

19 December 2017

Digital Economy Strategy Team
Department of Industry, Innovation and Science
GPO Box 2013
Canberra ACT 2601

By email: digitaleconomy@industry.gov.au

Dear Sir/Madam

The Digital Economy: Opening up the Conversation

Suncorp Group (Suncorp) welcomes the opportunity to provide a submission in response to the consultation paper *The Digital Economy: Opening up the Conversation* (the Issues Paper).

Suncorp Group Limited is an ASX top-20 company with \$97 billion in assets. The Group employs approximately 13,400 people and serves close to nine million customers across general insurance, life insurance, banking and wealth, through its trusted brands including Suncorp, AAMI, GIO, Shannons, Vero and Apia.

Executive Summary

As one of Australia's largest insurers and regional banks, Suncorp is at the forefront of digital disruption in the financial services sector. With customers now expecting better choice and improved integration with their digital presence, change and digital transformation is occurring at breakneck speed. The result is that incumbents are competing, and in some cases partnering, with start-ups to meet customer needs and drive superior outcomes.

Suncorp is ready for this disruption and is actively transforming to become a platform business through our Marketplace strategy. We are creating an ecosystem that will sell products manufactured by Suncorp but also those from our partners. To prepare for this new way of working, Suncorp has sought to transform its processes, including drawing on artificial intelligence and automation. We have also commenced partnerships with local and international start-ups to grow our product offering to our customers. Some of our early partnerships and innovative products include products that provide on-demand insurance (*Trov*), reimagine learning to drive a car (*SmartPlates*), and which revolutionise the concept of a rental bond (*Trustbond*). These are just a few examples, with many more to come.

This change is inevitable and is being driven by our customers and investors. They expect us to innovate and embrace digital change. To achieve this, however, Suncorp considers that it is essential for government to develop a regulatory environment that supports the trialling of new products and technologies, continues investment in information technology skills and training, and ensures legislation/regulation is fit for the digital world in which we now live.

In this submission, we make the following recommendations:

- The continuation of investment in STEM;
- Investment in development and training in 'soft' skills that will be required in an ever-changing labour market, including by partnering with industry and education providers;
- Amendment of regulation to allow new products that fall within 'grey areas' to be trialled while government considers their impact in a timely manner;
- Reduction of the compliance burden on business, enabling businesses to be more agile and better-placed to compete in the digital economy;

- Commencement of a rolling legislative maintenance programme to continually update legislation and regulations to ensure they accommodate new technologies;
- Changes to the current fintech regulatory sandbox to include products from start-ups that partner with established Australian Financial Services Licence (AFSL) holders, as well as innovative products created by Australian Financial Services (AFS) licensees;
- Pass legislation giving effect to the Productivity Commission's data availability recommendations to unleash reforms around open banking; and
- Ensure that customer outcomes, particularly privacy, are at the centre of all government reform and decisions.

Digital Innovation at Suncorp

Suncorp Marketplace

Suncorp's strategic priority is to elevate our customers in everything that we do, enabling them to make better choices and ensuring we can meet their needs in the moments that matter. A key part of the way Suncorp is achieving this, is through the development of our Marketplace, where our customers can interact with us, and our partners, via a digitised platform which includes a new Suncorp Marketplace app. In addition to our existing digital-first focus, the Marketplace will accelerate our connections with third-party partnerships (such as fintech start-ups), enhancing the speed at which customers can access new services and solutions.

Adoption of technology

Suncorp agrees with the premise contained in the Issues Paper that the financial services sector has been an early adopter of digitisation. Due to the global nature of the financial services sector, innovation is adopted around the world quickly and is often driven by market pressures and expectations, rather than by specific governmental or regulatory policy settings. Suncorp uses a variety of technologies across our business, both to improve the experience for our customers and to realise improved efficiencies in our internal processes. Suncorp is also partnering with start-ups to develop innovative products that embrace new opportunities presented by the increasing role of digital technologies in daily life.

Suncorp also uses digital technologies to assist our employees to work more efficiently, and in a manner that suits them, providing the majority of our staff with the tools to perform their role under flexible working arrangements.

