Solvency II taxonomy 2.8.0
17 October 2023

Agenda

Time	Topic	Speaker
9:30	Opening Remarks	Tim O'Hanrahan – Head of Insurance Supervision
9:35	Data Insights	Niamh O'Malley
9:50	Template changes	Béibhinn Whelan, Stephen Maher, Liam Fannon and Mark Mulholland
11:00	*Tea break*	
11:25	Technology changes (New portal, UAT, XBRL)	Padraig Foley, Colm Devine, Simon O'Connor
12:00	Internal Model changes	Tim Nagle
12:15	*Questions and answers*	All
12:45	Close	

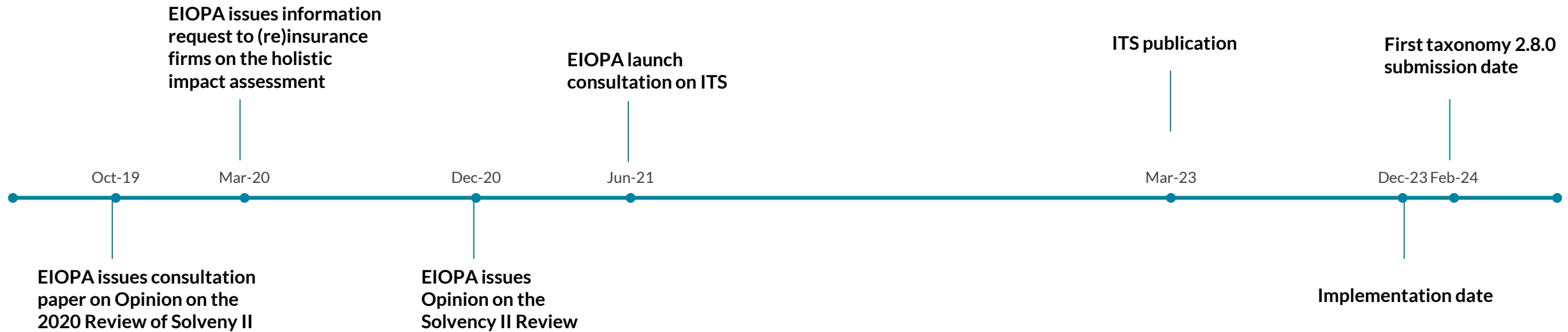Banc Ceannais na hÉireann
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EIOPA Review timeline

EIOPA issues information request to (re)insurance firms on the holistic impact assessment

ITS publication

EIOPA launch consultation on ITS

First taxonomy 2.8.0 submission date

Oct-19 Mar-20 Dec-20 Jun-21 Mar-23 Dec-23 Feb-24

EIOPA issues consultation paper on Opinion on the 2020 Review of Solveny II

EIOPA issues Opinion on the Solvency II Review

Implementation date

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- Open sli.do

- #CBIQRT
- Passcode ddbnrh

- Open until 3pm today

- Questions and answers will be published on our website
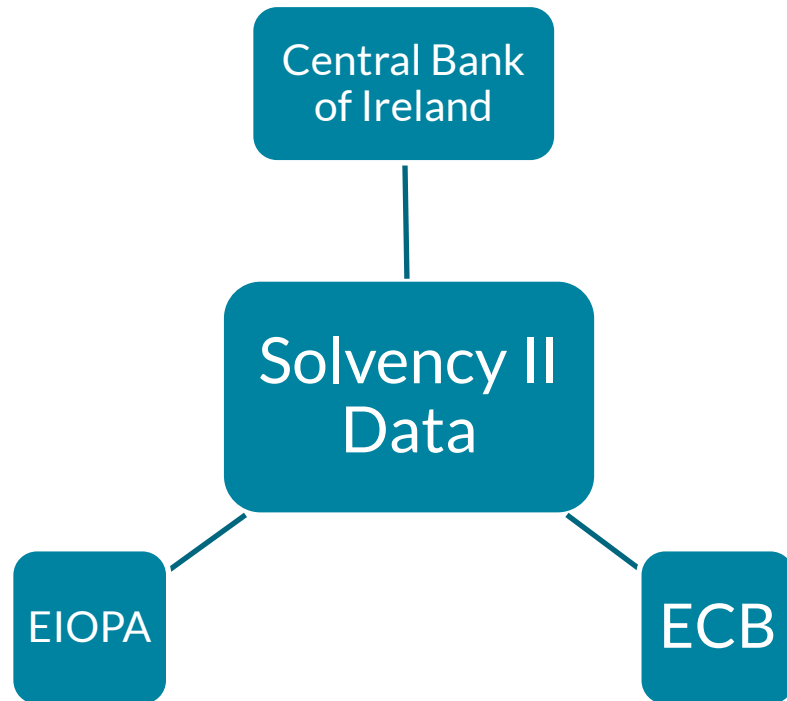
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Users of Solvency II Data

Irish insurance market

€102bn GWP in 2022

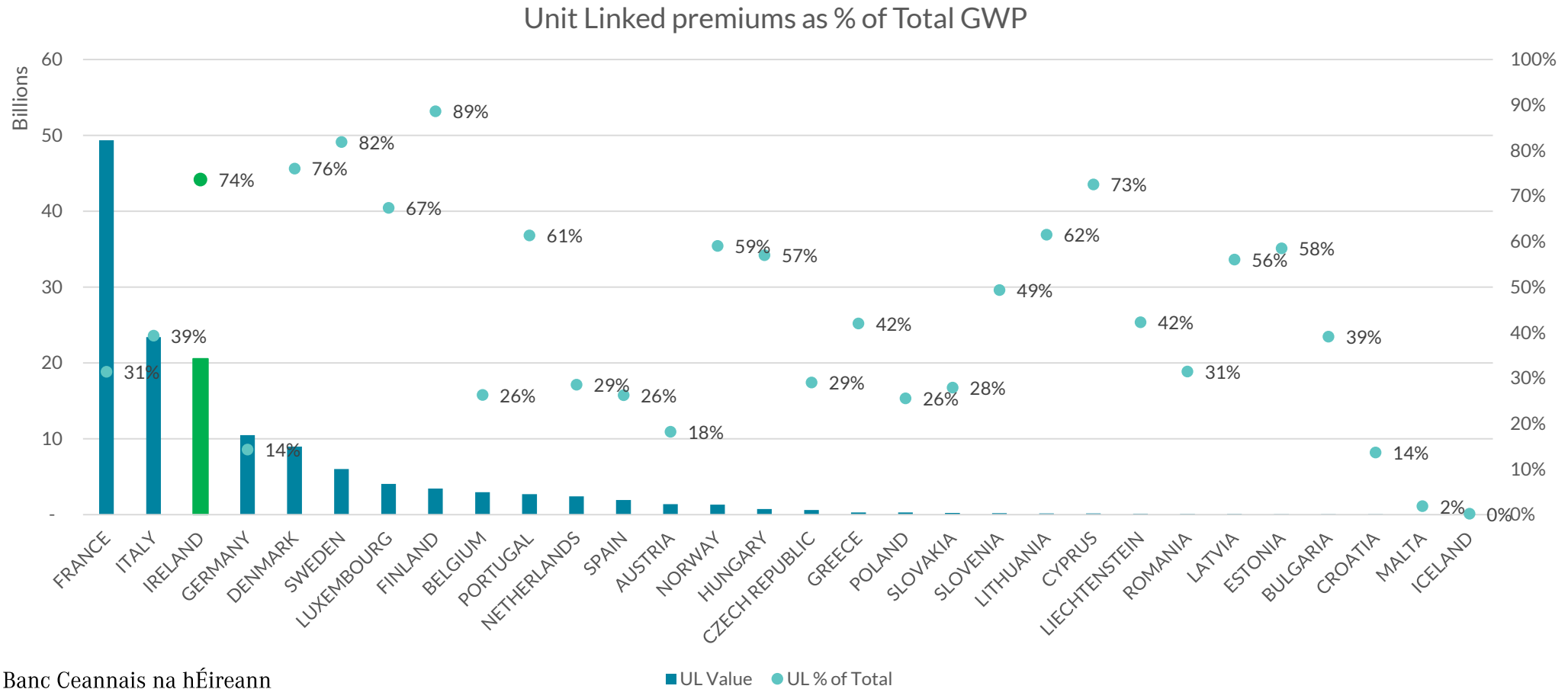€68bn Gross claims in 2022

3rd largest unit-linked market in EU

5th largest market for direct insurance in EU

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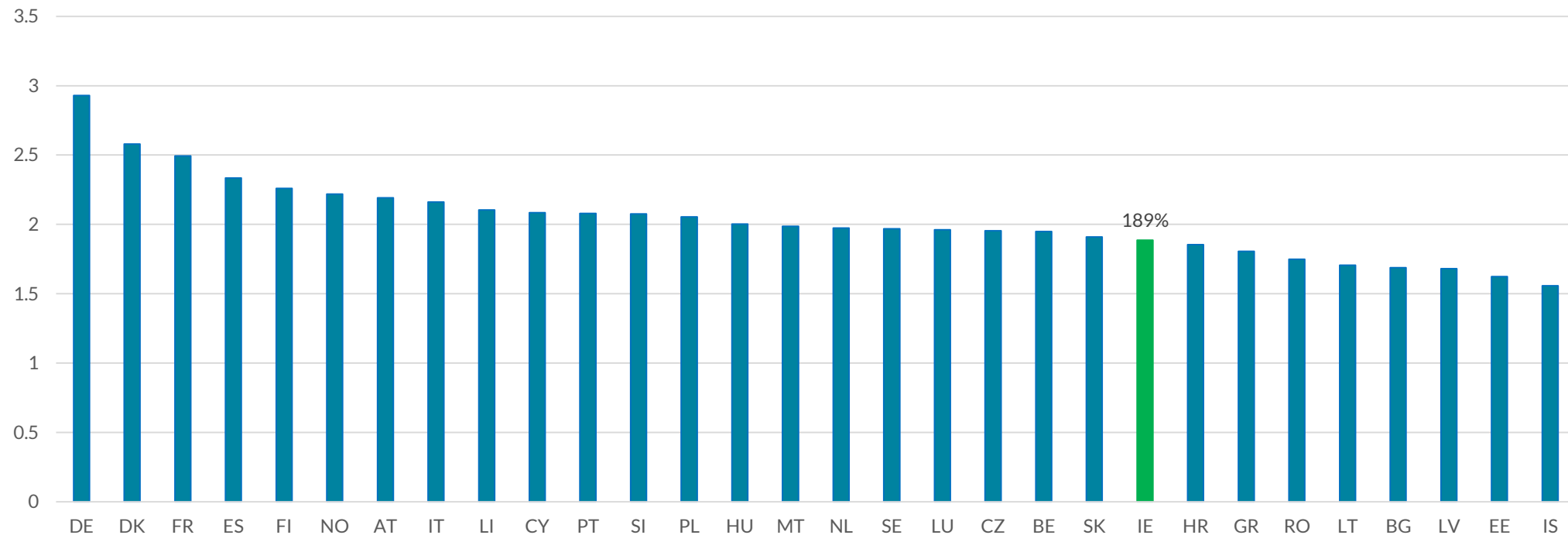Central Bank of Ireland

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Irish insurance market

Unit Linked premiums as % of Total GWP

Level of Solvency Coverage across EU entities

Median SCR coverage (YE 2022)

189% (IE)

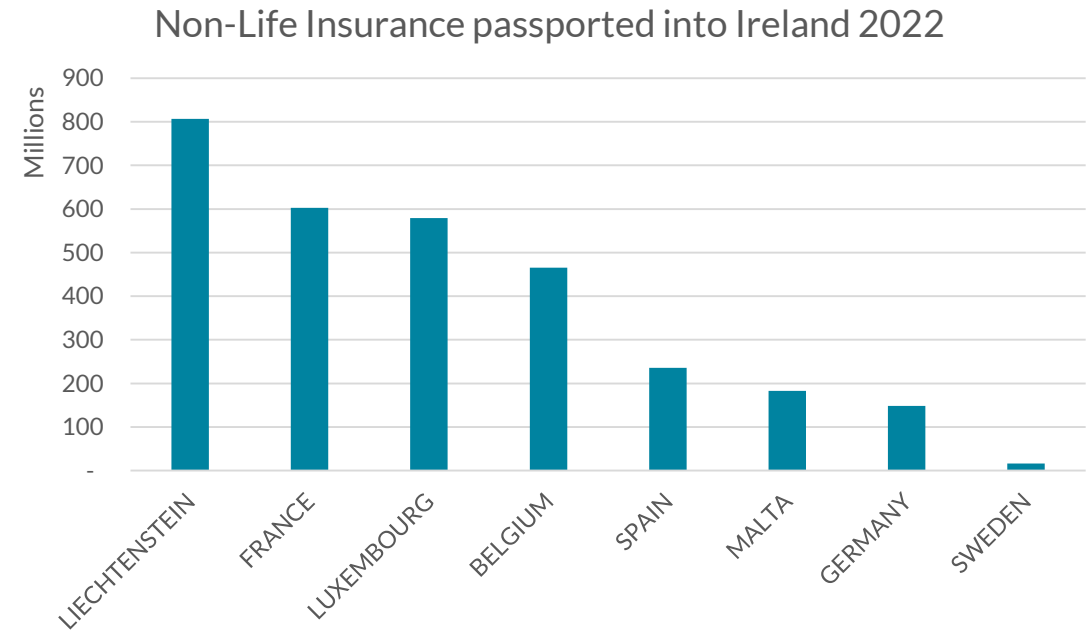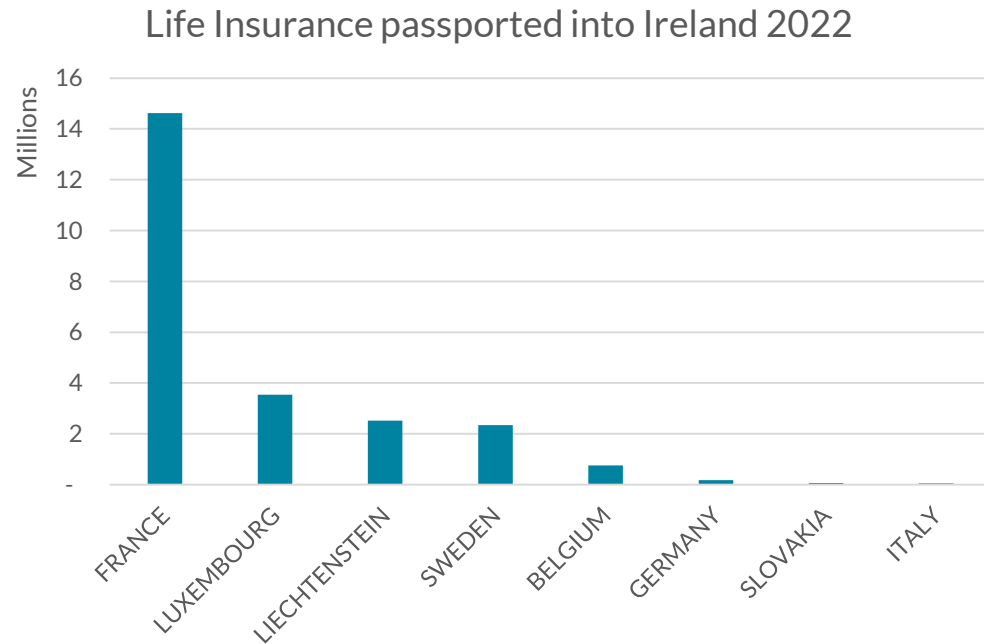Source: EIOPA insurance overview 2023

