



Retail Insurance in Northern Ireland

February 2018

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1. Executive Summary

- 1.1 The Consumer Council has undertaken a review of some of the issues that exist in the Northern Ireland (NI) retail insurance market. The research considers common forms of insurance taken by consumers, where the issues in the NI market differed from Great Britain (GB). Home, motor, travel and health insurance are common issues and have been given specific focus. The research has been undertaken by The Consumer Council as part of a wider project into NI financial services. The project's aim is to identify areas of notable difference with GB, gaps in knowledge, consumer detriment and areas for future policy focus in NI's financial services.

Main Findings

- 1.2 There are many positives about the NI insurance market. The significant broker network ensures greater access to qualified advice, and high coverage in NI for home contents insurance. Furthermore, NI specific insurers and price comparison websites (PCW) are able to understand the nuances of the market to the benefit of consumers. However The Consumer Council also holds some concerns for the NI insurance market.

Home Insurance

- 1.3 There is a disparity in home contents insurance cover between the overall NI population and those who are Northern Ireland Housing Executive (NIHE) tenants, who may be on a lower income. Only 26% of NIHE tenants have contents insurance¹, compared to 87% of all NI households². NI has the highest proportion of people of any United Kingdom (UK) region with low levels of savings, with 56.8% of the NI adult population having savings of under £100³. The high numbers of people with low savings in NI adds further to the concern that people are not financially prepared for unexpected costs.

¹ https://www.nihe.gov.uk/ctos_2015_main_report-3.pdf

² <https://www.abi.org.uk/globalassets/sitecore/files/documents/publications/public/2013/industry-data/household-spending-on-insurance-tables.xlsx>

³ <https://www.statista.com/chart/6219/half-uk-adults-less-than-%25C2%25A3100-savings/>

Motor Insurance

- 1.4 A number of insurers based in GB opt not to operate in the NI motor insurance market, creating less competition and more expensive premiums. Covea, AIG and esure do not offer car insurance in NI⁴. Royal and Sun Alliance (RSA) in 2014 withdrew from the NI broker market⁵. Aviva, the largest UK insurer, stated in 2014 they ‘*carried out a very small amount of [motor insurance] business in Northern Ireland*’⁶.
- 1.5 The cost of claims is also higher in NI. The average range for minor whiplash claims⁷ is **£3,765 - £6,183** in NI compared to **£1,917 - £3,960** in GB⁸. Furthermore, while 3.3% cars in the UK are located in NI, personal injury awards in NI amounted to 5.5% of the UK total⁹.
- 1.6 Attempts to lower motor insurance premium prices have not worked and previous recommendations have not been implemented. Reforms in the courts process in NI are needed to bring down claim costs. The resulting changes from GB court reforms brought about by the introduction of the Legal Aid, Sentencing and Punishment of Offenders Act 2012 (LASPO) led to a reduction in premium costs in GB of 14% in the 18 months following its introduction¹⁰. LASPO has not been introduced into NI.

Travel Insurance

- 1.7 There is lower uptake of travel insurance in NI. In the UK, 24% of people do not have travel insurance¹¹; in NI the figure is 35%¹². The average cost of a medical claim on a

⁴https://assets.publishing.service.gov.uk/media/5329dee940f0b60a760002be/130816_customer_survey_tables.pdf - Derived from Table 11 – S11; <https://piba.ie/system/files/999/original/motor-insurance-presentation.pdf?1473253153>

⁵ <https://piba.ie/system/files/999/original/motor-insurance-presentation.pdf?1473253153>

⁶https://assets.publishing.service.gov.uk/media/5329dee3e5274a22680002f5/130628_wp21_survey_report.pdf

⁷ Minor whiplash claims refer to injuries with moderate systems and where recovery is expected in one year.

⁸ <https://piba.ie/system/files/999/original/motor-insurance-presentation.pdf?1473253153>

⁹ http://www.consumercouncil.org.uk/images/uploads/languages/APG_on_Motor_Insurance.pdf

¹⁰ Ibid

¹¹ <https://abta.com/about-us/press/numbers-travelling-abroad-uninsured-on-the-rise>

¹² http://www.consumercouncil.org.uk/filestore/documents/CC_Travel_Insurance_FINAL.pdf

travel insurance policy is £900¹³. People are being left uninsured and open to significant detriment if anything goes wrong on holiday.

- 1.8 It is highly likely that people identified as 'high risk' by insurers may not be getting the required cover for their needs. People with medical conditions will often be better served by seeking specialist advice from a qualified insurance broker rather than effectively 'self-advising' through a PCW. As only 7% of travel insurance policies were purchased through a broker in NI¹⁴, not many people are seeking professional advice.

Health Insurance

- 1.8 The largest provider of UK private health insurance BUPA has withdrawn from all NHS hospitals in NI¹⁵, citing lack of medical negligence cover and an insufficient level of service wanted by its customers. The implication of the announcement means that BUPA customers in NI who require an intensive care bed after surgery, routine cardiac surgery, scans to grade cancer and operations to tackle obesity will have to travel to England to receive treatment¹⁶. BUPA are working towards a resolution but at the time of writing the issue still remains.

Cross-Insurance Issues

- 1.9 Common issues in all four insurance markets reviewed have been addressed as 'cross-sector issues'. A lack of data is inhibiting the NI insurance market. The Association of British Insurers (ABI), the Competition and Markets Authority (CMA) and Consumer Intelligence have all published UK regional insurance analysis that leaves NI as the only excluded UK region. These studies will be used by insurers in their premium pricing models alongside their own internal research. NI being a missing UK region will create inaccurate pricing in the NI market.

¹³ <https://www.abi.org.uk/news/industry-data-updates/2013/07/travel-insurance-statistics-update/>

¹⁴ http://www.consumercouncil.org.uk/filestore/documents/CC_Travel_Insurance_FINAL.pdf

¹⁵ <https://www.belfasttelegraph.co.uk/news/health/bupa-pulls-out-of-every-northern-ireland-nhs-hospital-36313089.html>

¹⁶ Ibid

- 1.10 Whilst not specific to NI, the increased use of PCWs may mean that some consumer needs are not being met. Research shows that many consumers think that PCWs identify the correct policy for their needs, in effect an ‘auto-advised’ service, which is not the case¹⁷. PCWs show consumers the policies they are eligible for. PCWs do not offer a ‘whole of market’ service and several insurers choose not to operate on them.
- 1.11 The Consumer Council will ensure appropriate bodies and elected representatives are provided with the evidence outlined in this report, in order to support and equip them to fully address the issues highlighted for NI consumers.

¹⁷ <https://www.fca.org.uk/publication/research/price-comparison-website-consumer-research.pdf>

2. Methodology

Aim

- 2.1 The aim of this research is to understand the issues that exist in commonly held insurances by consumers in NI.
- 2.2 In order to achieve this aim, the research considered common forms of insurance taken by consumers, where the issues in the NI market differ from GB. In the course of the research into the broader NI insurance market, home, motor, travel and health insurance came up commonly and has been given specific focus. Where issues were commonly identified across many insurance types, including these four specific areas of focus, they have been tackled as 'cross-sector issues'.

Method

- 2.3 Where possible the research has sought to compare NI to other regions within the UK, to have a benchmark for comparison and to determine if a bespoke approach to NI needs to be considered.
- 2.4 The research has primarily used secondary research sources. In this approach, areas have been found where there appears to be a gap in publically available research. This has been highlighted in the text and may be considered by The Consumer Council for future research.
- 2.5 The research has sought the views of many organisations in the course of the work. The seeking of views has come in the form of data requests and where possible meetings with organisations that operate in the NI insurance market. These meetings were not meant to be recorded opinions but an opportunity for organisations to give their views of the market they operate within. Where views have been expressed, the research has sought data to verify.
- 2.6 The Consumer Council hosted a roundtable discussion on behalf of the Financial Conduct Authority (FCA) in September 2017. The discussion was attended by

representatives from the NI insurance industry, NI consumer groups and the FCA. Some of the views expressed in this discussion formed part of the initial scoping for travel insurance.

- 2.7 No view expressed to The Consumer Council in the course of the research has been included in the final report. This has been to maintain the neutrality of the work and to avoid conjecture being considered as fact.

