

Brief on

IRDAI's Consultation Paper on Public Insurance Registry



Brief on IRDAI’s Consultation Paper titled “Public Insurance Registry: Digital Public Infrastructure for Insurance”

In September 2026, the Insurance Regulatory and Development Authority of India ("IRDAI") released a public consultation paper titled "[Public Insurance Registry: Digital Public Infrastructure for Insurance](#)" ("Consultation Paper"), proposing the creation of a Public Insurance Registry ("PIR"). The PIR is conceptualized as a population-scale, interoperable and non-exclusionary Digital Public Infrastructure ("DPI") for the insurance sector, aimed at facilitating growth and inclusion, building trust and transparency, and promoting affordability and financial sustainability.

The PIR is anchored in the [Sabka Bima Sabki Raksha \(Amendment of Insurance Laws\) Act, 2025](#) ("SBSR Act"), which amends provisions of the [Insurance Act, 1938](#) and the [IRDA Act, 1999](#) providing a basis for electronic policy and claims records, common standards, collection and furnishing of insurance information, and confidentiality safeguards. The PIR will also comply with the [Digital Personal Data Protection Act, 2023](#) ("DPDP Act"), the [Aadhaar \(Targeted Delivery of Financial and Other Subsidies, Benefits and Services\) Act, 2016](#), and the [Information Technology Act, 2000](#).

Core Design Principles Framework

The Consultation Paper structures the PIR’s design principles across three foundational pillars:

- Technology Design, such as "Protocols, not Platforms", minimalist building blocks, federated architecture, and privacy-by-design.
- Governance Features, with the Consultation Paper acting as an anchor to the SBSR Act; mandates promoting “Make in India” and "Obligations in Code".
- Market Participation, such as open access and regulatory guardrails against market capture or cartels.

Data Architecture

The PIR will follow a federated data architecture with source-system primacy, under which insurers and other institutions remain the source of record. Each repository within the PIR will hold information in only one of three modes: a lightweight reference to the source record (pointers to source records held by insurers; full documents remain with the source), a governed copy (held centrally only when a specific cross-insurer regulatory or operational need requires it), or an anonymized aggregate for analysis (held for industry analytics, research, morbidity or mortality studies, and disaster risk modeling).

Information Category	Held by PIR	Retained at Source
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Insurance products	Standardized product record, including coverage, premiums, exclusions and performance indicators	Pricing models, actuarial documentation and product strategy
Insurers and intermediaries	Verified register of license status, conduct, performance and blacklisting	Commercial contracts and internal compliance records
Policies	Policy-level reference, anonymized aggregates, and contact-bearing records of policies and claims with an open or recent grievance, anomalous status; and unclaimed amounts	Full policy contract, proposal form and underwriting notes
Claims	Claim-level reference, anonymized aggregates, and claim settlement status and quality	Full claim files, medical records and investigation files
Grievances	Consolidated complaint and resolution status across channels	Detailed case files with insurers, Ombudsman and consumer forums
Policyholder identity	PIR functional identifier with secured references to identity anchors and a confidence level (high/medium/low)	Full KYC documents and raw identity numbers
Derived insights	Anomaly signals, risk indicators and Insurance Risk Scores	Underlying source data
Governance records	Consent records, an immutable log of PIR's actions and research data releases	Not applicable

Stakeholder Cohorts and User Stories

The Consultation Paper adopts a user-story-led approach across eight stakeholder cohorts, such as the public and policyholders, including Small and Medium Enterprises (“SMEs”), Farmer Producer Organizations (“FPOs”) and Self-Help Groups (“SHGs”); insurers; reinsurers; insurance intermediaries; regulators; financial institutions, including banks, Non-Banking Financial Companies (“NBFCs”), credit bureaus and rating agencies; government departments and agencies; and researchers, academia and public policy institutes.

