EIOPA’s ACTION PLAN FOR COLLEGES 2012

It is intended that the Action Plan for 2012 should be implemented having in mind that the internal model pre-application process related tasks are considered as high priority.

Moreover, the group supervisor should always remain able to propose prioritization of different tasks by explaining to the College the reasons.

I. Action points for Colleges which have not been constituted until now or which not having fulfilled the College Work Plan 2011

1. Organize a College meeting. The meeting might be a video- or phone-conference in case proportionate to the number of participants and agenda of the College.

2. Agree on the scope of group supervision, participation of supervisors of relevant branches and third countries and other sectors’ involvement in the College.

3. Start discussing the nature and main risks of the group including Intra Group Transactions (IGT) and Risk Concentrations (RC), including thresholds for the further info exchange.


5. Set up and approve an emergency plan.

6. Start discussing a coordination arrangement.

Point I to be complied with by 15 March 2012.

II. Action points for all Colleges - including the ones mentioned under I

1. Internal Model related tasks: for those Colleges where relevant

   a) A work plan - where the group internal model is planned to calculate the consolidated group Solvency Capital Requirement, as well as the Solvency Capital Requirement of insurance and reinsurance undertakings in the group (Art. 231) –
for the pre-application and application process consistent with the joint timetable\(^1\), needs to be established by the College initiated by the Group Supervisor aiming to get day 1 approval.

**Point II.1.a) to be complied with by 31 March 2012**

b) In case of an application under Art. 230 prior to making its final decision, the group supervisor shall consult the other supervisory authorities within the College of Supervisors. After this consultation, the group supervisor shall make its own decision on the application.

c) Interim discussion on/review of pre-application of group internal model, including sufficient information provided by the Group Supervisor to the College according to their needs.

**Point II.1.b) and II.1.c) are on-going tasks, in accordance with the (joint) work plan prepared for the pre-application.**

2. **Colleges work plan SII**

   a) In order to meet the requirements of group supervision under SII, the Group Supervisor initiates a process to evaluate and discuss within the College.

   • which items of the requirements on group supervision under SII are relevant for the group
   • what kind of organisational structure fits best to tackle the issues (e.g. set up of a specialised team, telco, etc.)
   • what activities have to be taken to fulfil the tasks (e.g. analysis of documents, on-site visits, discussion in the College)

   **Point II.2.a) to be complied with by 31 May 2012**

   b) On the basis of the evaluation and discussion of II.2.a), the College is to agree on the outcome of the discussion as regards the actions to be taken, a joint timetable and the responsible NSAs/persons, and include these in their Workplan 2012-2013.

   **Point II.2.b) to be complied with by 30 June 2012**

   The Workplan 2012-2013 is to be double checked when the final level 2 implementing measures are published.

3. **Regular exchange of information**

   a) The College, as a preparation for SII, agrees on a set of quantitative and qualitative information which covers the most important risks within the group, to be exchanged within the College. It is the Colleges’ task to calibrate the set of data needed for the relevant group.

---

\(^1\) From EIOPA’s Action Plan Colleges 2011 a joint timetable (main time steps) is expected to be agreed by the College for carrying out the pre-application for group internal models. The deadline was extended (decision by EIOPA BoS in July 2011) till 31 January 2012.
Point II.3.a) to be complied with by 31 May 2012

b) Regular (normally for the largest groups every 3 months) exchange of the agreed set of data. Each College should agree on the technical means of a secure communication channel for the information exchange.

Same set of information is used as a basis for College meetings information collection and preparations. The exchange of information might occur via face to face meetings, telcos, or written templates/reports being exchanged via secure channels.

In case significant new risks are identified in between, a telco is organized or the College is informed via written procedures within a reasonable timeframe.

Point II.3.b) to be complied with from 30 June 2012 ongoing

III. Task for the Group Supervisor

Make a gap analysis for comparing the organisation and activity of the College and the guidelines on the Functioning of Colleges currently in development within EIOPA; propose changes for closing the gaps. Discuss it in the College and send the result to EIOPA by the end of 2012.

EIOPA supports by providing guidance for the gap analysis.

Point III to be complied with by the end of 2012