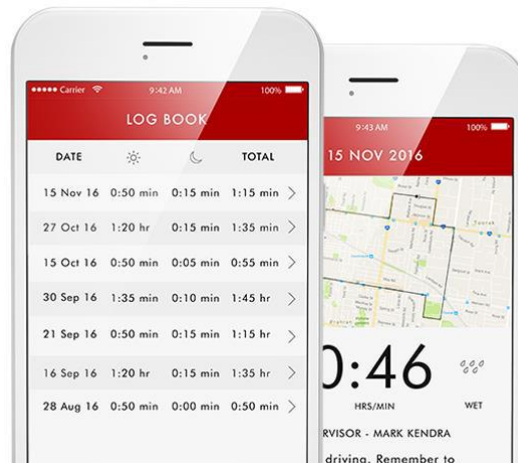
Innovative products

Suncorp has developed, and is trialling, a number of innovative products that provide significant customer benefit, some of which are outlined below.

SmartPlates

AAMI SmartPlates reinvents the way people learn to drive a motor vehicle by transforming their smartphone into a real-time driving tracker and coach. The *AAMI SmartPlates* app automates the traditional log book process, simplifying the experience for learners and improving road safety by introducing innovative features like Road Block, which discourages learners from using their smartphones while they are driving.

Figure 1: Screen-shot of the AAMI SmartPlates app

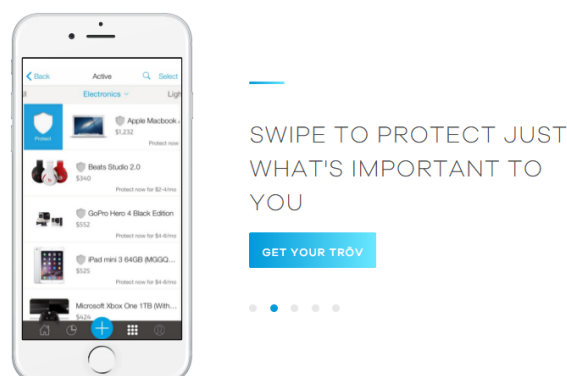


AAMI SmartPlates was launched in South Australia in February 2017 and is also operating in Queensland. We are in discussions with other States and Territories regarding the use of SmartPlates to meet their learner driver log book requirements.

Trov

Trov Protection is the world's first insurance platform that allows customers to insure their individual possessions on demand. Customers can insure specific possessions (a camera, tablet, laptop, etc) and can switch their insurance cover 'on or off' for each item, whenever and wherever they choose. Customers make claims using a simple online process, using the Trov smartphone app or via the Trov website.

Figure 2: Screen-shot of the Trov platform



Artificial Intelligence and Automation

Suncorp has tested, and is now using, IBM's Watson artificial intelligence program to assist with claims made on AAMI, GIO, Apia, Bingle and Suncorp motor vehicle insurance policies. When using our online claims process, customers are able to pay any applicable excess, find a repairer, book in for repairs and lodge their claim in as little as five minutes and without needing to speak to a claims consultant. Customers are referred to a claims consultant for more complex claims, such as those involving malicious damage or damage from natural hazard. Watson uses a natural language classifier to analyse the text of the claim submitted by our customer, makes a

determination of liability, and attaches a 'confidence level' to that conclusion. If Watson's confidence assessment is below a specified threshold, the claim is referred to a consultant for analysis.

Suncorp is also using Robotic Process Automation (RPA) 'bots' to reduce the amount of time our store-based banking employees spend on administrative and process tasks, such as generating reports and notifying customers of details for appointments. Use of these bots enables staff to spend more time assisting customers.

We are working on increasing our use of emerging technologies to assist with the insurance claim process, such as using image recognition to assess type and extent of damage, augmented reality that would enable an off-site claims assessor to discuss and assess damage, speech recognition, and obtaining telematic data from increasingly automated vehicles.

In addition to these programs, Suncorp continues to explore opportunities to expand our use of artificial intelligence and RPA across our insurance and banking products, to streamline our processes and to improve our customers' experience.