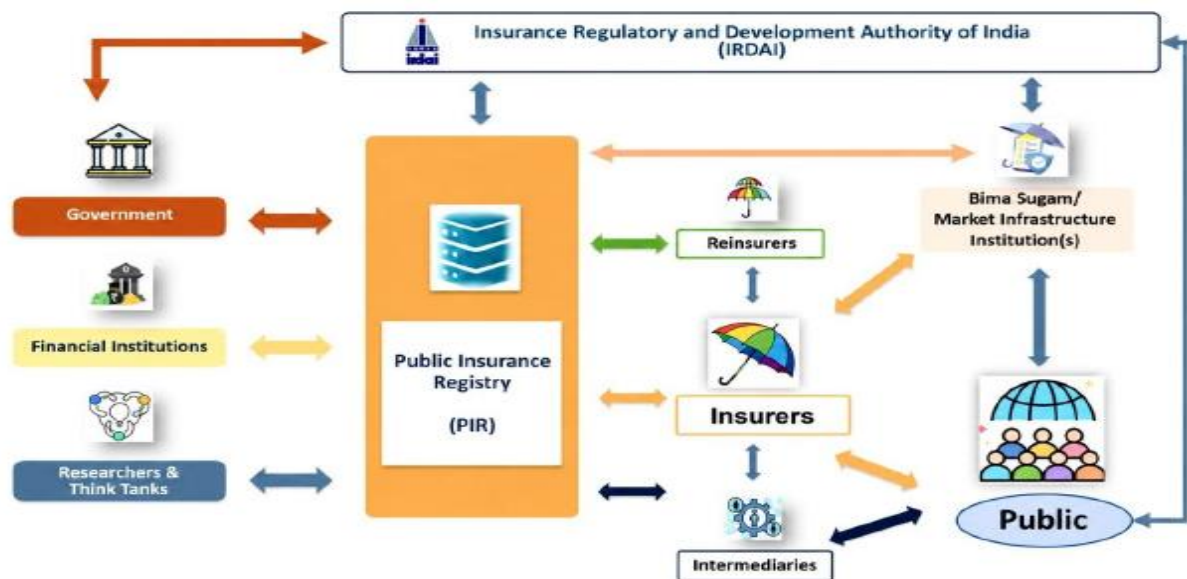


Exhibit 1: PIR Overview Schema – Relationship with all stakeholder cohorts

Source: IRDAI's Public Consultation Paper titled "Public Insurance Registry: Digital Public Infrastructure for Insurance" (2026).

Some of the illustrative use cases, as detailed in the Consultation Paper, include:



Source: IRDAI's Public Consultation Paper titled "Public Insurance Registry: Digital Public Infrastructure for Insurance" (2026).

However, the user stories are conceptual, with detailed functional and technical design to follow.

Privacy, Consent and Commercial Confidentiality

- Processing of personal data will rest on four bases: statutory processing under IRDAI's power to call for information; consent-based processing for customer-initiated requests; investigative and supervisory uses authorized under applicable law, including under the [Prevention of Money Laundering Act, 2002](#); and anonymized and aggregated analytics.
- Consent must be specific, informed, revocable, and auditable. The insurer or regulated entity will obtain it at the point of interaction, with the PIR holding only a consent record. Consent given for one purpose cannot be reused for another without fresh consent.
- Full KYC files, policy documents, and medical records will not be held centrally by default and will be fetched from the insurer with consent only when required. Personal identifiers will be tokenized on receipt, and access will follow least privilege, role-based access and purpose limitation, with sensitive data masked by default.
- Requests for correction, withdrawal of consent, grievances and, where applicable, deletion will be routed to the concerned insurer.
- The PIR cannot disclose insurer-specific pricing, underwriting rules or product strategy. Cross-insurer reports may be released only in aggregated or anonymized form, subject to minimum cohort sizes and re-identification safeguards.

Data Standards and Identity

- The PIR proposes a two-method approach to identity, combining deterministic matching against Aadhaar, Permanent Account Numbers ("PANs") or CKYC with probabilistic matching on demographic fields where no strong anchor is available. Each identity record will carry a confidence level.
- Participating institutions will be required to follow common definitions, identifiers and formats.
- New policies and policy events will be submitted in the standard format from an agreed date, while existing records will be migrated progressively at renewal or other material events. Insurers may maintain their own mapping layers, with IRDAI setting milestones by insurer category.

