# ICP Questionnaire – ICP 20 Public Disclosure

This ICP questionnaire is based on ICP 20 version 2011.

## Introduction

For each question, choose the response that most closely corresponds to the situation in YOUR JURISDICTION and YOUR AUTHORITY. Some questions ask about the actual experience in YOUR JURISDICTION during the last three years. If records or reports exist that would help you to respond to such questions, please refer to them. If not, please respond based on your best estimate of what the actual experience has been.

If your response to one or more questions would differ significantly for different types of insurers, for example, life insurers versus non-life insurers, then please respond to each such question with respect the same type of insurer.

In this survey (as in the ICPs), the term “legislation” is used to include both primary legislation (which generally requires full legislative consent) and secondary and other forms of legislation, including rules and regulations which have the legal force of law but are usually the responsibility of the supervisor. The term “supervisory guidelines” means documents issued by the supervisor to communicate expectations to the industry, which do not have the legal force of law. In this survey, the term “requirements” means requirements that apply broadly to insurers or to a type of insurer, for example, non-life insurers.

It is recommended that you prepare all answers to this questionnaire in advance and obtain approval in your supervisory authority before entering the results in the ICP Self-Assessment Tool (SAT) via [www.icp-selfassessment.org](http://www.icp-selfassessment.org)

Please note that in contrast to other ICP assessment processes the ICP SAT only takes into account your answers to multiple choice questions without any qualitative review. Therefore, the results are only high level and non-binding.

## Questionnaire

**20. The supervisor requires insurers to disclose relevant, comprehensive and adequate information on a timely basis in order to give policyholders and market participants a clear view of their business activities, performance and financial position. This is expected to enhance market discipline and understanding of the risks to which an insurer is exposed and the manner in which those risks are managed.**

**20.0 Overarching questions I**

1. How have the requirements for the public disclosure of information by insurers been established in YOUR JURISDICTION? (More than one response from among numbers 1 to 5 may be entered, where applicable.)
   1. The requirements have been established by legislation applicable to companies generally.
   2. The requirements have been established by legislation applicable to companies whose securities are publicly-traded.
   3. The requirements have been established by legislation applicable to insurers.
   4. The requirements have been established under financial reporting standards.
   5. The requirements have been established through supervisory guidelines.
   6. There are no specific requirements, but YOUR AUTHORITY advises insurers when it has concerns about their approach to public disclosure.
   7. There are no requirements.

Several of the standards on public disclosure refer to the need for information to be “appropriately detailed”. When responding to questions that include this term, please interpret it to mean information that is sufficiently detailed so that the effects of distinct material factors may be separately identified, while also being sufficiently aggregated so that a proper overall picture of the insurer is provided.

**20.1 Insurers disclose, at least annually, appropriately detailed quantitative and qualitative information in a way that is accessible to market participants on their profile, governance and controls, financial position, technical performance and the risks to which they are subject. In particular, information disclosed must be:**

• **decision useful to decisions taken by market participants;**

• **timely so as to be available and up-to-date at the time those decisions are made;**

• **comprehensive and meaningful;**

• **reliable as a basis upon which to make decisions;**

• **comparable between different insurers operating in the same market; and**

• **consistent over time so as to enable relevant trends to be discerned.**

1. To what extent are insurers in YOUR JURISDICTION required to disclose information that gives policyholders and market participants a clear view of their business activities, performance and financial position?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | 1. Fully reflected in the requirements | 2. Largely reflected in the requirements | 3. Partly reflected in the requirements | 4. Not reflected in the requirements |
| a. Insurers must disclose information at least annually |  |  |  |  |
| b. Information must be disclosed in a way that is accessible to market participants |  |  |  |  |
| c. Insurers must disclose appropriately detailed quantitative information |  |  |  |  |
| d. Insurers must disclose appropriately detailed qualitative information |  |  |  |  |
| e. Insurers must disclose information on their profile |  |  |  |  |
| f. Insurers must disclose information on their governance and controls |  |  |  |  |
| g. Insurers must disclose information on their performance |  |  |  |  |
| h. Insurers must disclose information on the risks to which they are subject |  |  |  |  |
| i. The information disclosed must be decision useful to decisions taken by market participants |  |  |  |  |
| j. The information disclosed must be timely so as to be available and up-to-date at the time those decisions are made |  |  |  |  |
| k. The information disclosed must be comprehensive and meaningful |  |  |  |  |
| l. The information disclosed must be reliable as a basis upon which to make decisions |  |  |  |  |
| m. The information disclosed must be comparable between different insurers operating in the same market |  |  |  |  |
| n. The information disclosed must be consistent over time so as to enable relevant trends to be discerned |  |  |  |  |

