

Bank of England PRA

Appendix 13: Draft amendments to SS40/15 – Solvency II: reporting and disclosure

Supervisory statement | SS40/15

April 2024

Draft for consultation



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April 2024 (updating December 2021)

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Draft for consultation

1: Introduction

1.1 This supervisory statement is of interest to all UK insurance firms and groups within the scope of Solvency II, the Society of Lloyd's and, where applicable, to third country branches (excluding branches of Swiss general insurers). For third country branches it should be read alongside the Prudential Regulation Authority's (PRA's) Rules for Third Country Branch undertakings and SS44/15: 'Solvency II: third – country insurance and pure reinsurance branches'.¹

1.2 This supervisory statement sets out the PRA's expectations of firms in relation to:

- supervisory reporting set out in Chapter 2A of the Reporting Part of the PRA Rulebook; and ~~Chapter 3A of the Reporting Part of the PRA Rulebook~~
- public disclosure Solvency and Financial Condition Report (SFCR) set out in Chapters 3 to 6 of the Reporting Part of the PRA Rulebook, or
- in areas that require the PRA to issue additional instruction

This supervisory statement sets out the PRA's expectations of how firms are to comply with the options contained in the Reporting Part of the PRA Rulebook in the following areas:

- Accident or underwriting year reporting
- Reporting of annuities stemming from non-life obligations by currency.
- Development of the distribution of reported but not settled (RBNS) claims - reporting number of claims.
- Group reporting where the PRA is the group supervisor and there are no consolidated financial statements at the UK holding company which is at the head of the insurance or reinsurance group.
- Information that should be disclosed in the solvency and financial condition report (SFCR)
- 'Pre-defined events' (see paragraph [13] below)
- Firms processes for public disclosure
- Firms processes for reporting
- Quantitative reporting and validations

1.3 [Deleted].

¹ SS44/15 'Solvency II third country branches', December 2024: www.bankofengland.co.uk/prudential-regulation/publication/2015/solvency2-third-country-insurance-and-pure-reinsurance-branches-ss.

1.4 Firms should also refer to:

- Bank of England and PRA Statement of Policy ‘Interpretation of EU Guidelines and Recommendations: Bank of England and PRA approach after the UK’s withdrawal from the EU’;²
- Supervisory Statement (SS) 1/19 ‘Non-binding materials: The PRA’s approach after the UK’s withdrawal from the EU’;³ and
- Supervisory Statement (SS) 2/19 ‘PRA approach to interpreting reporting and disclosure requirements and regulatory transactions forms after EU withdrawal’.⁴

1.5 Any reference to any provision of direct EU legislation is a reference to it as it forms part of retained EU law.

1.6 For sections 12-16, firms should consider the materiality principle as set out in Articles [4A] and [3A] of Chapters 2A and 3A, respectively of the Reporting part of the PRA Rulebook.

1.7 If not defined in this supervisory statement, the terms have the meaning as defined in the PRA Rulebook.

1.8 In the area of public disclosure, the PRA’s overall proportionate approach⁵ should result in firms not being required to disclose any information which would not be relevant to their business, or not be material.

2: [Deleted]

This chapter has been deleted.

3: [Deleted]

This chapter has been deleted.

² December 2020: SoP – Interpretation of EU Guidelines and Recommendations: Bank of England and PRA approach after the UK’s withdrawal from the EU.

³ December 2020: SS1/19 – Non-binding PRA materials: The PRA’s approach after the UK’s withdrawal from the EU.

⁴ December 2020: SS2/19 – PRA approach to interpreting reporting and disclosure requirements and regulatory transactions forms after the UK’s withdrawal from the EU.

⁵ See The Prudential Regulation Authority’s approach to insurance supervision page 34.

4: Accident or underwriting year reporting

4.1 Article 11 of Chapter [2A] of the Reporting Part of the PRA Rulebook requires firms to submit claims information in templates IR.16.01.01, IR.19.01.01, and IR.20.01.01 of Chapter [9] of the Reporting Part of the PRA Rulebook following instructions set out in IR.16.01, IR.19.01 and IR.20.01 of Chapter [10] of the Reporting Part of the PRA Rulebook respectively. Article 4 of Chapter [3A] of the Reporting Part of the PRA Rulebook requires firms to disclose claims information in IR.19.01.21 of Chapter [9A] of the Reporting Part of the PRA Rulebook following the instruction set out in IR.19.01 of Chapter [10A] of the Reporting Part of the PRA Rulebook.

