Chubb Target Market Determination

Aon Education Staff Personal Accident Insurance



## **Chubb Target Market Determination**

## **Important Information**

This Target Market Determination (**TMD**) is required under section 994B of the Corporations Act 2001 (Cth) and has been prepared by one of the product issuers, Chubb Insurance Australia Limited (**Chubb**) AFSL 239687 ABN 23 001 642 020.

This TMD is designed to assist customers, distributors and Chubb staff to understand who this product has been designed for and who it is not suitable for.

The TMD identifies triggers for Chubb to review the target market and sets out the conditions and restrictions on distribution of the product described below. It also sets out the reporting obligations of Chubb's distributors. This document is not a Product Disclosure Statement (**PDS**) and is not a summary of the product features or terms of the product.

This document does not take into account any person's individual objectives, financial situation or needs and is not intended to constitute personal advice. Persons interested in acquiring this product should carefully read the Policy Wording & PDS before deciding whether to purchase this product.

This TMD is effective from the date of publication until its replacement or withdrawal.

Where a word is capitalised in this TMD and not otherwise defined, the definition of the word can be found in the Policy Wording & PDS.

## **Target Market Determination**

#### 1. Details

Product Name/s:	Aon Education Staff Personal Accident Insurance (PDS Reference code 21PDSSTAFFGP01) (the Product)
Publication Date of TMD:	Originally published: October 2021  Reviewed: June 2022  Reviewed (2): October 2023  Reviewed (3): October 2025
Frequency of TMD Reviews:	An initial review will occur within two (2) years of the Publication Date of the TMD, subject to intervening review triggers as outlined in section 4 of this TMD.  Subsequent periodic reviews will occur every two (2) years from date of last review, subject to intervening review triggers as outlined in section 4 of this TMD.

## 2. Product Target Market

#### What is the Product?

This Product provides personal accident cover such as lump sum payments for certain Bodily Injuries for staff of the Policyholder's school.

#### **Key covers/attributes**

- ✓ Cover for all staff (Covered Person) employed by the Policyholder.
- ✓ The scope of cover for this Product is 24 hour a day, 7 days a week for all benefits unless specified otherwise.
- ✓ Lump sum payments up to a specified amount for certain Bodily Injuries sustained by a Covered Person such as Permanent loss of Fingers, Toes, eye/s or Limbs and Accidental Death.
- Cover for reimbursement of extortion/ransom monies paid in the event the Covered Person is kidnapped.
- Cover for Trauma Counselling if the Covered Person is the victim of or witnesses certain criminal acts.

#### Key exclusions or limitations of cover

- $\times$  The Product excludes claims resulting from (amongst other things):
  - Sickness
  - piloting;
  - Professional Sport;
  - intentional self-injury;
  - childbirth or pregnancy;
  - War or Civil War;
  - Pre-Existing Medical Conditions, illness or disease.

× There is no cover under the Policy for any loss, damage, liability, Event, Bodily Injury or Sickness which is covered under any other insurance policy required to be effected by or under law, health or medical scheme or Act of Parliament or common law entitlement but only to the extent to which the loss, damage, liability, Event or Bodily Injury is in fact covered by one or more of these schemes.

## Customers the Product was designed for

This Product is designed for:

✓ education providers who wish to purchase cover for their staff for personal accident.

#### **Classes of Customers**

The class of customers that are likely to be within this Product's target market are:

- ✓ primary and secondary schools, who have enrolled students;
- ✓ education providers, (other than primary and secondary schools) on an exception basis.

Customer's likely objectives, financial situation, and needs		
Objectives	The likely objective of customers in this target market is to provide accident cover to their staff.	
Financial situation	The schools this product is intended for must have the financial means to pay the premium. Covered Persons must have the financial means to bear any relevant excesses and/or waiting periods in the event of a claim, where applicable. Schools in this target market may be privately, or government funded. Schools in a range of financial situations may seek to provide insurance to their staff to insure them for personal accident.	
Needs	Customers in this target market will likely need an insurance product which can offer their staff lump sum payments for accidental Bodily Injury or Accidental Death.	

#### Customers the Product was not designed for

This Product is not suitable for:

- × schools seeking cover for students;
- × schools seeking cover for unpaid/voluntary workers;
- × schools seeking cover for only during their employees' or students' journey/commute to or from school;
- × schools seeking to provide cover as a requirement under an Enterprise Bargaining Agreement;
- × individuals; and
- × organisations requiring the following types of insurance for their employees:
  - workers compensation insurance;
  - private health insurance;
  - income protection insurance; and
  - life insurance.

#### Why the Product is consistent with the Target Market

Chubb considers the Product to be consistent with the target market as the target market comprises schools who employ staff and the product provides cover for personal accident of their employees. As such, the Product is likely to meet the needs, or go towards meeting the needs, of those within the target market.