3. Home Insurance

- 3.1 Home insurance is a general term used to describe two different types of insurance. Buildings insurance is for the rebuilding cost of the structure of the property and permanent fixtures and fittings, like kitchens and bathrooms. Contents insurance is for items kept in homes such as furniture, TVs and personal belongings. Consequently, when studies refer to 'home insurance' it can be slightly misleading.
- 3.2 People in NI are no more or less likely to make an active purchase of 'home insurance' than the rest of the UK. 52% of people in NI made an active purchase of home insurance in 2015¹⁸, compared to a UK average of 50%¹⁹. As the study refers to the making of an active purchase, it is more of a reflection of changing suppliers than of overall coverage.
- 3.3 There is a significant disparity in the coverage of contents insurance. NIHE undertake an annual survey which asks if the tenants have their contents insured. Whilst 87% of people in NI have contents insurance²⁰, only 26% of NIHE tenants do²¹.

Chart 1 – 2015 content insurance of NIHE tenants²²

Are the contents of your house insured?	No. of Households	% of Households
Yes	22,550	26.3%
No	59,760	69.8%
Don't Know	3,329	3.9%
Total	85,639	100.0%

Source: NIHE, Tenants Omnibus Survey 2015

¹⁸ <https://www.statista.com/statistics/501583/united-kingdom-financial-products-personally-purchased-share-of-adults/>

¹⁹ <https://www.statista.com/statistics/501668/northern-ireland-uk-financial-products-personally-purchased/>

²⁰ <https://www.abi.org.uk/globalassets/sitecore/files/documents/publications/public/2013/industry-data/household-spending-on-insurance-tables.xlsx>

²¹ https://www.nihe.gov.uk/ctos_2015_main_report-3.pdf

²² Ibid

3.4 Buildings insurance is often a pre-requisite to obtaining a mortgage and as such uptake is high. Contents insurance is not a compulsory insurance so uptake can be variable. Of the UK regions, NI has the lowest cost and highest uptake of contents insurance²³.

Chart 2 – 2013 cost and coverage of contents insurance in the UK²⁴

Region	Contents	
	£	%
North East	151	70.9
North West	162	73.3
Yorkshire & The Humber	168	79.0
East Midlands	150	80.0
West Midlands	162	76.0
Eastern	174	80.7
London	240	57.1
South East	181	81.9
South West	164	83.2
England	172	76.1
Wales	161	78.0
Scotland	151	77.2
Northern Ireland	126	87.0
United Kingdom	170	76.4

Source: ONS Cost of Living Survey 2013

3.5 Whilst 27% of NIHE tenants chose not to have their contents insured due to cost, 68% of tenants said they either did not think it was needed or they had not got round to it (Chart 3). Not being insured for contents could leave people with unexpected costs.

²³ <https://www.abi.org.uk/globalassets/sitecore/files/documents/publications/public/2013/industry-data/household-spending-on-insurance-tables.xlsx>

²⁴ Ibid

Chart 3– Reasons for NIHE tenants not insuring home contents - 2015²⁵

Why have you not insured your home contents?	No. of households	% of Households
Not got round to getting insurance	28,396	47.5%
Quotes received were too expensive	15,974	26.7%
Don't think I will need insurance	11,960	20.0%
Don't know how to get insurance	1,430	2.4%
Other	2,001	3.3%

Source: NIHE, Tenants Omnibus Survey 2015

3.5 Previous Consumer Council research has highlighted that NI has the lowest proportion of people with savings under £100 in the UK²⁶. The NIHE research further highlights that many people are not taking steps to guard against unexpected costs.

²⁵ https://www.nihe.gov.uk/ctos_2015_main_report-3.pdf

²⁶ Consumer Council – NI Debt

4. Motor Insurance

4.1 The motor insurance market in NI has been heavily researched in recent years, including the following publications:

- **‘Quote...Unquote – The cost of insurance in Northern Ireland’** – The Consumer Council, March 2009.
- **‘The Cost of Insurance in Northern Ireland’** – Research and Library Service Paper for the NI Assembly, June 2010
- **‘Private Motor Insurance (PMI) Investigation’** – Competition and Markets Authority, 2014 – Specific focus on NI in Appendix 5.4
- **‘Northern Ireland Assembly’s All Party Group on Motor Insurance’** – Report prepared by The Consumer Council, March 2016

4.2 The different pieces of research have had different focuses, but all have drawn similar conclusions; that the market suppliers are in many cases different and policy premiums are more expensive in NI compared to other UK regions. The 2014 CMA PMI investigation agreed that the NI market was sufficiently different from the UK market that a separate assessment was conducted²⁷. The final paper stopped short of calling the NI market separate stating:

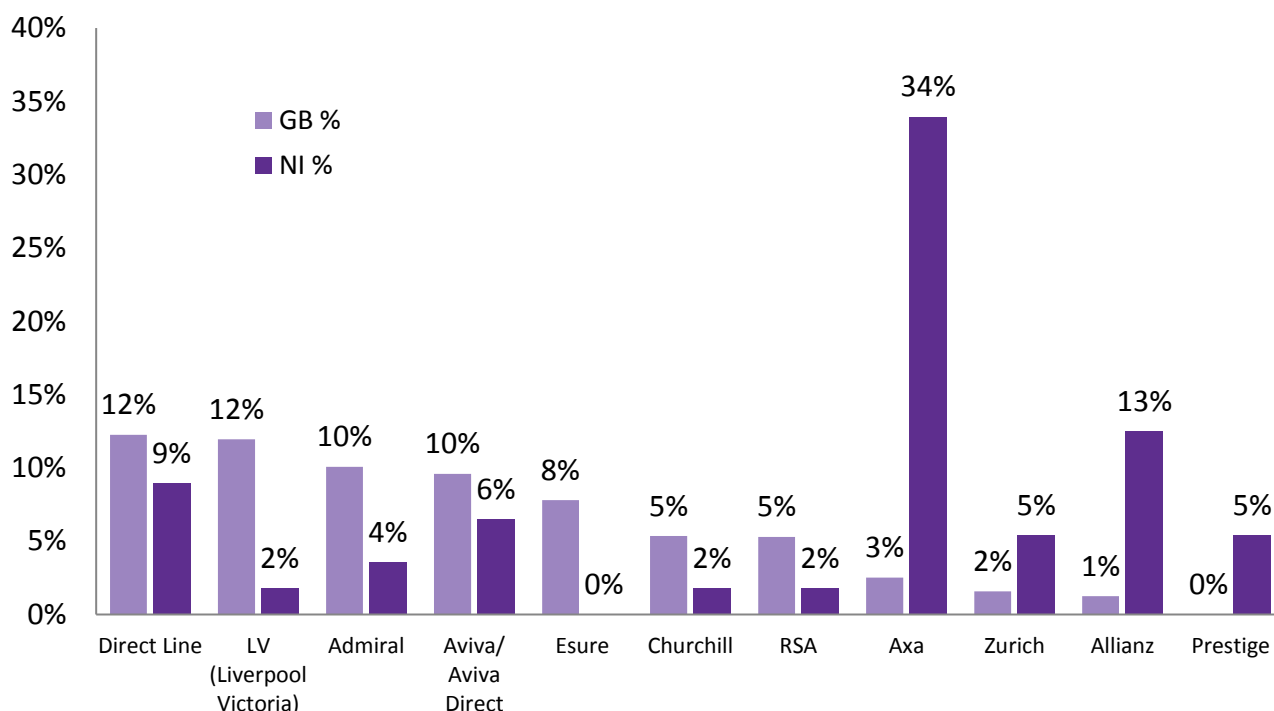
‘We saw some reasons for considering that competition in Northern Ireland operated differently from the rest of the UK ...We did not reach a final view on whether there was a separate PMI market in Northern Ireland.’

4.3 The market share figures from the CMA report show that Axa is the dominant car insurance provider in NI. Axa held approximately 34% of the car insurance market in

²⁷ <https://www.gov.uk/government/news/cma-sets-out-changes-for-private-motor-insurance>

NI in 2014 compared to 3% in GB²⁸. It should be noted that in 2016, Axa considered their own market share to have fallen to 27%²⁹. Furthermore, the two biggest underwriters of car insurance in NI, Axa and Allianz operate as all Ireland operations. Axa Ireland and Allianz Ireland are separate entities respectively from Axa UK and Allianz UK³⁰.