Trustbond

Suncorp has partnered with Spanish start-up Traity to develop a product that provides tenants with a low-cost alternative to a traditional cash bond for their rental property. Using a 'trust score' created from a tenant's online profile – such as their Airbnb or Uber ratings and social media presence – as well as traditional profile information such as rental history, a tenant can purchase a Trustbond for a fraction of the full bond amount. The landlord is then able to call on the Trustbond in the same way as they would make a claim on a traditional cash bond.

We are currently in discussions with various State and Territory governments and regulators about how Trustbond works, and (where necessary) how regulatory regimes could be amended to encourage innovative products such as Trustbond to complement the traditional rental bond schemes.

Investment in fintech

Suncorp is a partner in Stone & Chalk, an independent, not-for-profit hub that supports the development of fintech start-ups. Stone & Chalk has been operating since May 2015 and has already assisted more than 300 entrepreneurs, working on more than 60 fintech start-ups that have raised in excess of \$100 million in funding, and employed an additional 50 people.

Suncorp is also a founding member of Insurtech Australia, a recently formed standalone division of FinTech Australia. Insurtech Australia will operate as a national, non-profit organisation to represent start-ups, insurers, reinsurers, brokers and related disciplines, with the aim of Australia becoming a world leader for insurance technology (in 2016, only one per cent of the \$US1.69 billion raised by insurtech start-ups globally went to Australian start-ups¹).

Digital interaction by Suncorp consumers

Across Suncorp's insurance business, we have experienced a 441 per cent increase in digital customer interactions over the past four years, including a significant increase in the number of mobile-based interactions. Between 2011 to 2016, AAMI alone saw a 156 per cent increase in overall digital customer interactions. Significantly, this included a four per cent overall decrease in desktop-based interactions but a 907 per cent increase in mobile interactions.

Across all of our insurance brands, the volume of online claims lodgement has significantly increased over the past few years. Even after discounting for months where significant weather events occurred, online claims have increased from an average of 1,602 per month in 2013-14 (starting as low as 876 in July 2013) to an average of 6,099 per month in 2016-17 – an increase of 380 per cent in 3 years.

¹ CBInsights, *Insurance Tech Startups Raise \$1.7B Across 173 Deals in 2016*, 5 January 2017. Available online at <https://www.cbinsights.com/research/2016-insurance-tech-funding/>

Around 80 per cent of our banking customers now choose to do their banking digitally, with 75 per cent of those customers banking via a mobile device. Our banking customers also demonstrate that when using mobile technology, the public prefers to use purpose-designed apps rather than web-based services: more than 75 per cent of our customers' online banking transactions are now performed via our Suncorp Bank app, with only five per cent of online transactions completed using the web-based mobile site.

Enabling and supporting the digital economy

The following section outlines areas where government can assist business, individuals and communities to take advantage of the increasing role of digital technology across the Australian economy, and support Australians as digital transformation occurs.

Investment in digital skills and training

As part of our *Cost of Living Series* research, Suncorp recently conducted a survey of small to medium enterprises on a range of issues, including their adoption of digital technology.² Our June 2017 *SME vs Me Report* found that 43 per cent of SMEs that have been operating for more than 10 years use no online or digital tools, more than twice the rate of non-use by newer businesses. Further, SME owners who are more confident of meeting their medium-term business goals are more likely to use online or digital tools (specifically social media, mobile apps and SEO/SEM). This research not only demonstrates that newer businesses are more likely to use digital technology, but that older businesses must be supported to introduce digital technology to remain competitive in an increasingly digital economy.

The *SME vs Me Report* also found that 18 per cent of SME owners viewed keeping up with technology as a challenge that prevented them from achieving their business goals, with six per cent of respondents rating this as their business' biggest challenge. The report also found that 17 per cent of SME owners would like to spend more time developing e-commerce capability, with four per cent of respondents stating this was their top priority.

Suncorp's expertise in developing strategies for how businesses can take advantage of the opportunities presented by the increasingly digital economy is demonstrated by the recent appointment of Pip Marlow (CEO Customer Marketplace) to the Federal Government's Small Business Digital Taskforce.