3. Conditions/Restrictions on product Distribution		
Restriction/ Condition	Description	
Method of distribution	This Product may be distributed by Aon Risk Services Australia Ltd (ABN 17 000 434 720, AFSL No. 241141) ( <b>Distributor</b> ).  The Distributor is a licenced insurance broker operating throughout Australia, acting under its own Australian Financial Services Licence.  Distributor contact details:  Level 33 Aon Tower 201 Kent Street Sydney, NSW 2000 Phone 02 9253 7000	
Underwriting criteria	The Distributor is required to distribute the product in accordance with Chubb's underwriting criteria.	
Promotional Material	Any promotional material which is used by the Distributor in relation to the Product must be pre-approved by Chubb and must contain an electronic link to this TMD.	
Distribution in accordance with TMD	accordance arrangements in place between Chubb and the Distributors.	
Explanation		

Customers that obtain the Product in accordance with the distribution conditions set out above are more likely to be in the target market for this product because a qualified insurance broker is acting on their behalf and can assess the customers objectives, financial situation and needs.

4. TMD Review		
Initial review period:	An initial review will occur within two (2) years of the Publication Date of the TMD, subject to intervening review triggers (see below).	
Subsequent review periods:	Subsequent periodic reviews of the TMD will occur at least every two (2) years subject to intervening review triggers (see below).	

## **Review triggers:**

Review triggers are events and circumstances that reasonably suggest the TMD may no longer be appropriate and may trigger a review **prior** to the reviews as set out above. The review triggers for this product are set out below.

1. Any material change to the Product, including a change to the Policy Wording & PDS.

2.	Changes to relevant laws, regulatory guidance, or industry codes.	
3.	Any determination of or feedback from regulators, the Australian Financial Complaints Authority, a court or a tribunal suggesting that the target market may no longer be appropriate (including the use of Product Intervention Powers).	
4.	The nature of feedback regarding the Product, including whether complaints have increased significantly from consumers or distributors.	
5.	Distribution or purchasing of the Product in a manner significantly inconsistent with the TMD.	

# 5. Reporting Obligations

The Distributor must report the following information to Chubb.

Distributor Reporting Obligations				
Type of Report	Description	Reporting Period		
Complaints	Complaints are received by Chubb pursuant to the Complaints and Dispute Resolution Process set out in the Product Disclosure Statement.	<b>Quarterly</b> (10 business days after the quarter has closed)		
	If the Distributor acts under a binding authority from Chubb, or as an Authorised Representative of Chubb, the Distributor must provide complaints data and information in accordance with the existing contractual terms as agreed to between the parties.	Send data to: <u>Complaints.AU@chubb.com</u>		
	If the Distributor acts as a broker (agent for the consumer), the Distributor must provide the following complaints data:			
	The number of complaints received regarding the Product during the Reporting Period and the nature and details of the complaints.			
	Complaint is defined in the Australian Securities and Investment Commission ( <b>ASIC</b> ) Regulatory Guide RG 271 Internal dispute resolution.			
Significant dealings	A significant dealing in the Product which is not consistent with this TMD must be notified to ASIC. What amounts to a "significant dealing" will be determined by the circumstances of each case but generally regard should be had to:	Within <b>1 business day</b> of becoming aware of the significant dealing.		
	<ul> <li>the proportion of customers purchasing the product who are not in the target market;</li> <li>the actual or potential harm to those customers;</li> </ul>	Send data to:  aus.incidentreporting@chubb.com		

- the nature and extent of the inconsistency of distribution with the TMD; and
- current ASIC guidelines when determining what may constitute a significant dealing.

If in doubt, Distributors must report the dealing to Chubb, so that Chubb can undertake the necessary assessments.

## The report must include:

- date(s) of the significant dealing;
- description of the significant dealing;
- why the dealing is significant;
- how the significant dealing was identified;
- what steps, if any, have been taken in relation to persons affected by the significant dealing; and
- steps which have been, or will be, taken to ensure that the significant dealing does not occur again.

## 6. Appropriateness

Chubb has assessed the Product's key attributes and formed the view that it is likely to be consistent with the likely objectives, financial situation and needs of consumers in the target market as described within this TMD.

#### About Chubb in Australia

Chubb is a world leader in insurance. Chubb, via acquisitions by its predecessor companies, has been present in Australia for 100 years. Its operation in Australia (Chubb Insurance Australia Limited) provides specialised and customised coverages including Business Package, Marine, Property, Liability, Energy, Professional Indemnity, Directors & Officers, Financial Lines, Utilities as well as Accident & Health, to a broad client base, including many of the country's largest companies. Chubb also serves successful individuals with substantial assets to insure and consumers purchasing travel insurance.

More information can be found at www.chubb.com/au.

#### Contact Us

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