Chart 4 - GB vs. NI Car Insurance Market Share 2014³¹



Source: CMA Private Motor Insurance 2014

4.4 Regional specific underwriters give further rise to differences between the NI and GB car insurance markets. Insurers such as Prestige only operate in NI. GB based insurers Covea (parent company of Swinton Insurance), AIG and e-sure (parent company of e-sure and Sheila's Wheels) insurers do not offer car insurance in NI³². Since the 2014 CMA report, RSA have also pulled out of the NI broker market³³, which they had

²⁸https://assets.publishing.service.gov.uk/media/5329dee940f0b60a760002be/130816_customer_survey_table.pdf - Derived from Table 11 – S11

²⁹<https://piba.ie/system/files/999/original/motor-insurance-presentation.pdf?1473253153>

³⁰<https://www.axani.co.uk/>; <http://www.allianzni.co.uk/>

³¹https://assets.publishing.service.gov.uk/media/5329dee940f0b60a760002be/130816_customer_survey_table.pdf - Derived from Table 11 – S11

³²Ibid

³³<https://piba.ie/system/files/999/original/motor-insurance-presentation.pdf?1473253153>

previously stated made up 60% of their presence in the NI market³⁴. Aviva, who are one of the biggest providers of car insurance in GB, stated in 2014 that they '*carried out a very small amount of business in Northern Ireland*'³⁵.

- 4.5 Several insurers told the 2014 CMA PMI investigation that a lack of previous underwriting experience was a bigger barrier to entry in NI than it was in the rest of the UK. Some of the other differences include lower switching rates, where 45% in NI stayed with the same insurer compared to 30% in England³⁶.

Purchase method

- 4.6 People in NI were more likely to have purchased their motor insurance in person (23% in NI versus 7% in the UK), and by telephone (49% in NI versus 42% in the UK) and less likely to have purchased online (20% in NI versus 46% in the UK). If purchased by phone, NI consumers were more likely to have purchased via a broker (56% in NI versus 31% in the UK) and less likely to have purchased direct from an insurer (41% in NI versus in the 60% UK). If purchased online, those in NI were less likely to have purchased via a PCW (53% in NI versus 72% in the UK)³⁷.
- 4.7 In 2014, fewer policies were bought online in NI than in the UK as a whole, suggesting that PCW use may also be lower. Conversations had in the course of this research with NI insurers and brokers suggested that the use of PCWs in NI is growing and its use as a purchase method is becoming similar to that of GB. It may be that NI has simply lagged behind in this development rather than being fundamentally different.

Cost

- 4.8 The cost of car insurance in NI is also higher than all other UK regions except Granada³⁸:

³⁴https://assets.publishing.service.gov.uk/media/5329dee3e5274a22680002f5/130628_wp21_survey_report.pdf

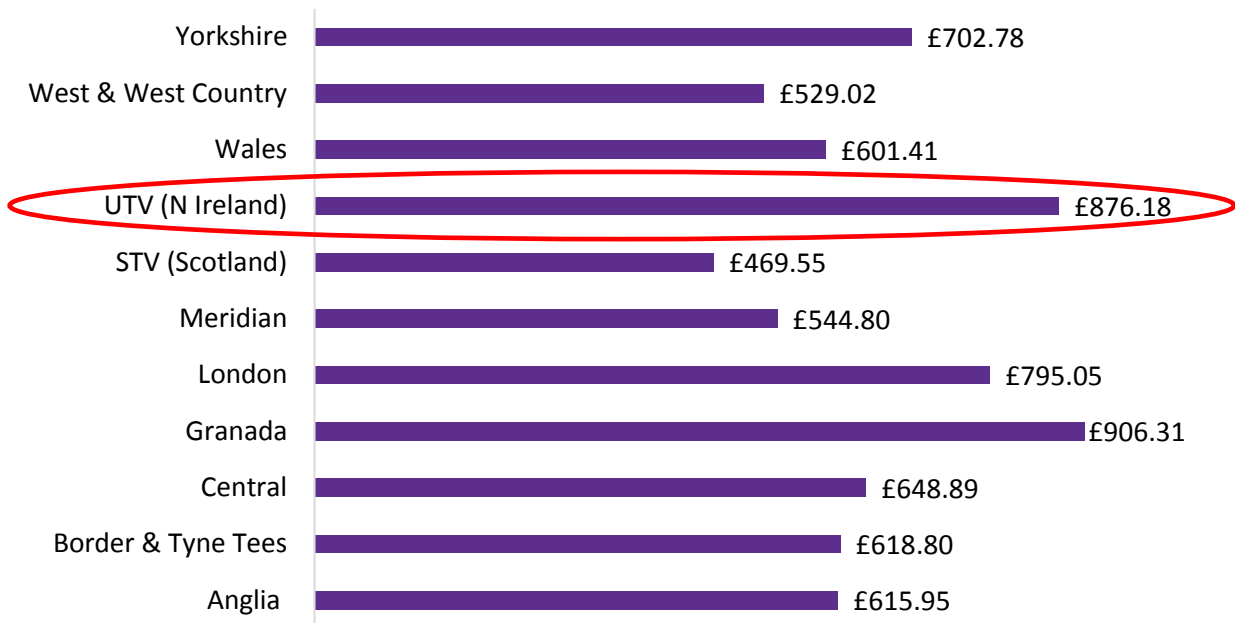
³⁵[Ibid](#)

³⁶[Ibid](#)

³⁷[Ibid](#)

³⁸ AA has labelled UK regions based on how these regions are split for TV coverage.

Chart 5 – Q1 2017 – Average UK Car Insurance Premium³⁹



Source: AA – *Regions split by television coverage*

- 4.9 In 2016, the NI Assembly published their All Party Group (APG) report on motor insurance. Part of the work focused on why costs were higher in NI than other UK regions. One of the primary reasons given is the higher claims costs which are driven by more accidents. Department for Regional Development (DRD) figures show that in 2013 there were 502 road traffic collision casualties per 100,000 of the population in NI compared with 304 per 100,000 in England⁴⁰.
- 4.10 A further reason for higher premium costs are higher amounts paid out on key claim issues such as whiplash. Whiplash claims make up 20% of all UK claims⁴¹. The average range for minor whiplash claims is **£3,765 - £6,183** in NI compared to **£1,917 - £3,960** in GB⁴². In 2014, 3.3% of cars in the UK were located in NI, but personal injury awards in NI amounted to 5.5% of the UK total⁴³. It is of note however that there are fewer

³⁹ <http://www.theaa.com/about-us/newsroom/insurance-news/car-home-insurance-news-2017-q-1>

⁴⁰ http://www.consumercouncil.org.uk/images/uploads/languages/APG_on_Motor_Insurance.pdf

⁴¹ Ibid

⁴² <https://piba.ie/system/files/999/original/motor-insurance-presentation.pdf?1473253153>

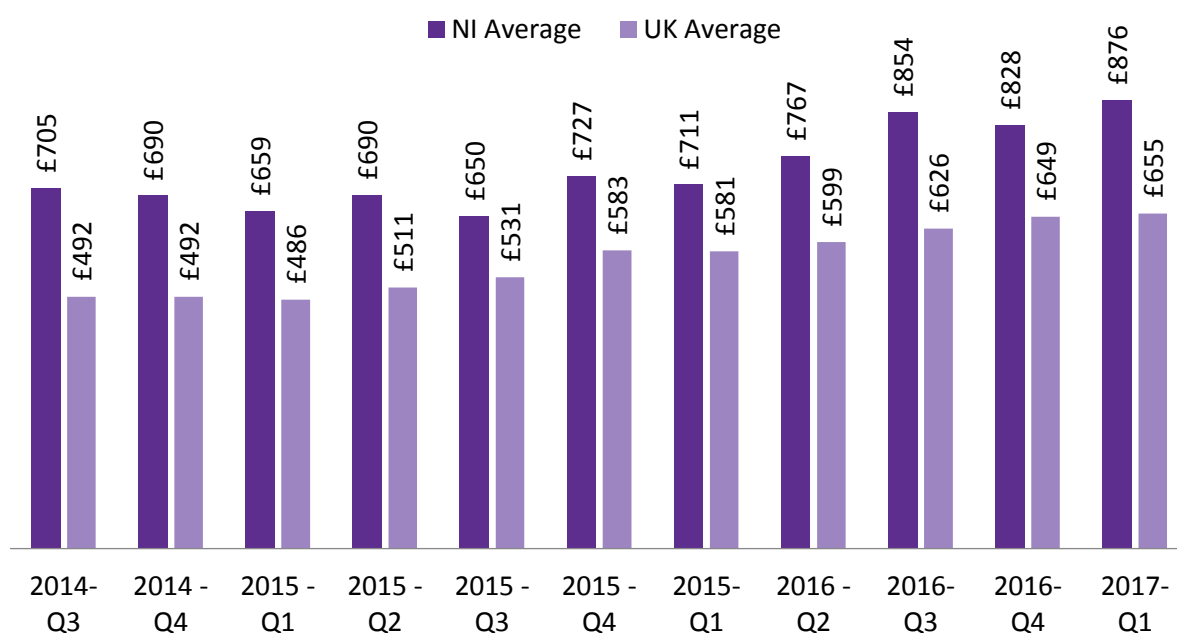
⁴³ http://www.consumercouncil.org.uk/images/uploads/languages/APG_on_Motor_Insurance.pdf

personal injury claims in NI. In 2014, there was 125 personal injury claims per 10,000 in NI whereas in England and Wales the figure was 148 per 10,000⁴⁴.