Key Technological Innovations and External Linkages

Connections and linkages will be done through formal, purpose-bound, and auditable arrangements, without replicating their data. Some of the external linkages will be with the following:

- Insurance Risk Score ("IRS"), which is a unified, consent-based risk scoring mechanism designed as a decision-support tool at the underwriting stage, synthesizing an applicant's insurance history, credit bureau records, and permitted external data sources.
- Unified Lending Interface ("ULI") Integration, where direct Application Programming Interface rails connect with the [Reserve Bank of India's \("RBI"\) ULI](#) to enable seamless lien recording, assignment management, and collateral verification for bank loans.
- Purpose-bound, auditable data bridges that connect PIR to external public registries without replicating raw underlying data, and CKYC and Aadhaar authentication.

- In the case of transport and accidents, there is linking with [VAHAN \(National Vehicle Registry\)](#) and the [Electronic Detailed Accident Report \(“e-DAR”\)](#).
- For agriculture, the linkage is with [AgriStack](#) and the [Pradhan Mantri Fasal Bima Yojana](#) portal.
- In the case of the judiciary, [e-Courts](#) for Motor Accident Claims Tribunal case tracking and Lok Adalat settlements will be linked.
- The Consultation Paper proposes a functional ID for each policyholder, called the PIR Functional Identifier and Identity Confidence Levels, generated via deterministic matching (Aadhaar, PAN, CKYC) and probabilistic demographic matching, assigned dynamic Identity Confidence Levels (High, Medium, Low, Manual Review) that refine over policy lifecycle events.
- Automated event-driven notification mechanisms, including cross-insurer death claim prompts to initiate claim processing and uncover unclaimed benefits across all insurers, as well as stolen/total-loss vehicle recovery flags.
- The Consultation Paper also proposes a 24x7 Multilingual Grievance and Redressal Engine, which integrates insurer Complaint Management Systems (“CMS”), [Bima Bharosa](#), and the [Centralised Public Grievance Redress and Monitoring System](#) to enable 24x7 multi-channel (voice/data) grievance lodging, real-time tracking, and root-cause analytics.

Phased Implementation

User stories will be prioritized through a value and ease-of-implementation framework, placing each in one of four categories:

	Lower ease of Implementation	Higher ease of Implementation
Higher Value	Q2: Build Towards	Q1: Implement First
Lower Value	Q4: Opportunities	Q3: Enable Quickly

Implementation Assessment Matrix (Priorities, as of the moment, are conditional upon the receipt of stakeholder inputs)

Category	Implementation Treatment
Q1: Implement first	Initial implementation shortlist
Q2: Build towards	Readiness work, implemented as data and linkages mature
Q3: Enable quickly	Taken up selectively to build adoption
Q4: Later-stage opportunities	Retained for later phases

Governance Structure

The PIR is proposed to be governed as a public-purpose market infrastructure institution, with IRDAI retaining regulatory oversight and a dedicated operating institution handling day-to-day operations. To this end, the Insurance Information Bureau ("IIB") is proposed to be converted into a not-for-profit company wholly owned by IRDAI, which will set up the PIR under a separate set of regulations and subsume the Bureau's existing functions. The IIB Board may include rotating representation from insurers.

Consultation Questions and Timeline

The Consultation Paper invites responses to 14 questions, which are listed below:

A Strategic case and public value

Sections 2 to 4

Q1 Any other outcome PIR should seek to achieve?

B User stories and coverage gaps

Sections 7 to 9

Q2 Additional stakeholder needs not covered by the proposed user stories

Q3 Stakeholders not currently covered who could benefit from PIR

Q4 Importance of user stories (high / medium / low) for your stakeholder group

C Data architecture, identity and standards

Sections 10 to 12

Q5 Scope of repositories; what PIR should hold versus source institutions

Q6 Use of an existing functional identity such as CKYC or PAN, with safeguards

Q7 Practical strategy for data standardisation and legacy records

D Privacy, consent and confidentiality

Section 10

Q8 Adequacy of consent, privacy and personal data protection safeguards

Q9 Safeguards for commercial confidentiality and competitive neutrality

Q10 Approach towards notification as a Significant Data Fiduciary

E Regulation, governance and readiness

Q11 Strengthening oversight of market conduct and micro-prudential compliance

Q12 Technology readiness, transition approach and implementation timeline

Q13 Clarity of roles; participation, incentives and accountability mechanisms

F Any other suggestions

Q14 Any other aspects to be considered for PIR design and implementation

Source: Created using Generative AI