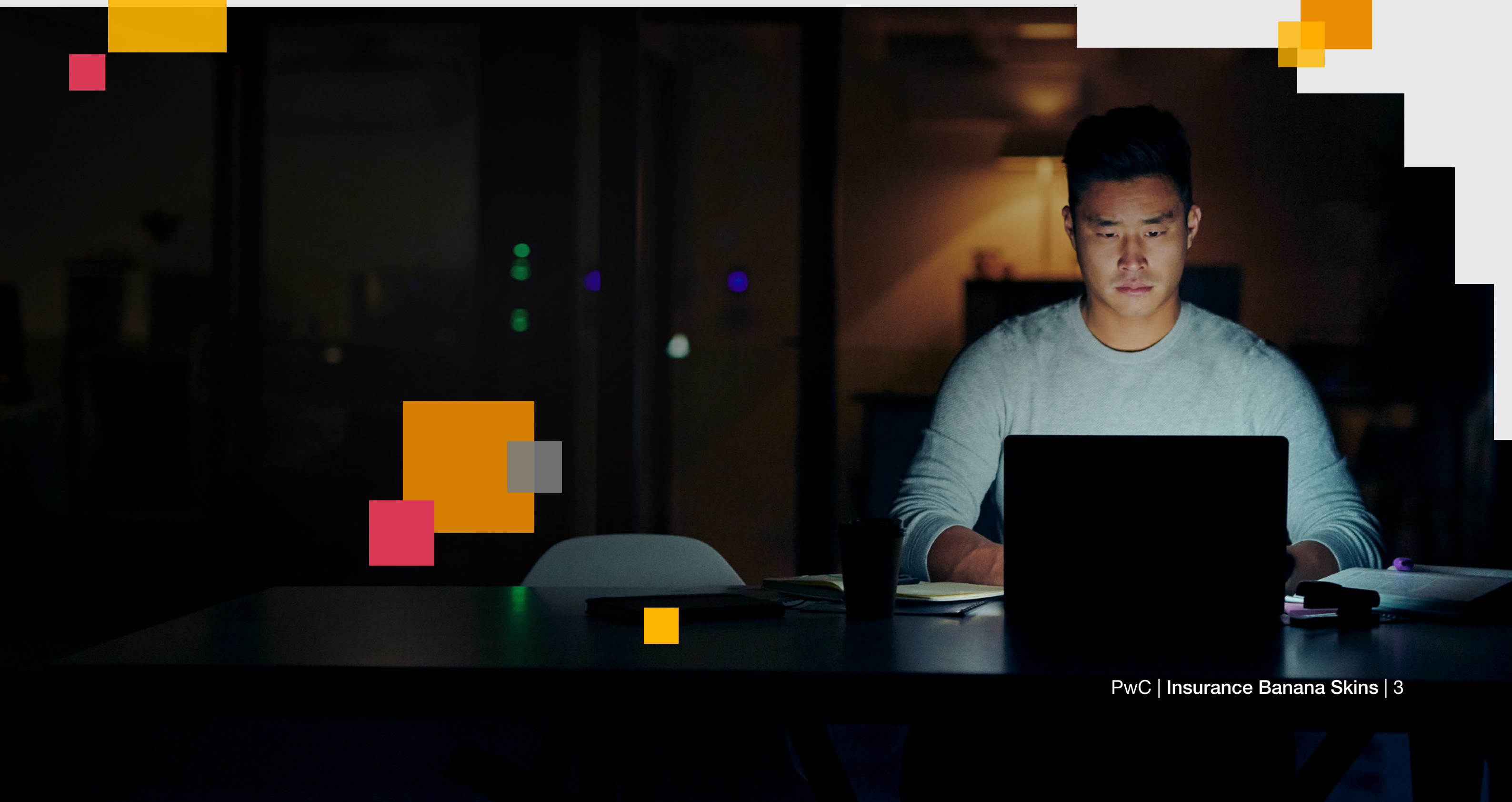
Anxiety levels in Australia's insurance industry are above the global average, suggesting that the local industry feels less prepared to handle risks.

The Banana Skins Index gauges the industry's level of anxiety in responding to risks. In 2023, it showed a higher degree of apprehension among Australia's insurance industry players, compared to their global peers. Anxiety in Australia in 2023 was also higher than it was in Australia in 2021 (Figure 1).

In terms of how ready Australia's insurance industry is to handle these risks, the Preparedness Index suggests there has been a decline since 2021 (Figure 1). The Australian industry also trails the 2023 global average on this Index.