4.2 For the supervisory reporting templates referred to in 4.1 above, the information is to be reported by accident year (ie the information is aggregated by the year the claim event occurred) or reported by underwriting year (ie the information is aggregated by the year the insurance or reinsurance obligations were recognised), and whether the information is to be disclosed by accident year or by underwriting year.

4.3 If the PRA does not stipulate that a firm is required to report data on an accident year or underwriting year basis (in accordance with any requirements), the firm can choose whether to report all information for line of business (LoB) as described in the relevant instructions, by accident year or by underwriting year. Once a choice of reporting basis is made, the PRA expects that choice to be applied for future reporting periods.

4.4 The PRA expects a firm's choice to report a LoB, as described in the relevant instructions, by accident or underwriting year to be consistent with how the firm manages its business and reports data internally. In cases where a firm manages part of a LoB on an accident year basis and the other part on an underwriting year basis, it is for the firm to decide which of accident or underwriting year is the more appropriate for reporting that LoB.

4.5 For the disclosure template referred to in 4.1 above (where information is required to be at undertaking level of granularity), firms have the choice of whether to disclose the information by accident year or by underwriting year. Once a choice of disclosure basis is made, the PRA expects that choice to be applied for future periods.

4.6 Firms are expected to discuss any change to whether information is reported or disclosed by accident year or underwriting year with their usual supervisory contact prior to making a change.

5: [Deleted]

This chapter has been deleted.

6: [Deleted]

This chapter has been deleted.

7: [Deleted]

This chapter has been deleted.

8: Reporting of annuities stemming from non-life obligations by currency

8.1 Article 11(1)(g)(d) of Chapter 2A of the Reporting Part of the PRA Rulebook requires firms to submit information on annuities stemming from non-life obligations in template IR.16.01.01 of Chapter [9] of the Reporting Part of the PRA Rulebook following the instructions set out in S.16.01 of Chapter [10] of the Reporting Part of the PRA Rulebook.

8.2 The PRA expects firms to report the information on template IR.16.01.01 in the original currency of the contracts, unless otherwise specified by the PRA.

9: Development of the distribution of reported but not settled (RBNS) claims – reporting number of claims

9.1 Article 11(1)(h)(i) of Chapter 2A of the Reporting Part of the PRA Rulebook requires firms to submit information on RBNS claims in template IR.20.01.01 of Chapter [9] following the instructions set out in IR.20.01 of Chapter [10].

9.2 The PRA expects firms to use their own definition for number of claims at items C0020, C0060, C0090, C0110, C0140, C0170 and C0200 in template IR.20.01.01. However, where an insurance and reinsurance contract cover risks across lines of business and the firm has unbundled the obligations relating to that contract into the appropriate LoBs for the purpose of reporting template IR.17.01.01, then the PRA expects a firms definition of number claims reported on template IR.20.01.01 to be consistent with this unbundling. In particular, any obligation for which gross RBNS or gross payments made to date are included in template IR.20.01.01 for a LoB should have a corresponding claim count for that LoB.

9.3 An example of how 9.2 might be applied is shown in Appendix 2 of this supervisory statement.

10: [Deleted]

This chapter has been deleted.

11: Group reporting where the PRA is the group supervisor and there are no consolidated financial statements at the UK holding company which is at the head of the insurance or reinsurance group

11.1 Chapter [2A] and Chapter [3A] of the Reporting Part of the PRA Rulebook contain references to a group's consolidated financial statements. The PRA is aware that in some cases consolidated financial statements are not produced at the same level at which the PRA exercises group supervision under Solvency II. Where this is the case, the PRA expects a firm to discuss and agree with its usual supervisory contact how best to provide meaningful information for inclusion in the reporting and disclosure templates. This discussion should include the agreement of the reporting currency and exchange rates to be used for its reporting and disclosure.

11.2 The PRA expects firms to consider at least sections 11.3 to 11.5 below before discussing the information to be reported and disclosed with their usual supervisory contact. Sections 11.3 to 11.5 are a non-exhaustive list.

