

Experiences of a Reviewing Actuary

Andrew Kay 30 March 2017

Scope of the Peer Review

Application: all High, Medium High and Medium Low Impact Solvency II undertakings

Timing:

- High at least every 2 years
- Medium High at least every 3 years
- Medium Low at least every 5 years

Covering:

- Technical Provisions and related:
 - AOTPs
 - ARTPs

Other areas?

- SCR
- Opinion on underwriting
- Opinion on reinsurance
- Opinion on ORSA
- Overall process



External Audit vs Peer Review?

External Audit

 Provides a reasonable assurance opinion on whether the specified elements of the SFCR have been properly prepared, in all material respects, in accordance with the Solvency II regulations

Peer Review

- Provides an independent view of the TPs
- Much more detailed review
- Some calculations likely
- Review of assumptions, methodology and opinion on results
- Uncertainties and key judgements
- Not just asking "Are you compliant?" but also "Have you used appropriate methodology and assumptions?"



Areas of review

Data



Assumptions



Methodology



Results & Reporting

- Data quality
- Controls from data extract to models
- Grouping & segmentation
- **Data dictionary**

- Appropriate and realistic
- Actual vs expected differences
- Management actions
- Dynamic policyholder behaviour

- Appropriate and consistent with the requirements
- BEL and RM
- Options and guarantees

- Compliance with S2 requirements
- Reasonableness of conclusions of AOTPS, ARTP
- Independent recalculation?

Other areas: significant LoBs; material sensitivities; material uncertainties; expert judgements

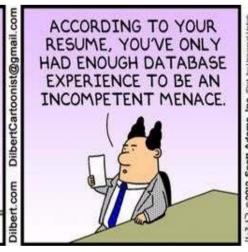
Expert judgements

Delegated Regs. Art 2: "...assumptions shall be based on the expertise of persons with relevant knowledge, experience and understanding of the risks inherent in the insurance or reinsurance business." "...ensure that internal users of the relevant assumptions are informed about their relevant content, their degree of reliability and their limitations."

Consider:

- Materiality
- Governance
- Communication and uncertainty
- Documentation
- Validation

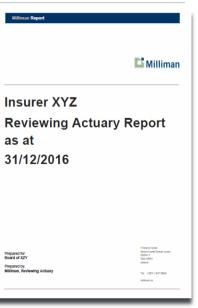




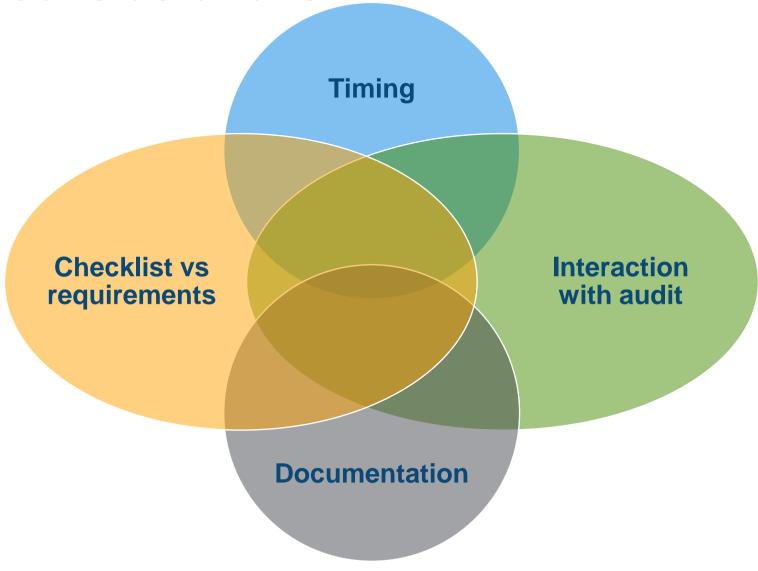


Peer Review Report

- Report to the Board covering:
 - Independent view of the TPs and the approach taken by the HoAF in reaching his/her opinion on them
 - Work done and process followed
 - Commentary on appropriateness of the assumptions, methodology and main uncertainties in the TPs
- Provided to the Board within 1 month of the Board receipt of the related ARTPs, and to the CBI on request.
- Board considers the results of the report and, where necessary, takes appropriate action.
- Board notifies the CBI highlighting any material issues and action plan.



Practical considerations





Some areas of judgement & interpretation

Contract
Boundaries

Risk Margin

Expense assumptions

Simplifications & approximations

Emerging market practice and regulatory interpretation



Provides reassurance to...

Head of Actuarial Function

Internal Audit, Risk Management, Compliance

Board





Thank you

Andrew Kay 30 March 2017



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