



Financial Reporting Council
FAO Vanessa Leung
FAO Mark Babington
8th Floor
125 London Wall
London
EC2Y 5AS

8 July 2022

Via email to: ATP@frc.org.yuk

Dear Vanessa/Mark

Post Implementation Review of the TASs – Call For Feedback on TASs 200, 300, 400 and ASORP1

I write to set out the response of the Institute and Faculty of Actuaries (IFoA) to the FRC's Call for Feedback on its specific Technical Actuarial Standards.

The IFoA previously set out a range of concerns about the current TAS Framework in its response to the Call for Feedback on that framework. The full response can be found [here](#).

Since then, the UK Government has provided a response to its White Paper on 'Restoring Trust in Audit and Corporate Governance', with more detail provided on the proposed arrangements for UK actuarial regulation.

Given that there is a great deal more clarity and detail to be provided about ARGA's regulatory actuarial role (including, in particular, the list of actuarial activities and definitions of entities, that will set its scope), we believe that it would be inappropriate for the FRC to continue with its review of the TASs at this stage.

We are strongly of the view that a review of the specific TASs, and indeed the whole TAS framework, should await publication of draft legislation by the Government and the clarity around the scope of ARGA's remit that will bring.

This review should also only begin once the list of actuarial activities that will be included within ARGA's remit has been published and consulted upon.

We also believe that the changes are likely to require a far more significant overhaul of the TAS framework if they are to be fit for purpose under a statutory system and align with the principles that the Government proposes to underpin the actuarial regulatory regime.

We would also flag that, while we welcome the Government's decision to focus ARGA's regulatory remit on clearly identified public interest activities, the IFoA has significant concerns about the consequences of the proposed additional role for ARGA in setting technical standards for IFoA members.

In particular, it has concerns about the negative public interest impact if that is put on a statutory footing both as a result of regulatory arbitrage and a depleted UK actuarial profession. The IFoA will continue to raise these concerns.

Please note that this response is provided by the IFoA in its capacity as a body with Royal Charter responsibilities for regulating the actuarial profession in the public interest and as the body responsible for enforcing the FRC's TASs.

I would stress that we expect that the FRC will share the concerns raised by the IFoA, as the body responsible for enforcing the TASs and the ethical regulator of the actuarial profession in the UK, with those responsible for approving proposals, including its Regulatory Standards and Codes Committee. To that end, we have copied in the Chair of that Committee.

The IFoA will also be writing separately to the FRC in relation to its consultation on an Exposure Draft of a new TAS 100 and associated guidance.



Neil Buckley
Chair of IFoA Regulatory Board

CC Hannah Nixon, Chair of FRC Regulatory Standards and Codes Committee

CC Mark Babington, Executive Director, FRC