

**From:** [Patrick Cleary](#)  
**To:** [basnovember07;](#)  
**Subject:** Comments on BAS Nov 2007 Consultation Paper on conceptual framework  
**Date:** 27 January 2008 14:36:52

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Dear BAS

Please find a few comments on the consultation paper. These comments are made by me personally and do not represent the views of my employer.

I think that the BAS general direction is sensible.

Qu 1

I am not sure what the thinking is behind excluding category E work entirely from the standards - this seems odd to me.

Qu 2

OK!

Qu 3

BAS standards are over individuals and not firms. I am wondering about the situation in which an actuary finds himself/herself disagreeing strongly with the line that a firm is taking. I hope that the standards can be clear about what practical action is expected from that actuary eg recording the steps taken to influence the firm, escalating the issue within the firm, whistle blowing, or whatever. I think that reasonably following some such steps should be strong evidence (perhaps even a safe harbour) against needing to take disciplinary action.

Qu 4

I would want the standards to be broad enough to accommodate a very wide range of actuarial approaches, work and styles of report writing. It should be allowable to do shorter, less formal work / report in appropriate circumstances.

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