

The CSNA welcomes the opportunity to make comments in this consultation process.

The CSNA is the representative group for convenience stores and newsagents throughout the Republic of Ireland. Our 1500 members are placed in stores throughout the country and all hold employers and public liability insurance. We do not believe that restricting or limiting the database to claims within the motor insurance area will be of much use to our members and suggest that there is sufficient room to include all insurance and all policyholders affected by claims on such a database.

We are also of the belief that there needs to be a full picture developed of individual claims that will be able to show the length of time the process of dealing with claims takes.

Many of our members experience lengthy periods of premiums being loaded in anticipation of a consequent award or payout to a claimant. The standard loading is 25% but this can rise to 40% in some instances. Regardless of the outcome, this additional premium is never repaid or used as offset once the claim is satisfied. This is particularly unfair in instances where our member is joined in an action alongside another insured undertaking, and that undertakings insurance company will neither assume liability or grant indemnity even where the facts quite plainly suggest that our member has no case to answer.

Given that this process is Finance, it is unlikely that you will concede our observation that we would believe the better agency to deal with this is the PIAB as we believe it to be more independent and customer focused than the Central Bank.

In summary, CSNA wishes to see the database set up in such a fashion as it can include ALL claims, not just motor insurance claims.

We also believe that the database should have a longitudinal aspect to its data collection.

We believe that it needs to capture data of the number of joined parties on the respondents "side" and track the presence of absence of indemnity agreements.

We would prefer to see PIAB rather than CB.

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