With the pace of digital change occurring so fast, investment in digital skills and training is required to ensure that the workforce is adequately prepared for the jobs of the future – many of which are likely to be currently unknown. Long-term strategies will be required to support workers in industries where technological displacement occurs, because the creation of new jobs from technological advancement may not be immediate.³ As noted by the OECD, a failure to provide digital skills and further training may result in increasing inequality in the community:

“Even if the risk of technological unemployment can be discounted, job displacement and changes to occupational structure will take place in addition to many jobs being retooled. ... These changes can have an adverse impact on those workers who are not able to make the transition to new jobs. If the labour market polarises even further, some workers may end up stuck in low-skill, low-paying jobs with little possibility of crossing the growing divide into jobs that provide sufficient income and well-being.”⁴

These comments were echoed in a June 2016 Productivity Commission report regarding government preparation for digital disruption.⁵ In relation to the 'gig' economy, the Commission's findings included that:

- Workplace relations regulation may need to be reviewed to accommodate new categories of employment that develop from digital disruption; and

² Internal Suncorp research, *Suncorp SME vs Me Report*, June 2017 – see media release (5 June 2017) online at <https://www.suncorp.com.au/about-us/news/media/business-owners-sme-over-me.html>.

³ OECD, *Policy Brief on the Future of Work – Automation and Independent Work in a Digital Economy*, May 2016, page 3. Available online at <https://www.oecd.org/els/emp/Policy%20brief%20-%20Automation%20and%20Independent%20Work%20in%20a%20Digital%20Economy.pdf>.

⁴ Ibid.

⁵ Productivity Commission, *Digital Disruption: What do governments need to do?*, June 2016.

- Governments may need to review income support systems “to ensure that it is not a barrier to workforce engagement and helps reduce income volatility for low income workers.”⁶

Suncorp would support reforms aimed at ensuring that workplace relations legislation adapts to the changing nature of work that may result from the increasingly digital economy.

Digital disruption is already leading to change in many industries, and an acknowledgement that ongoing learning is a necessary aspect of the future work environment. Global research by Infosys during 2016 found that a majority of young people already acknowledge that they will be required to learn new skills throughout their working lives – with 87 per cent of Australian respondents agreeing with this statement.⁷ This research found that not only do young people consider that formal education has not (or will not) equip them with necessary skills for their career, they view new skills and training as necessary throughout their lifetime.⁸

State governments, such as Victoria, have announced programs to help prepare future generations for employment in an increasingly digital and changing economy. As well as the teaching of science, technology, engineering and mathematics (STEM) as part of the primary and secondary school curriculum, these programs include development of ‘soft’ skills that will be required in an environment of change, such as resilience, critical thinking, creativity and problem solving.

Suncorp welcomes these moves and encourages the Federal Government to continue to support these and similar strategies, including through the National Innovation and Science Agenda. In particular, government should:

- Increase funding for programs that promote and develop STEM skills, particularly those in primary and secondary schools; and
- Continue to support programs – at all levels of education, from primary through to post-graduate – that provide training in ‘soft’ skills that will be required as part of the transition to, and as part of, a digital economy.

Suncorp also calls on the Government to support business and the current workforce to develop greater digital skills, including by:

- Supporting retraining of workers from traditional manufacturing and other industries that are increasingly being automated, including for redeployment in advanced manufacturing industries;
- Supporting programs that facilitate collaboration between industry and training providers (including universities) on emerging areas; and
- Working with industry to provide access to ongoing education and skills training that the workforce will need as digital disruption affects the economy.

Innovation outpaces regulatory reform

Australia’s ability to take advantage of the economic opportunities presented by digital transformation is reliant on government providing a regulatory and economic environment that drives reform where it will unquestionably benefit consumers and the economy, as well as encouraging the private sector to continue innovation in response to market-led demand. This requires government and regulators to be able to act quickly to remove any barriers that may prevent new technologies or products from providing benefits to consumers. This issue was highlighted by the Productivity Commission’s view on the need for regulatory frameworks to become more adaptive in response to digital disruption:

“There are compelling grounds for regulation, for example to reduce information asymmetries, limit abuse of market power, address externalities (such as pollution), or achieve social goals. But regulation can explicitly or indirectly hinder the development and adoption of some technologies, or intentionally or

⁶ Ibid, Finding 3.2.

