

1	Please provide your name (note: anonymous responses will not be accepted).	DELETED FOR GDPR PURPOSES
2	Are you responding as an individual or on behalf of an organisation? If the latter, please specify.	Yes - The Society of Pension Professionals (SPP)
3	Please provide your email address. The responses to this survey are being collected and processed by the Financial Reporting Council (FRC) in order to inform certain aspects of the Actuarial Policy Team's (APT) work. In particular, the data collected through this survey will be used by the FRC's APT for the Technical Actuarial Standards Post Implementation Review. The FRC will process any personal data provided by you in accordance with the General Data Protection Regulation and the Data Protection Act 2018. More information about how we handle the personal data of stakeholders is contained in the privacy notice on the FRC website at https://www.frc.org.uk/about-the-frc/procedures-and-policies/privacy-the-frc .	DELETED FOR GDPR PURPOSES @the-spp.co.uk
4	Do you request confidentiality of your response? (note: if so, your response will NOT be published to the FRC website).	No, but it should be published under The Society of Pension Professionals, not DELETED FOR GDPR PURPOSES
5	<i>[for users of technical actuarial work]</i> Have the TASs been effective in ensuring the quality and clarity of the actuarial information you receive is reliable for any decisions that you take based on that information?	In general, TAS300 has been helpful in ensuring quality and clarity of advice, subject to the comments in later responses
6	To what extent has TAS 200 been effective in supporting high quality technical actuarial work in the insurance sector?	No comment made
7	What aspects of TAS 200 have caused difficulties? Please explain what those difficulties were and how you were able to overcome them.	No comment made
8	To what extent have the Provisions 12 to 23 of TAS 200 been effective in supporting high quality technical actuarial work in the specified areas?	No comment made
9	Have you observed difficulties with the quality of technical actuarial work in support of pricing frameworks? Would further additional requirements help clarify the FRC's expectations in this area?	No comment made
10	Are there other areas of insurance-related technical actuarial work, beyond the areas covered in Provisions 12 to 23 of TAS 200, where you would welcome further technical actuarial standards?	No comment made

11	Does TAS 200 currently give sufficient direction on the nature of professional scepticism, what that involves, and how that should be demonstrated?	No comment made
12	Do Provisions 16 and 17 of TAS 200 in relation to insurance transformations provide sufficiently clarity in setting out the FRC's expectations of technical actuarial work in this area? Are there further additional requirements which should be considered?	No comment made
13	What changes should be made to TAS 200 to better reflect the PRA and the FCA's expectations of the Independent Expert's work in a Part VII transfer?	No comment made
14	How should TAS 200, in particular the provisions in relation to financial statements (Provisions 12 and 13 of TAS 200), be updated to address the challenges in respect of the implementation of IFRS 17?	No comment made
15	To what extent has TAS 300 been effective in supporting high quality technical actuarial work in the pensions sector?	SPP thinks that TAS300 has been broadly effective in this regard, serving as a useful benchmark to set a standard for actuarial advice in this area.
16	What aspects of TAS 300 have caused difficulties? Please explain what those difficulties were and how you were able to overcome them.	We note a small number of difficulties relating to advice given to sponsors rather than trustees. For example, in the area of funding, TAS300 explicitly applies to advice given to sponsors but the remainder of the funding section seems to be very much drafted with advice to trustees in mind. Some amendments to make this more usable for corporate advisers may be helpful. As one specific example, there is a need to state how assumptions take account of employer covenant, but sponsors will typically not have taken separate covenant advice themselves. However we do not think this is an area to review at this time, but rather review TAS300 more thoroughly once the regulations and code of practice on the new funding regime have been finalised, to ensure consistency here and avoid the need to review the document twice.