Figure 1: The Banana Skins Indices, Australia, 2021 - 2023 (scale of 1 to 5)

Banana Skins Index		Preparedness Index	
2021	**2023**	**2021**	**2023**
Australia – 3.40	**Australia – 3.41 (▲ by 0.01 points)**	**Australia – 3.22**	**Australia – 3.10 (▼ by 0.12 points)**
Global – 3.19	**Global – 3.21 (▲ by 0.02 points)**	**Global – 3.22**	**Global - 3.20 (▼ by 0.02 points)**

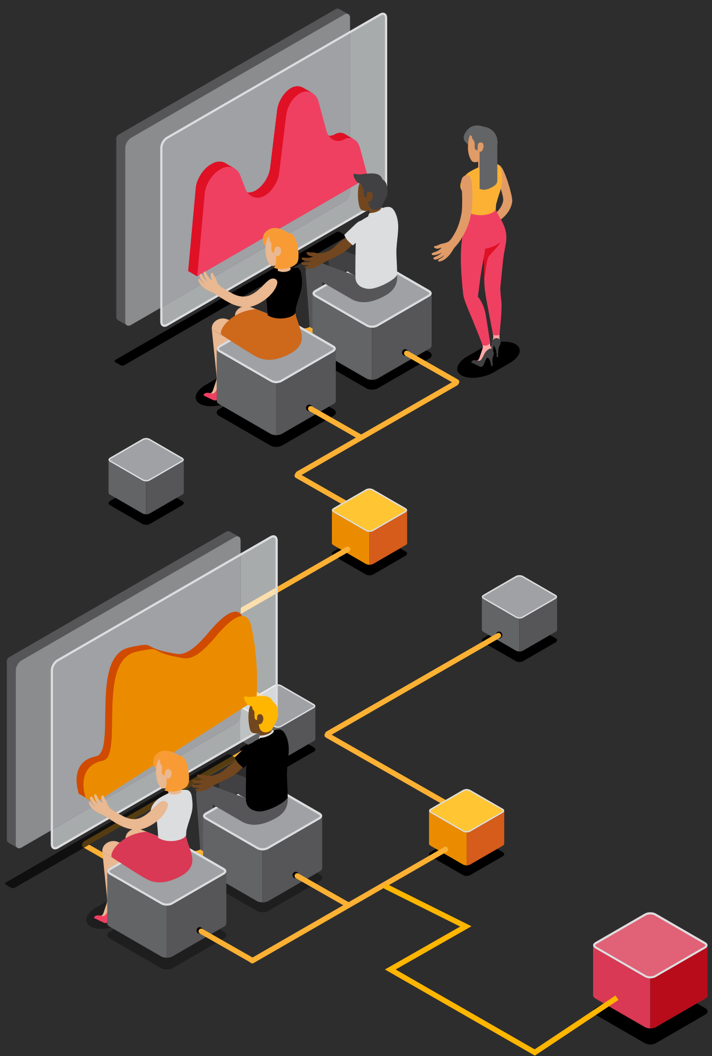


“Similar risks are dominating insurers’ agendas everywhere, with cyber, regulation and climate change cited as the top risks across Australia, Asia Pacific and worldwide. Meanwhile, concerns over reputation are particularly acute in Australia.”

Much has happened in a short space of time in Australia, and insurers are feeling the pinch.

Substantial recent losses were triggered by long-tail classes and natural perils, while other factors (e.g. high levels of claims inflation) have squeezed the non-life market in particular.

Concerns are mounting over insurance affordability due to the large premium rises required to keep up with inflation. Climate-related events have increased in prevalence, affecting claims frequency and severity. And the speed of policy payments is under the spotlight, as vulnerability and financial hardship issues escalate.



In short, Australia’s insurers face a raft of competing priorities. Simultaneously, they’re seeking to:

- Maintain growth and profitability
- Rise to heightened regulatory & reporting requirements.
- Respond to increasing threats (e.g. climate change and cyber attacks).
- Attract and retain customers (through new channels, new products, acquiring books of business, etc.)

Among these many risks, a few issues stand out on insurance leaders’ agendas, and this report explores these in detail.

Society has become more dependent upon technology, so it’s no surprise to see cyber risk topping the list of risks cited by insurers in the Banana Skins survey. Cyber incidents can wreak devastation on businesses and consumers, with obvious implications for insurance institutions.

Regulation also ranked among the top three risks in the survey, which is understandable given the raft of new regulations here and overseas. With the bar being lifted in several areas (including board oversight, accountability and risk management) the cost of remediating regulatory breaches can be sizeable for Australian insurers. For example, non-life insurers are expected to repay c.$815m to customers for broken pricing promises in more than 6.5 million insurance policies.

Climate risk rounded out the top three concerns for insurers in the survey. Natural perils can be the most unpredictable and costly events for any company, causing more than $30bn in losses in Australia in the past decade. Furthermore, many Australian insurers have a 31 December year-end, which typically coincides with higher perils incidence. This complicates the task of managing the impact on financial statements, which is prompting CFOs to step up their risk management efforts.