⁷ Infosys, *Amplifying Human Potential – Education and Skills for the Fourth Industrial Revolution*, 2016, p23. Available online at <http://www.experienceinfosys.com/humanpotential>

⁸ Ibid.

unintentionally restrict how an activity is undertaken. It can also protect incumbent firms from competition. Getting the most from technological change requires an adaptive regulatory approach.”⁹

Our experience has been that the pace of development and disruption is significantly faster than the pace of regulatory reform. We would support measures to ensure that government and regulators are able to move faster to ensure that opportunities – for both consumers and business – are not lost because of delays in regulatory adaptation to support new products and business models.

Suncorp agrees with the comment contained within the Issues Paper that new and innovative products can result in a “*regulatory grey area*”¹⁰ and that the existing regulatory framework can inhibit innovative products that would result in benefits to consumers. When presented with new products that fall into the grey area, we would encourage government and regulators to adopt an approach that permits innovative products to operate while necessary regulatory amendments are made – provided that the regulator is satisfied that adequate consumer and other protections are in place.

Further, as noted in our initial submission to consultation regarding the Banking Executive Accountability Regime,¹¹ increased regulatory measures and associated penalties (such as created under BEAR) can result in a risk-averse mindset, stifling innovation. When developing the Digital Economy Strategy, and in future policy initiatives across all portfolios, government should be careful to ensure that any regulation does not inhibit innovation – whether by start-ups, SMEs or larger businesses.

In relation to SMEs, our *SME vs Me Report* found that 21 per cent of SME owners find meeting legal and regulatory requirements a challenge that prevents them from achieving their business goals, with nine per cent of respondents stating that meeting these requirements were the biggest challenge faced by their business. Significantly, SME owners who are confident of meeting their 12-month business goals rated legal and regulatory requirements as their second-highest challenge (after finding new customers/clients).

Suncorp strongly encourages the Government to continue efforts to decrease the regulatory burden on businesses of all sizes, enabling them to continue innovating, be more agile and to take advantage of opportunities that the digital economy will create.

Digital-friendly regulation

The Issues Paper notes that digital transformation is enabling new, technology-focussed entrants into traditional industries such as healthcare, banking and retail, and questions whether traditional sector-based regulation remains appropriate.¹² Suncorp does not consider that sector-based regulation is inhibiting innovation, other than where there may be duplication of reporting to different regulators, or where there may be conflict between sector-based regulations – for example, a provider of health insurance that is subject to both financial services regulation as well as health insurance regulation. We encourage government to ensure that regulation is ‘technology-neutral’ and is flexible enough to cover both traditional and digital operations in relevant sectors, rather than creating additional requirements for digital operations.

Our experience has been that existing regulation sometimes does not facilitate the community’s increasing preference for digital communications. For example:

- The *Insurance Contracts Act* requires insurers to provide individual customers with written notice or documents personally, or to their last-known address¹³, regardless of whether there has been electronic correspondence regarding the same issue.¹⁴ Despite the increasing level of digital interaction between insurers and their customers, Australia Post’s recent decision to reduce the frequency of mail delivery means that insurers now risk non-compliance with the timeframe for hard copy correspondence required by the Act.

⁹ Productivity Commission, *Digital Disruption: What do governments need to do?*, June 2016, p98.

¹⁰ Issues Paper, p7.

¹¹ 3 August 2017, available online at <https://treasury.gov.au/consultation/c2017-t200667/>.

¹² Issues Paper, p16.

¹³ *Insurance Contracts Act 1984* (Cth), section 72A.

¹⁴ Note to *Insurance Contracts Act* section 72A – correspondence “*may also be given to a person by electronic communication*” (underline added).