**20.2 Disclosure about the financial position of the insurer includes appropriately detailed quantitative and qualitative information about the determination of technical provisions. Technical provisions are presented by appropriate segment. This disclosure includes, where relevant to policyholders and market participants, information about the future cash flow assumptions, the rationale for the choice of discount rates, and risk adjustment methodology where used or other information as appropriate to provide a description of the method used to determine technical provisions.**

1. To what extent are insurers in YOUR JURISDICTION required to disclose information about the determination of technical provisions in the disclosure about their financial position?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | 1. Fully reflected in the requirements | 2. Largely reflected in the requirements | 3. Partly reflected in the requirements | 4. Not reflected in the requirements | 5. Not applicable, because such information is not relevant to policyholders and market participants in YOUR JURISDICTION |
| a. Insurers must disclose appropriately detailed quantitative information about the determination of technical provisions |  |  |  |  |  |
| b. Insurers must disclose appropriately detailed qualitative information about the determination of technical provisions |  |  |  |  |  |
| c. Insurers must disclose technical provisions by appropriate segment |  |  |  |  |  |
| d. Insurers must disclose a description of the method used to determine technical provisions. This includes information about the future cash flow assumptions, the rationale for the choice of discount rates, and risk adjustment methodology, where used, or other information as appropriate. |  |  |  |  |  |

**20.3 Disclosure about the financial position of the insurer includes appropriately detailed quantitative and qualitative information about capital adequacy. An insurer discloses information that enables users to evaluate the insurer’s objectives, policies and processes for managing capital and to assess its capital adequacy. This information encompasses the generic solvency requirements of the jurisdiction(s) in which the insurer operates and the capital available to cover regulatory capital requirements. If an internal model is used to determine capital resources and requirements, information about the model must be provided, having due regard to proprietary or confidential information.**

1. To what extent are insurers in YOUR JURISDICTION required to disclose information about capital adequacy in the disclosure about their financial position?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | 1. Fully reflected in the requirements | 2. Largely reflected in the requirements | 3. Partly reflected in the requirements | 4. Not reflected in the requirements | 5. Not applicable, because the use of internal models is not allowed |
| a. Insurers must disclose appropriately detailed quantitative information about capital adequacy |  |  |  |  |  |
| b. Insurers must disclose appropriately detailed qualitative information about capital adequacy |  |  |  |  |  |
| c. Insurers must disclose information that enables users to evaluate the insurer’s objectives, policies and processes for managing capital |  |  |  |  |  |
| d. Insurers must disclose information that enables users to assess the insurer’s capital adequacy |  |  |  |  |  |
| e. Insurers must disclose information that encompasses the generic solvency requirements of the jurisdiction(s) in which the insurer operates |  |  |  |  |  |
| f. Insurers must disclose information that encompasses the capital resources available to cover regulatory capital requirements |  |  |  |  |  |
| g. If an internal model is used to determine capital resources and requirements, insurers must provide information about the model (having due regard to proprietary or confidential information) |  |  |  |  |  |

**20.4 Disclosure about the financial position of the insurer includes appropriately detailed quantitative and qualitative information about financial instruments and other investments by class. In addition, information disclosed about investments includes:**

• **investment objectives;**

• **policies and processes;**

• **values, assumptions and methods used for general purpose financial reporting and solvency purposes, as well as an explanation of the differences (where applicable); and**

• **information concerning the level of sensitivity to market variables associated with disclosed amounts.**

1. To what extent are insurers in YOUR JURISDICTION required to disclose information about financial instruments and investments in the disclosure about their financial position?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | 1. Fully reflected in the requirements | 2. Largely reflected in the requirements | 3. Partly reflected in the requirements | 4. Not reflected in the requirements |
| a. Insurers must disclose appropriately detailed quantitative information about financial instruments and other investments by class |  |  |  |  |
| b. Insurers must disclose appropriately detailed qualitative information about financial instruments and other investments by class |  |  |  |  |
| c. Information disclosed about investments must include investment objectives, policies and processes |  |  |  |  |
| d. Information disclosed about investments must include values, assumptions and methods used for general purpose financial reporting and solvency purposes, as well as an explanation of differences (where applicable) |  |  |  |  |
| e. Information disclosed about investments must include information concerning the level of sensitivity to market variables associated with disclosed amounts |  |  |  |  |

**20.5 Disclosure about the financial position of the insurer includes appropriately detailed quantitative and qualitative information about enterprise risk management (ERM) including asset-liability management (ALM) in total and, where appropriate, at a segmented level. At a minimum, this information includes the methodology used and the key assumptions employed in measuring assets and liabilities for ALM purposes and any capital and/or provisions held as a consequence of a mismatch between assets and liabilities.**