4.11 Both LV= and First Central told the CMA PMI investigation that, *'because NI was a small market, claims costs could be volatile'*. Aviva told the CMA PMI investigation that *'its business in NI had had unpredictable results, with some large claims'*.

4.12 The 2016 APG on motor insurance also acknowledged that *'fewer insurance companies [are] operating in NI than elsewhere'*. As referred to previously, multiple GB insurers do not offer car insurance in NI. A lack of competition has the potential to increase costs for consumers. In addition to premiums in NI being more expensive than other parts of the UK, the cost of insurance is also on the rise.

Chart 6 – Cost of Car Insurance in NI 2014 – 2017⁴⁵



Source: AA

4.13 The reasons for increasing premium costs include a cut to the 'Ogden Rate'. The 'Ogden Rate' is the discount rate that is used in the calculation of payments from insurers to personal injury claimants. It is intended to take account of the investment

⁴⁴ 2012 Compensation Recovery Unit figures

⁴⁵ Based on AA figures from Quarter 3 -2014 to Quarter 1 – 2017

return that a claimant would make on a lump sum award so as to ensure an individual is never under- or over-compensated. It is applied by the UK courts to an amount calculated to cover loss of earnings and any care costs for claimants.

4.14 Until early 2017, the Ogden rate had been set for a number of years at 2.5%, meaning (simply) that for every £1,000 of loss award calculated, the insurer would pay out £975 initially. The claimant would then be expected to earn 2.5% interest a year, earning them the full £1000 payment they were due. This rate moved to -0.75% due to the very low (or even negative) then current rates of interest, meaning the same pay out would now be £1,007.50. This has had a significant effect on claim costs, which has been passed through to premium costs. A further cause for rising premium costs is the Government's tax on the insurance industry, the Insurance Premium Tax increased from 10% to 12% in June 2017.

4.15 Evidence given by British Insurers Brokers Association (BIBA) in 2013 as part of the NI APG on motor insurance predicted that *'telematics is likely to play a large part in bringing down future car insurance prices.'*⁴⁶ This has not come to fruition. The rise in the cost of car insurance in NI and the continued price disparity with GB also demonstrates that mitigating strategies outlined in previous research are either not working or are not being implemented. A more proactive approach is needed.

⁴⁶ http://www.consumercouncil.org.uk/images/uploads/languages/APG_on_Motor_Insurance.pdf

5. Travel Insurance

- 5.1 Previous Association of British Travel Agents (ABTA) and Consumer Council research found that in 2013, 24% of people in the UK travelled without insurance⁴⁷, compared to 35% in NI⁴⁸. Not having travel insurance can mean people encounter large unexpected bills abroad. The average cost of a medical claim on a travel insurance policy is £900⁴⁹. The primary reasons for people in NI not being covered are ‘travelling within the UK or Ireland’ (34%), and ‘do not feel it is necessary’ (28%), as opposed to insurance being ‘too expensive’ (5%)⁵⁰.
- 5.2 For many people, travel insurance is not expensive. However for people with pre-existing medical conditions or extenuating circumstances travel insurance premiums can be high. For instance, the average travel insurance premium in 2014 for someone aged 21-25 years old was £20, for someone aged 71-75 years old, average premiums were £80 and for 86-90 year olds premiums were £160⁵¹. Previously insurers have not always been able to identify ‘high risk’ individuals who may be more likely to claim so insurers balanced out the risks by charging everyone a higher premium to fund eventual claims. With improved ‘big data’ it is now possible to segment the markets and better identify high risk individuals.
- 5.3 Those who were likely to have benefitted from lower premiums in the past, as a result of larger risk pools, may now find there are fewer options open to them and that they have to navigate an increasingly complex and confusing market to find insurers willing to cover them.

⁴⁷ <https://abta.com/about-us/press/numbers-travelling-abroad-uninsured-on-the-rise>

⁴⁸ http://www.consumercouncil.org.uk/filestore/documents/CC_Travel_Insurance_FINAL.pdf - Figure quoted as 44%, does not include the 9% of respondents who said their travel insurance was purchased by a partner, leaving total uninsured in NI at 35%

⁴⁹ <https://www.abi.org.uk/news/industry-data-updates/2013/07/travel-insurance-statistics-update/>

⁵⁰ http://www.consumercouncil.org.uk/filestore/documents/CC_Travel_Insurance_FINAL.pdf

⁵¹ <http://www.telegraph.co.uk/finance/personalfinance/insurance/10946133/Travel-insurance-costs-ramped-up-for-older-travellers-even-though-claims-fall.html>

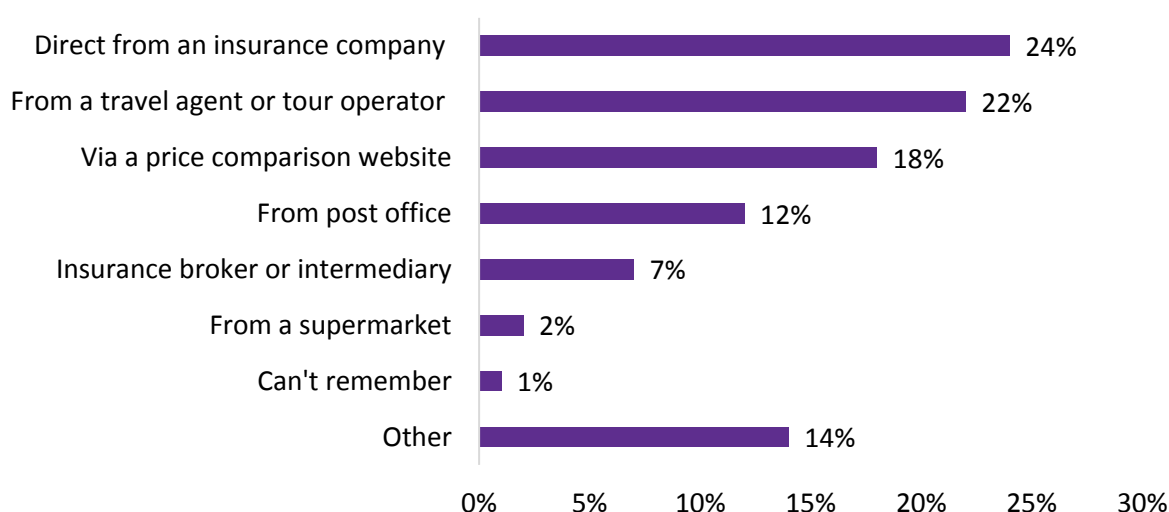
5.4 In September 2017, The Consumer Council hosted a roundtable discussion on behalf of the FCA in NI on access to travel insurance for vulnerable customers. The discussion was attended by representatives from the NI insurance industry and consumer organisations and had a particular focus on access to insurance for people who have cancer or have previously had cancer. This discussion was held in response to the FCA consultation on travel insurance⁵²

5.5 Beside the primary focus of the discussion, it was an important forum where other travel insurance issues were raised:

Method of payment used to purchase travel insurance

5.6 Whereas 52% of car insurance policies are bought through an insurance broker, only 7% of travel insurance is purchased through a broker⁵³. In the roundtable discussion NI consumer groups expressed concern that people who have bespoke insurance needs are not getting bespoke coverage. PCWs are designed to ask as few questions as possible in order to make it easier to compare different insurance products. These questions may not pick up notable characteristics of an individual that should be included in a policy, most notably health issues that could invalidate the policy.