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Origin of Cross-Border Insurance Products into the Irish Market
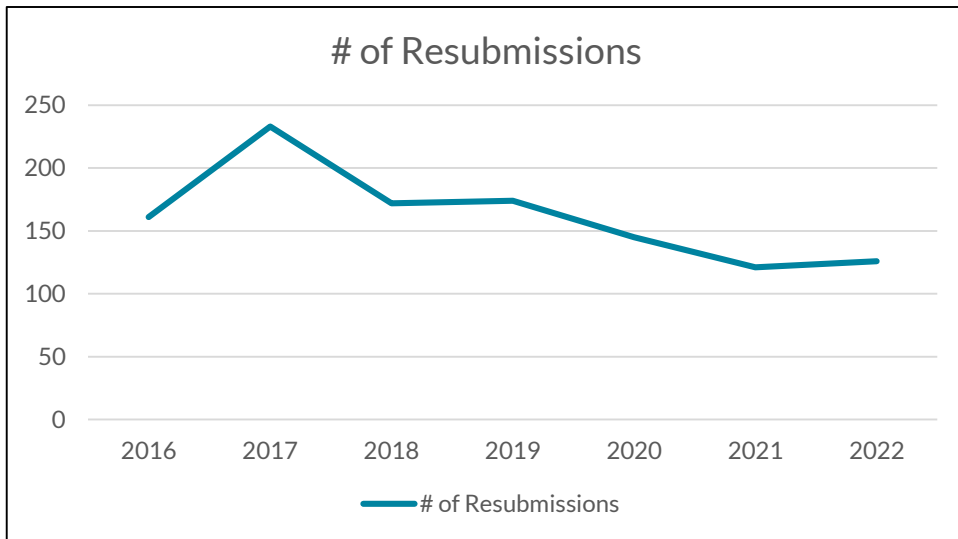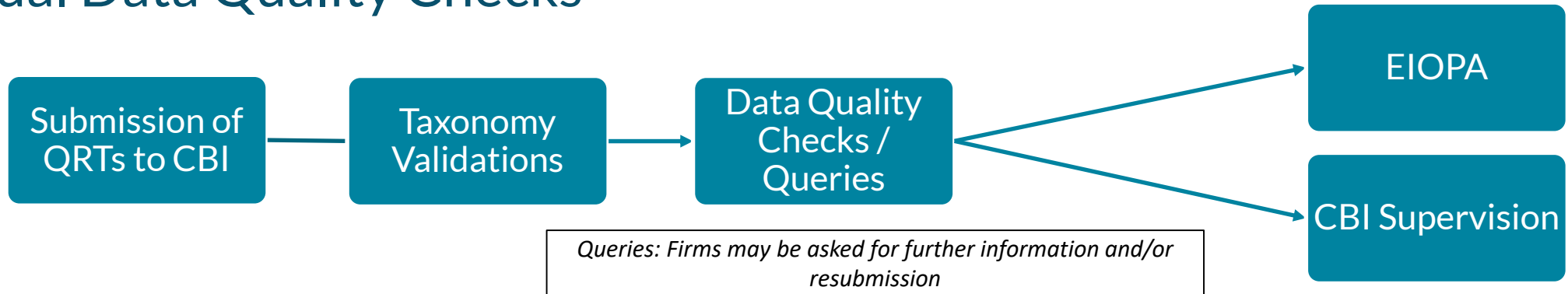

Source: EIOPA insurance overview 2023

Turbulent times

- Granular investment data can help us respond to diverse crises as they arise

- Irish insurance sector had a very low level of exposure to the recent issues in the global banking sector.

- Irish (re)insurers had no material exposure to SVB or Signature Bank

- €135 million of non-linked investments in equities or bonds issued by Credit Suisse at Q4 2022

   (representing less than 0.2 per cent of their total non-linked investments)

- Overall 18% of non-linked investments in Banking sector at Q4 2022

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Annual Data Quality Checks

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Submission of     →    Taxonomy      →    Data Quality          EIOPA
QRTs to CBI            Validations        Checks /        ↗
                                          Queries         ↘
                                                          CBI Supervision
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Queries: Firms may be asked for further information and/or resubmission

of Resubmissions

Submissions by Company

- The number of resubmissions has stabilized over the years
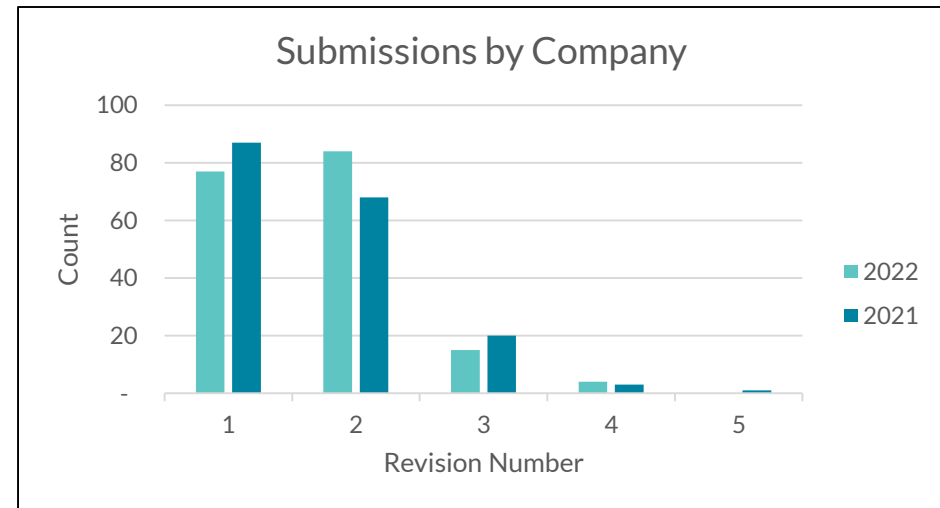
- Year on Year improvements in # Revisions (Shorter Tail in 2022)

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Summary of Template Changes

	Annual ECB Solo	Quarterly ECB Solo	Annual Group	Quarterly Group	Quarterly FSR Solo	Quarterly FSR Group	Quarterly FSR TCB	Annual ECB TCB	Quarterly ECB TCB
Removed	14	3	13	2	0	0	0	10	2
Added	21	3	19	1	3	3	1	15	2
Altered	42	7	27	5	3	6	3	38	7
Total 2.8	100	14	67	8	8	12	6	90	14

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Group Reporting

- Most of the changes in solo reporting apply also to group reporting.
- Group template changes:
  - S.05.02: Removal of rows for changes in other technical provisions.
  - S.23.01: New rows added to break down the eligible own funds from other financial sectors and undertakings included via Deduction and Aggregation (D&A) method.
  - S.23.04: Additional columns to disclose non-available own funds in the reconciliation reserve.
  - S.32.01: New columns added to disclose the type of VA being used in the group internal model.
  - S.33.01: New column added for contribution of solo SCR to the group SCR.
  - S.34.01: New column added for contribution of solo (notional) SCR to group SCR.
  - S.37.01: Additional columns to split exposure by asset types.
- New Group templates:
  - S.37.02 Risk concentration: New template to split exposure by currency, sector and country.
  - S.37.03 Risk concentration: New template to split exposure by asset class and rating.

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Financial Stability Reporting

- Financial Stability Report (FSR) annual templates are removed and most annual templates are now reportable quarterly

- Financial Stability template changes:
  - S.01.02: New rows to flag if the undertaking is captive business; run-off business; any M&A during the period.
  - S.39.01: New section to disclose details of profit and loss (P&L).

- New Financial Stability templates:
  - S.14.04 Liquidity risk for life business
  - S.14.05 Liquidity risk for non-life business
  - S.38.01 Duration of technical provisions

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Removed Templates

S.03.02
&
S.03.03

S.06.01

S.25.02
&
S.25.03

S.08.02

S.15.01
&
S.15.02

SR.25.02
&
SR.25.03

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What's changing in Taxonomy 2.8.0?

Béibhinn Whelan, Stephen Maher, Liam Fannon, Mark Mullholland

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What's changing in Taxonomy 2.8.0?

■ Templates with ITS changes (White Templates) – Béibhinn Whelan

■ Templates with structural changes (Orange Templates) – Stephen Maher

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■ ECB Add-ons – Mark Mullholland

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Taxonomy Validations Impact

Affected validations and implementation of new validations

Validation rules (VRs) can be divided into three groups:

- Already existing VRs that continue to be valid in the new framework (45% of the total)
- Existing VRs that needed to be amended due to changes in the templates (38% of the total)
- New VRs (17% of the total):
  - New Variant –Old VRs implemented for new templates
  - New VRs on existing templates
  - New VRs on new templates

eiopa

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Insights from EIOPA – Q&A Clarifications

Some identified issues via the Q&As

- S.04.05 – clarification that it is to be reported on a country-by-country basis for at least 95% of gross written premium. All business shall be reported, however, **any residual business over the 95% threshold may be grouped as "other countries".**

- S.04s – confirmation that templates S.04.03.01, S.04.04.01 and S.04.05.01 are not due if the home country represents 100% of "activity. (Q&A 2531)

- S.05.01.04 - mistakes in the labels of C0280/R2600

- S.06.02:

  - CIC95 shall be excluded from the C0296 and C0297;

  - C0292, SCR calculation approach for CIU – request for adjusting the definition from being investment related to being position related in case of same asset held in different portfolios (for example, unit linked and non-unit linked) (Q&A 2648);

  - typo in the instructions of C0320 – instead of including items with CIC code 87 and 88 it should be CIC 8, other than 87 and 88 in line with the provisions for the internal rating and nominated ECAI.

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Insights from EIOPA – Q&A Clarification

Some identified issues via the Q&As

- S.12.01 - R0300 does not need to be reported for reinsurance accepted which would mean that C0100 and C0200 can be crossed out.

- S.12.01 and S.17.01 - restore the breakdown of the "Amount of transitional on Technical Provisions" rows in the quarterly S.12.01 and S.17.01 (Q&A 2533)

- S.18/S.19/S.20/S.21 – threshold clarification that "at least" 90% coverage is to be reported to so that companies that wish to report 100% can still do it (Q&A 2606)

- S.21.01 – inconsistency in the definition of the C0100 (Q&A 2413)

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Insights from EIOPA – Q&A Clarifications

Some identified issues via the Q&As

- S.22.01.04 – mistake, the MCR ratio (R0130) shall not be reported in.

- S.27.01 - C0090-C0120 should be calculated after diversification effect.

- S.30.01 and S.30.02 - clarification of the LOG that the reinsurance recoverables referred to in the threshold refer to all reinsurance recoverables (Q&A 2504).

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Minor Changes

- S.06.03 – Inclusion of category 7 in categories that C0040, Country of issue is not applicable to.

- S.10.01 – Change to make the detailed descriptions more explicit in how C0040 and C0050 should be filled out but no material changes.

- S.16.01 – Shall not be reported for accepted reinsurance business, some captives to report without currency split

- S.26.06 - Gross Technical Provisions, and Gross Premiums exclude unit linked and index linked wording added to the column name where already present in detailed description C0020/R0100, R0200, R0230

- Other templates have minor wording and grammatical changes in the ITS.

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SE.02.01 – Balance Sheet

■ Wording for government bonds makes clear that bonds issued by governments in any currency is a government bond.

■ Insurance and intermediaries receivables/payables no longer states that Solvency II value shall only include amounts past due.

