

# GAP ANALYSIS

	(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
<b>Governance Section</b>			
<b>General governance requirements (pages 1-6)</b>			
<b>Existing</b>			
<ul style="list-style-type: none"> <li>• Governance standards</li> </ul>			
<ul style="list-style-type: none"> <li>• Risk management standards (risk governance) - structure for governance that supports risk management by providing clearly defined accountabilities, expectations and reporting requirements for all parties</li> </ul>			
<ul style="list-style-type: none"> <li>• Operational processes minimum standards:                             <ul style="list-style-type: none"> <li>◦ key business and operational processes must be properly documented</li> <li>◦ directors and staff should understand all the operational and business processes relevant to their role</li> </ul> </li> </ul>			
<ul style="list-style-type: none"> <li>• Risk management standards - effective risk policy, subject to regular review</li> </ul>			
<b>New</b>			
<ul style="list-style-type: none"> <li>• Regular internal review of the system of governance</li> </ul>			
<ul style="list-style-type: none"> <li>• Written policies for:                             <ul style="list-style-type: none"> <li>◦ internal control</li> <li>◦ internal audit</li> <li>◦ outsourcing</li> </ul> </li> </ul>			
<ul style="list-style-type: none"> <li>• Policies for risk management, internal control, internal audit and outsourcing reviewed at least annually</li> </ul>			
<ul style="list-style-type: none"> <li>• Processes for the identification and management of emerging risk issues</li> </ul>			
<b>Fit &amp; Proper Requirements (page 7)</b>			
<b>Existing</b>			
<ul style="list-style-type: none"> <li>• Underwriting Byelaw, para 42A, (appointments to senior positions) - fit and proper requirements for directors/partners/active underwriters/run-off managers</li> </ul>			
<ul style="list-style-type: none"> <li>• Lloyd's process for notification and amendment of appointments to all senior positions, including active underwriters and run-off managers</li> </ul>			
<ul style="list-style-type: none"> <li>• Governance standards</li> </ul>			
<b>New</b>			
<ul style="list-style-type: none"> <li>• N/A (no significant changes to Lloyd's requirements and processes anticipated at this stage)</li> </ul>			
<b>Risk Management (pages 8-9)</b>			
<b>Existing</b>			
<ul style="list-style-type: none"> <li>• Risk management standards - governance structure to support the management of risk</li> </ul>			
<ul style="list-style-type: none"> <li>• Risk management standards:                             <ul style="list-style-type: none"> <li>◦ risk policy setting out risk management strategy, covering each risk category</li> <li>◦ risk management process - risk identification and assessment, monitoring and reporting</li> </ul> </li> </ul>			
<ul style="list-style-type: none"> <li>• Risk management standards - process to identify all significant risks</li> </ul>			
<ul style="list-style-type: none"> <li>• Risk management standards (risk governance) - structure of the risk management function</li> </ul>			
<ul style="list-style-type: none"> <li>• ICA guidance minimum standard: 'Mapping to the risk register'</li> </ul>			
<ul style="list-style-type: none"> <li>• Contingency plans - operational processes minimum standards - appropriate business continuity plans</li> </ul>			
<b>New</b>			
<ul style="list-style-type: none"> <li>• Risk management function will need to address the following tasks relating to the internal model:                             <ul style="list-style-type: none"> <li>◦ design and implementation</li> <li>◦ testing and validation</li> <li>◦ documentation</li> <li>◦ informing the Board about the performance of the model</li> <li>◦ analysis of the performance of the model and production of summary reports</li> </ul> </li> </ul>			
<ul style="list-style-type: none"> <li>• Contingency planning (considered in a wider sense than operational business continuity)</li> </ul>			
<b>ORSA (pages 10-11)</b>			
<b>Existing</b>			
<ul style="list-style-type: none"> <li>• N/A (this is a new requirement under Solvency II consistent with the principles of the ICAS regime)</li> </ul>			
<b>New</b>			
<ul style="list-style-type: none"> <li>• To be completed by the end of the year and subject to approval</li> </ul>			

# Gap Analysis Report Format

**Michael Seilmaier**



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