The risks of climate and regulation also overlap. Regulators are increasingly focusing on the risk of greenwashing in making claims which have not been fully validated and supported. And the fourth most cited risk by Australia’s insurers – reputation – is interlinked, too. Climate-related challenges (including the need to provide rapid support during unfolding natural disasters) put insurers’ reputations on the line. They must deliver services consistently and seamlessly, with no outages. Like the communities they serve, insurance companies must be strengthened so that they can respond to emerging risks.

2023 Top 10 Insurance Banana Skins

	Australia		Asia Pacific	Global
	2023	2021	2023	2023
1	Cyber crime	#2 (Increase by 1)	Cyber crime	Cyber crime
2	Regulation	#3 (Increase by 1)	Technology	Regulation
3	Climate change	#1 (Decrease by 2)	Human talent	Climate change
4	Reputation	#7 (Increase by 3)	Regulation	Technology
5	Human talent	#8 (Increase by 2)	Climate change	Human talent
6	Technology	#4 (Decrease by 2)	Macro-economy	Macro-economy
7	Macro-economy	#13 (Increase by 6)	Interest rates	Artificial intelligence
8 =	Cost reduction	#12 (Increase by 4)	Artificial Intelligence	Interest rates
8 =	Political risk	#5 (Decrease by 3)	Cost reduction	Cost reduction
10	Change management	#9 (Decrease by 1)	Change management	Change management

2

Cyber crime

For the past nine years, cyber has been the top risk for insurers in this longitudinal survey, and we expect that to continue over the next few years. In 2023, respondents indicated their chief concerns:

- Attacks from increasingly sophisticated threat actors.
- The growing manifestation of operational outages resulting from cyber vulnerabilities.

Such incidents can have severe reputational consequences for individual organisations and the wider industry alike. In Australia, these risks are also reflected in increasing regulatory scrutiny and obligations related to cybersecurity and digital resilience.

The risk of an incident is very real. In recent years, Australian insurers have been the target of significant attacks (including acts by disgruntled employees, ransomware incidents, and espionage-motivated attacks conducted by sophisticated threat actors). Insurers are a prime target because they hold substantial monetary assets and customer data (from health details to property, from vehicles to pets).

To be cyber-resilient, insurance companies need to constantly enhance their cybersecurity strategy, defence mechanisms, and governance regime.

Key trends

Ransomware

Ransomware remains a common tactic among cyber criminals, with the number of total victims posted on leak sites in 2023 easily surpassing those in 2022 and 2021. In fact, the actual number of ransomware attacks is likely to be higher than reported, with some threat actors choosing not to run leak sites or otherwise reveal their victims on public blogs. The ransomware environment, frequently referred to as Ransomware-as-a-Service (RaaS), is an evolving ecosystem consisting of – at the most basic level – programmes and affiliates. This has enabled ransomware attacks to readily scale, and the number of active threat actors has multiplied accordingly.

AI & emerging technology risks

Two emerging technologies are also beginning to pose risks to organisations – Generative AI and quantum computing. Both these technologies could be used by cyber criminals to defeat and bypass the existing cyber defence capabilities of organisations.

Business Email Compromise (BEC)

Another key attack pattern we have observed is BEC. This is a financially motivated attack made by a threat actor traditionally targeting HR and Finance personnel in an organisation. In a typical BEC attack, threat actors often impersonate a legitimate business or individual to trick a victim into revealing sensitive information or transferring funds. To achieve this, BEC threat actors will use several tools, techniques, and procedures to launch successful attacks. Given the wide variety of stakeholders and third parties across the insurance ecosystem, this is a real and all too common form of attack.

Rising to these risks

Can insurers maintain robust security in this evolving threat landscape? Confidence appears to be declining, according to the survey. In 2023, Australian respondents on average stated a 3.1 out of 5 level of preparedness for the key risks they identified through the survey. In the previous 2021 survey, Australian respondents indicated a 3.22 out of 5 level of preparedness. As one chief risk officer at a Canadian life insurer pointed out:

> **“Cyber criminals always seem to be one step ahead - the need to invest in cyber continues to increase.”**

In Australia, survey respondents' risk and investment priorities have also been reflected in increasing regulations to elevate cyber risk management. Insurers are now impacted by obligations in:

- **APRA's CPS 234:** focusing on measures to be resilient against information security incidents.
- **APRA's CPS 230:** aiming to strengthen the management of operational risk and resilience, which comes into effect in 2025 (explored further in the next section of this report).
- **The SLACIP Act:** the Security Legislation Amendment (Critical Infrastructure Protection) Act 2022) for managing risks relating to critical infrastructure.

