



# Pillar 3: One year on: How have things changed?

Cat Drummond FIA Sayeed Zaman FIA



## Agenda



- Background
- Constituents
- Feedback from 2016 year end
- Market progress
- Key findings
- Case study
- Conclusions and next steps
- Questions and comments





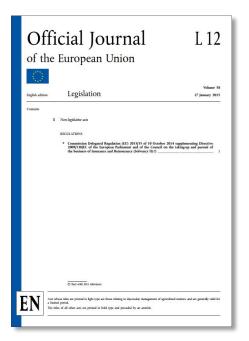
## **Background**

- What are SFCRs and QRTs?
- LCP's second annual review
- 100 constituents
- Review of public QRTs and SFCR narrative reporting
- How have things changed since last year?
- Looking ahead





### What are SFCRs and QRTs?



Articles 293-297



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Quantitative Reporting Templates (QRTs)



26 October 2018

















































100 non-life insurers across the UK and Ireland



































mutual





















Cornish Mutual















Endurance













































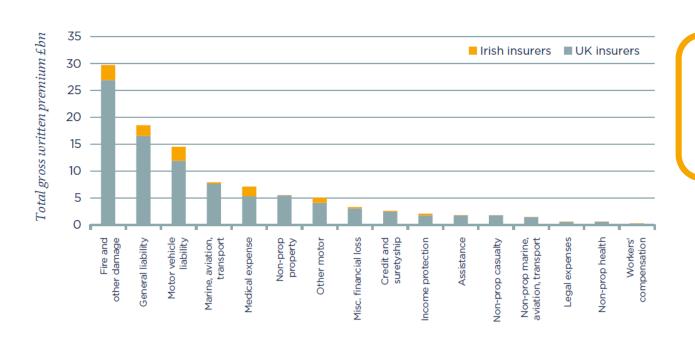








#### Gross written premium by SII LoB (non-life)



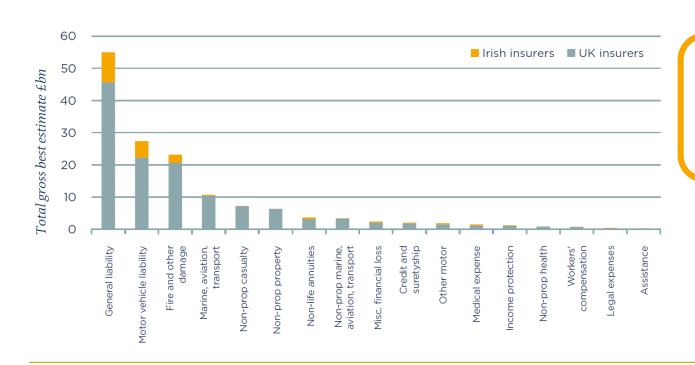
£103bn

non-life gross written premium





#### **Technical provisions by SII LoB (non-life)**



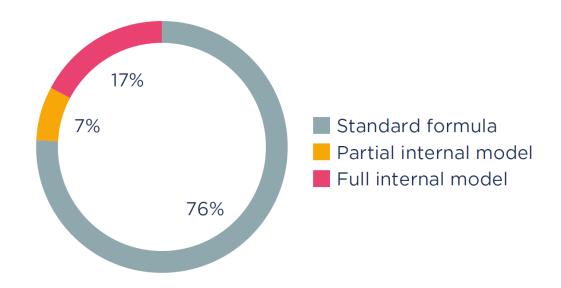
£148bn

non-life gross best estimate SII TPs





### Percentage of firms using SF/PIM/FIM







### Feedback from 2016 year end

- More detail required on stress, scenario and sensitivity testing
- More granular disclosures
- Ensure greater compliance with regulations
- Improvements in quality of QRTs needed
- 2017 year-end SFCRs should include comparative information





### **Market progress**



- Stress and sensitivity and TPs uncertainty disclosures
- Non-compliance still an issue around less "clear cut" requirements
- Drivers of movements in SCR coverage
- Availability of disclosures



