



INKSAFE™
**National Safety & Compliance Standard for
Tattooing**

**Submission to the Parliamentary Joint Committee on
Corporations and Financial Services**

***Inquiry into the Provision, Regulation and Pricing of Modern Insurance
Products for Small Businesses***

25 November 2025

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1. Introduction

This submission responds to the Parliamentary Inquiry into the Provision, Regulation and Pricing of Modern Insurance Products for Small Businesses, focusing specifically on systemic insurance challenges within the tattooing sector — an industry that remains high-risk, high-growth, but low-support in both regulatory and insurance contexts.

Tattoo studios face the same structural insurance failures identified in other high-risk SME industries (such as residential construction), including disproportionate premium costs, unclear underwriting criteria, limited insurer appetite, and the complete absence of a nationally recognised compliance framework. These pressures contribute to increased consumer risk, reduced business continuity, and significant financial strain on otherwise compliant and safe operators.

To address these challenges, this submission presents InkSafe™, a proposed national safety and compliance standard designed in consultation with tattoo industry operators, insurers, risk analysts, and health-sector advisors. InkSafe provides a clear, measurable, insurer-recognised framework to allow risk-tiered pricing, improved underwriting consistency, and strengthened industry-wide safety outcomes.

2. Response to Terms of Reference

- Access to insurance products that meet contemporary small-business needs
- Affordability and availability of insurance products for SMEs in high-risk sectors
- Adequacy of the current regulatory and compliance framework affecting insurance
- Related matters, including insurer–regulator interaction, consistency of underwriting, and the need for national industry standards.

3. Context: Vulnerability of SMEs in High-Risk Personal Services

Tattooing is one of Australia's most rapidly expanding personal-services industries. Yet it exists in a regulatory vacuum, with inconsistent state-based hygiene rules, minimal enforcement, and no unified national standard.

In this void, insurance providers have effectively become the industry's de facto regulators, determining what constitutes “acceptable risk”. The availability and pricing of insurance products directly determine whether a tattoo studio can open, remain trading, renew a lease, or participate in events and collaborations.

This dynamic creates four systemic problems:

1. No recognised national compliance or training standard.
2. Studios with vastly different hygiene and safety practices are priced identically.
3. Premium volatility remains high, even for claim-free studios.
4. Insurer appetite is shrinking, reducing competition and increasing prices.

4. Access to Insurance Products That Meet Industry Needs

4.1 Lack of industry-specific underwriting

Tattoo studios are grouped into broad “high-risk personal services” categories despite wide variation in hygiene engineering, documentation, training and sterilisation systems.

4.2 Inconsistent and unclear exclusions

Common problematic exclusions include infection-related clauses, bodily fluid exclusions, or restrictions on cover-up work — all of which undermine practical coverage.

4.3 Unpredictable underwriting and renewal outcomes

Studios report inconsistent underwriting decisions, often without clear reasons or actionable guidance.

5. Affordability and Availability Across High-Risk Industries

Insurance availability in tattooing is characterised by:

- limited insurers willing to underwrite the sector
- significant price variance
- unpredictable premium increases
- exclusion-heavy policies
- reduced appetite in rural areas

6. Adequacy of Current Regulatory Framework

Tattooing lacks a harmonised national standard covering:

- infection control
- sterilisation
- training
- documentation
- hygiene engineering

Insurers therefore rely on broad classifications rather than structured benchmarks.

7. Case Study — Operational Realities for a Tattoo Studio

Examples observed include:

- Safety investment not reflected in premiums
- Exclusions that contradict routine procedures
- No incentives for high compliance
- Limited insurer appetite
- Lack of underwriting transparency

8. Recommendations

8.1 Adoption of a National Tattoo Industry Standard — InkSafe™

8.2 National review of insurance affordability

8.3 Implementation of risk-tiered pricing

8.4 Mandatory clarity in underwriting

8.5 Insurer–regulator collaboration

8.6 Government recognition of minimum standards

8.7 Recognition of standards for premium reductions

8.8 SME support during hardship

9. Conclusion

InkSafe™ provides a practical pathway to stabilise pricing, improve safety, and create transparency across the tattoo industry.