Chart 7 – Method of purchase for Travel Insurance 2013⁵⁴



Source: *The Consumer Council – Insured to Travel, 2013*

⁵² <https://www.fca.org.uk/publications/calls-input/access-travel-insurance-cancer>

⁵³ http://www.consumercouncil.org.uk/filestore/documents/CC_Travel_Insurance_FINAL.pdf

⁵⁴ Ibid

5.7 Travel insurance could be perceived by many as a ‘simple’ form of insurance that does not need advice, however the costs of not being insured can be significant. Previous research by The Consumer Council suggests that people could incur some of the following costs in health issues incurred abroad:⁵⁵

- Acute appendicitis in the USA - £22,000;
- A minor heart attack in the USA - £28,000;
- Breaking a leg in Switzerland - £8,000; and
- Fracturing a hip in Spain - £19,000 (depending on the severity of the break).

5.8 People who have health issues or mitigating circumstances may be better served by specialist insurance advice that PCWs are unable to provide.

The ‘Dublin Issue’:

5.9 A further issue raised was the issue of possibly invalidated travel insurance if a flight is taken from Dublin rather than Belfast on a UK travel insurance policy. The ‘Dublin issue’ is when travel insurance policies state the trip must start from the UK, however for 1.2 million NI passengers a year their flight leaves from Dublin Airport⁵⁶. This means that their initial international bound departure point was not in the UK. The insurance may not therefore pay out if there is an issue with the flight from Dublin. The policy wording would not invalidate the whole insurance policy but may prevent a claim being made on the initial flight.

5.10 In 2014, The Consumer Council conducted a mystery shopping exercise that found several travel insurance policies used wording that still appeared to exclude NI customers from being insured from an outbound flight from Dublin. Examples of policy wording includes:

- *‘If the scheduled departure of the ship, aircraft or train on which you are booked to travel is delayed at the point of international departure for more*

⁵⁵ http://www.consumercouncil.org.uk/filestore/documents/CC_Travel_Insurance_FINAL.pdf

⁵⁶ <https://www.dublinairport.com/latest-news/detail/dublin-airport-grows-ni-resident-business-by-37-in-2015>

*than 24 hours on your **outward journey from the UK**, and you choose to abandon your trip, we will cover you up to the limits shown on your policy.'*

- *'If departure of the scheduled public transport on which you are booked to travel is delayed at the final departure point **from or to the United Kingdom** for at least 24 hours from the scheduled time of departure due to...'*
- *'If after a 12 hour delay to the departure of your **outward journey from the United Kingdom**, you to decide to cancel the trip...'*

5.11 The Consumer Council raised this issue with the FCA in early 2015. The FCA agreed that insurance firms needed to provide clear wording to customers, if there is a risk that they may not be insured for their outbound journey. The FCA wrote to the ABI, ABTA and Association of Travel Insurance Intermediaries (ATII) to ask their members to look at the wording of their policies to ensure clarity. This contact was made by the FCA in January 2015.

5.12 Assessing policy documents in 2017⁵⁷, The Consumer Council has found that many policy wordings are still ambiguous and in some cases the same wording is in place from our initial mystery shopping exercise in 2014. The following are examples of travel insurance policy wording:

- **Axa's** travel insurance policy states that *'Trips outside of the UK must start and end in the UK⁵⁸'* but also says *'You must start each trip from your home or place of business in the UK and return to your home or place of business in the UK at the end of each trip.'* There is no mention of transport departure location in Axa's Key Fact documents⁵⁹.

⁵⁷ Date accessed 28th December 2017

⁵⁸ http://www.axainsurance.com/travel/policy-wording/policywording_210.pdf

⁵⁹ http://www.axainsurance.com/travel/policy-summary/policysummary_210.pdf

- **Aviva's** insurance policy states that *'If the scheduled departure of the ship, aircraft or train on which you are booked to travel is delayed at the point of international departure, we will pay you...for your own unused personal travel and accommodation costs which you have paid or legally have to pay but cannot get back if the delay lasts for more than 24 hours on **your outward journey from the UK**, and you choose to abandon your trip⁶⁰.'*
- **The AA's** insurance policy states that *'If departure of the scheduled public transport on which you are booked to travel is delayed at the final departure point **from or to the United Kingdom** for at least 24 hours from the scheduled time of departure due to...'⁶¹*

5.13 A data request to the Financial Ombudsman Service (FOS) found that in the last few years this issue has not been complained about. Whilst insurers appear at present to be honouring the spirit in which the travel insurance policy is sold, the potential for detriment remains. The request from the FCA to insurance companies to reflect more specifically what parts of a journey would be covered by a travel insurance policy appears not to have been heeded.

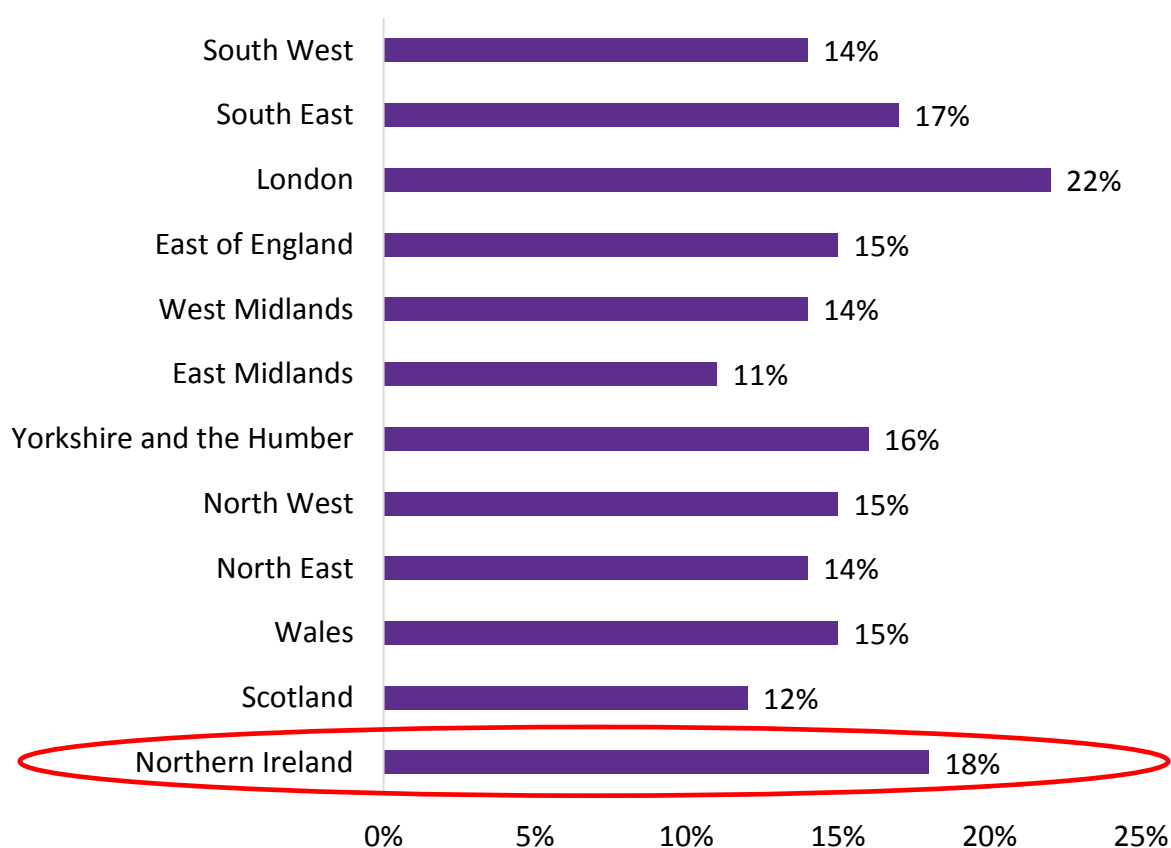
⁶⁰ https://www.aviva.co.uk/content/dam/aviva-public/gb/pdfs/personal/insurance/travel/policy_document_insurance_travel_ntrtg10145_v34_092015.pdf

⁶¹ https://www.theaa.com/resources/Documents/pdf/insurance/aatravelinsurance_policywording_new_sales-09-14.pdf

6. Health Insurance

- 6.1 Private health insurance is not a legal requirement in the same way as car or building insurance is. It is however a high value market. In 2016, £4.83bn was paid in private health insurance premiums in the UK⁶². This compares to £13.4bn for motor insurance and £10.8bn for property insurance⁶³.
- 6.2 NI has relatively high coverage for private health insurance. A 2017 Statista survey put health insurance coverage at 18% of people in NI, compared to 15% in Wales and 12% in Scotland.