- ‘Analog legislation’ is also a problem at a state level. Recently the NSW Government announced that all small businesses would be exempt from stamp duty on insurance products. Although Suncorp supported this decision, as it will improve insurance coverage and reduce operating costs for small business, unfortunately to apply the exemption the legislation required insurers to receive written declarations from applicants confirming they were a small business. This requirement caused much frustration for customers and significant cost for insurers. To the NSW Government’s credit, the legislation was later amended to give the public service discretion to allow other modes of communication, however an earlier focus on a ‘digital-friendly’ approach would have avoided this unnecessary complication.

To avoid these scenarios, Suncorp recommends that government (at all levels) initiate a legislative maintenance program to ensure that regulatory requirements are ‘digital-friendly’, permitting electronic communication and compliance in all available circumstances. While a decision to focus on digital communication can require business to make initial expensive capital investments, legislation should provide business with that choice. Legislative maintenance of this type should not alter the intent of legislation and regulation (although it could be included in broader proposals for reform), rather it would seek to address only the format of communication and disclosure requirements. Such a program will ensure that the regulatory environment provides for digital-only economic activity, and would likely increase compliance by providing customers and businesses with the most user-friendly method of communication.

Fintech Regulatory Sandbox

Suncorp welcomes the Government’s intended legislative changes to enhance the fintech regulatory sandbox (administered by ASIC). However, we note that the opportunities for encouraging fintech development, provided by the sandbox have so far not had a high utilisation by start-ups. While Australia is producing an ever-increasing number of successful fintech start-ups, we believe that government can take further steps to both increase support and improve opportunities for consumers to take advantage of the benefits of new and innovative fintech start-up products. Regulatory changes that could be considered include:

- Allow fintech start-ups partnering with AFSL holders to access the regulatory relief provided through the sandbox, by relaxing (if not removing) the restriction on bodies corporate associated with AFSL holders from accessing the sandbox;
- Encouraging development and testing of new and innovative products, by allowing existing AFSL holders to access the regulatory relief provided through the sandbox;
- Improving a start-up’s ability to test a product at scale, by increasing the limits on the number of retail clients and consumers for each financial service or credit activity undertaken through the sandbox;
- Promoting greater innovation and the ability to test multiple products simultaneously, by relaxing the proposal that breach of exemption conditions for one product being tested will automatically terminate exemptions provided for other products being tested by the provider; and
- Allowing new products to be refined and tested in new markets, by relaxing (if not removing) the restriction on eligibility for regulatory relief regarding a product if the provider (or a related body corporate) has previously tested a product of the same type within the sandbox.

It is also important to note that innovation within the financial services sector is not solely the domain of the start-up community. Incumbents, such as Suncorp, are spending significant resources to drive innovation in financial services and need the flexibility to deliver new untested products. Governments should be careful not to focus too heavily on facilitating the start-up community without acknowledging established companies’ vast experience, along with their imperative and desire to innovate. Governments should ensure that there is competitive neutrality reflected in government policy to encourage product development in both start-ups and incumbents.

Data Sharing

Government can assist the private sector by promoting the use of open data. The *EY/Fintech Australia Fintech Australia Census 2017* found that 85 per cent of respondents (participants in the fintech industry) agreed that government mandated open data protocols would be effective.¹⁵ Suncorp supports greater access to data where there are demonstrable benefits and protections for consumers.

Greater access to public sector data would enable the private sector to drive innovative product development, more accurately implement risk-based pricing, and help educate customers about risk.

The Issues Paper notes that the Government has commissioned Treasury to review implementation of an open banking regime. Suncorp supports the introduction of such a regime but endorses the views made by the Australian Bankers' Association in its submission to that review.¹⁶ We specifically note the ABA's view that any open banking regime must be supported by an economy-wide framework that supports data sharing "*across the economy with minimum standards on customer protections like privacy, liability and security*"¹⁷, and that developments like open banking will result in further innovation that benefits customers, albeit driven by customer demand rather than government policy.¹⁸

Similarly, there is also a role for government, at all levels, to play by using technology to reduce the compliance burden on businesses (regardless of size). Suncorp welcomes ASIC's engagement with regtech businesses and considers that increased support for digitally-assisted compliance will have significant economic benefits for the broader economy, as well as providing government with improved processes and more detailed data and with greater frequency. Further, where businesses provide information to one government department or agency as part of its compliance, that data should be able to be shared with other departments or agencies rather than the business being required to provide the same information again as part of multiple compliance regimes.