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SE.02.01 – Balance Sheet: Reinsurance

■ Explicit instructions on how to fill out Reinsurance recoverables from, receivables and payables

		Solvency II value
		C0010
Assets		
Reinsurance recoverables from:	R0270	
Reinsurance receivables	R0370	
Liabilities		
Reinsurance payables	R0830	

All expected payments from reinsurers to the undertaking corresponding to payments not yet made to policyholders

All expected payments from reinsurers to the undertaking corresponding to payments already made to policyholders

All expected payments from the undertaking to reinsurers that are not included in reinsurance recoverables

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S.11.01 – Assets Held as Collateral

- This template now only needs to be filled out when the ratio of value of assets held as collateral to total assets is greater than 10% - CBI Validation Check
- What should be reported in this template is the collateral covering reinsurance receivables
- Collaterals are considered "held" when the undertaking has the "right of direct access to the collateral"
- The off-balance sheet assets held as collateral for covering balance sheet assets held directly by the undertaking shall also be reported in S.03.01 C0020/R0100 to R0130 – CBI Validation Check
- Alternate options for property address now include CRESTA/NUTS region of the property investment i.e. administrative boundaries or merged postal code areas.
- NACE codes A to N now require the 4 digit code for the class to be used, remaining sections can use a minimum of the letter reference of the section. Previously the 4 digit code was only necessary for section K - CBI Validation Check

- Note the change in wording from natural persons to now using the new CIC codes 87 and 88 (discussed later)

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S.23.01 – Own Funds

- Net deferred tax assets should be included when there is an excess of deferred tax assets over deferred tax liabilities. When deferred tax liabilities exceed deferred tax assets, the net deferred tax assets reported should be 0

- Where there is not a full recalculation performed but the SCR has been updated by the undertakings, the updated SCR can be reported in the quarterly submission

- Once a dividend is foreseeable, the full amount must be included in the quarterly at one time. The dividend shall not be added incrementally. A dividend is foreseeable when the payment becomes likely, it should be reported as foreseeable until it has been approved at the AGM (not until it has been paid)

- Expected Profits values are explicitly "gross of reinsurance and taxes" and will be reported annually only

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S.23.03 & S.23.04 – Own Funds

- A new threshold is being added for S.23.03 and S.23.04: shall be reported if the amount of the own funds for any tier changes more than 5% compared to the previous year calculated as below.

- % change (T; T-1):= $\dfrac{Available\ Own\ funds\ in\ tier\ i\ to\ cover\ SCR\ in\ T}{Available\ Own\ funds\ in\ tier\ to\ cover\ SCR\ in\ T-1}$

- S.23.03 – Total ancillary own funds applies to total ancillary own funds and no longer Tier 2 ancillary own funds

- S.23.04 – Column C0710 and C0970 description corrections.

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S.19.01 – Non-life Insurance claims

- Threshold on LoB of Non-Life TPs introduced – only required to report lines of business covering 90% of the non-life gross technical provisions (based on decreasing order of the absolute value of technical provisions)

- Threshold on LoBs to be reported with currency information has increased from 3% to 10% of the total gross best estimate. Reporting currency split no longer always needs to be provided, only in those scenarios where reporting currency is material currency for that LoB (same criteria for material currency as previously).

- For captive insurance and reinsurance undertakings complying with the conditions specified in Article 5(4) and (5), this template shall be reported without the currency split i.e. Z0030 is reported always as Total.

- No changes to the corresponding S.19.01.21 SFCR table (i.e. should still include 100% of business)

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S.20.01, S.21.01 & S.21.03

■Threshold on LoB of Non-Life TPs introduced – only required to report cashflows for all lines of business combined covering 90% of the non-life gross technical provisions.

■EIOPA clarified that "at least" 90% coverage is to be reported such that firms may choose to report 100% if they so wish.

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S.28 – Minimum Capital Requirement

■ Amount of taxes or charges levied with premiums shall be excluded from the written premiums

■ Affecting:

  ■ S.28.01.01.02 C0030 – Net (of reinsurance) written premiums in the last 12 months

  ■ S.28.02.01.01 C0040 – Net (of reinsurance) written premiums in the last 12 months for Non-Life activities

    and C0060 – Net (of reinsurance) written premiums in the last 12 months for Life activities

■ S.28.02 – Clarification that insurance and reinsurance undertakings shall disclose written and earned premiums

  as defined in Article 1(11) and (12) of Delegated Regulation (EU) 2015/35 regardless whether a local GAAP or

  IFRS is used.

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Removals

- S.23.02 Table 3 and 4 have been removed

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What's changing in Taxonomy 2.8.0?

■ Templates with ITS changes (White Templates) – Béibhinn Whelan

■ **Templates with structural changes (Orange Templates) – Stephen Maher**

   ➢ Outline the changes to the template

   ➢ Highlight specific aspects that are important for the updated template

   ➢ Provide some examples of populated data

   ➢ Provide some <u>sample draft</u> data checks we plan to run

■ New Templates in Taxonomy 2.8.0 (Blue Templates) – Liam Fannon

■ ECB Add-ons – Mark Mullholland

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SE.01.01 - Content of the submission

- Updated to reflect the large number of changes to the templates

- Updated to reflect the new risk-thresholds

- Clarify the instructions on when a template is submitted only with zeros or without figures

  - "When a template is submitted only with zeros or without figures, then SE.01.01 should indicate one of the

    'non reported' options."

C0010/R0060	S.03.01 – Off–balance sheet items – general	One of the options in the following closed list shall be used:
		1 – Reported
		2 – Not reported as no off–balance sheet items
		3 – Not reported due to value of guarantee/collateral/contingent liabilities below the threshold and no unlimited guarantee provided or received as in the template instructions
		0 – Not reported other reason (in this case special justification is needed)

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S.01.02 – Basic information

■ New rows to flag

  ➢ Captives

  ➢ Run-off business

  ➢ Mergers & Acquisitions during the reporting period

■ Provide a direct link to the webpage where the SFCR is disclosed

Direct URL to the webpage where the Solvency and Financial Condition Report is disclosed	R0255	
Direct URL to download the Solvency and Financial Condition Report	R0260	
Captive business	R0270	
Run-off business	R0280	
M&A during the period	R0290	

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S.02.02 - Liabilities by currency

■ Delete the assets part of the template (and add currency in S.31.01)

■ Captives are <u>exempt</u> from this template

■ New Threshold

➢ This template is not required to be submitted if one single currency represents more than 80 % of liabilities. In case the value of technical provisions, as reported in R0030 and R0120 in S.12.01 and R0060 and R0160 in S.17.01, is negative, for the purposes of the calculation of the threshold above the absolute value of those notional amounts should be considered without netting of technical provisions between different LoBs.

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S.03.01 - Off–balance sheet items

Unlimited guarantees		Information about the unlimited guarantees
		C0050
		╳
received	R0510	
provided	R0520	

■ S.03.02 & S.03.03 deleted

■ New section on unlimited guarantees in S.03.01

■ New Threshold

➢ a)the amount of any of the following sums is higher than 2 % of Total Assets:

➢ i. (C0020/R0010) Value of guarantee/collateral/contingent liabilities – Guarantees provided by the undertaking, including letters of credit + (C0020/R0300) Value of guarantee/collateral/contingent liabilities – Total collateral pledged + (C0010/R0400) Maximum value – Total Contingent liabilities;

➢ ii. (C0020/R0030) Value of guarantee/collateral/contingent liabilities – Guarantees received by the undertaking, including letters of credit + (C0020/R0200) Value of guarantee/collateral/contingent liabilities – Total collateral held; or

➢ b) the undertaking has provided or received unlimited guarantee

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S.05.01 - Premiums, claims and expenses

■ Changes in other technical provisions deleted

■ "Balance - other technical expenses/income" replaces "Other Expenses"

■ ITS clarification:

➢ Insurance and reinsurance undertakings shall report written/earned premiums as defined in Article 1(11) and

(12) of Delegated Regulation (EU) 2015/35 regardless whether local GAAP or IFRS is used.

■ No changes related to IFRS17 – Q&A 2228, 2206, 2465 & 2634

		Line of Business for: life				Total
		Health insurance			Life-reinsurance	
		C0210	......		C0280	C0300
Balance - other technical expenses/income	R2510		.....			
Total technical expenses	R2600		......			
Total amount of surrenders	R2700		.....			

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SE.06.02 - List of assets

- ■ Additional columns (see below)

- ■ Clarify instructions for CIC 09 – other investments

- ■ C0190 Item title will now have property location

- ■ C0230 issuer sector full 4 digit NACE codes for A to N required

- ■ CIC table updated - ANNEX V – e.g. CIC88 Loans to other natural persons

- ■ Many smaller updated to the guidance – especially regarding applicable CIC codes

ITS clarification ref Q&A 2511

Custodian code and Type of code	Long-term equity investment
C0121	C0145

Bail-in rules	Regional Governments and Local Authorities (RGLA)	Crypto-assets
C0293	C0294	C0295

Property type	Property location
C0296	C0297

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S.08.01 - Open derivatives

- C0120 Delta, C0410 Swap delivery currency & C0420 swap received currency deleted

- Additional columns (see below)

- C0270 Counterparty code and C0340 Counterparty Group code now are always reported, even when a LEI code isn't available

- Clarify C0121 Notional amount of the derivative reported in original currency

Unique Transactions Identifier
C0041

Currency of price	Swap delivered	Swap received
C0371	C0450	C0460

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S.08.01 - Data Quality Checks

S.08.02
deleted

Unique Transactions Identifier
C0041

SOLVENCY II ⟷ | ⟷ EMIR
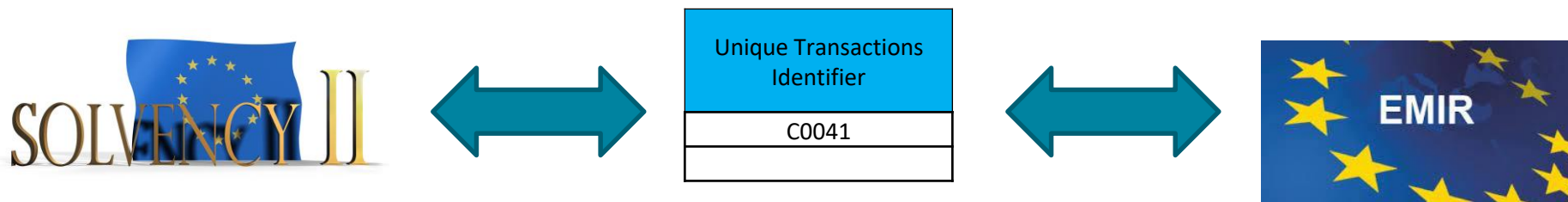
UTI will be used to compare data to EMIR.
Differences will be flagged.

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S.12.01 & S.12.02 - Life and Health SLT Technical Provisions

- S.12.01
  - New row for expected profits included in future premiums (EPIFP) – annually
  - All references to surrender values shall not be applicable to the reinsurance business.
  - Quarterly information on the transitional information deleted

		Insurance with profit participation		Index-linked and unit-linked insurance		.....
				Contracts without options and guarantees	Contracts with options or guarantees	.....
		C0020	C0030	C0040	C0050	.....
Expected profits included in future premiums (EPIFP)	R0370					.....

- S.12.02
  - S.12.02 Removal of total columns to simplify the template
  - Clarify how negative technical provisions are calculation of the threshold
    - The negative technical provisions at the level of the line of business or countries shall be considered with absolute value for the purpose of the calculation of the materiality of the above thresholds.

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S.13.01 - Projection of future gross cash flows

- Future Benefit columns split into new columns for future guaranteed and discretionary benefits

- New columns for reinsurance recoverable cash-flows by line of business

- Best estimate not reported if using simplifications where no future cashflows calculated

S.13.01.01.01

Best Estimate - Life

		Insurance with profit participation					
		Cash out-flows			Cash in-flows		Total recoverable from reinsurance (after the adjustment)
		Future guaranteed benefits	Future discretionary benefits	Future expenses and other cash out-flows	Future premiums	Other cash in-flows	
		C0011	C0015	C0020	C0030	C0040	C0045
Year (projection of undiscounted expected cash-flows)							
1	R0010						
2	R0020						
3	R0030						

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S.14.01 Life obligations analysis

- Single Product ID -> Now possible to read across all S.14.01 tables
- Additional columns (see below)
- Reinsurance accepted business no longer to be reported

Reminder: Country threshold has not changed, split out country if more than 10 % of technical provisions or written premiums for a given product.

S.14.01.01.01
Portfolio

Product ID code	Line of Business	Number of contracts at the end of the year	of which contracts with surrender option	Number of new contracts during year	Number of contracts surrendered during the year	Number of insured at the end of the year	Fiscal treatment of the products	Country
C0010	C0030	C0040	C0041	C0050	C0051	C0054	C0055	C0080

S.14.01.01.05
Portfolio product

Product ID code	Fund number		Total amount of Written premiums			Total amount of claims paid during year	Total amount of commissions paid during year	Expected future premiums	Expected future commissions	Best Estimate and Technical Provisions as a whole	Capital-at-risk
			of which written directly by the insurance undertaking	of which written via credit institutions	of which written via other insurance distributors						
C0090	C0020	C0060	C0061	C0062	C0063	C0070	C0071	C0075	C0077	C0180	C0190

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S.14.01 Life obligations analysis

- Pension entitlement information now identified in new column
  - ➤ TPs should be consistent with E.02.01
- Note guaranteed rate of blank is different from 0%

S.14.01.01.02 Characteristics of product							
Product ID code	Product classification	Pension entitlements	Type of product	Product denomination	Product still commercialised	Profit sharing	Remaining contractual
C0090	C0101	C0102	C0110	C0120	C0130	C0141	C0142

S.14.01.01.05 Portfolio product						Guaranteed rate	
Product ID code	Fund number	...	Best Estimate and Technical Provisions as a whole	Capital-at-risk	Surrender value	Annualised guaranteed rate (over average duration of guarantee)	Yearly interest rate guarantee for the reporting year
C0090	C0020		C0180	C0190	C0200	C0260	C0261

S.17.01, SE.17.01 & S.17.03 - Non–Life Technical Provisions

■ S.17.01/SE.17.01

➢ Quarterly S.17.01 replaced with SE.17.01

➢ Quarterly information on the transitional information deleted

➢ New row for expected profits included in future premiums (EPIFP) – annually

■ S.17.03

➢ Accepted non-proportional reinsurance now included

➢ Clarify how negative technical provisions are calculation of the threshold

		Direct business and accepted proportional reinsurance		Accepted non-proportional reinsurance			
		Medical expense insurance	.....	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance
		C0020	.....	C0140	C0150	C0160	C0170
Direct business			.....				
Home country	R0010		.....				
EEA countries outside the materiality threshold - not reported by country	R0020		.....				
Non-EEA countries outside the materiality threshold - not reported by country	R0030		.....				
Accepted proportional reinsurance business			.....				
....			.....				
Accepted non-proportional reinsurance			.....				
.....			.....				