3 Regulation

Regulation remains a major concern for Australian insurers, according to the survey. This is to be expected, given the raft of new regulations which continue to lift the bar – particularly with regards to board oversight, accountability and risk management – with the ultimate objective of ensuring positive customer outcomes.

In Australia, regulatory changes in the pipeline include APRA's Prudential Standard CPS 230 *Operational Risk Management,* which will take effect from 1 July 2025 (with transition agreements for existing service provider arrangements until 1 July 2026) and the *Financial Accountability Regime* (FAR) legislation with an implementation date of March 2025.

CPS 230 *Operational Risk Management*

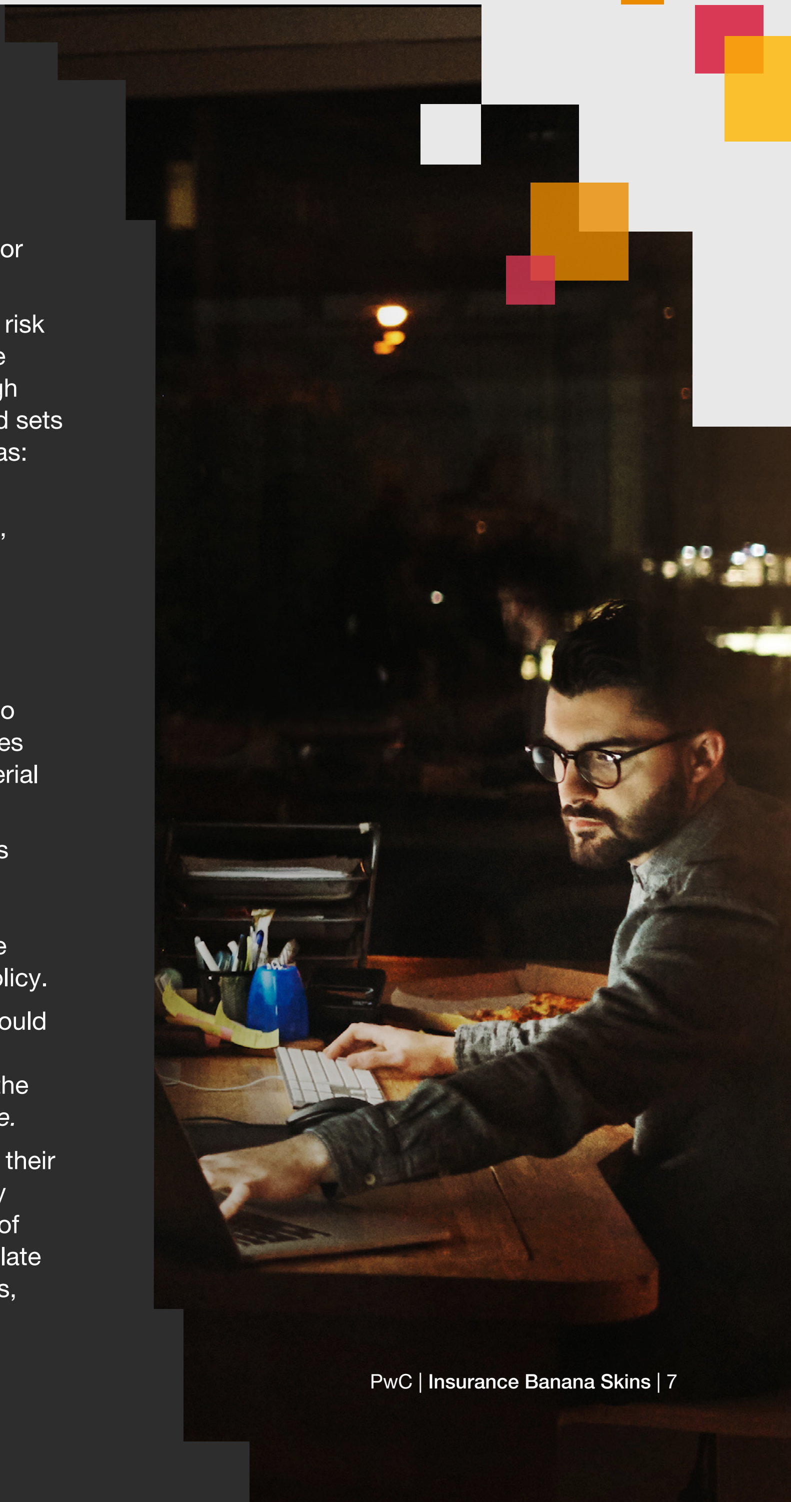
The operational risks faced by insurers continue to change and are ever increasing – whether it be cyber hacks, ageing technological infrastructure causing operational complexity, or oversight of third (and fourth) parties.