11.3 Firms should analyse which templates may be impacted by not having consolidated financial statements at the level of the Solvency II reporting group. These will include:

- the balance sheet reporting template IR.02.01.01 as required under Article 26.1(a) ~~26(1)(a)~~ of Chapter [2A] of the Reporting Part of the PRA Rulebook. The "statutory accounts value" column in the template relates to financial statements produced by the group;
- the premiums claims and expenses reported in ~~IR.05.03.02~~ IR.05.02.01, ~~IR.05.05.02~~ IR.05.03.02, and ~~IR.05.02.04~~ IR.05.04.02 as required under Article 26 of Chapter 2A of the Reporting Part of the PRA Rulebook;

- the premiums claims and expenses disclosed in ~~IR.05.03.02~~ IR.05.02.01, ~~IR.05.05.02~~ IR.05.03.02, and ~~IR.05.02.04~~ IR.05.04.02 as required under Articles 5 of Chapter 3A2A of the Reporting Part of the PRA Rulebook;
- own funds reporting template IR.23.01.04 as required under Article 30.1(a) of Chapter 2A of the Reporting Part of the PRA Rulebook. The item at row R0220 relates to own funds from the financial statements;
- own funds disclosure template IR.23.01.04 as required under Article 5.1(g) of Chapter 3A of the Reporting Part of the PRA Rulebook. The item at row R0220 relates to own funds from the financial statements; and
- own funds by tiers reporting template IR.23.02.04 as required under Article 30.1(b) of Chapter 2A of the Reporting Part of the PRA Rulebook. The items at rows R0630 to R0650 relate to reserves from the financial statements.

11.4 The information groups propose to include in the templates, where consolidated financial statements are not available at the level at which the PRA exercises group supervision, should:

- be a meaningful representation of the size and nature of the group in question; be consistent with the undertakings in the scope of the group as reported in template IR.32.01.04;⁶ be linked (by reconciliation) to the relevant information included in the group consolidated financial statements;
- enable a meaningful comparison between the template in question and other templates in the Reporting Part of the PRA Rulebook; and
- in cases where only specific items of a template are impacted, be meaningful in the context of the rest of the template.

11.5 Firms should consider the impact on public disclosure information in the group solvency and financial condition report (for example, Reporting [3.3A(8)] to [3.3A(10)], [3.4A(1)(b)], [3.4A(2)(c)], [3.4A(3)(b)] ~~onshored Commission Delegated Regulation (EU) 2015/35 articles 293(2) to (4), 296(1)(b), 296(2)(c), and 296(3)(b) (as they form part of retained EU law) refer to financial statements~~). ~~They should also consider the impact on the regular supervisory report (for example, onshored Commission Delegated Regulation (EU) 2015/35 Articles 307(2) and (3) (as they form part of retained EU law) refer to financial statements).~~

⁶ As required under Article 33.1(a) of Chapter 2A of the Reporting Part of the PRA Rulebook.

12: Information that should be disclosed in the SFCR

12.1 Chapters 3 and 3A, of the Reporting part of the PRA Rulebook set out the structure and contents that should be included in a firms SFCR. The PRA supplements this information by providing firms with further detail on the contents required to be disclosed.

Business and Performance 12.2 Under section 'A.1 Business' of the SFCR as set out in [Article 1A] of Chapter 3A of the Reporting Part of the PRA Rulebook, firms should describe at least the following information regarding their business:

- the name and location of the legal or the natural persons that are direct and indirect controllers in the firm (including the immediate and ultimate parent entity or natural person), the proportion of ownership interest held and, if different, the proportion of voting rights held;
- a list of material related firms including the name, legal form, country, proportion of ownership interest held and, if different, proportion of voting rights held; and
- a simplified group structure.

12.3 Under section 'A.4. Performance of other activities' of the SFCR as set out in [Article 1A] of Chapter 3A of the Reporting Part of the PRA Rulebook, firms should describe in general the leasing arrangements in relation to each material leasing arrangement, separately for financial and operating leases.

