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■Nine n	pired" fast track guidance note – GN w fast track guidance notes GN39-4 N1, GN8	

# Agenda continued GN37 GN39 GN44 – Phase 1 ■ GN40 GN45 GN47 - Phase 2 ■ GN41 GN42 GN43 GN46 - Phase 3 ■ GN2 – Probably Phase 3 ■ GN1 and GN8 – to await further developments **Timings** ■ Phase 1 consultation in early summer ■ Phase 2 consultation early autumn The above for implementation this year ■ Phase 3 consultation early 2006 Morris ■ The world doesn't stop Nobody knows when or how the new regime will kick off • We have guidance which will expire without some action

# **GN37** • FIMC have granted an extension, but this guidance needs to go through due process Supervision Committee want to "promote" some parts to Practice Standard Duality of status will need to be made clear GN37 - some key issues • With Profits Actuary – issues not related to with profits business Materiality ■ FSA "guidance" to be removed • Some "commencement" provisions are deleted **GN39** • Few changes considered necessary ■ Mostly it is a "tidy-up" • All parts are, of course, open for consultation Non-controversial?

#### **GN44**

- GN44 will not DEFINE "generally accepted actuarial practice"
- GN44 describes some practices which are generally accepted by the profession
- Reduce repetition of FSA rules and guidance?
- Look instead to add GAActP?

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#### GN44 - Issues

- Materiality relative to surplus and liabilities
- Approximations to stochastic methods
- Negative sterling reserves
- Prudent PUP assumptions
- Guaranteed minimum values on otherwise variable benefits to be treated in the same way as options

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### GN44 - Issues continued

- Minimum stochastic standard of "mean of a risk neutral valuation"
- Limited permission to be more lenient where a WPICC is going to apply
- More guidance on persistency timing
- "Emergence as surplus of margins" deficits elminiation
- Can lapse risk come within "insurance risks that are reinsured"?

#### GN44 - Issues continued

- No arbitrary changes in the context of the RCR
  - Clarifying a zillmer may be introduced to net premium calculations provided the net premiums change can be justified
- Clarification re RCR the "matching test" in PRU 7.2.34 need not be applied to the postresilience position (effectively the assets could be adjusted thereafter to meet this requirement)

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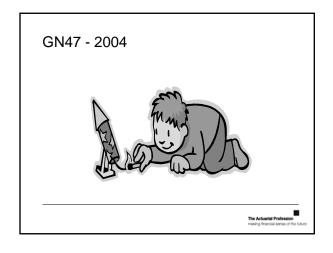
#### **GN40**

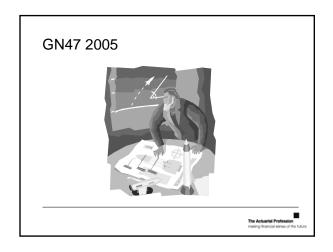
- David Lechmere is looking for volunteers now!
- Comments invited from post holders
- Is the current version incomplete, or too proscriptive?
- Should more "recommended practice" requirements be added – in GN40 or new GN2?
- Do we need to give more guidance on monitoring/capital?

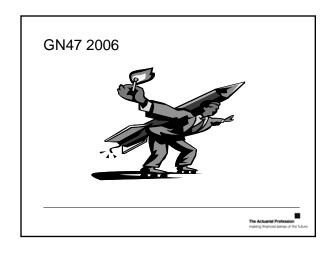
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#### **GN45**

- New area many practices are evolving
- I expect significant "experience" input
- We are looking for volunteers!
- How can we help the 2005 year end process?
- Feedback NOW is vital







#### **GN47**

- Technical modelling issues
- Understandable!
- Legitimate aspirations versus theoretical alchemy
- Needs to be practical, theoretically justifiable, and to stretch towards attainable best practices

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### GN47 - Working Party intentions

- Testing the suitability of models will continue to be a feature – maybe the tests will change
- For RBS work testing calibration requirements: reliable prices versus duration considerations
- For ICA the "table" is there a better way?
- Much more for uses to calculate mathematical reserves
- Remove insurance risk section?

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## Looking further ahead ...



#### GN41 GN42 GN43

- So far, these are not seen as controversial notes
- Or does anyone know otherwise?
- Does anyone feel the reviewing actuary needs more guidance on different but acceptable views?

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#### **GN46**

- Even less well developed technology than GN45 and GN47
- The AFH's role was added relatively late
- Much to be learned, by firms, FSA, actuaries, other risk managers
- Volunteers will be sought to help make this guidance more useful

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#### GN<sub>2</sub>

- Still alive
- Application

Appointed Actuaries. Actuaries responsible for longterm insurance business written outside the UK are expected to follow the same principles. The Guidance Note is also written to help actuaries advising UKsupervised long-term insurers and friendly societies (directive and incorporated societies only) on their world-wide business.

#### GN<sub>2</sub>

- Needs to be updated to reflect
  - New roles
  - PRU instead of IPRU
  - The purpose of the ICA
  - The difficulties of managing under two peaks
  - Modern methods
- Too important to scrap, too difficult to rush?

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#### GN1 and GN8

- GN1 applies to Lloyds only
- GN8 applies to non-directive friendly societies and Lloyds only
- FSA will change non-directive rules eventually
- Lloyds is also developing



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