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S.18.01 - Projection of future gross cash flows

- Firms using simplifications with future cash flows, for the calculation of technical provisions no longer required to report info (compared to previously where they required to report info in those cases where more than 10% of technical provisions have a settlement period longer than 24 months)

- New Threshold
  - Only required to report cashflows for all lines of business combined covering 90% of the non-life gross technical provisions.

EIOPA has confirmed via Q&A that only material lines of business be provided in R1000 C1000 of S.18.01.01.02 and reported in the form "1,2,3,4,5,6" (in-line with EIOPA XBRL Filling Rules for reporting lists with multiple choices)

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S.30.01 & S.30.02 - Facultative covers

■ Replace the 10 most relevant risks per line of business by the overall 20 largest facultative reinsurance

exposures plus the largest two in each line of business if not covered by the largest 20

■ Delete data related to Commission & broker info

■ New Threshold

➢ This template should only be reported if the reinsurance recoverables are higher than 10 % of the Best

Estimate calculated separately for life and non-life business

Threshold clarification ref Q&A 2504

Line of business for non-life	Indication of belonging to the 20 largest exposures
C0041	C0042

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S.30.03 & S.30.04 - Outgoing Reinsurance Program

■ S.30.03 Additional columns (see below) – replaces old columns on commission data

■ S.30.04 Removal of section for broker info

■ New Threshold

➤ This template should only be reported if the reinsurance recoverables are higher than 10 % of the Best

Estimate calculated separately for life and non-life business

Coverage of a layer covered by reinsurance	…..	Sliding scale commission	Minimum claim ratio on which the amount of sliding scale commission is dependant	Maximum claim ratio on which the amount of sliding scale commission is dependant	Minimum commission	Maximum commission	Expected commission
C0245	…..	C0390	C0400	C0410	C0420	C0430	C0440

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Minor Template Changes

- S.22.01 - Impact of long term guarantees measures and transitionals
  - New rows to disclose SCR ratio and MCR ratio.

- S.25.01 - Solvency Capital Requirement - for undertakings on Standard Formula.
  - New rows to split capital add-ons by type

- S.29.01 – S.29.04 - Variation Analysis
  - Captives exemption from S.29.01

- S.31 - Share of reinsurers
  - New column to disclose currency of reinsurance recoverables.

- S.22.04, S.22.05 & S.52.01
  - minor changes.

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What's changing in Taxonomy 2.8.0?

■ Templates with ITS changes (White Templates) – Béibhinn Whelan

■ Templates with structural changes (Orange Templates) – Stephen Mahe...

■ **New Templates in Taxonomy 2.8.0 (Blue Templates) – Liam Fannon**

■ ECB Add-ons – Mark Mullholland

New Templates

- S.04 – Cross Border Templates

- S.06.04 - Climate change-related risks to investments

- S.14.02 - Non-Life obligation analysis,

- S.14.03 - Cyber underwriting risk

- S.36 – Intra-Group Transactions

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S.04 – Cross-Border Templates

■ Core Annual template that collects information on business transacted on a cross-border basis

■ Reconfiguration of cross-border information capture, by adopting a matrix approach to capture LoB, U/W entity

and geographical split (by location of u/w and risk).

■ Deleted: S.04.01, S.05.02

■ Additions:

■ S.04.03 – List of underwriting entities

■ S.04.04 –Activity by country - location of underwriting

■ S.04.05 - Activity by country - location of risk

■ These templates are not required where **100%** of business activity occurs in the home country

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S.04.03 – List of underwriting entities

■ Capture all relevant underwriting entities classified by H/O, Branch e.g. EEA/non-EEA, country of establishment (N.B. Location of sales intermediary(ies) not relevant)

■ No materiality threshold – all entities and branches should be reported (inc. non-EEA branches)

■ Each reported entity will further provide a perspective on business written by location of underwriting (S.04.04) and location of risk (S.04.05)

S.04.03.01			
Basic Information - list of underwriting entities			
S.04.03.01.01			
List of underwriting entities			
Underwriting entity code	Type of entity	Type of branch localisation	Country of establishment
C0010	C0020	C0030	C0040
natural key|"mandatory"	Metric: Type of entity relation	Metric: Branch localisation	Metric: Branch country of establishment
UE: Underwriting entity code			

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■ Example 1

   ■ Head Office, based in Ireland

   ■ Branch Office Located in Portugal

S.04.03.01.01			
List of underwriting entities			
Underwriting entity code	Type of entity	Type of branch localisation	Country of establishment
C0010	C0020	C0030	C0040
213800WSGIIZCXF1P572	1 – Head office		
5493000IBP32UQZ0KL24	2 – Branch	1 – EEA branch	PT

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Activity by country - location of 1) underwriting, 2) risk

■ Considers all the entities listed in S.04.03

■ Business Perspective: LoB x Entity x Location

■ Location definitions ITS (reinsurance)

■ <u>All business</u> to be reported (iot fulfil our statistical and supervisory obligations)

 ■ but (S.04.05 only) residual materiality threshold i.e. 95% GWP reported with residual premium

  (<5% GWP) reported as 'Other countries'

■ Other Considerations

 ■ Templates will be reported in the case of any business activity outside the home country inc.

  business in run-off (i.e. so where there is no GWP but there are claims/exp incurred).

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S.04.04 Activity by country – location of underwriting

- Non-EEA Branch should have no FPS
- Total FPS business equals summation of FPS business by country
- Consistency between S.04.04 and S.04.05 e.g. Total reported business, LoBs etc.
- Consistency with S.05.01 e.g. Premiums, claims etc.

S.04.04.01
Activity by country- location of underwriting

Line of Business	Z0010			Underwriting entity code	Z0020
				EEA country	R0010

		By underwriting entity		By underwriting entity and by EEA member (localization of activity [based on place of underwriting])	...
		Business underwritten in the country of establishment	Business underwritten through FPS in country different from the country of establishment	Business underwritten in the considered country through FPS	...
		C0010	C0020	C0030	
Premiums written (gross)	R0020				
Claims incurred	R0030				
Acquisition expenses	R0040				
of which commissions	R0050				

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■ Example 2

■ One LoB: 6 - MAT insurance

■ Head Office, based in Ireland (writing business in Ireland & UK, and No FPS business)

■ Branch office in Lisbon, PT -> FPS business in IT and IE (2m premium), 1m premium Brazil

S.04.03.01.01			
List of underwriting entities			
Underwriting entity code	Type of entity	Type of branch localisation	Country of establishment
C0010	C0020	C0030	C0040
213800WSGIIZCXF1P572	1 – Head office		
5493000IBP32UQZ0KL24	2 – Branch	1 – EEA branch	PT

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■ Example 2

■ One LoB: 6 - MAT insurance

■ Head Office, based in Ireland (writing business in Ireland & UK, and No FPS business)

■ Branch office in Lisbon, PT -> FPS business in IT and IE (2m premium), 1m premium Brazil

		S.04.04.01.01			S.04.04.01.02
		Business u/w in CoE	FPS Bus (diff to CoE)		Business in considered country through FPS
IRELAND	R0010	**C0010**	**C0020**		**C0030**
Premiums written (gross)	R0020	1,600,000			
Claims incurred	R0030	1,150,000			
Acquisition Expenses	R0040	20,000			
Of which commissions	R0050	5,000			

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- Example 2

  - One LoB: 6 - MAT insurance

  - Head Office, based in Ireland (writing business in Ireland & UK, and No FPS business)

  - Branch office in Lisbon, PT -> FPS business in IT and IE (2m premium), 1m premium Brazil

		S.04.04.01.01			S.04.04.01.02	
		Business u/w in CoE	FPS Bus (diff to CoE)		Business in considered country through FPS	
		C0010	**C0020**		**C0030**	
PORTUGAL	**R0010**				IE	IT
Premiums written (gross)	**R0020**	5,500,000	2,000,000		800,000	1,200,000
Claims incurred	**R0030**	3,750,000	1,500,000		400,000	1,100,000
Acquisition Expenses	**R0040**	250,000	200,000		50,000	150,000
Of which commissions	**R0050**	150,000	100,000		40,000	60,000

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- Example 2
  - One LoB: 6 - MAT insurance
  - Head Office, based in Ireland (writing business in Ireland & UK, and No FPS business)
  - Branch office in Lisbon, PT -> FPS business in IT and IE (2m premium), 1m premium Brazil

		S.04.04.01.01			S.04.04.01.02	
		Business u/w in CoE	FPS Bus (diff to CoE)		Business in considered country through FPS	
		C0010	C0020		C0030	
PORTUGAL	R0010				IE	IT
Premiums written (gross)	R0020	5,500,000	2,000,000		800,000	1,200,000
Claims incurred	R0030	3,750,000	1,500,000		400,000	1,100,000
Acquisition Expenses	R0040	250,000	200,000		50,000	150,000
Of which commissions	R0050	150,000	100,000		40,000	60,000

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S.04.05 - location of risk

- 'Other Countries' <5% of Total GWP
- Summation across countries
- Consistency between S.04.04 and S.04.05 – Total reported business, LoBs

S.04.05.01
Activity by country - location of risk

Line of Business		Z0010		Country		R0010
Underwriting entity code		Z0020				

		Total underwriting entity activity	...	Activity by country – location of risk	...
		Total of business written by the undertakings	...	Total by country	...
		C0010		C0020	
Premiums written (gross)	R0020				
Premiums earned (gross)	R0030				
Claims incurred (gross)	R0040				
Expenses incurred (gross)	R0050				

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■ Example 3

  ■ One LoB: 6 - MAT insurance.

  ■ Ireland H/O - (writing business in Ireland & UK, and No FPS business)

  ■ Branch office in Lisbon, PT -> 50% FPS business risk is located in France

		S.04.05.01.01		S.04.05.01.02	
		Total of business written by the undertakings			
		C0010		**C0020**	
IRELAND	**R0010**			IE	Other Countries
Premiums written (gross)	**R0020**	1,600,000		1,150,000	450,000
Claims incurred	**R0030**	1,150,000		950,000	250,000
Acquisition Expenses	**R0040**	20,000		15,000	5,000
Of which commissions	**R0050**	5,000		4,000	1,000

4.95% GWP

		S.04.04.01.01			S.04.04.01.02
		Business u/w in CoE	FPS Bus (diff to CoE)		Business in considered country through FPS
IRELAND	**R0010**	**C0010**	**C0020**		**C0030**
Premiums written (gross)	**R0020**	1,600,000			
Claims incurred	**R0030**	1,150,000			
Acquisition Expenses	**R0040**	20,000			
Of which commissions	**R0050**	5,000			

■ Example 3

■ One LoB: 6 - MAT insurance.

■ Ireland H/O - (writing business in Ireland & UK, and No FPS business)

■ Branch office in Lisbon, PT -> 50% FPS business risk is located in France

		S.04.05.01.01		S.04.05.01.02				
		Total of business written by the undertakings						
		C0010		**C0020**				
PORTUGAL	**R0010**			BR	FR	IE	IT	PT
Premiums written (gross)	**R0020**	7,500,000		1,000,000	1,000,000	400,000	600,000	4,500,000
Claims incurred	**R0030**	5,250,000		750,000	750,000	200,000	550,000	3,000,000
Acquisition Expenses	**R0040**	450,000		50,000	100,000	25,000	75,000	200,000
Of which commissions	**R0050**	250,000		25,000	50,000	20,000	30,000	125,000

		S.04.04.01.01			S.04.04.01.02	
		Business u/w in CoE	FPS Bus (diff to CoE)		Business in considered country through FPS	
		C0010	**C0020**		**C0030**	
PORTUGAL	**R0010**				IE	IT
Premiums written (gross)	**R0020**	5,500,000	2,000,000		800,000	1,200,000
Claims incurred	**R0030**	3,750,000	1,500,000		400,000	1,100,000
Acquisition Expenses	**R0040**	250,000	200,000		50,000	150,000
Of which commissions	**R0050**	150,000	100,000		40,000	60,000

S.06.04 – Climate Change related Risks to Investments

- This template contains information on the share of investments exposed to climate change-related risk and should <u>always</u> be reported

- Methodology not prescribed – (<u>EIOPA ORSA guidance</u> available)
  - KPIs are <u>not comparable</u> across companies

- If no KPI is provided a justification is necessary to be filled.

- The KPI on transition risk on investments should include assets held within funds (CIUs) which are part of investments

- Unit Linked and Index Linked investments are not in the scope of the KPI on transition risk

Climate change-related risks to investments

		C0010
Climate change-related transition risk - KPI	R0010	
Climate change-related physical risk - KPI	R0020	
Justification for not reporting climate change-related transitio	R0030	
Justification for not reporting climate change-related physical risk - KPI	R0040	

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S.06.04

- Justification for not reporting climate change-related KPIs should be in line with firms' materiality assessment of climate change risk in their ORSAs.

- The Central Bank published its [Guidance for Insurance Undertakings on Climate Change Risk](#) in March 2023. The Guidance clarifies expectations with regard to how firms consider climate change risk within their business

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S.06.04 – Examples of incorrect reporting

All fields should not be completed

		C0010
Climate change-related transition risk - KPI	R0010	0.31
Climate change-related physical risk - KPI	R0020	0.25
Justification for not reporting climate change-related transition	R0030	Test
Justification for not reporting climate change-related physical risk - KPI	R0040	Non

Template should not be empty

		C0010
Climate change-related transition risk - KPI	R0010	
Climate change-related physical risk - KPI	R0020	
Justification for not reporting climate change-related transition	R0030	
Justification for not reporting climate change-related physical risk - KPI	R0040	

Risk should be reported as a proportion

		C0010
Climate change-related transition risk - KPI	R0010	1200000
Climate change-related physical risk - KPI	R0020	
Justification for not reporting climate change-related transition	R0030	
Justification for not reporting climate change-related physical risk - KPI	R0040	

Reporting should not be contradictory

		C0010
Climate change-related transition risk - KPI	R0010	0.31
Climate change-related physical risk - KPI	R0020	
Justification for not reporting climate change-related transition	R0030	Test
Justification for not reporting climate change-related physical risk - KPI	R0040	

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S.14.02 – Non-Life obligation analysis

■ This template includes supervisory information about the characteristics of non-life products. Intended to capture product category information similar to reporting of S.14.01. (Life products).

