

| COMPLIANCE DEEP-DIVE · OCTOBER 2026

The UAE's New Claims Rulebook: What the *September 2026* Central Bank Deadline Means for Your Coverage

A plain-English guide to the CBUAE's overhauled insurance claims-handling standards — and what individuals, families and business owners across the UAE should check before their next renewal or claim.

Prepared for policyholders in the UAE • Car • Health • Travel • Home & Pet • Life & Savings • Business/SME

Federal Decree-Law No. 6 of 2025

CBUAE Circular C4/2026

Reconciliation deadline: 15 Sept 2026

Insure with **Shamna**

Shamna Ponnath Valappil · Senior Insurance Officer, Gargash Insurance Services LLC

Sales@insurewithshamna.com
insurewithshamna.com

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What Just Happened — and Why September 2026 Matters

If you hold an insurance policy in the UAE — on your car, your health, your home, or your business — the rules behind how your insurer must handle your claim have just changed, whether or not you noticed.

In September 2025, **Federal Decree-Law No. 6 of 2025** came into force, folding insurance regulation into a single supervisory framework run by the **Central Bank of the UAE (CBUAE)**. Insurance companies, once overseen separately, now sit inside the same regulatory perimeter as banks and other licensed financial institutions.

The law gave every insurer, broker and licensed entity a one-year runway — under Article 184 — to bring their governance, systems and processes into line with the new framework. That runway closed on **15 September 2026**. Since the law took effect, the CBUAE has been issuing the implementing regulations that give it teeth, including the Insurance Company Licensing Regulation (Circular C4/2026, effective 14 August 2026), an Operational Risk Regulation, a Telemarketing Regulation aimed at customer protection, and guidance on the use of AI in regulated decision-making.

WHY IT'S RELEVANT TO YOU, NOT JUST INSURERS

Most coverage of this deadline has focused on what insurers must fix internally — licensing, governance, IT systems. But buried in the same framework is a set of rules that directly change how your *claim* gets handled: how quickly it must be documented, who your insurer stays accountable for, and what you're entitled to see if a claim is rejected.

The short version

Every UAE-licensed insurer was required to have reconciled its claims processes, outsourcing arrangements and decision-making systems with the new standard by mid-September 2026. If you file a claim from this point forward, you are filing it under a materially stricter, more transparent regime than existed a year ago — and you have new rights if things go wrong.

The Four Pillars of the New Claims-Handling Standard

Underneath the legal language, the CBUAE's overhaul of claims handling comes down to four practical requirements every insurer operating in the UAE must now meet.

1 Real-time documentation

Claims files must be built **as events happen**, not reconstructed afterwards. Decisions, evidence and timelines have to be recorded contemporaneously — which means the notes, photos and assessments an insurer relies on to accept or reject your claim need a genuine paper trail from day one.

2 Accountability for outsourced work

Many claims are actually handled by third parties — third-party administrators (TPAs) on health claims, loss adjusters and surveyors on motor and property claims, call centres on first notification of loss. Insurers **remain fully responsible** for the due diligence, service standards, data handling and audit trail of anyone they outsource to (licensed loss adjusters are treated separately from general outsourcing, but the accountability principle still applies to the insurer overall).

3 Data access and explainable decisions

Claimants must be able to **access the personal information held in their claims file**. And where an insurer uses automated tools or AI in reaching a decision — increasingly common in fraud screening, valuation and fast-track approvals — those steps must be **transparent, explainable, and subject to real human oversight**, not a black-box "no."

4 Alignment with the wider legal framework

Claims processes now have to sit consistently alongside the UAE Civil Code, the UAE's data protection law (PDPL), and the CBUAE's own guidance on responsible AI adoption — closing gaps that previously let claims practices drift out of step with consumer and data-protection law.

SECTION 03

Why This Has Teeth: The Penalties Behind the Rules

Regulatory overhauls only change day-to-day behaviour when the cost of ignoring them is real. This one is backed by one of the broadest sanctions regimes the UAE's financial sector has seen.

21

categories of administrative sanctions available to the CBUAE under the new framework

AED 1bn

maximum fine for an institution found in breach

AED 5m

maximum fine for an individual manager or officer found responsible

Separately, carrying out licensed financial or insurance activity without proper authorisation under the new perimeter can draw fines from **AED 50,000 up to AED 500 million**, alongside potential imprisonment. Management can face personal consequences where negligence or a failure of duty is established — this is no longer purely a "company" problem.

WHAT THIS MEANS PRACTICALLY

Insurers now have a direct financial incentive to get claims documentation, outsourcing oversight and decision transparency right — which, in principle, should translate into faster, better-documented, more explainable claims outcomes for you. It also gives you real leverage: an insurer that mishandles your claim isn't just risking your loyalty, it's risking regulatory exposure.