17	<p>How are recent or anticipated changes in the regulatory framework requirements in relation to scheme financing changing the nature of advice and support provided by practitioners? What changes should be made to TAS 300 to reflect these?</p>	<p>We would suggest that changes to the TAS statements should happen infrequently where possible, as even small changes can lead to significant costs and efforts by the industry in revising advice and processes, with users bearing the ultimate cost. With that in mind, it seems clear that there is a need for TAS300 to be joined up with the regulations and code of practice on the new funding regime, and hence (noting the exception below) any changes to TAS300 should be postponed until the detail there is finalised, to avoid the need for reviewing TAS300 twice. In this regard the FRC should liaise closely with DWP and TPR – this is essential to ensure TAS300 is appropriate in the context of the new funding regime. The exception is CDC (or CMP) schemes, where given the regulations for these schemes will be finalised in the nearer term, modifications to TAS300 should be made to accommodate this. SPP strongly feels this should be included as a separate section in TAS300 – noting that the considerations for these schemes, the nature and scope of advice required, and how this interacts with member benefits is all very different to DB schemes to which the current TAS300 relates. Four particular areas should be covered relating to CDC schemes:</p> <ul style="list-style-type: none"> • Scheme design modelling work for an employer or other sponsoring organisation • Modelling for trustee scheme design viability assessments, • Trustee valuation work to determine benefit increases, • Trustee member option factors <p>Our strong preference is for a high level, principle based, approach, consistent with the majority of the existing TASs, rather than a more prescriptive 'checklist' approach to what should be included in advice. We would also strongly urge a further consultation on the detailed wording to be included for CDC schemes before any changes to TAS300 come into force.</p> <p>Regarding the remainder of the content of TAS300, and noting the comment above on timing, SPP suggests that the following modifications could be made in due course:</p> <ul style="list-style-type: none"> • The current Appendix A – the detailed checklist for what should be included in the Scheme funding report – would probably sit better elsewhere, for example in regulations, rather than within the TAS
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		<p>itself. Currently it is inconsistent with the other content which is more principles based.</p> <ul style="list-style-type: none"> • Similarly, any additions made to TAS300 for other areas should be principles based and high level rather than prescriptive. • Regarding the specific areas of buyout and risk transfer mentioned in the call for evidence – we agree that these are becoming more popular, and some changes may be worthwhile to give additional focus to these areas. As schemes get better funded, whether transferring risk or updating how they approach cashflow matching and hedging risks, they will be exposed to a different set of risks compared to typical scheme earlier in its journey. However there is a need to avoid the risk of obligating actuaries to include advice on something that is not relevant to a particular scheme. Our preference is therefore that any additions to TAS300 for these areas should be kept high level and principles based and focussed on situations where such advice is relevant.
18	<p>How has the development in pensions freedoms in recent years impacted on your technical actuarial work for actuarial factors? What changes should be made to TAS 300 to reflect these?</p>	<p>The development in pensions freedoms has had several impacts, including:</p> <ul style="list-style-type: none"> • Shifting the age profile of members who take transfer values, and to a lesser extent other options. Members typically take transfer values at older ages now compared with before the pensions freedoms. This can impact advice on transfer value assumptions and on funding – noting that due to e.g. differing allowances for other options such as commutation, there can be examples where members taking a transfer value close to their Normal Retirement Age can cause a funding strain. • There is also much more focus on the consistency of different member option terms – especially commutation versus transfer values versus trivial commutation. <p>That said, we think that the existing content of TAS300 is sufficiently broad that no changes are required as a result. We also note that the new funding code may also impact advice on actuarial factors – noting the requirements around a long-term funding target etc – and hence again we feel no changes should be considered until the new funding code is finalised.</p>

19	Are there other areas of pensions-related technical actuarial work where you would welcome further technical actuarial standards?	<p>As per our response to Q17, SPP suggests that the whole of TAS300 could perhaps have some additional focus on journey to endgame and risk transfer.</p> <p>As one example, one area that is currently high profile and where we are seeing a greater deal of focus is discretionary increases. We believe the current wording on Scheme modifications covers advice in this area, however that section of TAS300 should also mention the impact of discretionary payments on funding, journey to settlement and other risk transfer options. We do not believe this is covered by the current funding section as this is specific to legislative requirements rather than anything broader. However as per earlier responses there is a need to wait until the new funding code is finalised before any such changes are made.</p>
20	To what extent has TAS 400 been effective in supporting high quality technical actuarial work for funeral plans trusts?	No comment made
21	What aspects of TAS 400 have caused difficulties? Please explain what those difficulties were and how you were able to overcome them.	No comment made
22	What are your views on the timings of the changes to TAS 400 given the timings of the change in authorisation and supervision regimes?	No comment made
23	Do you think that TAS 400 should create a standard terminology to be used for funeral plan valuation reports?	No comment made
24	What are your views on whether TAS 400 should apply to technical actuarial work for Burial Societies?	No comment made
25	To what extent has ASORP 1 been effective in supporting high quality technical actuarial work in the social security sector?	No comment made
26	What aspects of ASORP 1 have caused difficulties? Please explain what those difficulties were and how you were able to overcome them.	No comment made
27	Do you consider the definition of work which falls in the scope of application of ASORP 1 is clear? What changes should be made to the definitions set out in ASORP 1 to improve clarity?	No comment made
28	Have you observed an increased variety of technical actuarial work which falls into the scope of application of ASORP 1, for example since the pandemic? What changes should be made to ASORP 1 to reflect the new types of work and practices?	No comment made

29	What changes should be made to the existing sector specific TASs to reflect these developments?	
30	Would there be greater coherence in the requirements in relation to technical actuarial work in the fields of investment and finance by setting them out in their own standard?	No comment made
31	Are there any areas where you would welcome further standards; in particular, new areas where an increasing number of actuaries are performing technical actuarial work?	No comment made