■ It covers non-life <u>direct business only</u>. No information has to be provided for accepted reinsurance business.

■ Similar to the CBIs existing NST14 (NST14 no longer required to be reported from YE23)

■ Where products are modular/bundled, the template captures the characteristics of each of the unbundled LoBs e.g. MTPL – reported LOB 4 (Motor Lia) & 5 (Other motor)

■ Points to note:

  ■ Products with Active contracts (but no longer sold) should be reported

  ■ Products with no active contracts shall not be reported

  ■ Where no additional product cat is selected (C0020), a max of one row per LoB (C0010) is expected

  ■ Each LoB should have maximum 2 rows with the exception of LoB 12 with max 3 rows

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- General filing points:
  - C0030 Should be between 0 and 100
  - C0050, C0060 C0130 and C0140 must be integers
  - C0120 <u>multiple countries</u> for a given line of business should be listed with a comma separating them
  - C0120 should be filled for <u>all</u> lines of business
  - C0130, C0140 – ITS specifies the min requirements, additional information can be reported if available
  - S.05.01 R0110 should be equal to the sum of C0070, C0080, and C0090 for each individual line of business

Country		Country		Country	
C0120		C0120		C0120	
FRA&GER&IRL		France, Germany, Ireland		DE,FR,IE	

For the products commercialised under this product category/LOB, which proportion (measured by gross written premiums) covers climate related perils? (0-100)	If the product covers climate-related perils, does the product design make allowance for risk-prevention measures? (Yes/No/Not applicable)	Number of contracts at the end of the year	Number of new contracts during year
C0030	C0040	C0050	C0060
Metric: Pure	Metric: Allowance for risk-prevention measures	Metric: Integer	Metric: Integer
PP/Proportion of products commercialised under the product category (measured by gross written premiums) that covers climate-related perils		NT/Number of contracts	DI/Year to Date

Country	Information on number of insured	
	Number of insured at the end of the year	Number of insured properties at the end of the year
C0120	C0130	C0140
Metric: String	Metric: Integer	Metric: Integer
TS/Description of countries or group of countries	NT/Number of insured contracts at the end of the year	NT/Number of insured properties at the end of the year

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S.14.03 – Cyber Underwriting Risk

■ New template added to reflect the growth in European cyber insurance industry

■ This template is relevant to non-life insurance and reinsurance undertakings which underwrite products covering cyber risks as defined in the ITS

■ Data provided by <u>product</u> (product group) NOT by contract

■ Materiality Threshold

    ■ Where sum of a products premium earned for cyber risk (or the part premium e.g. cyber add-on) is:

        ■ >5% of the overall non-life business (by premium)

        ■ or greater than >€5m

    ■ OR policies with cyber coverage represent >3% of the total number of policies of the non-life business

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S.14.03 – Cyber Underwriting Risk

S.14.03.01.01
Cyber underwriting risk - risk identification

Line identification	Product Group Code	Target market	Product Identification	Cyber coverage in the Product Identification	Line(s) of business	Description of Risk(s) included in the coverage	Other risk detailed description		
C0009	C0010	C0020	C0030	C0040	C0050	C0060	C0070		

artificial key|"mandatory"	Metric: String	Metric: Business individual customers	Other risk detailed description	Sum(s) insured	Premium(s)	Sum(s) reinsured	Number of Claims settled with Payment	Amount of Claims Paid	Numbers of Claims settled without payment	Technical Provisions
			C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140
NJ: S.14.03.01 line identification	TS/Product group code		Metric: String	Metric: Monetary	Metric: Monetary	Metric: Monetary	Metric: Integer	Metric: Monetary	Metric: Integer	Metric: Monetary

- A single line entry will indicate a single product (ID), covering a single LoB, Description of Risk i.e. sharing the same characteristics
- Similarly, multiple lines reflect each combination of ID/LoB/Risk.
- C0010 – consistency over time, ordered where product group needs to be reported in more than one row

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S.36 – Intra-Group Transactions

- S.36.05 shall report P&L or P&L transactions associated with all relevant (significant, very significant and transactions required to be reported) IGT
- S.36.06 IGT between entities (in scope of group supervision) related to off-balance sheet guarantees/contingent liabilities
- S36.07 IGT related to internal insurance and reinsurance within the group.

- Considerations:
  - Remapping of existing templates - will be relevant to Groups currently reporting IGTs
  - Each transaction which is part of a single economic operation and/or indirect transactions
  - Significant threshold – Discuss with supervisor

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Slido: #CBIQRT
Passcode ddbnrh

What's changing in Taxonomy 2.8.0?

■ Templates with ITS changes (White Templates) – Béibhinn Whelan

■ Templates with structural changes (Orange Templates) – Stephen Mahe...

■ New Templates in Taxonomy 2.8.0 (Blue Templates) – Liam Fannon

■ **ECB Add-ons – Mark Mullholland**

Background

■ Requirement ([ECB/2014/50](#)) to produce financial statistics on the insurance sector

■ We collect data needed for both prudential and statistical purposes in one data collection. More efficient and avoids separate data collections.

Focus today

■ Reminder on E.02 (Pension entitlements) in context of updates to S.14.01 (Life obligations)

■ Highlight what else has changed to the ECB add-ons and the new E.04 template

■ Links to resources – ECB template instructions

■ Removal of E.03 (Non-life TP reinsurance geography) – using new data from S.17

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Why do we collect?

■ To allocate insurance corporations (IC) life

insurance liabilities to 'pension entitlements' in

insurance statistics

What to include?

■ Any products that are classified as pension

entitlements in C0102 S.14 (Q&A 343)

■ **Note**: pension entitlement classification in S14

has been separated from the product

classification column – alignment between S.14 &

E.02

Template

		Gross TP as a whole and Gross Best Estimate
		EC0010
Pension entitlements	ER0010	
of which: Pillar II pension entitlements	ER0020	
Pillar II defined benefit pension entitlements	ER0030	
Pillar II defined contribution pension entitlements	ER0040	
Pillar II hybrid pension entitlements	ER0050	

ECB Template Instructions

E.02.01 – Pension entitlements (template for ESCB purposes)

General comments:

This template contains information required for statistical purposes on pension entitlements (which are identified in column C0102 of template S.14.01 " and should be included in this template if the C0102 is reported as "1. – yes".

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Pillar 2 (ER0010 & ER0020)

- This category only refers to occupational pension plans
- (ER0030) for DB counterparty
- (ER0040) for DC counterparty

Some IE examples (where classified as a pension entitlement)

- occupational pension schemes, buy-in annuities
- i.e. counterparty to product is a pension fund (S129 statistical sector)

Pillar 3 (ER0010)

- Individual pension plans

Some IE examples (where classified as a pension entitlement)

- Additional Voluntary Contributions (AVCs)
- Personal Retirement Savings Accounts (PRSA)
- Pan-European Personal Pension (PEPP)
- Approved Retirement Funds (ARF)
- Personal Retirement Bonds (PRB) / Buy-out bonds (BOB)
- Retirement Annuity Contract (RAC)
- Individual annuities
- Buy-out annuities

ECB Template Instructions

COLUMN	ITEM	INSTRUCTIONS
EC0010/ ER0010	Pension entitlements	Amount of gross technical provisions as a whole and gross best estimate relating to the reporting undertaking's pension schemes, including both occupational and individual pension plans.
EC0010/ ER0020	Of which: Pillar II pension entitlements	Amount of gross technical provisions as a whole and gross best estimate relating to Pillar II pension entitlements. Pillar II pension entitlements refer to occupational pension plans only and hence are a subset of the total pension entitlements. In some cases, undertakings may need to make assumptions/approximations to provide these data.

Pillar 2 and 3

	Gross TP as a whole and Gross Best Estimate
	EC0010
Pension entitlements	ER0010
of which: Pillar II pension entitlements	ER0020
Pillar II defined benefit pension entitlements	ER0030
Pillar II defined contribution pension entitlements	ER0040
Pillar II hybrid pension entitlements	ER0050

Pillar 2

Relationship with S.14 life obligations analysis

We may query where there isn't alignment between

E.02 ER0010 EC0010 (total pension entitlements)

and

∑ Best estimate and TP as a whole (S14 C0180) where S14 C0102 is pension entitlement

S14


```
S.14.01.01.05
Portfolio product

Product ID code

                              Pension entitlements
        C0090                      C0102

S.14.01.01.02
Characteristics of product

                              Best Estimate and
                              Technical Provisions as a
                              whole
        Product ID code
        C0090                      C0180
```

E02

	Gross TP as a whole and Gross Best Estimate
	EC0010
Pension entitlements ER0010	
of which: Pillar II pension entitlements ER0020	
Pillar II defined benefit pension entitlements ER0030	
Pillar II defined contribution pension entitlements ER0040	
Pillar II hybrid pension entitlements ER0050	

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What is in this new template?

- Include investment revenues (S29.02 R0040) and expenses (S29.02 R0050) reported in S.29.02

- Include dividends, rents, interest income but <u>not</u> holding gains and losses

- Geographical breakdown (similar to S.12.02) of:

    - Life investment revenues and investment expenses attributed to policyholders and

- Life and non-life investment revenues and investment expenses not attributed to policyholders.

- Example in template instructions: a with-profit contract entered into in the home country pays a dividend of 3 and the attribution to the policyholder is 85%

		Investment revenues attributed to policyholder		Investment expenses attributed to policyholder	
		Non-index-linked and non-unit-linked insurance	Index- and unit-linked insurance	Non-index-linked and non-unit-linked insurance	Index- and unit-linked insurance
		EC0020	EC0030	EC0040	EC0050
Home country	ER0010	2.55			
EEA countries	ER0020				
Non-EEA countries	ER0030				
Countries in the materiality threshold	ER0040				

		Investment revenues and expenses not attributed to policyholder	
		Investment revenues	Investment expenses incl. interest charges on subordinated and financial liabilities
		EC0060	EC0070
Total not attributed to policyholder	ER0050	0.45	

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New ECB add-on 3 rows by LOB and Total

Gross claims provision

- ER0161 - Gross discounted Best Estimate Claims Provisions for **claim events** occurred **during the current financial year**

Cash-flows of best estimate claims provision (Gross)

- ER0421 - Gross claims paid in the current quarter relating to risks covered **before** the current reporting period
- ER0422 - Gross claims paid in the current quarter relating to risks covered **in** the current reporting period

						Direct business and accepted proportional reinsurance		Total Non-Life obligation
						Medical expense C0020	Income C0030	C0180
					R0160			
Technical provisions calculated as a sum of BE and RM	Best estimate	Claims provisions	Gross	Gross discounted Best Estimate Claims Provisions for claim events occurred during the current financial year	ER0161			
			Total recoverable from	R0240			
			Net Best Estimate of Claims Provisions	R0250			
Cash-flows of the Best estimate of Claims Provisions (Gross)	Gross claims paid in the current financial year relating to claims incurred before the current financial year			ER0421			
	Gross claims paid in the current financial year relating to claims incurred in the current financial year			ER0422			

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New ECB add-on 6 rows

- ECB add on ER0851 – ER0856: non-negotiable instruments (an o/w for subordinated liabilities), split of
  - held by credit institutions and non-credit institutions and
  - by geographic domestic (Ireland), other euro area (ex. Ireland), and rest-of-world (ex. Ireland and euro area)
- Q&A 2722 – describes a non-negotiable instrument
  - where the transfer of legal ownership is subject to restrictions which imply that they cannot be marketed or
  - although technically negotiable, cannot be traded owing to the absence of an organised market.
- Allocate as appropriate any subordinated liabilities to ER0851-ER0856 that are non-negotiable.

Subordinated liabilities	R0850	
Non-negotiable instruments held by credit institutions resident domestically	ER0851	
Non-negotiable instruments held by credit institutions resident in the euro are	ER0852	
Non-negotiable instruments held by credit institutions resident in rest of the w	ER0853	
Non-negotiable instruments held by non-credit institutions resident	ER0854	
Non-negotiable instruments held by non-credit institutions resident in the eurc	ER0855	
Non-negotiable instruments held by non-credit institutions resident in rest of t	ER0856	

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New ECB add-on columns

■ These items shall be reported for CIC Categories 1, 2, 5, 6 and 8 if the instruments do not have an ISIN

■ i.e. non ISIN government, corporate bonds, structured notes, collateralised securities, mortgages and loans

■ Other data sources leveraged for ISIN instruments

■ EC0382 - Issue price - price as issued in percentage of par amount and should be filled for percentage-quoted zero-coupon bonds without an ISIN.

■ EC0391 – Cancellation option - the asset is repayable on demand at the request of the insurance corporation.