- Improvement in accuracy of QRTs and quality of reporting
- "Look and feel" slightly improved





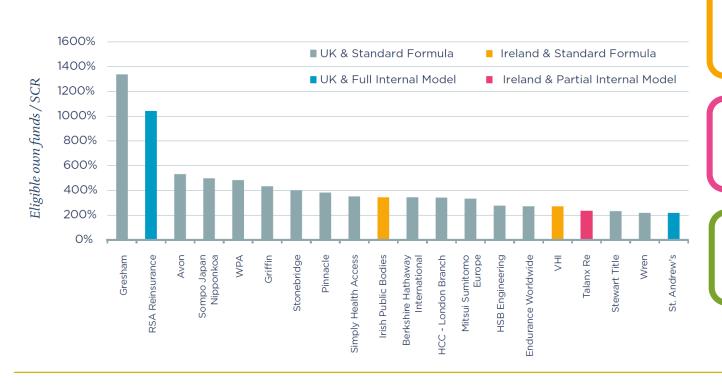
## **Key findings**

- Capital strength
- Risk margin
- Investments
- Key risks faced by firms
- Quality of reporting





#### Eligible own funds ratio - top twenty



206%

2017 average ratio

202%

2016 average ratio

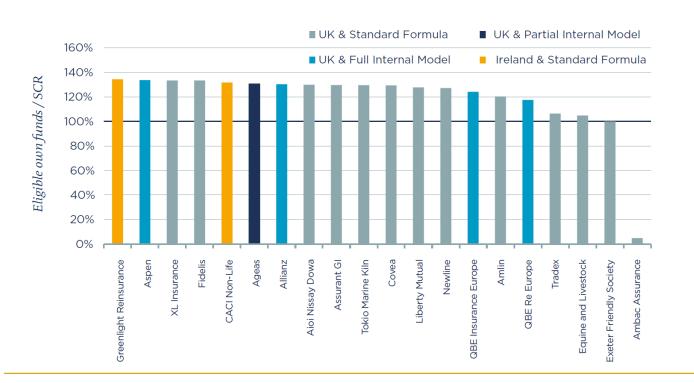
427%

average ratio of top twenty





#### Eligible own funds ratio - bottom twenty

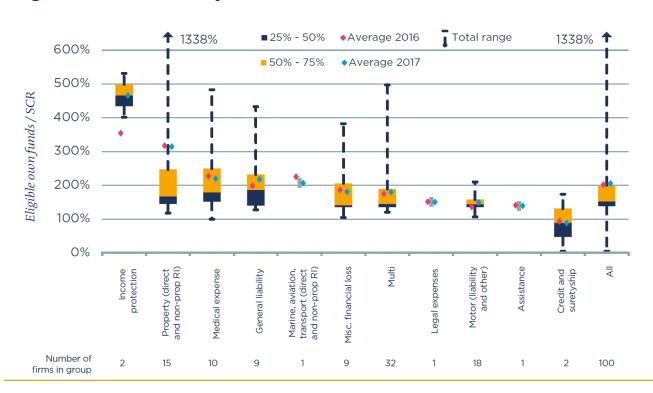


119% average ratio of bottom twenty





#### Eligible own funds ratio by line of business



Allocated to SII LoB if firm wrote more than 50% of GWP in that line, otherwise "Multi-line"





Bottom twenty - eligible own funds ratio after a loss equal to MCR \*



20% of firms had a 15% chance of breaching their SCR over a 1 year period

\* NB figures not adjusted for restrictions in place for ring-fenced funds







1 firm had insufficient capital to cover their SCR at the balance sheet date



53% of firms experienced an increase in their eligible own funds ratio over the year with some big swings



Average increase of 35% for those firms that experienced an increase in their ratio