Chart 8 - Individuals with private health insurance in the UK 2017, by region⁶⁴



Source: Statista Survey, 2017

⁶² <https://www.laingbuisson.com/press-releases/private-medical-cover-static-face-economic-political-uncertainty/>

⁶³ <https://www.statista.com/statistics/288947/uk-market-total-premiums-breakdown-by-market/>

⁶⁴ <https://www.statista.com/statistics/681534/individuals-with-private-health-insurance-in-the-united-kingdom-by-region/>

6.3 The CMA's 2016 UK Private Healthcare Market Report found that in key areas private healthcare suppliers operated differently in NI from GB⁶⁵. For instance, the majority of GB private healthcare suppliers use an IT system called 'Healthcode'. At the time of the publication of the CMA report in September 2016, no NI private healthcare suppliers operated on this system. Whilst a seemingly innocuous difference, Healthcode data formed a key part of the CMA report. The absence of NI private healthcare suppliers on the system meant that the study was unable to assess patient travelling distances and patient pricing data. Healthcode is described in the CMA report as:

*'An intermediary between private hospitals and insurers. It is used by the majority of providers, including the large private hospitals and insurers.'*⁶⁶

6.4 This difference means that once again insurers are left with an incomplete data set when it comes to NI. This has significant potential to lead to poor outcomes for consumers whose premiums will not be accurately priced to assess their risk.

6.5 In the UK, 90% of the private health insurance market is undertaken by BUPA, Prudential (PruHealth), Aviva and AXA PPP⁶⁷. BUPA is the largest private health insurer in the UK with 42% of the market⁶⁸. In November 2017, BUPA announced that it had withdrawn from all NHS hospitals in NI⁶⁹. BUPA said that, of the five Health and Social Care Trusts in NI, Belfast Trust did not have the medical negligence cover required and the remaining four Trusts did not offer the level of service wanted by its customers. BUPA stated at the time of the announcement that:

⁶⁵ <https://assets.publishing.service.gov.uk/media/57d6c3bee5274a34fb000032/private-healthcare-remittal-final-report.pdf>

⁶⁶ https://assets.publishing.service.gov.uk/media/533aea81ed915d6938000019/Appendices_1.1-6.14.pdf

⁶⁷ <http://www.netdoctor.co.uk/health-services/private-insurance/a4530/who-are-the-biggest-private-medical-insurance-companies/>

⁶⁸ <http://www.healthinsurancequotes.co.uk/the-big-4-health-insurers/>

⁶⁹ <https://www.belfasttelegraph.co.uk/news/health/bupa-pulls-out-of-every-northern-ireland-nhs-hospital-36313089.html>

'The vast majority of our customers in Northern Ireland have always chosen to receive treatment at private facilities, so very few were using any of the NHS trust hospitals.'

6.6 However, the announcement means that BUPA customers in NI who require assistance for the following issues will have to travel to England to receive treatment⁷⁰:

- An intensive care bed after surgery as none of the private hospitals in NI has an ICU [Intensive Care Unit];
- A routine cardiac surgery, such as cardiac catheterisation, will require travel to England for the diagnostic procedure;
- A scan to grade cancer; and
- Operations to tackle obesity.

6.7 BUPA are working towards a resolution but at the time of writing, this issue has not been resolved. It means that NI BUPA customers will be receiving a different service from BUPA customers in GB.

⁷⁰ <https://www.belfasttelegraph.co.uk/news/health/bupa-pulls-out-of-every-northern-ireland-nhs-hospital-36313089.html>

7. Cross-Insurance Issues

Lack of Data

- 7.1 A major cross-sector issue is that NI is often excluded from UK wide data sets. Aviva in the CMA PMI investigation cited the lack of data available for NI as a primary reason why some insurers chose not to compete in NI⁷¹. Aviva stated that *‘some sources of third party socio-demographic data, which could be accessed in GB to aid risk pricing, were not available in NI.’*⁷²
- 7.2 The ABI also have a UK wide data table for average policy cost and coverage for 12 other UK regions, but do not include NI. The ABI *‘Household Spending on Insurance Tables’* excludes NI for structural, whole of life, motor, medical and mortgage protection insurance⁷³. The only data from the ABI region breakdown where NI is included relates to contents insurance. However, when trying to verify NI contents insurance figures against Consumer Intelligence data for home insurance costs, NI is once again an excluded region. The Consumer Intelligence data covers 11 UK regions but not NI⁷⁴.
- 7.3 NI was again the only excluded UK data region for different data areas in the CMA 2016 report in the UK Private Healthcare Market. The report noted that:
- *‘We have not been able to estimate catchment areas for private hospitals and PPU’s [Private Patient Units] in Northern Ireland due to the lack of data.’*⁷⁵
 - *‘We did not have self-pay patient pricing data for Northern Ireland private hospitals. Final Report, Appendix 6.9, Table 1.’*⁷⁶

⁷¹https://assets.publishing.service.gov.uk/media/533aea81ed915d6938000019/Appendices_1.1-6.14.pdf

⁷²https://assets.publishing.service.gov.uk/media/5329ded7e5274a226b00024d/130729_toh_3_horizontal_concentration_in_pmi_providers_in_northern_ireland.pdf

⁷³ <https://www.abi.org.uk/data-and-resources/industry-data/free-industry-data-downloads/>

⁷⁴ <http://www.belfasttelegraph.co.uk/business/uk-world/average-home-insurance-costs-for-uk-households-rise-by-7-36064162.html>

⁷⁵ https://assets.publishing.service.gov.uk/media/533aea81ed915d6938000019/Appendices_1.1-6.14.pdf

⁷⁶ <https://assets.publishing.service.gov.uk/media/57d6c3bee5274a34fb000032/private-healthcare-remittal-final-report.pdf>

7.4 The CMA report was not looking at insurance specifically but private healthcare insurers will be reliant on the data from private healthcare suppliers. The exclusion of NI from the data sets will make accurate premium pricing more difficult.

7.5 Previous work by The Consumer Council has found that NI is regularly excluded as a UK region in the unsecured lending market as well.⁷⁷ Earlier in this research, it was noted that due to a lack of data some GB insurers chose not to offer insurance in NI. If there is to be a more competitive insurance market in NI, then NI must be included in data sets. Insurance premium calculations are based entirely on available data. Insurers will continue to opt out of NI as long as data sets exclude NI.

Price Comparison Websites

7.6 The use of PCWs to purchase insurance is not a practice specific to NI. The emergence of PCWs has changed the way insurance is bought and sold throughout the UK. It is of some note that an NI specific PCW has been set up, called Compare NI. Compare NI's presence in the NI PCW market gives further credence to the view that NI is a separate market to GB for many forms of insurance. Given some of the differences in the GB and NI market discussed in this paper, an NI specific PCW is a welcome addition to the market for NI consumers.

7.7 The increased use of PCWs has provided some benefit to consumers. FCA commissioned the market research company Atticus to undertake focus group research on PCWs in 2014. The focus groups found that⁷⁸:

- *'Many participants were quick to identify significant benefits from using a PCW;*
- *PCWs encouraged consumers to habitually 'shop around' for the lowest cost GI [General Insurance] quotes they can find;*

⁷⁷ The Consumer Council – Lending and Debt in Northern Ireland

⁷⁸ <https://www.fca.org.uk/publication/research/price-comparison-website-consumer-research.pdf>

- *The PCWs were perceived to allow consumers to achieve in minutes what would otherwise take hours; and*
- *Those who could recall the days before PCWs keenly felt the benefits, and while not dissimilar in concept from an insurance broker, many felt PCWs were more impartial and put the consumer in control of the research and purchase process.’*

7.8 Whilst the positives are recognised, the same research found that by the time Atticus took the focus group through the full insurance sales process for PCW and non-PCW bought insurance, many changed their positive view of PCWs. The research found that:

‘At the outset of the research sessions, many consumers took the view that using a PCW would deliver a number of significant outcomes....However, once respondents had completed their research...these outcomes were not always achieved and many reflected that their initial views and expectations might have been misplaced.’⁷⁹

7.9 PCWs can drive competition and give a range of choice to consumers but their limits must be recognised. Axa Ireland and Direct Line for instance cannot be found on PCWs. The FCA undertook a review of the PCW market in 2014⁸⁰. The review found that:

- PCWs did not always ensure that consumers were given the appropriate information to help them make informed decisions;
- Consumers’ focus on headline price and brand when using PCWs could distract from crucial product features such as policy coverage and terms;
- By failing to provide clear information, the websites are increasing the risk that consumers may buy products without understanding key features such as level of cover or excess levels and purely focus on the price;

⁷⁹ <https://www.fca.org.uk/publication/research/price-comparison-website-consumer-research.pdf>

⁸⁰ <https://www.fca.org.uk/publication/thematic-reviews/tr14-11.pdf>

- PCWs did not make clear their role in the distribution of the product or the nature of service they provided;
- Some consumers mistakenly believed that the PCW had provided them with quotes on the best policy for their individual needs and had assessed the suitability of the policy for them.