System of Governance

12.4 Under section 'B.1. General information on the system of governance' of the SFCR as set out in [Article 1A] of Chapter 3A of the Reporting Part of the PRA Rulebook, firms should explain how the key functions have the necessary authority, resources and operational independence to carry out their tasks and how they report to and advise the management body and/or governing body of the firm

12.5 Under section 'B.3 Risk management system including the own risk and solvency assessment' of the SFCR as set out in [Article 1A] of Chapter 3A of the Reporting Part of the PRA Rulebook, firms using a partial or a full internal model to calculate the SCR, should describe at least the following information addressing the governance of the internal model:

- the responsible roles and specific committees if any, their main tasks, position and scope of responsibilities;
- how existing committees interact with the governing body in order to meet the requirements of [7.1] and [7.2] of the Solvency Capital Requirement – Internal Models Part of the PRA Rulebook;
- any material changes to the internal model governance during the reporting period; and
- a description of the validation process (used to monitor the performance and on-going appropriateness of the internal model).

Risk Profile

12.6 Under section 'C.1 Underwriting risk' of the SFCR as set out in [Article 1A] of Chapter 3A of the Reporting Part of the PRA Rulebook, firms should, regarding the use special purpose vehicles, describe if they are a UK ISPV or a special purpose vehicle regulated by a third country supervisory authority, identify the risks that are transferred to it and explain how the fully funded principle is assessed on an ongoing basis.

Valuation for Solvency Purposes

12.7 Under section 'D.1 Assets' of the SFCR as set out in [Article 1A] of Chapter 3A of the Reporting Part of the PRA Rulebook, firms should, when aggregating assets into material classes to describe the valuation basis that has been applied to them, consider the nature, function, risk and materiality of those assets.

12.8 Classes of assets other than those used in the templates as set out in Chapter [3A] of the Reporting part of the PRA Rulebook should only be used if the firm is able to demonstrate to the PRA that another presentation is clearer and more relevant.

12.9 Under section 'D.1 Assets' of the SFCR as set out in [Article 1A] of Chapter 3A of the Reporting Part of the PRA Rulebook, firms should, in relation to each material class of asset, describe at least the following quantitative and qualitative information:

- The recognition and valuation basis applied, including methods and inputs used, as well as judgements made other than estimations which would materially affect the amounts recognised, in particular:
 - For material intangible assets: nature of the assets and information on the evidence and criteria used to conclude that an active market exists for those assets;
 - For material financial assets: information on the criteria used to assess whether markets are active and, if the markets are inactive, a description of the valuation model used;
 - For financial and operating leaseings: describe in general the leasing arrangements in relation to each material class of assets subject to leasing arrangement, separately for financial and operating leases;
 - For material deferred tax assets: information on the origin of the recognition of deferred tax assets and the amount and expiry date, if applicable, of deductible temporary differences, unused tax losses and unused tax credits for which no deferred tax asset is recognised in the balance sheet;
 - For related firms: where related firms were not valued using quoted market prices in an active markets or using the adjusted equity method, provide an explanation why the use of these methods was not possible or practical.
- Any changes made to the recognition and valuation bases used or to estimations during the reporting period; and
- Assumptions and judgments including those about the future and other major sources of estimation uncertainty.

12.10 Under section 'D.2 Technical provisions' of the SFCR as set out in [Article 1A] of Chapter 3A of the Reporting Part of the PRA Rulebook, firms should describe the significant simplified methods used to calculate technical provisions, including those used for calculating the risk margin.

12.11 Under section 'D.3 Other liabilities' of the SFCR as set out in [Article 1A] of Chapter 3A of the Reporting Part of the PRA Rulebook, firms should, when aggregating liabilities other than technical provisions into material classes to describe the valuation basis that has been applied to them, consider the nature, function, risk and materiality of those liabilities.

12.12 Classes of liabilities other than those used in templates as defined in Chapter 3A of the Reporting part of the PRA Rulebook should only be used if the firm is able to demonstrate to the PRA that another presentation is clearer and more relevant.

12.13 Under section 'D.3 Other liabilities' of the SFCR as set out in [Article 1A] of Chapter 3A of the Reporting Part of the PRA Rulebook, firms should, in relation to each material class of liability other than technical provisions, describe at least the following quantitative and qualitative information:

- Recognition and valuation basis applied, including methods and inputs used, in particular:
 - Describe in general the material liabilities arising as a result of leasing arrangements, separately disclosing information on financial and operating leases;
 - The origin of the recognition of deferred tax liabilities and the amount and expiry date if applicable, of taxable temporary differences;
 - The nature of the liabilities for employee benefits and a breakdown of the amounts by nature of the liability and the nature of the defined benefit plan assets, the amount of each class of assets, the percentage of each class of assets with respect to the total defined benefit plan assets, including reimbursement rights.
- Any changes made to the recognition and valuation bases used or on estimations during the reporting period; and
- Assumptions and judgments including those about the future and other major sources of estimation uncertainty.