1. To what extent are insurers in YOUR JURISDICTION required to disclose information about enterprise risk management (ERM), including asset-liability management (ALM), in the disclosure about their financial position?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | 1. Fully reflected in the requirements | 2. Largely reflected in the requirements | 3. Partly reflected in the requirements | 4. Not reflected in the requirements |
| a. Insurers must disclose appropriately detailed quantitative information about ERM |  |  |  |  |
| b. Insurers must disclose appropriately detailed qualitative information about ERM |  |  |  |  |
| c. Information disclosed about ERM must include information about ALM |  |  |  |  |
| d. Information disclosed about ERM and ALM must be for the insurer in total and, where appropriate, at a segmented level |  |  |  |  |
| e. Information disclosed about ALM must include the methodology used and the key assumptions employed in measuring assets and liabilities for ALM purposes |  |  |  |  |
| f. Information disclosed about ALM must include any capital and/or provisions held as a consequence of a mismatch between assets and liabilities |  |  |  |  |

**20.6 Disclosure includes appropriately detailed quantitative and qualitative information on financial performance in total and by segmented financial performance. Where relevant, disclosures must include a quantitative source of earnings analysis, claims statistics including claims development, pricing adequacy, information on returns on investment assets and components of such returns.**

1. To what extent are insurers in YOUR JURISDICTION required to disclose information about their financial performance, where such information is relevant to the nature of their business?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | 1. Fully reflected in the requirements | 2. Largely reflected in the requirements | 3. Partly reflected in the requirements | 4. Not reflected in the requirements | 5. Not applicable, because such information is not relevant for any insurer in YOUR JURISDICTION |
| a. Insurers must disclose appropriately detailed quantitative information about financial performance in total |  |  |  |  |  |
| b. Insurers must disclose appropriately detailed qualitative information about financial performance in total |  |  |  |  |  |
| c. Insurers must disclose appropriately detailed quantitative information about financial performance by segment |  |  |  |  |  |
| d. Insurers must disclose appropriately detailed qualitative information about financial performance by segment |  |  |  |  |  |
| e. Where relevant, disclosures must include a quantitative source of earnings analysis |  |  |  |  |  |
| f. Where relevant, disclosures must include claims statistics including claims development |  |  |  |  |  |
| g. Where relevant, disclosures must include pricing adequacy |  |  |  |  |  |
| h. Where relevant, disclosures must include information on returns on investment assets and components of such returns |  |  |  |  |  |

**20.7 Disclosure about the financial position of the insurer includes appropriately detailed quantitative and qualitative information on all reasonably foreseeable and relevant material insurance risk exposures and their management. This disclosure must include information on its objectives and policies, models and techniques for managing insurance risks (including underwriting processes). At a minimum, disclosures must include:**

• **information about the nature, scale and complexity of risks arising from insurance contracts;**

• **how the insurer uses reinsurance or other forms of risk transfer;**

• **an understanding of the interaction between capital adequacy and risk; and**

• **a description of risk concentrations.**

1. To what extent are insurers in YOUR JURISDICTION required to disclose information about their financial position?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | 1. Fully reflected in the requirements | 2. Largely reflected in the requirements | 3. Partly reflected in the requirements | 4. Not reflected in the requirements |
| a. Insurers are required to disclose appropriately detailed quantitative information about all reasonably foreseeable and relevant material insurance risk exposures and their management |  |  |  |  |
| b. Insurers are required to disclose appropriately detailed qualitative information about all reasonably foreseeable and relevant material insurance risk exposures and their management |  |  |  |  |
| c. Insurers are required to disclose information on their objectives and policies, models and techniques for managing insurance risks (including underwriting processes) |  |  |  |  |
| d. Insurers are required to disclose information about the nature, scale and complexity of risks arising from insurance contracts |  |  |  |  |
| e. Insurers are required to disclose how they use reinsurance or other forms of risk transfer |  |  |  |  |
| f. Insurers are required to disclose an explanation of the interaction between capital adequacy and risk |  |  |  |  |
| g. Insurers are required to disclose a description of risk concentrations |  |  |  |  |

**20.8 Disclosure includes appropriately detailed information about the company profile, including the nature of its business, a general description of its key products, the external environment in which it operates and information on the insurer’s objectives and the strategies in place to achieve them.**