Government at all levels can also demonstrate leadership by adopting a digital-first approach in its interactions with Australians, particularly with business. Greater digital interaction with government would promote digital capabilities and lead to accelerated digital take-up across the economy – particularly by SMEs that may not yet be aware of how digital operations could help their business.

Privacy and Security

Suncorp acknowledges that greater use of digital technology can raise concerns around privacy and security of information, and supports efforts to ensure that consumer concerns about privacy are a key focus of all reforms. However, we consider that existing privacy laws are drafted in a manner that sufficiently covers electronic information and should not require significant amendment to address increased digitisation of economic activity.

Further, the introduction of open data across the economy in 2018 will provide the public with greater power to transfer their data between organisations and with increased control over how their information is shared. Recent Galaxy research found that Australians place greater trust in banks to securely manage personal data than government agencies,¹⁹ demonstrating that current privacy regulation in the private sector is sufficient.

We encourage government to continue to support business and the public to have greater awareness of cybersecurity risk, continue advising Australian business on potential threats, and support both Australian and other cybersecurity firms to provide solutions to increasing cybersecurity needs as digital transformation in the economy continues to occur.

¹⁵ EY Fintech Australia Census 2017, p19. Available online at

<https://fintechauscensus.ey.com/2017/Documents/EY%20FinTech%20Australia%20Census%202017.pdf>

¹⁶ Australian Bankers' Association, Submission to Treasury *Review into open banking in Australia* (22 September 2017), Available online at https://static.treasury.gov.au/uploads/sites/1/2017/09/c2017-t224510_ABA.pdf

¹⁷ Ibid, p2.

¹⁸ Ibid, p3.

¹⁹ Cited in Australian Bankers' Association media release "*Open banking a big win for consumers*", 21 November 2017. Available online at <https://www.bankers.asn.au/media/media-releases/media-release-2017/open-banking-a-big-win-for-consumers>.

Vulnerable customers and inclusion

With the transition to the digital economy there is increased risk that vulnerable Australians who are excluded from digital access will also become excluded from essential services and from the opportunities the new digital economy brings.

According to the Australian Digital Inclusion Index, about 3 million Australians are not online, and the gaps between digitally included and excluded Australians are substantial. But digital inclusion in Australia is improving.

Suncorp is playing its part in supporting vulnerable customers, through the [Financial Inclusion Action Plan](#) program, conducted in partnership with the Australian Government and Good Shepherd Microfinance. Through our Financial Inclusion Action Plan Suncorp has been able to take real action to enable financial inclusion and access to affordable financial products and services, and thereby support greater equality, inclusive growth and resilient communities.

Suncorp is also a founding member of the cross-sector [Thriving Communities Partnership](#) – a collaboration ensuring that everybody has fair access to the modern essential services they need to thrive in contemporary Australia, including utilities, financial services, telecommunications and transport. The Thriving Communities Partnership aims to build more resilient community and stronger businesses.

It is important that policy makers, business and education sectors continue to:

- Support initiatives focused on improving digital ability for vulnerable Australians;
- Support regional initiatives that tackle the geographic and social challenges of digital inclusion;
- Monitor digital and essential services affordability and its effects, especially in relation to digitally excluded Australians on low or fixed incomes; and
- Ensure the websites of essential service providers and government agencies are accessible and easy to navigate for mobile-only internet users.

Conclusion

Suncorp looks forward to continuing engagement with the Government to ensure that digital transformation provides the best possible outcomes for consumers, while supporting innovation and opportunities for the Australian economy. Should you have any questions or require further information, please do not hesitate to contact Lachlan Rees, Senior Advisor Government, Industry and Public Policy on (03) 8681 9509 or by email to lachlan.rees@suncorp.com.au.

Regards,



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CEO Customer Marketplace