



CADRI

CANADIAN ASSOCIATION
OF DIRECT RELATIONSHIP
INSURERS

12 August 2021

Mr. Brett Thibault

Director, Governance & Stakeholder Engagement

Insurance Council of BC

Suite 300–1040 West Georgia Street

P.O. Box 7

Vancouver, BC, V6E 4H1

consultation@insurancecouncilofbc.com

Dear Mr. Thibault,

Re: Council Rules Review - Rule 6(1)(b) – Second consultation

The Canadian Association of Direct Relationship Insurers (CADRI) is the voice of insurance enterprises that offer automobile, home, and commercial insurance directly to Canadians. We advocate for flexible and evolving regulatory and legislative frameworks governing automobile, property, and commercial insurance to enable product and service innovation so that Canadians can easily choose insurance that serves their needs through the delivery channels of their choice.

CADRI provided input during the Insurance Council of BC's (the Council's) initial consultation this Spring and appreciates the opportunity to review the Council's revised amendment to Rule 6(1)(b) on Location Restrictions for Level 1 General Insurance Salespersons.

Rule 6(1)(b) Recommendation: The Council should approve the amendment to remove restrictions limiting Level 1 licensees to a specific location.

CADRI welcomes the Council's amendment to Rule 6(1)(b).

CADRI members are national entities with structured, tiered staffing models to ensure excellent supervision of all employee and exclusive agents both in the office and virtually. Prior to contacting customers, agents undergo thorough background checks and rigorous training to ensure compliance with regulations, company policies and delivery on customer service commitments and fair treatment of consumers. After licensing, agents continuously update their skills and knowledge. Thus, the very nature of direct-relationship insurers' corporate structures and internal controls ensure that they comply with regulatory frameworks and protect consumers' interests.

Early in 2020, as CADRI members began to understand the impact of the global pandemic, they moved their agents from traditional call centres to virtual workspaces i.e., working from home. Looking ahead, our members anticipate that most of their agents will continue to work off-site or have a 'hybrid' workplace wherein they work from home and go into the office only occasionally.

In this context, CADRI supports with the Council's assessment that:

- A one-size-fits-all length of time for in-office experience could be seen as arbitrary
- Class license restrictions apply regardless of where agents are working
- Agency nominees are best positioned to determine whether a salesperson is equipped to work virtually
- The amendment provides sufficient flexibility for in-office training, experience and work to continue.

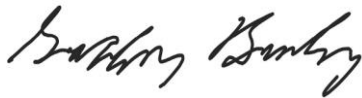
Conclusion

The Council plays an important role ensuring that those living in BC receive insurance advice from reliable, qualified agents.

CADRI welcomes the opportunity to comment on the Council's amendment to 6(1)(b).

We compliment the Council's swift action a year ago which enabled agents to work safely through virtual environments. We support the proposed amendment because it recognizes that these arrangements are likely to continue, and insurers have robust onboarding, training, and supervision procedures in place to serve consumers' interests.

Yours sincerely,



Geoffrey Beechey
Chair & CEO
CADRI

Cc:

Brett Thibault, VP, Stakeholder Engagement, Insurance Council of BC
Kandace Hopkins, Director, Practice and Quality Assurance, Insurance Council of BC

CADRI Board of Directors
CADRI Licensing Task Force
CADRI Western Committee