Capital Management

12.14 Under section 'E.1 Own funds' of the SFCR as set out in [Article 1A] of Chapter 3A of the Reporting Part of the PRA Rulebook, where undertakings disclose additional ratios to the ones included in template IR.23.01, the SFCR should also include an explanation on the calculation and meaning of the additional ratios.

12.15 Under section 'E.1 Own funds' of the SFCR as set out in [Article 1A] of Chapter 3A of the Reporting Part of the PRA Rulebook, firms should, regarding their own funds, describe at least the following information:

- For each material own fund item set out in Chapters [3A], [3D], [3H], [3F] and [3J] of the Own Funds Part of the PRA Rulebook, as well as for items for which a firm has received a classification of own funds permission in accordance with 3.4(2) of the Own Funds Part of the PRA Rulebook, the information required in Chapter [3.5A] of the Reporting Part of the PRA Rulebook, distinguishing between basic and ancillary own fund items;

- For each material own fund item, the extent to which it is available, subordinated, as well as its duration and any other features that are relevant for assessing its quality;
- An analysis of significant changes in own funds during the reporting period, including the value of own fund items issued during the year, the value of instruments redeemed during the year, and the extent to which the issuance has been used to fund redemption;
- In relation to subordinated debt, an explanation of the changes to its/ their value;
- When disclosing the information required in [3.5A(3)] of the Reporting Part of the PRA Rulebook, an explanation of any restrictions to available own funds and the impact of limits on eligible Tier 2 capital, Tier 3 capital and restricted Tier 1 capital;
- Details of the principal loss absorbency mechanism used to comply with 3B.1(5) of [Chapter 3] of the Own Funds Part of the PRA Rulebook, including the trigger point, and its effects;
- An explanation of the key elements of the reconciliation reserve;
- For each basic own fund item subject to the transitional arrangements:
 - The tier into which each basic own fund item has been classified and why;
 - The date of the next call and the regularity of any subsequent call dates, or the fact that no call dates fall until after the end of the transitional period.
- When disclosing the information required in 3.5A(7) of the Reporting Part of the PRA Rulebook, information on the type of arrangement and the nature of the basic own funds item which each ancillary own fund item would become on being called up or satisfied, including the tier, as well as when the item was approved by the PRA and, where a method was approved, for how long;
- Where a method has been used to determine the amount of a material ancillary own fund item, undertakings should describe:
 - how the valuation provided by the method has varied over time;
 - which inputs to the methodology have been the principal drivers for this movement; and
 - the extent to which the amount calculated is affected by past experience, including the outcome of past calls.
- Regarding items deducted from own funds:
 - the total excess of assets over liabilities within ring-fenced funds and matching adjustment portfolios, identifying the amount for which an adjustment is made in determining available own funds; and
 - the extent of and reasons for significant restrictions on, deductions from or encumbrances of own funds.

12.16 Under section 'E.3 Differences between the standard formula and any internal model used' of the SFCR as set out in [Article 1A] of Chapter 3A of the Reporting Part of the PRA

Rulebook, firms should, when disclosing the main differences in methodologies and underlying assumptions used in the standard formula and in the internal model, describe at least the following:

- structure of the internal model;
- aggregation methodologies and diversification effects; and
- risks not covered by the standard formula but covered by the internal model.

Group SFCR

Business and Performance

12.17 Under section 'A.1 Business' of the group SFCR as set out in [Article 1A] of Chapter 3A of the Reporting Part of the PRA Rulebook, firms should explain the material differences between the scope of the group used for the consolidated financial statements and the scope for the consolidated data determined in accordance with Group Supervision 11.1A to 11.1C of the PRA Rulebook.