I welcome the opportunity to engage further with the Committee.

Mitchell Hodson

Founder – InkSafe Standard & InkBook Platform

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Executive Summary

EXECUTIVE SUMMARY - InkSafe National Safety & Compliance Standard for Tattooing

Australia's tattoo industry is rapidly expanding, yet it operates without a nationally consistent regulatory or compliance framework. Insurance providers have effectively become de-facto regulators, determining acceptable risk in the absence of structured standards. This has resulted in widespread issues around affordability, availability, underwriting consistency and consumer protection.

InkSafe is a comprehensive national safety and compliance standard that enables insurers to apply risk-tiered pricing, reduce exposure, and improve underwriting confidence.

Key Issues Identified:

- Extreme variation in insurance pricing and availability
- No national baseline for infection control
- Safety investments not reflected in premiums
- Shrinking insurer appetite

What InkSafe Provides:

- Infection control and sterilisation standards
- Studio hygiene engineering requirements
- Documentation and incident management
- Training and competency benchmarks

- Auditing and verification framework

Recommendations:

1. National recognition of InkSafe
2. Risk-tiered pricing
3. Clear underwriting frameworks
4. Government-insurer collaboration
5. Recognition of certified studios for premium reductions

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Insurer Briefing

INKSAFE - INSURER BRIEFING

1. Executive Overview

InkSafe improves underwriting confidence, reduces exposure, and enables risk-tiered pricing in the tattoo industry.

2. Key Underwriting Challenges

- No industry-standard risk tiers
- Poor documentation in many studios
- Variations in hygiene practices not visible to insurers

3. How InkSafe Reduces Insurer Exposure

- Fewer infection-related claims
- Better documentation
- Clearer procedure definitions

4. Commercial Benefits

- Competitive advantage
- Lower long-term loss ratios
- Improved underwriting consistency

5. Partnership Models

- Preferred compliance partner

- Underwriting integration
- White-label compliance model

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InkSafe Overview, Framework & Certification Pathway

INKSAFE OVERVIEW & FRAMEWORK

1. What is InkSafe?

InkSafe is Australia's first national safety and compliance standard for tattoo studios. It establishes clear, measurable, insurer-recognised benchmarks for safety, hygiene, documentation, and professional practice.

2. Purpose of the Standard

- Improve public safety
- Provide insurers with reliable risk-differentiation
- Support consistent underwriting
- Reduce infection-related claims
- Promote higher professionalism across the industry

3. Core Components of the Standard

- Infection control and sterilisation protocols
- Engineering and hygiene requirements
- Documentation and record-keeping standards
- Artist competency and training
- Incident reporting and aftercare guidance

- Compliance auditing and verification

4. Certification Pathway

Studios progress through structured levels:

- Level 1: InkSafe Standard - Documentation & baseline compliance
- Level 2: InkSafe Certified - Verified audit + staff training
- Level 3: InkSafe Gold - Highest level hygiene engineering + zero non-compliance issues

Certification is valid for 12 months and requires renewal via documentation review and optional on-site verification.

5. Compliance Audits

Audits assess:

- Studio hygiene engineering
- Sterilisation and equipment controls
- Waste management and contamination prevention
- Training records and competency
- Documentation and aftercare processes
- Incident management systems

Studios receive a detailed report outlining compliance, corrective actions, and their official certification status.

6. How Studios Become Certified

Step 1: Submit required documentation (policies, logs, hygiene checklists)

Step 2: Complete InkSafe online training for all staff

Step 3: Book an on-site or virtual audit

Step 4: Receive a pass/fail decision with required corrective actions

Step 5: Achieve certification and appear in the InkSafe registry

7. Insurer Integration

Insurers may use InkSafe certification:

- As a prerequisite for premium discounts
- To apply risk-tiered pricing bands
- To reduce claims volatility
- To increase underwriting consistency

InkSafe creates a stable foundation for safer studios and more confident underwriting.

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