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Dear Karla

### **Updated IAA Education Syllabus – Consultation Response**

The Financial Reporting Council is the UK's independent regulator responsible for promoting high quality corporate governance and reporting to foster investment. We promote high standards of corporate governance through the UK Corporate Governance Code. We set standards for corporate reporting and actuarial practice and monitor and enforce accounting and auditing standards. We also oversee the regulatory activities of the UK's actuarial profession, the Institute and Faculty of Actuaries (IFoA), and the professional accountancy bodies and operate independent disciplinary arrangements for public interest cases involving actuaries and accountants.

A part of our actuarial oversight role is to consider, in the public interest, the appropriateness of the IFoA's criteria for qualification as an actuary and its education syllabus. The FRC therefore has an interest in the IAA's proposals for an updated education syllabus.

#### **Scope of our response**

Our response concerns the status of the IAA's education syllabus as described in the Preamble, Section 1 of the proposal.

#### **Status of the IAA's education syllabus**

We note that the education syllabus sets out the minimum requirements for a fully qualified actuary and that all full member associations are required to have a syllabus that covers all of these requirements.

We are concerned that the IAA encourages (in paragraph 4 of the preamble) full member associations to "*align their requirements as close as possible to IAA minimum requirements and not make it too onerous for students to become a fully qualified actuary*".

This focus on the minimum requirement would naturally lead to syllabus inertia. We consider this is a risk to the quality of actuarial work because it discourages local professional bodies to proactively ensure that their syllabuses evolve and remain fit for purpose as both the environment in which their members work and the role of the actuary continue to evolve.

Where professional bodies compete for members in an international marketplace, we consider that it would be more appropriate for the IAA and its members to focus instead on the value that properly trained actuaries can bring to potential users of their services rather than on the possibility that it may be onerous to obtain such training.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Siân Barr'.

**Siân Barr**

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