Risk profile

12.18 Firms providing information on any significant risk concentration at group level as provided for in Group Supervision 16.1 and 16.1A, in accordance with Article 7A(1)(c)(i) of Chapter 3A of the Reporting Part of the Rulebook, should also refer to the Statement of Policy – The PRA's approach to insurance group supervision- February 2024, paragraph 6.3.7

Capital Management

12.19 Under section 'E.1 Own funds' of the group SFCR as set out in [Article 1A] of Chapter 3A of the Reporting Part of the PRA Rulebook, firms should, regarding the group's own funds, describe at least the following information:

- the own funds items that have been issued by an undertaking of the group other than the firm;
- where material own funds are issued by an equivalent third country branch included via the Deduction and Aggregation method, if the third country allows the use of local rules, the local tiering of those own funds items, including information on the tiering structure, criteria and limits;
- where material own funds items are issued by an undertaking that is not an insurance or reinsurance undertaking and is subject to tiering requirements other than the [requirements set out in [Chapter 3] of the Own Funds Part of the PRA Rulebook], the source and nature of those tiering requirements, as well as the level of the own funds in each tier;

- how group own funds have been calculated net of any intra-group transactions, including intra-group transactions with entities of other financial sectors; and
- the nature of the restrictions to the transferability and fungibility of own funds items in the related firms, if any.

13: Pre-defined events

13.1 Firms should immediately notify in writing to the PRA about of the occurrence of any events which could reasonably lead or have already led to material changes in a firm's or a group's business and performance, system of governance, risk profile, and solvency and financial position (hereinafter 'pre-defined event'). In case of doubt, firms should consult the PRA whether a given event would classify as a pre-defined event.

14: Firms processes for public disclosure

14.1 Firms should have a public disclosure policy that complies with paragraph 12.4 above in respect of their system of governance, and which additionally includes the following:

- Identification of the persons or functions responsible for preparing and reviewing the information publicly disclosed;
- The processes for completion of the disclosure requirements;
- The processes for review and approval by the governing body of the SFCR;
- Identification of the information already available in the public domain that the firm believes is equivalent in nature and scope to the information requirements in the SFCR;
- Specific information that the firm intends not to disclose under the circumstances set out in Reporting 4.1 of the PRA Rulebook; and
- Additional information that the firm has decided to voluntarily disclose related to its solvency and financial condition which is not already required to be disclosed in accordance with Reporting 3.3–3.9, 3A, 4, and 5 5.1, 5.3, 5.4 and 5.5. A firm shall ensure that such information is consistent with any information provided to the PRA as provided for in [Reporting 3.10].

14.2 Firms should not enter into a contractual obligation binding them to secrecy or confidentiality of information that is required to be disclosed under the SFCR.

15: Firms processes for reporting

15.1 Firms should ensure that the supervisory reporting policy complies with paragraph 12.4 above in respect of their system of governance and additionally includes the following:

- Identification of persons/functions responsible for drafting and reviewing any reporting to the PRA;
- Set out processes and timelines for completion of the various reporting requirements, review and approval; and
- Explanation of processes and controls for ensuring the reliability, completeness and consistency of the data provided.

15.2 Firms should ensure that the annual quantitative reporting templates have been approved by the governing body or management body before submitting them to the PRA.

15.3 Firms should ensure that the quarterly quantitative templates have been approved either by the management body or by persons who effectively run the firm before submitting them to the PRA.

16: Quantitative reporting and validations

16.1 Firms should consider the data point model as published by the Bank of England when reporting information included in the quantitative reporting templates.

16.2 Firms should ensure that the data submitted in the quantitative reporting templates comply with the validations rules published by the Bank of England.

17: SFCR dispensation

17.1 Firms can apply to the PRA for reporting exemptions, allowing them to exclude certain information from their SFCR, for example, the public narrative report.

17.2 Groups may also apply to the PRA for this exemption. Groups that wish to apply for non-disclosure are also encouraged to submit the application checklist.

Appendix 1: [Deleted]

Appendix 2: Examples of how the PRA's expectations relating to definition of number of claims (for the purpose of the RBNS claims reporting template IR.20.01.01) might be applied

An example of how definition of claims referred to in section 9.2 of the draft supervisory statement might be applied is where a motor insurance contract is unbundled into lines of business 4 (motor vehicle liability insurance) and 5 (other motor insurance). If obligations arise under the contract and firm allocates gross RBNS or gross payments made to both lines of business 4 and 5 then the PRA would expect:

- the number of claims reported on template S.20.01.01 for LoB 4 to include the claim for gross RBNS or gross payments made allocated to LoB 4; and
- the number of claims reported on template S.20.01.01 for LoB 5 to include the claim for gross RBNS or gross payments made allocated to LoB 5.