1. To what extent are insurers in YOUR JURISDICTION required to disclose information about their business?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | 1. Fully reflected in the requirements | 2. Largely reflected in the requirements | 3. Partly reflected in the requirements | 4. Not reflected in the requirements |
| a. Insurers must disclose appropriately detailed information about the company profile |  |  |  |  |
| b. Information disclosed must include the nature of the insurer’s business |  |  |  |  |
| c. Information disclosed must include a general description of the insurer’s key products |  |  |  |  |
| d. Information disclosed must include the external environment in which the insurer operates |  |  |  |  |
| e. Information disclosed must include information on the insurer’s objectives |  |  |  |  |
| f. Information disclosed must include information on the insurer’s strategies in place to achieve its objectives |  |  |  |  |

**20.9 Disclosures include the key features of the insurer’s corporate governance framework and management controls including how these are implemented.**

1. To what extent are insurers in YOUR JURISDICTION required to disclose information about their corporate governance framework and management controls?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | 1. Fully reflected in the requirements | 2. Largely reflected in the requirements | 3. Partly reflected in the requirements | 4. Not reflected in the requirements |
| a. Insurers must disclose key features of their corporate governance framework |  |  |  |  |
| b. Information disclosed about the corporate governance framework must include how it is implemented |  |  |  |  |
| c. Insurers must disclose key features of their management controls |  |  |  |  |
| d. Information disclosed about the management controls must include how they are implemented |  |  |  |  |

**20.10 Subject to the nature, scale and complexity of an insurer, supervisors require insurers to produce, at least annually, audited financial statements and make them available to market participants.**

1. To what extent are insurers in YOUR JURISDICTION required to produce audited financial statements?
   1. All insurers are required to produce audited financial statements, at least annually.
   2. All insurers are required to produce audited financial statements, at least annually, except for one or more types of insurer whose nature, scale and complexity would make such a requirement disproportionate.
   3. All insurers are required to produce audited financial statements, but less frequently than annually.
   4. The production of audited financial statements is not a requirement for all insurers in YOUR JURISDICTION, but YOUR AUTHORITY requires some insurers to do so.
   5. No insurers are required to produce audited financial statements.
2. To what extent are insurers in YOUR JURISDICTION who produce audited financial statements required to make them available to market participants? (More than one response may be entered, where applicable.)
   1. Insurers are required to publish audited financial statements in a widely-circulated newspaper.
   2. Insurers are required to publish audited financial statements on their website.
   3. Insurers are required to make audited financial statements available to anyone, upon request.
   4. The audited financial statements of insurers are available through YOUR AUTHORITY.
   5. Insurers are required to make audited financial statements available to all policyholders.
   6. Insurers are required to make audited financial statements available to policyholders with participating (with-profits) policies.
   7. Although insurers are required to produce audited financial statements, they are not required to make them available to market participants.
   8. This question is not applicable, because insurers are not required to produce audited financial statements.

**20.98 Additional questions part I**

1. How does YOUR AUTHORITY review an insurer's implementation of and compliance with disclosure requirements?
   1. Reviews are regularly undertaken using off-site monitoring, which is sometimes supplemented by on-site inspection even when there are no supervisory concerns.
   2. Reviews are regularly undertaken using off-site monitoring, which is supplemented by on-site inspection in cases of actual or potential supervisory concerns.
   3. Reviews are undertaken only in cases of actual or potential supervisory concerns.
   4. Reviews are seldom undertaken, even in cases of actual supervisory concerns.
   5. Reviews are never undertaken.
2. During the last three years, to what extent has YOUR AUTHORITY taken appropriate corrective action when there were supervisory concerns regarding an insurer’s implementation of or compliance with disclosure requirements?
   1. Most concerns were resolved in a timely manner.
   2. Most concerns were resolved, but not always in a timely manner.
   3. Some concerns were resolved.
   4. Most concerns were not resolved.
   5. This question is not applicable, because no such concerns arose during the last three years.

**20.99 Additional questions part II**

1. To what extent do the disclosure requirements in YOUR JURISDICTION address insurance groups?
   1. Disclosure requirements exist at both the group level and the legal entity level, and the relationship between them has been clearly defined.
   2. Disclosure requirements exist at both the group level and the legal entity level, but the relationship between them has not been clearly defined.
   3. Disclosure requirements do not exist at the group level, but those at the legal entity level explicitly take account of an insurer’s membership of a group.
   4. Disclosure requirements do not exist at the group level, but those at the legal entity level broadly take account of an insurer’s membership of a group.
   5. Disclosure requirements do not exist at the group level, and those at the legal entity level do not take account of an insurer’s membership of a group.
   6. There are no disclosure requirements in YOUR JURISDICTION.
   7. This question is not applicable, because there are no groups in YOUR JURISDICTION.

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