CPS 230 aims to strengthen the management of operational risk and minimise the impact of disruptions to customers and the financial system – it's about preventing and operating through disruption rather than recovery from disruption. The standard sets out APRA's increased expectations across the following areas:

- Operational risk, including mapping of critical operations and associated resources, risks, obligations and controls, and having a clear understanding of the operational risk management of critical operations.
- Business continuity, including capturing tolerances and conducting scenario testing for critical operations.
- Service provider management, including enhancements to the management of third and fourth parties that companies rely on for critical operations or that expose them to material operational risk.
- Increased Board accountability for oversight of an entity's operational risk management, which includes business continuity and the management of service provider arrangements. The Board will also be required to approve tolerance levels and the service provider management policy.

To achieve implementation by the effective date, insurers should be well underway on their CPS 230 journey. APRA expects demonstration of progress throughout 2024, as reflected in the *January 2024 Interim Policy and Supervision Priorities update.*

For example, APRA expects that insurers will have identified their material service providers and critical operations by mid-July 2024, and be setting tolerance levels for the maximum level of disruption they are willing to accept for critical operations in late 2024. This will require scenario testing to calibrate tolerances, which may result in iteration.



The Financial Accountability Regime Act 2023

The Financial Accountability Regime Act 2023 (FAR) is the government's response to recommendations made by the Royal Commission into Misconduct in the Banking, Superannuation and Financial Services Industry to extend the Banking Executive Accountability Regime (BEAR) to strengthen the responsibility and accountability of the directors and most senior and influential executives of financial institutions.

The insurance (and superannuation) industry is waiting for further guidance from regulators (FAR will be jointly administered by APRA and ASIC), which is anticipated in Q1 2024. Given the FAR follows many of the provisions of the BEAR. Insurers can look to the BEAR and FAR guidance for authorised deposit taking institutions, and, importantly, the lessons learnt from their implementation.

There are no-regrets actions which insurers can already be undertaking, including (but not limited to):

- Establishing a multidisciplinary team to support the implementation of the FAR – we see the best results when both Risk and People teams are involved in implementation.
- Identification of and early engagement with accountable persons (APs), including those at significant related entities.
- Drafting of accountability statements and an accountability map, based on the information already known (i.e. draft ministers rules, pending their finalisation).
- Developing a reasonable steps framework which supports APs to discharge their accountabilities.
- Consideration of the impacts on remuneration and consequence management framework(s).

Implementation considerations

Key to the successful implementation of the new requirements is recognising the interconnectedness of the FAR and CPS 230. Insurers should look to focus on sustainable embedment that is integrated into business operations and aligned to their strategic direction to avoid adding complexity to business processes.

It's likely these regulatory changes will require substantial investment so ensuring long term benefits to the business are derived is important, as well as using these as a competitive advantage rather than seeing the new requirements as an onerous compliance exercise.

4 Climate change

As climate change commands more and more attention in political, social and economic circles, it's little wonder our survey found that insurers are similarly concerned. After all, climate change is presenting short-term risks as well as long term – and the insurance sector is already witnessing the impacts.

