

Response from Laura Salvatori

Dear Sir/Madam,

I am a qualified Italian actuary, and a Fellow of the Institute of Actuaries by virtue of the mutual recognition agreement between European actuarial associations. Although my actuarial training is of some general help to me in my current management role, I no longer work as an actuary. So I do not expect to be affected by BAS's technical standards as long as I do not suggest to anyone that I am giving formal actuarial advice. However, as a potential user of actuarial work, I have some comments on your draft generic reporting standard.

Overall, I think the proposals are sensible, and many of the suggestions would seem to be good advice to anyone writing a financial report. However, it is not always clear which provisions are mandatory and which are just discussion. The interpretation in the principles of what is material or immaterial, relevant or irrelevant, or an adequate indication of uncertainty, may be quite subjective. In places it reads more like a textbook than a standard.

I am confused by the 'Status and scope' box on page 13, which seems to cross-refer to some complicated provisions in another document which few people will ever read, let alone understand. I do not see why the status and scope of this standard should be limited so as to depend on the introduction of other more specific standards which I may not even know about.

As this is meant to be a generic standard, I would expect it to set the principles for any actuarial report which is described or presented as such. Whether something is an actuarial report to which a generic standard can be expected to apply should surely be clear to the reader, not left to the discretion of the writer. I appreciate that the actuarial profession's rules only apply to its own members, but I do not see why that should stop the BAS as a public interest regulator from putting this standard forward as applicable to all actuarial reporting, whether undertaken by an actuary or not.

Even if it is a non-actuary or a company who is claiming to have produced an actuarial report, then I would have thought it would be reasonable for me to expect them to comply with the standard. If they do not want to comply with the standard, then I would expect them to say so and explain why, or withdraw the claim that they are making an actuarial report.

Yours faithfully

Laura Salvatori