7.10 Many consumers' needs may be better served by seeking specialist advice from a trained insurance broker. If a person is identified as 'high risk' by insurers then they need to ensure that they are appropriately covered for their conditions or circumstances. The Consumer Council regularly uses media channels to encourage consumers to shop around for insurance. This has been particularly the case for the car insurance market as prices have risen in recent years. The Consumer Council will now also encourage consumers to ensure that the insurance purchased covers their needs. These messages will also highlight that consumers may be better served by seeking specialist advice.

8. Recommendations

- 8.1 Whilst this research has not covered all aspects of the NI insurance market, it has considered common forms of insurance taken by consumers, where the issues in the market differed in NI from GB.
- 8.2 There are many positives about the NI insurance market. For instance, the significant broker network means there is greater access to qualified advice. There is also high coverage in NI for home contents insurance and NI specific PCWs are a good example of private enterprise addressing the problems consumers in NI may face in accessing available policies.
- 8.3 Evidence from this research has found the following concerning aspects about the NI insurance market:
- 8.3.1 There is a disparity between the overall NI population and those who are NIHE tenants, and may be on a lower income, in relation to home contents insurance cover. Only 26% of NIHE tenants have contents insurance⁸¹, compared to 87% of all NI households⁸². NI has the highest proportion of people of any UK region with low levels of savings, with 56.8% of the NI adult population having savings of under £100⁸³. The high numbers of people with low savings in NI further suggests that people are not financially prepared for an unexpected cost;
- 8.3.2 The significant number of GB car insurers who choose not to operate in NI creates a less competitive and more expensive market. Covea, AIG and e-sure do not offer car insurance in NI⁸⁴. RSA in 2014 also pulled out of the NI broker

⁸¹ https://www.nihe.gov.uk/ctos_2015_main_report-3.pdf

⁸² <https://www.abi.org.uk/globalassets/sitecore/files/documents/publications/public/2013/industry-data/household-spending-on-insurance-tables.xlsx>

⁸³ <https://www.statista.com/chart/6219/half-uk-adults-less-than-%25C2%25A3100-savings/>

⁸⁴ <https://piba.ie/system/files/999/original/motor-insurance-presentation.pdf?1473253153;>
https://assets.publishing.service.gov.uk/media/5329dee940f0b60a760002be/130816_customer_survey_table_s.pdf - Derived from Table 11 – S11

market⁸⁵. Aviva stated in 2014 that they ‘carried out a very small amount of business in Northern Ireland’;⁸⁶

- 8.3.3 The high cost of claims in NI. Whiplash claims make up 20% of all UK claims⁸⁷. The average range for minor whiplash claims is **£3,765 - £6,183** in NI compared to **£1,917 - £3,960** in GB⁸⁸. Furthermore, 3.3% cars in the UK are located in NI, but personal injury awards in NI amount to 5.5% of the UK total⁸⁹. Both LV= and First Central told the CMA PMI investigation that, ‘because NI was a small market, claims costs could be volatile’, whilst Aviva said that ‘its business in NI had had unpredictable results, with some large claims’;
- 8.3.4 There is lower uptake of travel insurance in NI. In the UK, 24% of people do not have travel insurance⁹⁰, in NI this figure is 35%⁹¹. The average cost of a medical claim on a travel insurance policy is £900⁹². People are left uninsured and open to significant detriment if anything goes wrong on holiday;
- 8.3.5 There is significant potential that people identified as ‘high risk’ by insurers may not be getting the required cover for their needs. People with medical conditions will often be better served by seeking specialist advice from a qualified insurance broker rather than effectively ‘self-advising’ through a PCW. As only 7% of travel insurance was purchased through a broker in NI⁹³, it is clear that not many people are choosing this route;

⁸⁵ <https://piba.ie/system/files/999/original/motor-insurance-presentation.pdf?1473253153>

⁸⁶ https://assets.publishing.service.gov.uk/media/5329dee3e5274a22680002f5/130628_wp21_survey_report.pdf

⁸⁷ http://www.consumercouncil.org.uk/images/uploads/languages/APG_on_Motor_Insurance.pdf

⁸⁸ <https://piba.ie/system/files/999/original/motor-insurance-presentation.pdf?1473253153>

⁸⁹ http://www.consumercouncil.org.uk/images/uploads/languages/APG_on_Motor_Insurance.pdf

⁹⁰ <https://abta.com/about-us/press/numbers-travelling-abroad-uninsured-on-the-rise>

⁹¹ http://www.consumercouncil.org.uk/filestore/documents/CC_Travel_Insurance_FINAL.pdf - Figure quoted as 44%, does not include the 9% of respondents who said their travel insurance was purchased by a partner, leaving total uninsured in NI at 35%

⁹² <https://www.abi.org.uk/news/industry-data-updates/2013/07/travel-insurance-statistics-update/>

⁹³ http://www.consumercouncil.org.uk/filestore/documents/CC_Travel_Insurance_FINAL.pdf

8.3.6 The largest provider of UK private health insurance, BUPA, has withdrawn from all NHS hospitals in NI⁹⁴, citing lack of medical negligence cover and an insufficient level of service wanted by its customers. This means that BUPA customers in NI will have to travel to England to receive treatment for an intensive care bed after surgery, routine cardiac surgery, scans to grade cancer and operations to tackle obesity⁹⁵. BUPA are working towards a resolution but at the time of writing the issue still remains;

8.3.7 A lack of data is inhibiting the NI insurance market. The ABI, CMA and Consumer Intelligence have all published UK regional insurance analysis that excludes NI. These studies have the potential to be used by insurers to more accurately price premiums in the NI market. In the 2014 CMA PMI investigation, Aviva stated that *'some sources of third party socio-demographic data, which could be accessed in GB to aid risk pricing, were not available in NI'*⁹⁶;

8.3.8 Whilst not specific to NI, the increased use of PCWs may mean that some consumer needs are not being met. The 2014 FCA PCW research found that many consumers thought that PCWs were finding the correct policy for their needs, in effect an 'auto-advised' service. However, PCWs aim only to show consumers the policies they are eligible for, which is an important distinction. It is important to note that PCWs do not offer a 'whole of market' service and several insurers choose not to operate on them.

8.4 The research has identified two main areas for wider consideration:

8.4.1 Previous attempts to lower motor insurance premium prices are well documented⁹⁷. The raising of the Insurance Premium Tax on insurance policies

⁹⁴ <https://www.belfasttelegraph.co.uk/news/health/bupa-pulls-out-of-every-northern-ireland-nhs-hospital-36313089.html>

⁹⁵ Ibid

⁹⁶ https://assets.publishing.service.gov.uk/media/5329ded7e5274a226b00024d/130729_toh_3_horizontal_concentration_in_pmi_providers_in_northern_ireland.pdf

⁹⁷ See section 4.1

from 10% to 12% have only exacerbated the issues. An obvious mitigating action is for the Government to reverse this tax rise. If this does not occur, other solutions must be sought. In the 2016 NI APG report on motor Insurance, the ABI found that the introduction of the LASPO in GB led to of a reduction of fixed legal fees, which is the amount payable for work undertaken by the claimant's solicitor in low value personal injury claims. The ABI estimated that these actions had allowed premiums to fall by 14% over 18 months⁹⁸. LASPO has not been introduced into NI. Changes akin to these in NI would start to tackle escalating claims cost and reduce premiums for NI motorists; and

8.4.2 The exclusion of NI from UK wide data sets is a significant problem and is causing a lack of competition and effective premium pricing in NI. Some of the biggest GB insurers are choosing not to operate in the NI motor insurance market, citing a lack of data and variable claims costs as two of the primary reasons. The financial clout of these insurers competing in the NI market would start to drive pricing down. The significant market share of those insurance firms familiar with the NI market such as Axa Ireland, Allianz Ireland and Prestige further demonstrates that insurance companies consider NI to be a separate market from GB. Work needs to be done to address the NI data gap, to improve access to market entrants.