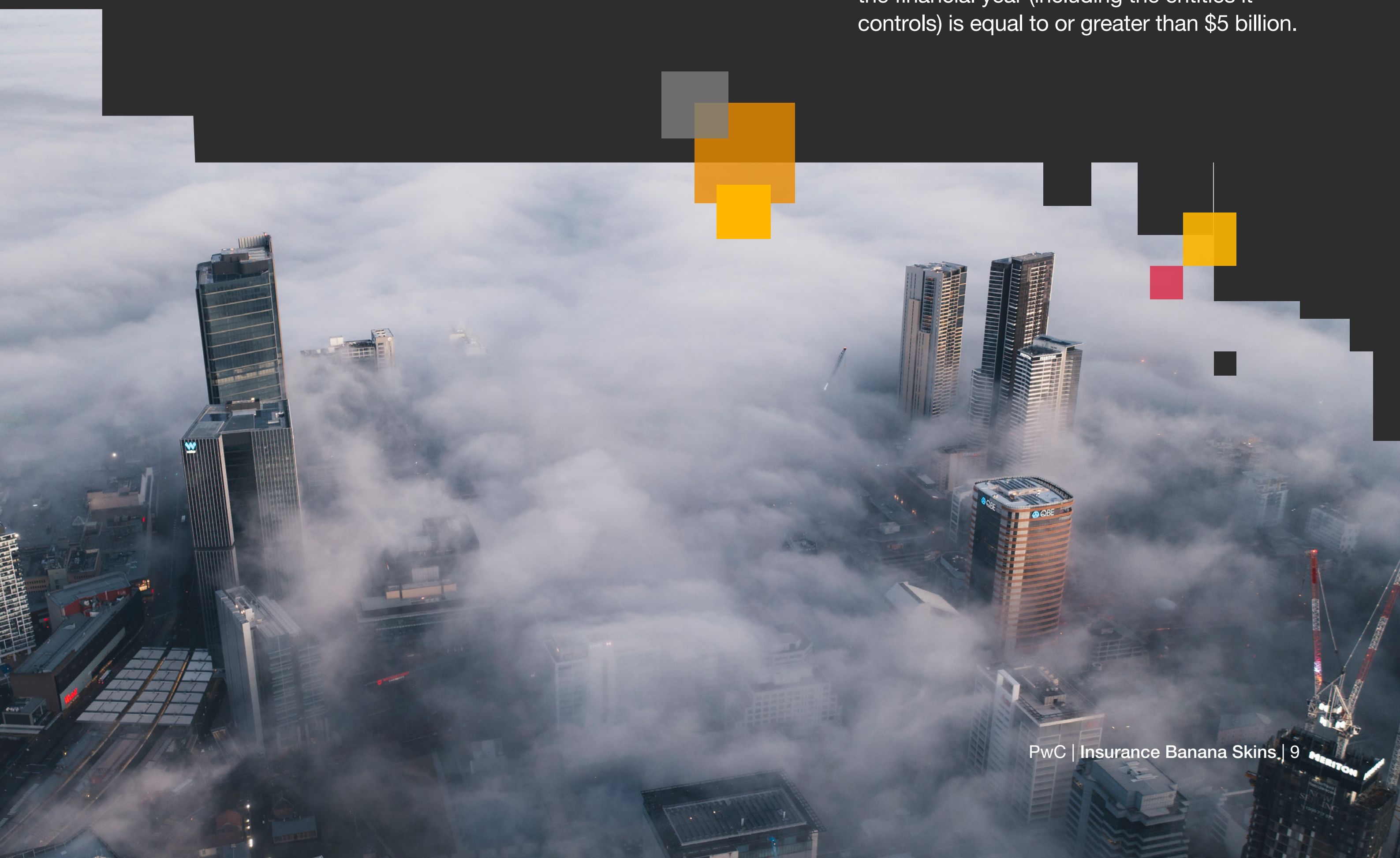
Climate change adds uncertainty and volatility for the insurance industry, affecting pricing and profitability. Insurers will need to develop the ability to navigate and adapt to these challenges to ensure sustainability in the insurance industry.

General insurers are particularly adversely affected by increased climate risks such as natural disasters, due to high exposures through customers, products and assets. Chronic changes like elevated temperatures and prolonged drought – as well as acute events like more frequent and severe hurricanes and wildfires – can significantly affect health and longevity risks for health and life insurers. Other impacts of climate change may result in increases in public health incidents, given the rising average temperatures. Climate change therefore compounds the impact of rising premiums.

Last year's UN COP28 conference showed that the world is not on track to meet its emissions reduction targets as laid down in the 2015 Paris Agreement. This will likely mean sharper reduction in emissions will be needed in the short to medium term, to keep long-term climate goals within reach. This will likely increase short-term policy or 'transition' risks for the insurance industry, alongside the mounting physical risks as highlighted in the survey results.

There are also incoming regulatory requirements, with the Australian Treasury releasing the Exposure Draft *Treasury Laws Amendment Bill 2024: Climate-related financial disclosures for corporate climate-related financial disclosures* on 12 January 2024.

Treasury's policy position statement proposes requiring certain entities (those that lodge financial reports under Chapter 2M of the Corporations Act and/or are required to prepare energy and emissions reports under the National Greenhouse and Energy Reporting Act 2007 (NGER Act)) to make annual climate-related financial disclosures. This includes asset owners where the value of assets at the end of the financial year (including the entities it controls) is equal to or greater than $5 billion.



Draft Australian sustainability reporting standards

In October 2023, the Australian Accounting Standards Board (AASB) released an exposure draft of the first three Australian Sustainability Reporting Standards (ASRS). These set out climate-related financial disclosure requirements based on the standards issued by the International Sustainability Standards Board (IFRS S1 *General Requirements for Disclosure of Sustainability-related Financial Information* and IFRS S2 *Climate-related Disclosures*). While based primarily on IFRS S1 and S2, there are differences proposed by the AASB in the draft ASRS standards.

Climate risks and opportunities

Under the draft disclosure requirements, entities will be required to disclose details of their climate related risks and opportunities, including a quantitative assessment of the likely impact on their financial position, financial performance and cashflows, over the short, medium and long term. And while many insurers have embedded the assessment of their climate-related risks into their operational risk, based on the exposure of the industry, there is arguably an opportunity to further reinforce this work.

Climate Resilience

Within the draft standards, one of the requirements is for entities to disclose climate scenario analysis, looking to assess a business' resilience under various climate outcome scenarios.