Issue price
EC0382

Metric: Pure

Cancellation Option
EC0391

Metric: Cancellation option

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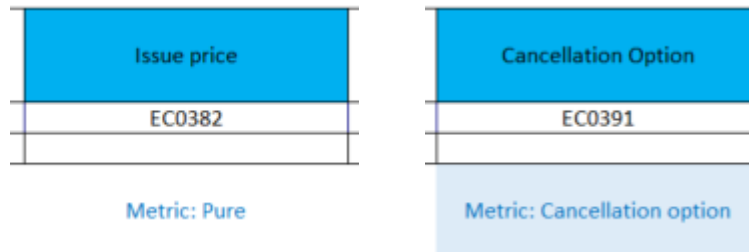
Statistical Publications

CBI Insurance Statistics
CBI Pension Fund Statistics
Behind the Data Research Series

ECB Data Portal (insurance data set)
ECB Data Portal (pension funds data set)

Queries on ECB add-ons

ECB add-on instructions
Email: insurance.statistics@centralbank.ie

Example chart Q2 2023 statistical release

Chart 2: Liabilities of Irish insurance corporations
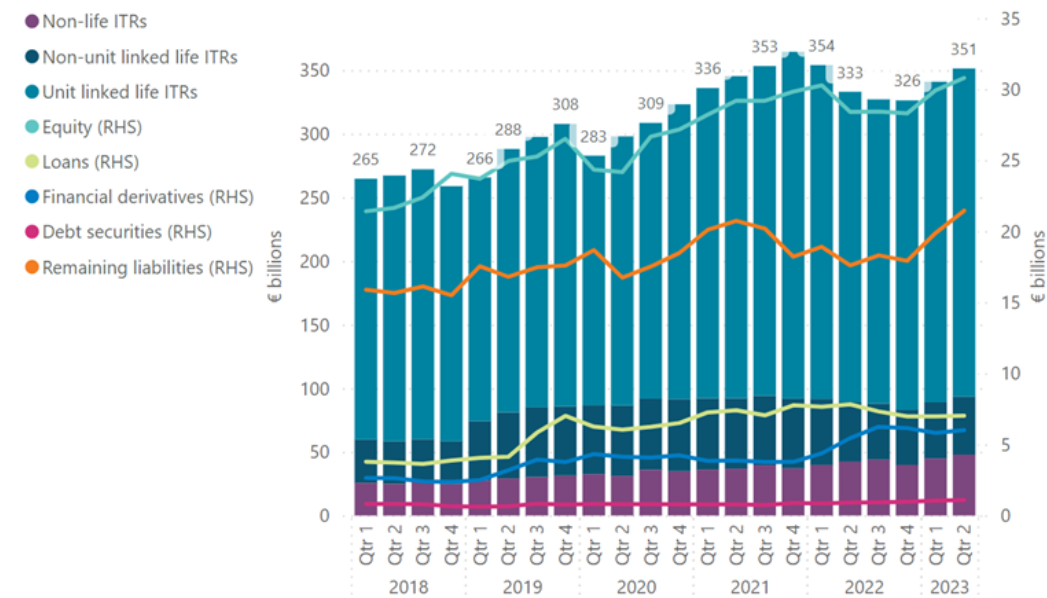
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coffee time

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Technology changes

Padraig Foley, Colm Devine, Simon O'Connor

Returns Transformation: Migrating from ONR to Portal

- Overview

- Benefits

- What has Returns Transformation delivered so far?

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Reporting Firms submit data via 'returns' and amendments through the ONR system, Portal and via email.

The Data was received into CBI and stored via shared outlook mailboxes and ONR. Data was also forwarded to different workflows such as F&P, Sharepoint, Unity CRM and Power BI. Processes for collecting and managing Data varies greatly between different business areas.

Reporting Firms
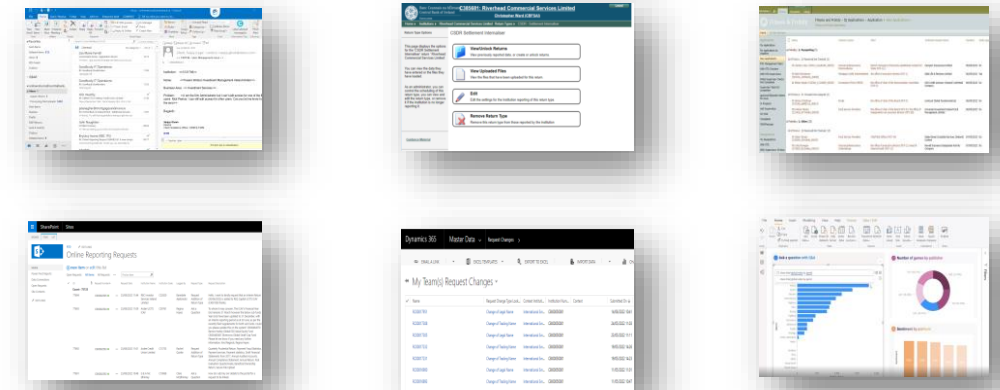
RETURNS TRANSFORMATION WILL FUNDAMENTALLY TRANSFORM HOW DATA IS SUBMITTED, COLLATED AND COMMUNICATED BETWEEN THE CBI AND ITS STAKEHOLDERS

Integrated Central Bank Portal

Internal Portal

The integrated Portal allows users to submit returns, F&P submissions, amendment requests and send/receive secure messages to CBI users from the one platform.

The internal portal provides CBI users with a single interface that can be used for viewing and managing returns, the actioning of master data amendment requests and sending/receiving secure messages with external portal users.

Reporting Firms

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What will the Benefits of Returns Transformation be?

Single Point of Entry for All Engagement with the Bank for the submission of data

Streamlined Internal Processes – Increased Efficiencies

Increased Security

Enhanced user-centric platform for viewing & managing returns relevant to each specific business area

Faster Turnaround Time for Queries & Engagement

Increased self-service capabilities reducing business area's reliance on IT Support

Benefits for internal Users

Benefits for External Users

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Returns Transformation Release 1 – June 2022

Portals Interface

ONR Interface

Portals interface with the resurfaced ONR appearing post Release 1 Go-Live

- ONR was resurfaced within Portal utilising Portals enhanced second factor authentication security features. (ONR used basic Username/Password login credentials).
- Portal users can be linked to multiple institutions on the Portal, removing the need for different login details for each institution. This should significantly reduce the number of administrative queries (password resets/assigning permissions) being handled by CBI business teams.
- Portals self-service registration process eliminates administrative overhead previously required to create user profiles and the risk associated with transmitting login details between the CBI and external stakeholders.

Fitness and Probity within Portal: April 2023

Returns Transformation Release 2 – Sept 2023

- ONR direct login was removed; all returns submitted through CBI Portal

- Return Related Requests: Unlock / Add / Delete / Amend

- Returns Related Messaging

- Enhanced Filing Notifications

Return Related Request Changes: Previous Process Flow

1. External user logins into Portal/ONR and navigates to a particular return to submit a request for that return.

2. The request feeds through to a Sharepoint list maintained by the support team within RBSD.
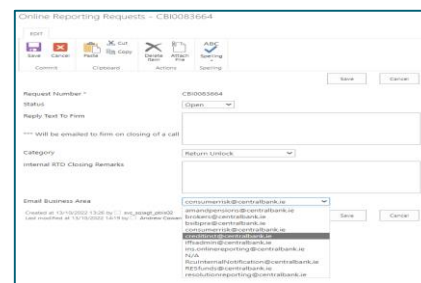
3. The support team check each request in order to determine the correct business unit to forward the request on to for decisioning.

4. The request is sent to a shared mailbox within the relevant business area.

How ONR Requests were managed
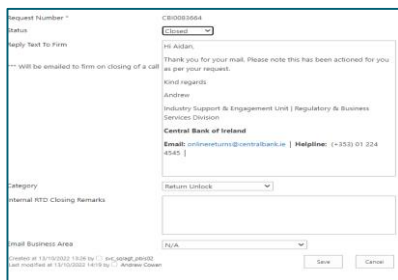
8. When the amendment has been completed the support team then need to close out the request within Sharepoint. When this is completed a notification is sent back to the external user advising that the task is complete.

6. If approved by the business owner, the support team will manually make the required amendments to the return via the ONR system.

6. The confirmation of the approval is received back into the Sharepoint list that needs to be continually monitored throughout the day.

5. The request is sent from the shared mailbox to the relevant supervisory team or team member who will either approve or reject the request.

Approx 7,500 requests received by RBSD via ONR in the last year.
We also received more than double that via Phone/email channels. While RBSD strives to close out its task on the day it is received the average lifespan of an ONR request was 1-2 days.
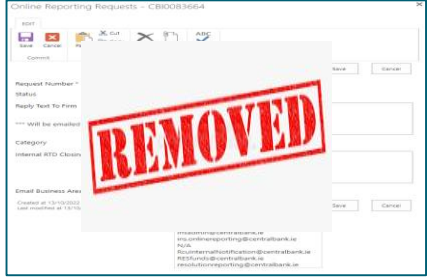
Return Related Request Changes: To Be Process Flow
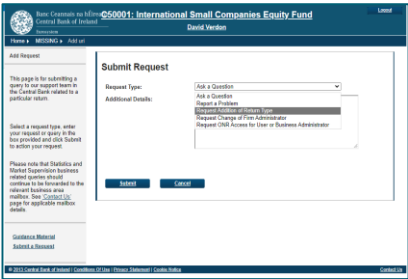
1. External user logins into Portal/ONR and navigates to a particular return to submit a request for that return.

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3. The support team check each request in order to determine the correct business unit to forward the request on to for decisioning.
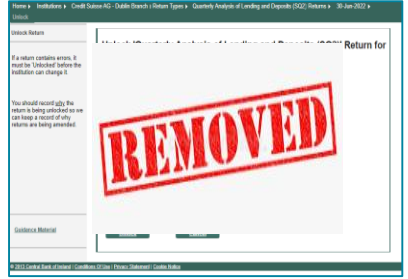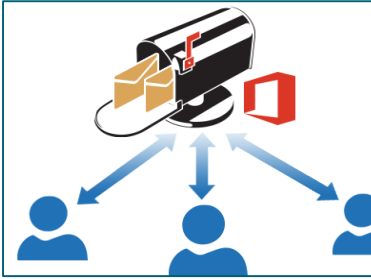

4. The request is sent to a shared mailbox within the relevant business area.

Returns Transformation will deliver a simplified route for the requesting and completing of return related requests by removing several layers of the existing process and utilising just 1 external platform and 1 internal platform end to end.

8. When the amendment has been completed the support team then need to close out the request within Sharepoint. When this is completed a notification is sent back to the external user advising that the task is complete.

6. If approved by the business owner, the support team will manually make the required amendments to the return via the ONR system.

6. The confirmation of the approval is received back into the Sharepoint list that needs to be continually monitored throughout the day.

5. The request is sent from the shared mailbox to the relevant supervisory team or team member who will either approve or reject the request.

The streamlined process now directs request / queries to the relevant decision making team instantly.

