

GAP ANALYSIS

Governance Section

General governance requirements (pages 1-6)

Existing

- Governance standards
- Risk management standards (risk governance) - structure for governance that supports risk management by providing clearly defined accountabilities, expectations and reporting requirements for all parties
- Operational processes minimum standards:
 - key business and operational processes must be properly documented
 - directors and staff should understand all the operational and business processes relevant to their role
- Risk management standards - effective risk policy, subject to regular review

NEW

- Regular internal review of the system of governance
- Written policies for:
 - internal control
 - internal audit
 - outsourcing
- Policies for risk management, internal control, internal audit and outsourcing reviewed at least annually
- Processes for the identification and management of emerging risk issues

Fit & Proper Requirements (page 7)

Existing

- Underwriting Byelaw, para 42A, (appointments to senior positions) - fit and proper requirements for directors/partners/active underwriters/run-off managers
- Lloyd's process for notification and amendment of appointments to all senior positions, including active underwriters and run-off managers
- Governance standards

Now

- N/A (no significant changes to Lloyd's requirements and processes anticipated at this stage)

Risk Management (pages 8-9)

Existing

- Risk management standards - governance structure to support the management of risk
- Risk management standards:
 - risk policy setting out risk management strategy, covering each risk category
 - risk management process - risk identification and assessment, monitoring and reporting
- Risk management standards - process to identify all significant risks
- Risk management standards (risk governance) - structure of the risk management function
- ICA guidance minimum standard: 'Mapping to the risk register'
- Contingency plans - operational processes minimum standards - appropriate business continuity plans

Now

- Risk management function will need to address the following tasks relating to the internal model:
 - design and implementation
 - testing and validation
 - documentation
 - informing the Board about the performance of the model
 - analysis of the performance of the model and production of summary reports
- Contingency planning (considered in a wider sense than operational business continuity)

ORSA (pages 10-11)

Existing

- N/A (this is a new requirement under Solvency II consistent with the principles of the ICAS regime)

Now

- The company has not been able to meet the requirements

(1) Do you understand the requirement sufficiently at this stage

(2) What further work/help is required to reach an understanding

(3) Do you currently meet this requirement

Gap Analysis Document

Clemens Wendtner

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