The draft ASRS requires assessments against at least two possible future states, one of which must be consistent with the most ambitious global temperature goal set out in the *Climate Change Act 2022* (1.5°C above pre-industrial levels). The purpose of these requirements is to enable users of those reports to strategically assess how risks and opportunities will be impacted under at least two climate scenarios. This may prompt insurers to broaden their strategic decision-making, and to seek industry wide initiatives to address climate-related risks and opportunities.

Workforce risk

Insurers must also address the impacts of climate change on their workforce due to increased workload, more stressful customer interactions, and sometimes even scrutiny over their societal impact (given the reputational scrutiny insurers often receive at these times). This was evident in 2022, when claims spiked during the major floods across Australia, and ASIC's subsequent inquiry into insurers' responses.

Attracting and retaining talent will be challenging as this profile of work becomes more common. However, no sector within financial services can offer employees a stronger link to the purpose of climate action (given the increased risk of natural perils). Therein lies an opportunity for insurers: to help team members connect their purpose to their day-to-day role.

Gear up for ESG reporting changes

The ESG reporting landscape is evolving rapidly and insurers can prepare in several ways:

1. Mobilise a working group

Assemble a cross-functional sustainability reporting working group with representatives from functions such as sustainability, strategy, finance, risk, legal, and investor relations. The working group should have appropriate executive level sponsorship.

2. Understand legal entity requirements and governance obligations

Consider legal entity size thresholds within Australian exposure draft legislation and how it may apply to your enterprise. Also consider emerging risks associated with greenwashing across different corporate content (e.g. annual report, advertising, website).

3. Perform gap analysis

Examine proposed requirements within draft Australian Sustainability Reporting Standards and compare against your existing climate disclosures. Consider potential gaps in existing disclosures practices, reporting policies and processes relative to these requirements. Consider the adequacy of your systems, processes and controls to underpin future disclosures and assurance requirements.

4. Agree priorities and develop sustainability reporting roadmap

Secure alignment and agreement regarding the changes required in sustainability. Establish ongoing project reporting to the executive and board.

5 Other notable risks

In the 2023 survey, Australia's insurers picked out several more risks that were top of mind for them – notably, talent and technology. Let's explore these in turn.

I Talent

Amidst unprecedented change and regulatory pressure, insurers are grappling with major workforce challenges. With labour shortages in a specialist industry, it is becoming increasingly difficult for Australian insurers to attract and retain talent with the required skills and capabilities.

The insurance industry also faces challenges and opportunities arising from emerging technologies and how these interact with employees. For example, the expansion of AI means insurers can realise operational efficiencies and reinvent their business models – but this process creates workforce challenges along the way.

And when it comes to business model reinvention, Australia is lagging. In the 27th PwC CEO survey 2023, Australia sat below the global average for shifting business models to generate revenue from new products and services. Australia's CEOs say their biggest barriers to business model reinvention are regulation and competing operational priorities (such as compliance, technology implementation, workforce management and cost reduction).

Workforce solutions in the insurance sector

To rise to the increasing risks facing the insurance industry, workforces need to be more agile, adaptable and multi-skilled while maintaining core expertise in claims and underwriting. Developing a resilient and productive labour market hinges on addressing talent shortages, closing skills gaps, and empowering workers with skills for the jobs of the future.

1. Strategic workforce planning

Technology and regulatory change, coupled with unforeseen and sudden spikes in demand, are becoming the 'new norm' in insurance. This calls for a deliberate and disciplined strategic workforce plan. For example, future-fit capabilities can be maintained with a proactive approach to partnering for effective 'extension of team' models, upskilling and reskilling.

2. Training and development

For team members at all levels, attention needs to be given to how to ensure they have the ability 'to weather a storm' (i.e., adapt to difficult situations, manage stress, remain motivated, and lead their people). It's also important to help all employees in to embrace agility so they can move quickly into new roles or develop new skills to support changing business needs.

3. Nurture the talent pipeline

Australia's 'big banks' dominate our financial services sector and they have the advantage when it comes to attracting and retaining talent. Their employer value propositions include a diversity of work and career options; roles at the cutting edge of innovation; and the technology investment to give team members the best tools to excel in their roles. But, in the longer term, these team members are often attracted to the specialist and technical nature of insurance. Insurers should redouble their efforts to entice graduates and early-career professionals to help nurture a healthy talent pipeline for the future.

Technology

The 2023 survey found that technology still ranks highly among the risks that insurers are focused on. No company can afford to be left behind.

In recent years, insurance companies have ramped up digital transformations to keep pace with leaps in technology capability and changing consumer expectations. Over time, many have stitched a patchwork of new front-end solutions onto their legacy back-end systems.

Insurers are concerned about how they can remain competitive, de-risk customer loyalty and improve customer experience by implementing new technologies (such as contact centre transformation solutions) to address call wait times and elevate customer self-service capabilities.