Return Related Request Changes: On Screen Enhancements - September 2023

Returns Related Requests On ONR

Returns Related Requests On Portal

Returns Related Messaging: September 2023
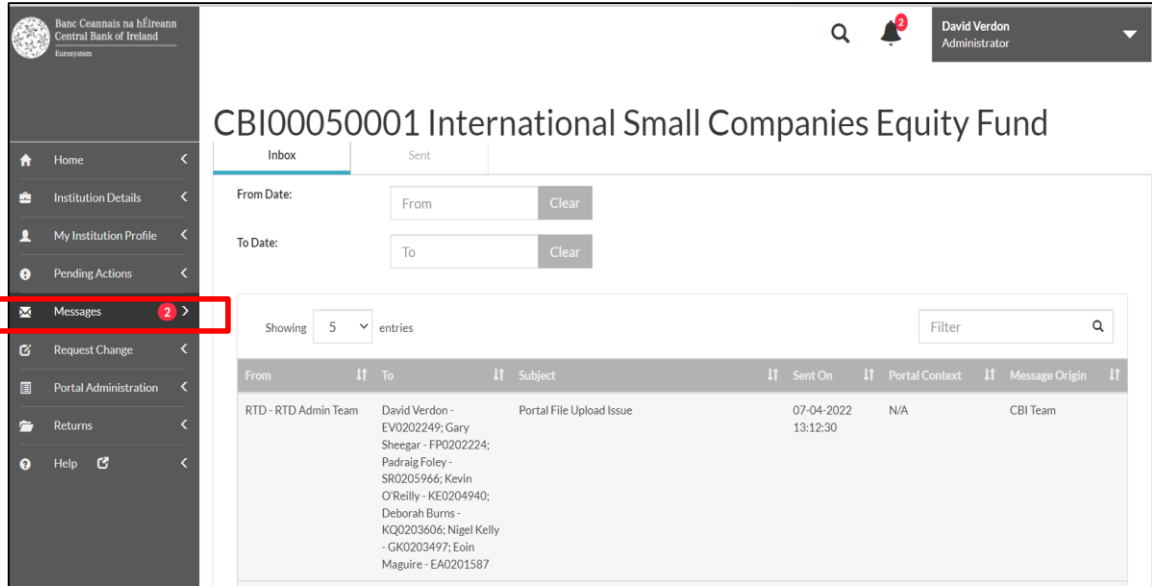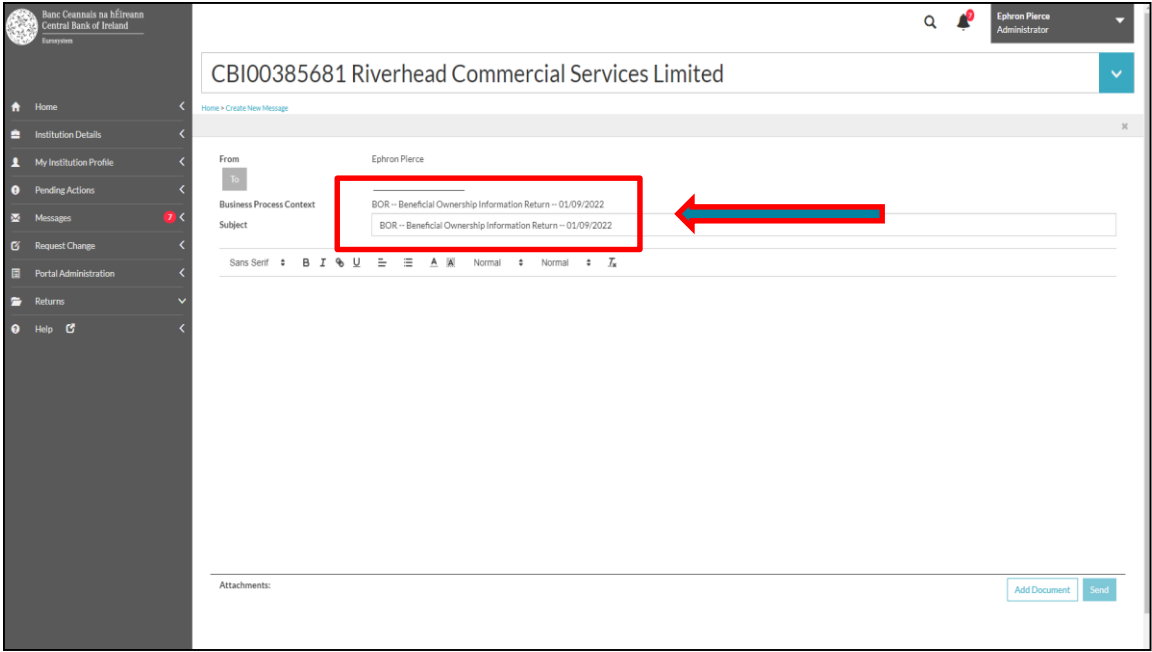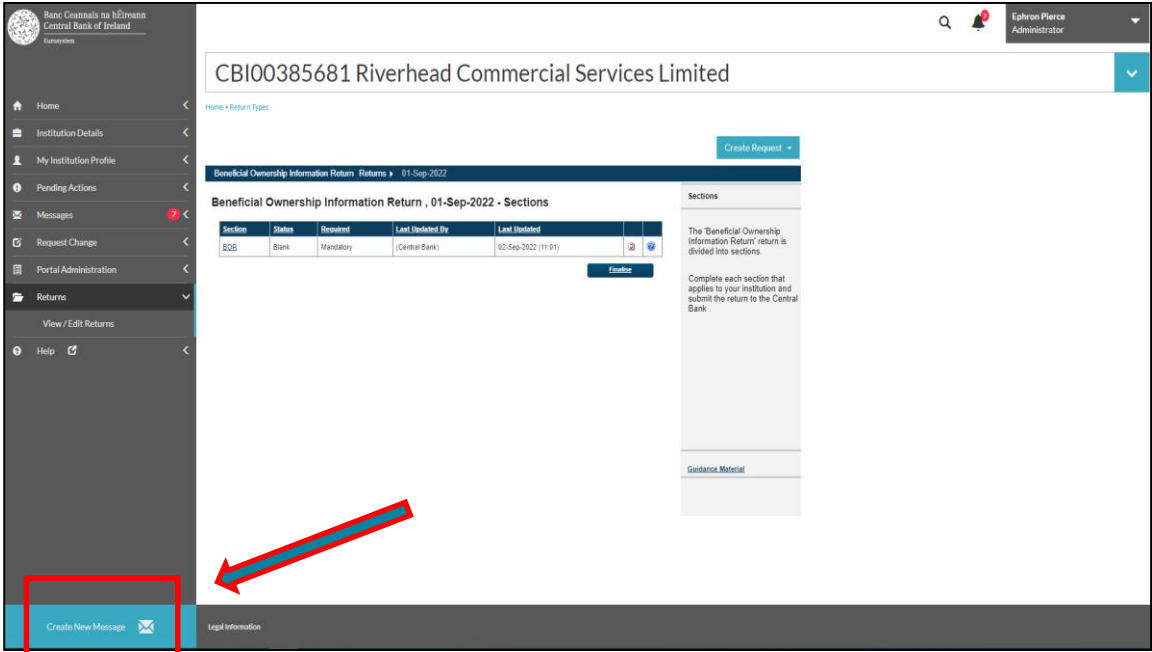
- From within a return a message can be generated.
- The system auto populates the Return type / Return Instance and the default CBI team that the return relates to into the message.
- Messages have a 2 way interaction allowing replies to be issued back and forth.
- The portal messages tab contains all portal related messages: Returns, Request Changes, Filing Notifications, Updates from CBI teams in the one place.

Enhanced Filing Notifications

Users with relevant permissions can assign Portal users as recipients for individual returns. Multiple users can be selected for each return if required.

There is also a backup option where the notification can default to another users or group of users should a recipients access to Portal be removed.

Recipients will receive a notification to their registered email address advising that a portal message has been received.

Once the users logs on to portal the message will be available on the home-screen and will also be stored within the messages section on Portal.

External Testing

Colm Devine

External Testing of Solvency II & NST Returns

- External test phase from Monday 4th to Friday 8th December. Firms can continue uploading test files after these dates

- Test Portal has replaced Test ONR

- Communication with further details will be sent to firms shortly

- Testing queries to SIITestReturns@centralbank.ie

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Future developments in xBRL and DPM

Simon O'Connor – Product Owner, xBRL Delivery

Agenda

1. Current state

2. Imminent changes

3. Future possibilities

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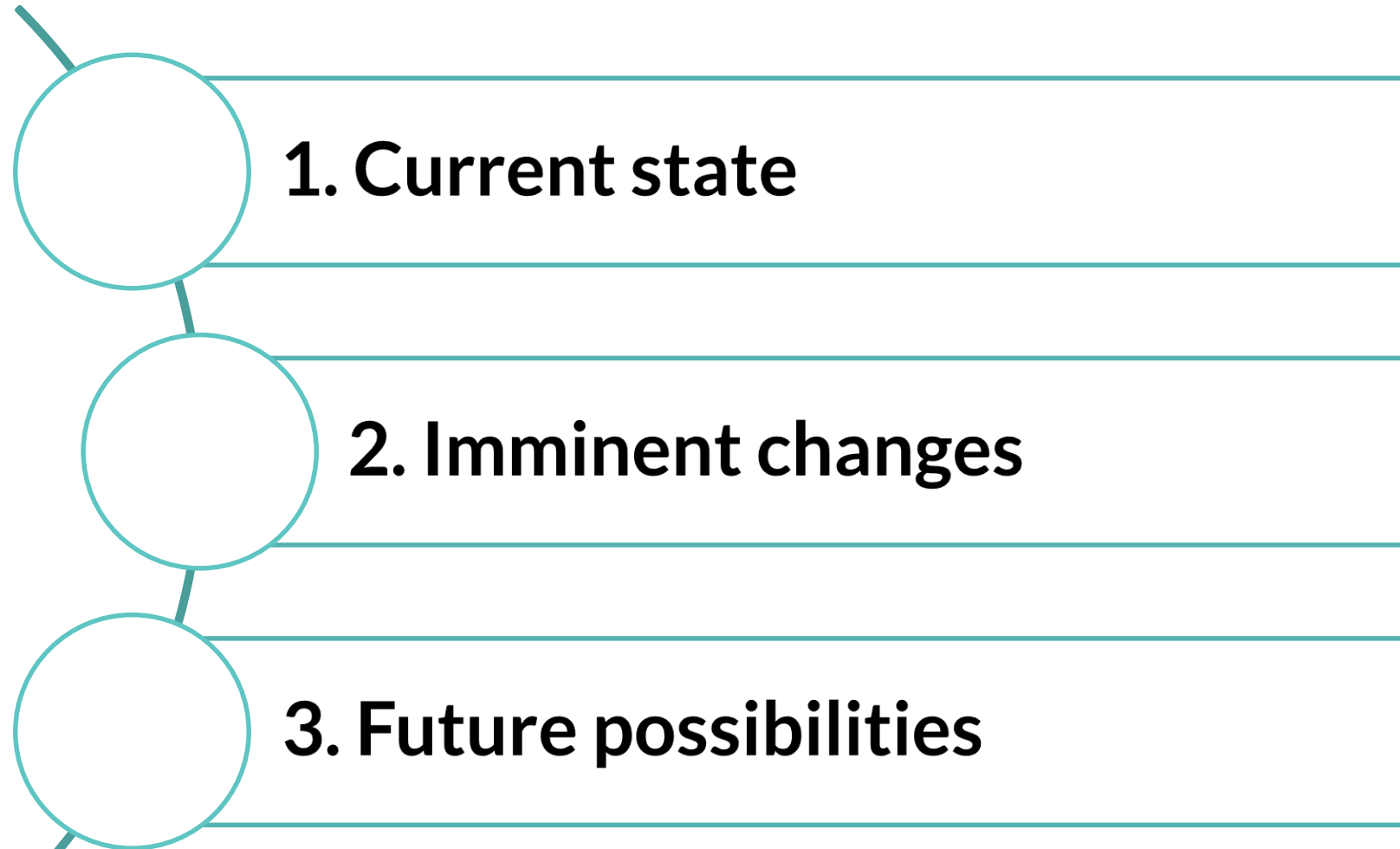
1.1 xBRL

- Adopted and mandated for data exchange by EBA in 2013 with introduction of EBA Reporting Framework 2.0
- Adopted and mandated by EIOPA for data exchange from Solvency II preparatory 2015
- Now used by several ESAs across numerous reporting frameworks.
- Default data exchange format.
- Has several advantages:
    - Combines data, meta-data, structure and validation requirements in one technical packages.
    - System agnostic and high interoperability.
    - Each data point defined by dimensional context providing a high degree of data governance.
    - High levels of data quality.

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1.2 xBRL-XML and DPM 1.0

1. Information requirements
Business templates (usually in spreadsheet format)

2. DPM
Methodology for creating the reporting model
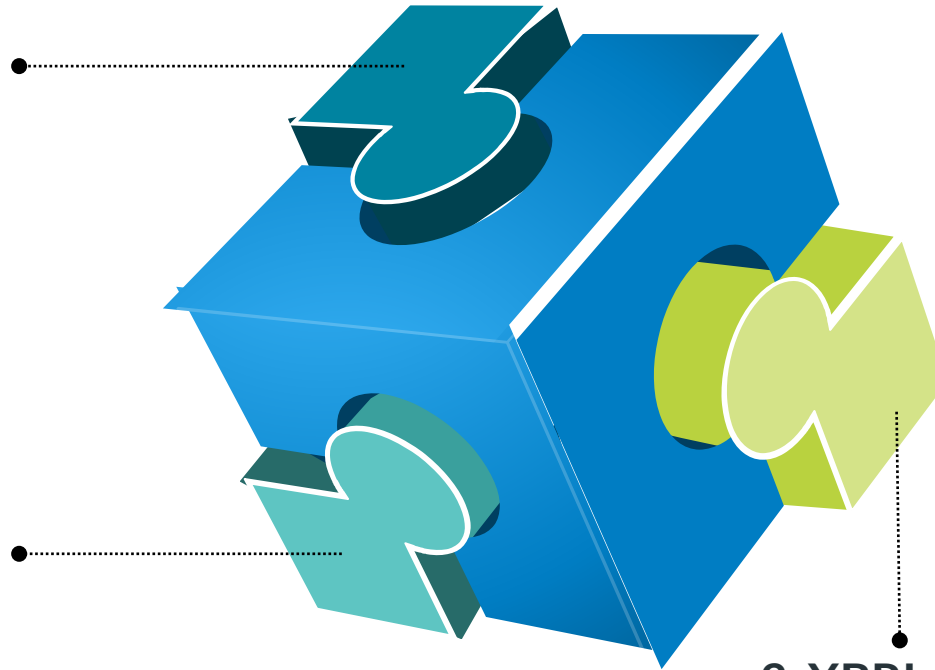
3. XBRL
The technology for the creation of the taxonomy

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Credit: Javier Mora-Gonzbalez – xBRL.org

1.3 DPM 1.0 and xBRL-XML

- Since the earliest adoption of xBRL, the DPM has been the data meta-model for describing the technical reporting artefacts.
- Information requirements are modelled using the DPM and manifested as technical artefacts (taxonomies) in xBRL.
- This relationship forms the basis of many existing ESA reporting frameworks.
  - EBA
  - EIOPA
  - SRB
  - CBI and other NCA national reporting.

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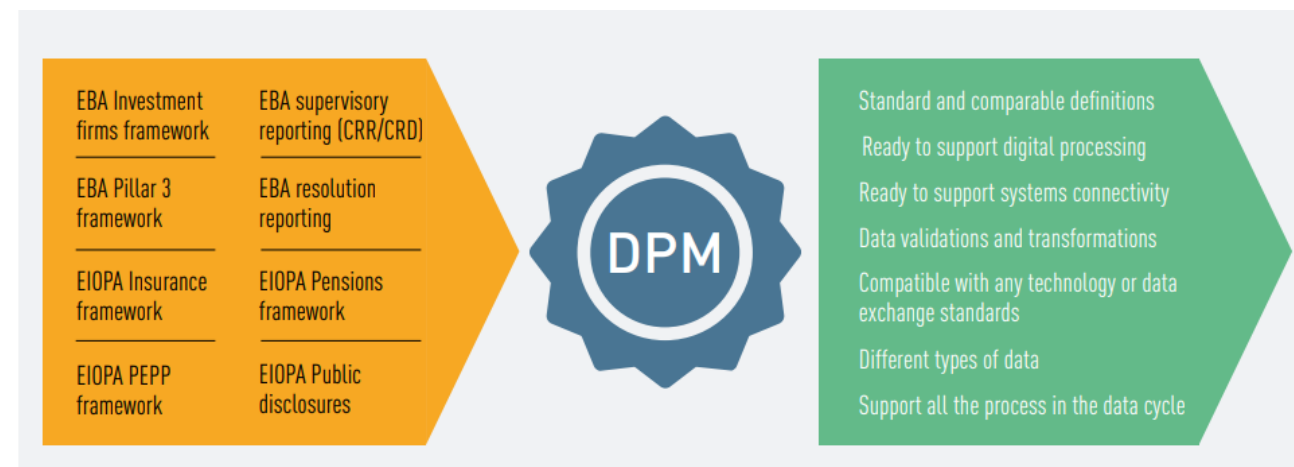
1.4 Limitations of xBRL-XML

■xBRL-XML is an excellent data exchange format, however it does have certain deficiencies.

■ Each data point must include it's full dimensional context in submitted instance document.

■ In-file each data point can run to many lines of XML for it's definition.

■ Format can be complex to work with.