How This Affects You, Line by Line

The new standard applies across every class of insurance — but it bites differently depending on what you hold. Here's what to watch for across each part of a typical UAE household or business insurance portfolio.

Motor / Car Insurance HOUSEHOLD

Motor claims already involve appointed surveyors and loss adjusters under the Unified Motor Vehicle Insurance Policy — now, insurers must show a real-time, audit-ready trail for every stage of your claim, from first notification through to settlement. If an automated system flags your claim for a lower payout or rejection (increasingly common as insurers adopt AI-assisted assessment), you can ask for a plain-language explanation of how that decision was reached. Note: separately, many insurers have been tightening motor terms — premium increases and reduced agency-repair options — largely driven by claims losses and reinsurance costs, not this regulation directly, so review your renewal terms carefully either way.

Health Insurance HOUSEHOLD

Health claims are processed almost entirely through third-party administrators and insurer networks. The outsourcing-accountability pillar matters most here: your insurer cannot shrug off a TPA's slow or poor handling of a claim as "not our problem" — they remain on the hook for it. If a claim or pre-approval is denied, you now have a clearer basis to request the reasoning and the documentation behind it, which matters most for DHA/DOH-regulated networks and higher-value treatments.

Travel Insurance HOUSEHOLD

Travel claims are often time-critical — medical evacuation, trip cancellation, delayed baggage — and have historically been vulnerable to rejection on notification-timing technicalities. The real-time documentation requirement works in your favour: if you report promptly and the insurer's own records are contemporaneous, disputes over "you told us too late" become harder for an insurer to win unfairly.

Home & Pet Insurance HOUSEHOLD

Property claims typically rely on an appointed surveyor or loss adjuster to value the damage. Under the new rules, your insurer stays accountable for that adjuster's service standards and the quality of the audit trail behind the valuation — useful leverage if you feel a settlement offer was reached without proper documentation. Pet claims, often handled through smaller specialist administrators, fall under the same outsourcing-accountability umbrella.

Life & Savings HOUSEHOLD

Claims here — death benefits, maturity payouts, critical illness triggers — are lower in frequency but higher in value and emotional stakes. Beneficiaries now have a clearer right to see the documentation behind a decision, and the CBUAE's tightened institutional oversight (including the new licensing regime for insurers themselves) adds an extra layer of assurance for long-tenor products where you're trusting an insurer for years or decades.

Business & SME Insurance BUSINESS

For business owners, this is worth a proper review, not a skim. Commercial property, liability, group medical and fleet policies all sit inside the same claims-handling standard — and claims delays hit a business's cash flow directly. Two concrete actions: (1) ask your broker or insurer to confirm, in writing, that their claims and outsourcing arrangements have been reconciled against the new framework; and (2) at your next renewal, verify your insurer is properly licensed under CBUAE Circular C4/2026, particularly if you're comparing quotes from a newer or foreign-branch insurer.

Your Action Checklist

For individuals & families

- ☐ Document any incident as it happens — dated photos, messages and timestamps strengthen your position if a claim is disputed later.
- ☐ Report claims promptly through official channels and keep the reference number and date/time of notification.
- ☐ If a claim is declined by an automated or AI-assisted process, ask your insurer directly for a plain-language explanation of the decision.
- ☐ If you're disputing an outcome, formally request access to the information held in your claims file.
- ☐ Before renewing any policy, confirm your insurer and broker are currently licensed under the CBUAE's regime.

For business & SME owners

- ☐ Request written confirmation from your commercial insurer/broker that their claims-handling and outsourcing arrangements have been reconciled against the new framework.
- ☐ Review any TPA, loss-adjuster or claims-outsourcing arrangements named in your policy wording.
- ☐ Build a simple, timestamped incident-logging habit into your operations — it materially speeds up claims on fleet, property and liability lines.
- ☐ Re-verify your insurer's licensing status at your next renewal, especially when comparing quotes from newer market entrants.
- ☐ Schedule a portfolio review ahead of renewal rather than after a claim goes wrong.

This guide is provided for general information purposes only and does not constitute legal, financial or regulatory advice. Regulatory requirements referenced here are summarised from publicly available legal commentary and official sources as of September 2026 and may be updated, extended or clarified by the Central Bank of the UAE. For guidance specific to your policy or circumstances, consult your insurer, a licensed insurance advisor, or qualified legal counsel.

LET'S REVIEW YOUR COVER

Not sure how your *current policies* hold up under the new rules?

Whether it's your family's car, health and travel cover, your home and pet policies, or protection for your business, I'll walk through your existing policies with you, flag anything worth tightening up before renewal, and make sure you're placed with insurers built for the new compliance standard — not just the lowest quote.

Book Your Policy Check-Up

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Insure with **Shamna**

Shamna Ponnath Valappil
Senior Insurance Officer, Gargash Insurance Services LLC

Sales@insurewithshamna.com

insurewithshamna.com