Australia's insurers are also trying to address risks presented by hybrid working patterns that proliferated during the COVID-19 pandemic.

Dovetailing with our commentary on talent (see above), this risk also presents an opportunity for insurers to attract and retain talent by giving their workforces access to emerging technologies and flexible ways of working.

Meanwhile, as insurers seek to upgrade their technology at speed, there have been more system issues (e.g. duplicate transactions, service outages). And, as highlighted earlier in this report, insurers' interconnected technology are a prime target for ransomware threats, which raises the risks of sensitive data, service disruptions, and regulatory penalties. Cybersecurity upgrades (and new solutions) will remain high on the priority list for insurers.

6

Concluding observations

A complex array of risks has been brought into sharp focus by the 2023 survey. Australia's insurers are particularly concerned by the risks stemming from cyber, regulation, climate change, reputation, technology, and talent. While facing these risks, insurers are also pursuing financial objectives, including pricing selection, cost management, growth and profitability.

This balancing act is notoriously hard, but waiting and responding to incidents as they arise is not an option. Instead, there are several 'no regrets' steps that insurance leaders can take to prepare:

- **Don't reinvent the wheel:** Digital transformations are underway across every industry, and insurers can seek and apply learnings from others (e.g. banks) to innovate and modernise their operations at speed.
- **Reinforce cyber defences:** As the custodians of finances and data, insurers will continue to be targeted by cyber criminals. To remain resilient, companies need to constantly enhance their cybersecurity strategy, defence mechanisms, and governance regime.
- **Formulate a strategic workforce plan:** Amidst labour shortages, it remains vital to attract, develop, and retain specialist talent to fully harness technology. For insurers, a compelling employer value proposition will include a diversity of work and career options, exposure to cutting-edge tools and projects, and a clear connection between individuals' roles and positive societal contributions.
- **Anticipate the direction of future compliance requirements:** Notable regulatory changes are coming soon, including new sustainability reporting standards, the Financial Accountability Regime, and APRA's CPS 230 Operational Risk Management prudential standard. The shape of these changes has already emerged in draft form. Now is the time to conduct a gap analysis, formulate a compliance plan and mobilise experts from across the company. Along the way, consider how exceeding the minimum requirements might bolster the organisation's reputation.

7

Appendices

A Australia participant profile

There were 29 responses from Australia, as follows:

Broking / Intermediary	1
Life	3
P&C / Non-Life	14
Composite	2
Reinsurance	4
Other (please state)	5

B Complete list of Insurance Banana Skins 2023

World		Australia	
1	Cyber crime	1	Cyber crime
2	Regulation	2	Regulation
3	Climate change	3	Climate change
4	Technology	4	Reputation
5	Human talent	5	Human talent
6	Macro-economy	6	Technology
7	Artificial Intelligence	7	Macro-economy
8	Interest rates	8	Cost reduction
9	Cost reduction	8=	Political risk
10	Change management	10	Change management
11	Political risk	11	Artificial Intelligence (AI)
12	Security risk	12	Products
13	Reputation	13	Security risk
14	Investment performance	14	Capital availability
15	Social change	15	Social change
16	Competition	16	Interest rates
17	Products	17	De-globalisation
18	Credit risk	18	Business conduct
19	De-globalisation	19	Investment performance
20	Capital availability	19=	Competition
21	Quality of management	21	Quality of management
22	Business conduct	22	Credit risk
23	Corporate governance	23	Post-Covid effects
24	Post-Covid effects	24	Corporate governance

C Main points of difference

Places higher or lower than the global average:

Reputation	Capital availability	Products
+9	+6	+5

Credit risk	Investment performance	Interest rates
-4	-5	-8

D The Banana Skins Indices

Banana Skins Barometer	
Nigeria	4.33
South Africa	4.17
Austria	3.91
UK	3.84
Canada	3.81
Japan	3.71
Hong Kong	3.69
Belgium	3.67
Singapore	3.59
Spain	3.50
USA	3.50
Australia	3.41
Italy	3.30
Luxembourg	3.22
GLOBAL	3.21
Netherlands	3.21
New Zealand	3.20
Taiwan	3.11
India	3.07
Germany	3.00
Denmark	2.88
Bermuda	2.77

Preparedness Index	
Spain	3.70
Austria	3.64
Denmark	3.44
Italy	3.40
Netherlands	3.36
USA	3.33
Canada	3.31
New Zealand	3.30
Hong Kong	3.21
GLOBAL	3.20
Singapore	3.20
Germany	3.20
Australia	3.10
Luxembourg	3.10
UK	3.09
Bermuda	3.08
Belgium	3.07
South Africa	3.06
Nigeria	2.90
Taiwan	2.89
India	2.87
Japan	2.79

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