

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

Gap Analysis Report Format

Camilla Rothe



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