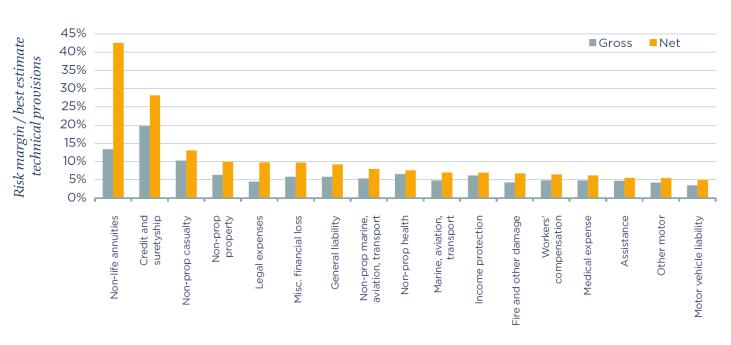
Average decrease of 30% for those firms that experienced a decrease in their ratio





### Risk margin

#### Risk margin as a percentage of best estimate technical provisions



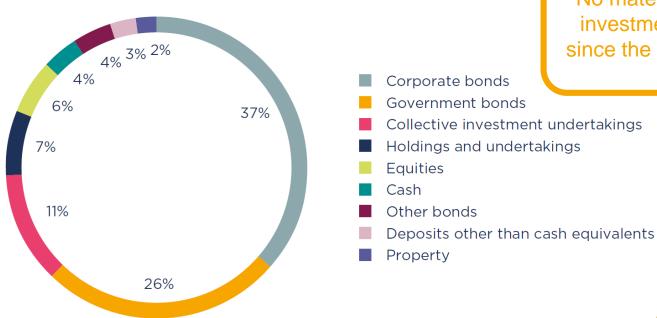
9%
Aggregate risk margin as % of non-life net technical provisions





### **Investments**

#### **Aggregated investment holdings**



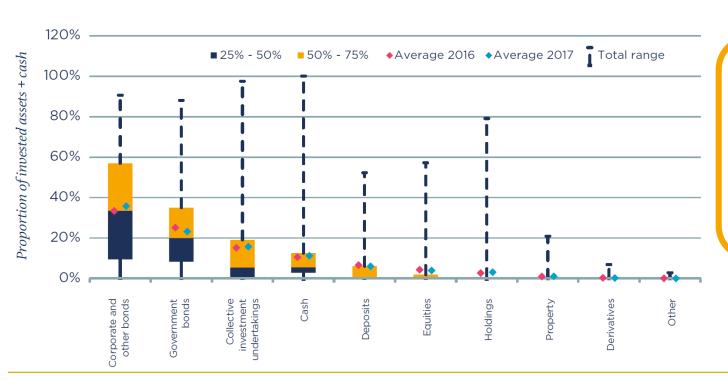
No material change in investment allocation since the 2016 year end

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### **Investments**

#### Range of asset allocations across insurers



No material change in investment allocation since the 2016 year end





## Tiering of own funds

- Capital is tiered based on loss absorbency and permanency
- Rules place certain restrictions on eligible own funds to meet the SCR:
  - Tier 1 funds should be at least 50% of the SCR
  - Tier 3 funds should be less than 15% of the SCR

Tier 3 = 15% SCR:





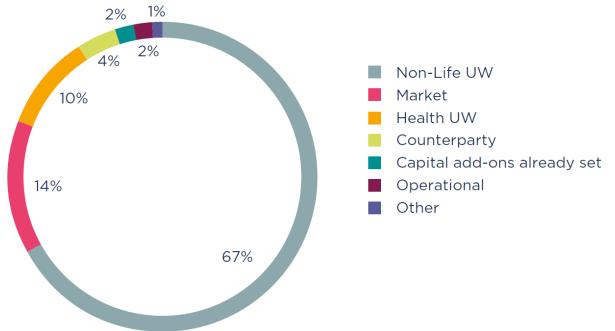






## Key risks faced by insurers

### Percentage of firms by largest risk area



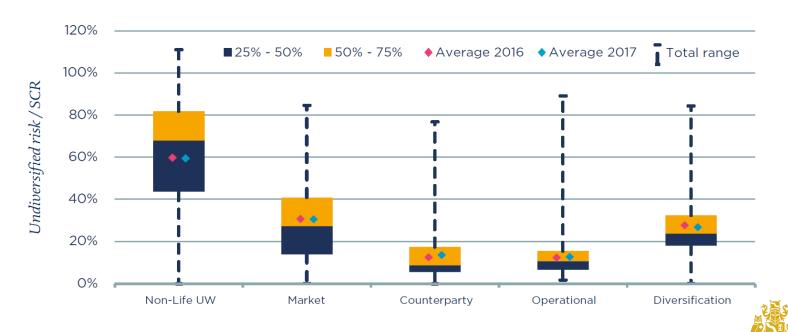
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## **Key risks faced by insurers**

#### Undiversified risk as a proportion of diversified SCR



26 October 2018



### **Key risks faced by insurers**



33% see Brexit as a key risk. Up from 23% last year



42% of firms have listed cyber risk as a key risk



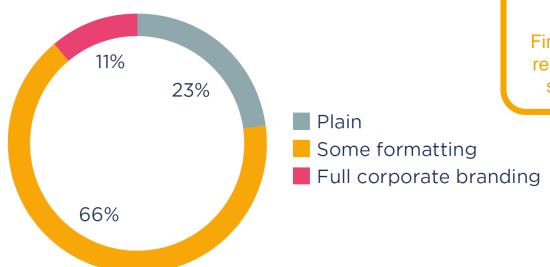
Only a small proportion of firms highlighted IFRS17 and the 'Trump' effect as key risks





## **Quality of reporting**

#### Look and feel



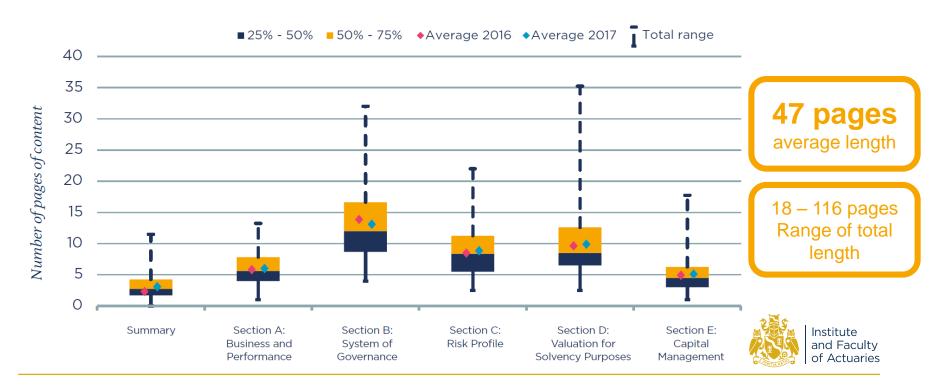
**77%**Firms that produced reports with at least some formatting





## **Quality of reporting**

#### Length of each section





## **Case study – capital improvements**



Your Partner in Insurance

- Ageas Eligible own funds ratio from 91% to 131%
- Ogden discount rate change
- £50m share capital
- Stop loss reinsurance
- De-risked bonds



- XL Insurance Company SE
   Eligible own funds ratio
   from 126% to 133%
- 3 capital injections from immediate parent company



- Financial Insurance
  Company Ltd Eligible own funds ratio from 131% to 140%
- £85m from parent





### **Conclusions**

- Insurers are generally sufficiently capitalised with greater buffers in place than last year
- Some firms saw large swings in capital cover over the year
- Cyber and Brexit risks are key areas of focus for firms
- Improvements needed in:
  - disclosure of stress and sensitivity testing for key risks and uncertainty in technical provisions
  - accuracy of QRTs
  - ensuring general compliance
  - availability of SFCRs and QRTs





### **Next steps**

- We are performing benchmark analyses to support our work for clients
- We have had a number of follow up meetings with insurers to:
  - discuss key findings;
  - see how they compare to other insurers; and
  - suggest practical ways to improve their reporting for future year ends





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# **Questions**

# Comments

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