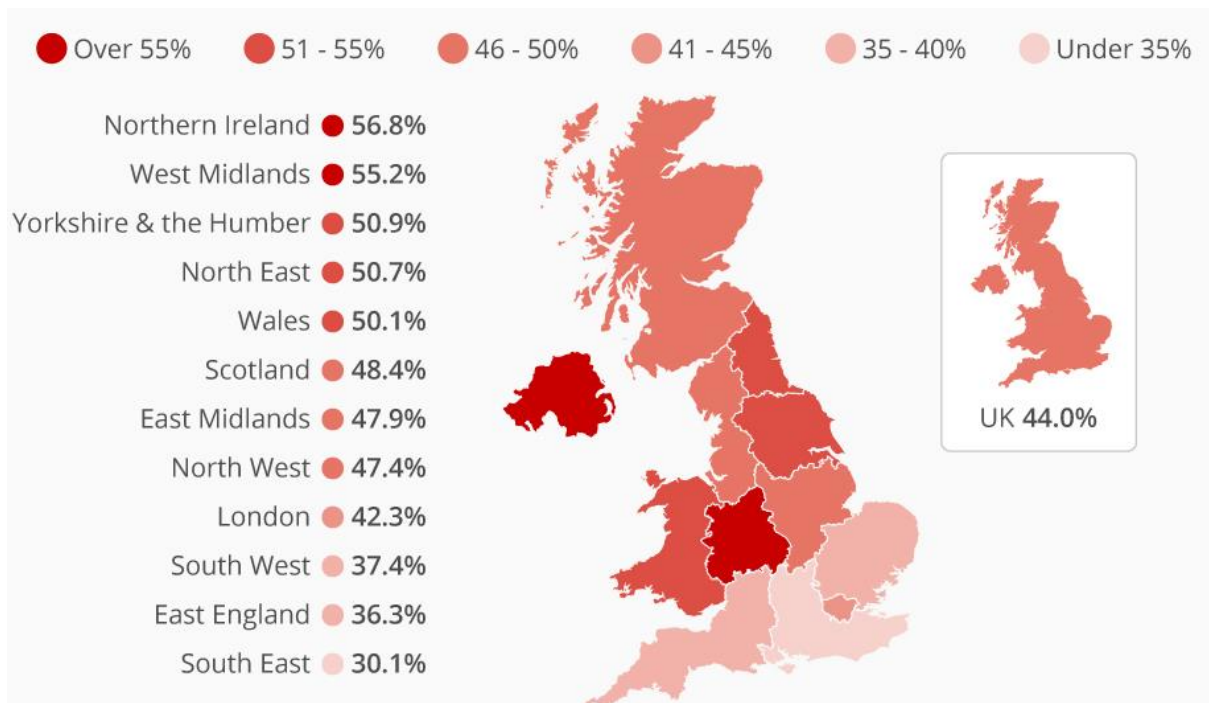
8.5 The Consumer Council will ensure appropriate bodies and elected representatives are provided with the evidence outlined in this report, in order to support and equip them to fully address the issues highlighted for NI consumers.

8.6 The Consumer Council's mission is to promote and safeguard the interests of NI consumers. We therefore welcome discussion and feedback on any of the topics raised in this report.

⁹⁸ http://www.consumercouncil.org.uk/images/uploads/languages/APG_on_Motor_Insurance.pdf

9. Appendix

Appendix 1 – Share of UK adult population with less than £100 savings, by region⁹⁹



Source: Money Advice Service

⁹⁹ <https://www.statista.com/chart/6219/half-uk-adults-less-than-%25C2%25A3100-savings/>

10. References

Allianz Insurance

- <http://www.allianzni.co.uk/>

Association of British Insurers

- <https://www.abi.org.uk/data-and-resources/industry-data/free-industry-data-downloads/>
- <https://www.abi.org.uk/globalassets/sitecore/files/documents/publications/public/2013/industry-data/household-spending-on-insurance-tables.xlsx>
- <https://www.abi.org.uk/news/industry-data-updates/2013/07/travel-insurance-statistics-update/>

Association of British Travel Agents

- <https://abta.com/about-us/press/numbers-travelling-abroad-uninsured-on-the-rise>

Automobile Association

- <http://www.theaa.com/about-us/newsroom/insurance-news/car-home-insurance-news-2017-q-1>
- https://www.theaa.com/resources/Documents/pdf/insurance/aatravelinsurance_policywording_new_sales-09-14.pdf

Aviva Insurance

- https://www.aviva.co.uk/content/dam/aviva-public/gb/pdfs/personal/insurance/travel/policy_document_insurance_travel_ntrtg10145_v34_092015.pdf

Axa Insurance

- http://www.axainsurance.com/travel/policy-summary/policysummary_210.pdf
- http://www.axainsurance.com/travel/policy-wording/policywording_210.pdf
- <https://piba.ie/system/files/999/original/motor-insurance-presentation.pdf?1473253153>
- <https://www.axani.co.uk/>

Belfast Telegraph

- <http://www.belfasttelegraph.co.uk/business/uk-world/average-home-insurance-costs-for-uk-households-rise-by-7-36064162.html>
- <https://www.belfasttelegraph.co.uk/news/health/bupa-pulls-out-of-every-northern-ireland-nhs-hospital-36313089.html>

Competition and Markets Authority

- https://assets.publishing.service.gov.uk/media/5329ded7e5274a226b00024d/130729_toh_3_horizontal_concentration_in_pmi_providers_in_northern_ireland.pdf

- https://assets.publishing.service.gov.uk/media/5329dee3e5274a22680002f5/130628_wp21_survey_report.pdf
- https://assets.publishing.service.gov.uk/media/5329dee940f0b60a760002be/130816_customer_survey_tables.pdf
- https://assets.publishing.service.gov.uk/media/533aea81ed915d6938000019/Appendices_1_1-6.14.pdf
- <https://assets.publishing.service.gov.uk/media/57d6c3bee5274a34fb000032/private-healthcare-remittal-final-report.pdf>

Daily Telegraph

- <http://www.telegraph.co.uk/finance/personalfinance/insurance/10946133/Travel-insurance-costs-ramped-up-for-older-travellers-even-though-claims-fall.html>

Dublin Airport

- <https://www.dublinairport.com/latest-news/detail/dublin-airport-grows-ni-resident-business-by-37-in-2015>

Financial Conduct Authority (FCA)

- <https://www.fca.org.uk/publication/research/price-comparison-website-consumer-research.pdf>
- <https://www.fca.org.uk/publication/thematic-reviews/tr14-11.pdf>

Health Insurance Quotes

- <http://www.healthinsurancequotes.co.uk/the-big-4-health-insurers/>

Laing Buisson

- <https://www.laingbuisson.com/press-releases/private-medical-cover-static-face-economic-political-uncertainty/>

Net Doctor

- <http://www.netdoctor.co.uk/health-services/private-insurance/a4530/who-are-the-biggest-private-medical-insurance-companies/>

Northern Ireland Housing Executive

- https://www.nihe.gov.uk/ctos_2015_main_report-3.pdf

Statista

- <https://www.statista.com/chart/6219/half-uk-adults-less-than-25C2%25A3100-savings/>
- <https://www.statista.com/statistics/288947/uk-market-total-premiums-breakdown-by-market/>
- <https://www.statista.com/statistics/501583/united-kingdom-financial-products-personally-purchased-share-of-adults/>

- <https://www.statista.com/statistics/501668/northern-ireland-uk-financial-products-personally-purchased/>
- <https://www.statista.com/statistics/681534/individuals-with-private-health-insurance-in-the-united-kingdom-by-region/>

The Consumer Council

- http://www.consumercouncil.org.uk/filestore/documents/CC_Travel_Insurance_FINAL.pdf
- http://www.consumercouncil.org.uk/images/uploads/languages/APG_on_Motor_Insurance.pdf
- The Consumer Council – Lending and Debt in Northern Ireland

UK Government

- <https://www.gov.uk/government/news/cma-sets-out-changes-for-private-motor-insurance>