■ Not really suitable for high data volumes/ granularity.

■ Large files are resource intensive to process.

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1.5 Limitations of DPM 1.0

- The existing DPM 1.0 meta-model is closely coupled with xBRL-XML

- This limits the number of use cases it can cover to those addressed by xBRL-XML format.

- The standard is now aging and requires an update to make it fit for challenges of increased data volume, granularity and complexity.

- In order to cover more use cases and expand the utility of the meta-model a restructuring of the DPM is required.

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2.1 Imminent changes

- To address the deficiencies in the existing approach and to better facilitate regulatory reporting requirements in the years ahead, new standards are required.
- There are two imminent changes which will directly impact the reporting landscape in the years ahead.
  - Mandate of OIM xBRL-CSV reporting.
  - Switch to the DPM 2.0 (formerly DPM refit meta-model)

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2.2 New reporting formats from xBRL.org in OIM specification suite

xBRL-CSV

- Suitable for collecting large volumes of data in a compact manner
- Much smaller than equivalent xBRL-XML files for same data volume (10 fold + reduction)
- Abstracts data reported from complex taxonomy artefacts.
- CSV is a compact and ubiquitous standard since 1972
- Inherently streamable

xBRL-JSON

- Simplifies understanding and use of xBRL data.
- Web friendly format ideal for many kinds of analytics processes and systems.
- Clear and straightforward syntax makes it highly accessible to developers unfamiliar with xBRL
- JSON is compatible with many popular tools, reducing time and costs for xBRL adoption and analysis

Software tools allow conversion of data between xBRL-XML, xBRL-CSV and xBRL-JSON

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2.2 xBRL-CSV – Addressing deficiencies of xBRL-XML

- xBRL-CSV combines the efficient and widely supported CSV format with the XBRL benefits of taxonomy-backed structured data.
- Allows for strong validation, dimensional data point definitions and multi-lingual data exchange per DPM model.
- Significantly faster processing times.
- OIM-CSV augments but does not replace xBRL-XML, rather it offers a degree of abstraction from xBRL-XML
- It will be adopted by several ESAs in the years to come .

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2.3 Inside an OIM-CSV package –EBA Pillar 3 financial disclosures
Note: same concepts and approach apply to EIOPA implementation.

FilingIndicators	Microsoft Excel Comma Separ...	1 KB
k_20.01	Microsoft Excel Comma Separ...	1 KB
k_20.02	Microsoft Excel Comma Separ...	1 KB
k_20.03	Microsoft Excel Comma Separ...	1 KB
parameters	Microsoft Excel Comma Separ...	1 KB
report	JSON Source File	1 KB

Filingindicators.csv – File reflecting submitted templates.

K_20.01, K_20.02, K_20.03 csv files - Data submissions in for these templates.

Parameters.csv- Reporting entity identification, reference date and precision information.

Report – Link to relevant taxonomy .JSON file for reported framework.

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2.4 OIM xBRL-XML filing indicators

Filing indicator context for xBRL –XML, Pillar 3 financial disclosures

```xml
<xbrli:context id="c1">
  <xbrli:entity>
    <xbrli:identifier scheme="https://eurofiling.info/eu/rs">DUMMYLEI123456789012.CON</xbrli:identifier>
  </xbrli:entity>
  <xbrli:period>
    <xbrli:instant>2023-12-31</xbrli:instant>
  </xbrli:period>
</xbrli:context>
<find:fIndicators>
  <find:filingIndicator contextRef="c1">K_20.01</find:filingIndicator>
  <find:filingIndicator contextRef="c1">K_20.02</find:filingIndicator>
  <find:filingIndicator contextRef="c1">K_20.03</find:filingIndicator>
</find:fIndicators>
```

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2.5 OIM xBRL-CSV filing indicators

Equivalent filing indicator context from filingindicators.csv for pillar 3 disclosures

```
templateID,reported
K_20.01,true
K_20.02,true
K_20.03,true
```

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2.6 OIM xBRL-XML data point definition

Single data point context from xBRL-XML for Pillar 2 financial disclosures

```
<xbrli:context id="c9">
  <xbrli:entity>
    <xbrli:identifier scheme="https://eurofiling.info/eu/rs">DUMMYLEI123456789012.CON</xbrli:identifier>
  </xbrli:entity>
  <xbrli:period>
    <xbrli:instant>2023-12-31</xbrli:instant>
  </xbrli:period>
  <xbrli:scenario>
    <xbrldi:explicitMember dimension="eba_dim:ENC">eba_CG:x8</xbrldi:explicitMember>
    <xbrldi:explicitMember dimension="eba_dim:BAS">eba_BA:x6</xbrldi:explicitMember>
    <xbrldi:explicitMember dimension="eba_dim:MCY">eba_MC:x60</xbrldi:explicitMember>
    <xbrldi:explicitMember dimension="eba_dim:CPS">eba_CT:x20</xbrldi:explicitMember>
  </xbrli:scenario>
</xbrli:context>
<eba_met:mi53 unitRef="uEUR" decimals="-3" contextRef="c9">3335000</eba_met:mi53>
```

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2.7 OIM xBRL–CSV data point definition

Template context from OIM xBRL-CSV for Pillar 3 financial disclosures template K20.01.csv

17 data points defined for similar size.

```
datapoint,factValue
dp41729,375938.16
dp41733,804224.21
dp41731,327415.95
dp41674,278546.83
dp41741,474496.95
dp41586,279382.61
dp41569,788168.86
dp41634,489545.8
dp41737,515045.54
dp454760,872000.61
dp454762,502839.8
dp454761,873569.68
dp454751,248862.4
dp454766,528183.86
dp454728,446240.31
dp454722,451887.76
dp454736,136184.18
```

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Data point ID

2.8 xBRL-CSV data point ID abstraction

Primary item

- Example data point

  dp42378, 661059.51

- Defined in .JSON file for template, K20.02.json

  included with published taxonomy

Dimensional context
(hypercube)

Template context

```
"dp42378": {
    "decimals": "$decimalsMonetary",
    "dimensions": {
        "concept": "eba_met:mi129",
        "eba_dim:BAS": "eba_BA:x17",
        "eba_dim:ECC": "eba_EC:x13",
        "eba_dim:ENC": "eba_CG:x8",
        "eba_dim:MCG": "eba_MC:x60",
        "eba_dim:MCY": "eba_MC:x409",
        "unit": "$baseCurrency"
    },
    "eba:documentation": {
        "CellCode": "{K 20.02, r0170, c0010}",
        "DataPointVersionId": "42378"
    }
},
```

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2.9 What does this mean for xBRL standard?

- It is still the xBRL standard, just a different way of using it.

- The OIM specification means that xBRL can be leveraged in different ways according to different requirements.

- It generates a degree of syntax independence in reporting.

- All important aspects of reporting are retained. Definitions, relationships between concepts, dimensional context etc. are all unchanged.

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2.10 What's currently missing?

- The **validation standard** for xBRL is not currently defined.

- This means that currently, in order to validate an xBRL-CSV instance file it must be converted to an xBRL-XML file for validation. This is obviously inefficient and negates some of the benefits.

- Validation has been agreed and is expected to be published before end of **Q4 2023**.

- Once published, native validation solutions should be available in the marketplace shortly thereafter. Vendors are monitoring xBRL.org progress intently.

- When CBI implements xBRL-CSV data collection, it is expected that we will apply native format validation with no conversion of files.

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2.11 High level timeline for OIM xBRL-CSV implementation in CBI

Mandated format for data collection from end of 2025
Filing entities can acclimate submissions by end of Q1 2025
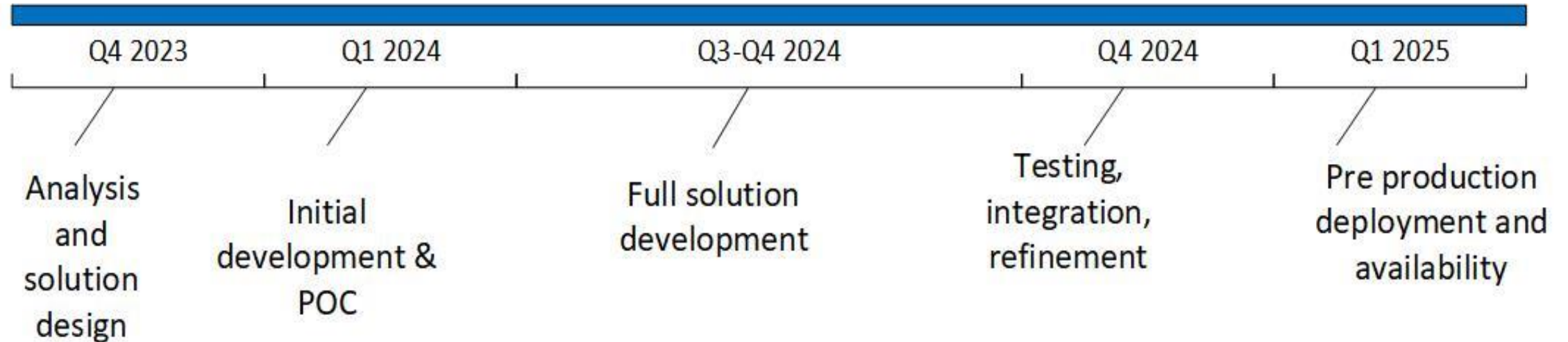
2.12 Introduction of DPM 2.0

- DPM 2.0 is the refactoring of the DPM standard to make it fit for the challenges ahead.

- It attempts to address all of the deficiencies with the current DPM 1.0 meta-model.

- The standard has been published by the EBA and EIOPA. First implementation will be by the EBA for taxonomy 3.4.

- https://www.eba.europa.eu/eba-and-eiopa-publish-data-point-modelling-standard-20-foster-collaboration-and-harmonisation-field

- Evolution of the standard from will be governed by **DPM Alliance,** a group composed of expert member from EBA, EIOPA and ECB.

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2.13 EBA / EIOPA perspective - key features
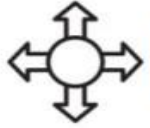
Agnostic

Not bound to a particular data exchange standard

Unified

Single metamodel supporting different types of data sets

Rendering

Enabling data visualisation in the template layout

Versatile

Compatible with different approaches for data requirements definition

Historisation

Keeping track of individual changes of data dictionary concepts across releases

Relationships

Support for primary/foreign keys and tables association

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2.15 ESA DPM 2.0 introduction timeline

2023

2024

2025

DPM Refit
completed
(DPM 2.0)

**Begin
publication
of DPM 2.0**

**Publication
of DPM 1.0
ends**

**DPM tooling and
Meta-data integration**

**Parallel publication of
DPM 1.0 and DPM 2.0.
Reporting systems adaptation.**
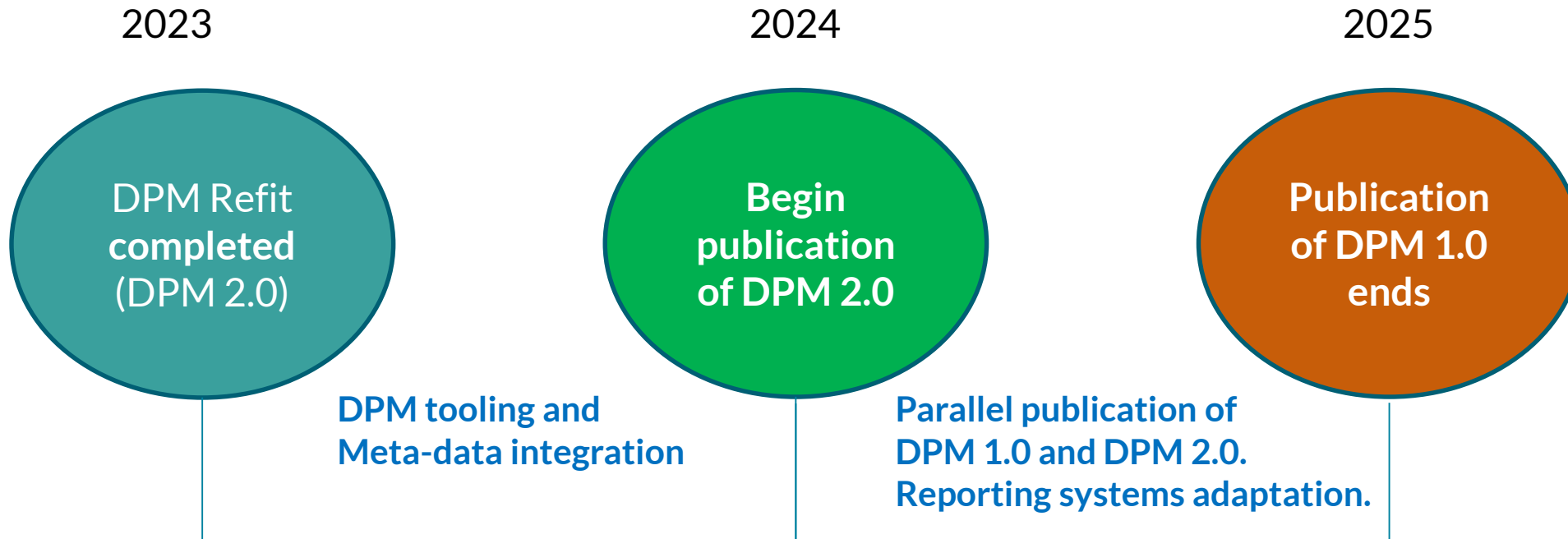
Tentative, EIOPA may
not fully implement
until end of 2026

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2.14 Imminent changes: DPM 2.0 Vision
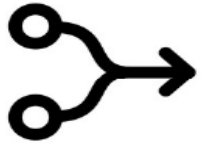
Total convergence of EBA and EIOPA methods, models, processes, and tools used for the development of data dictionaries and related regulatory products.
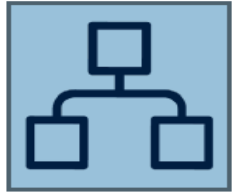
Unified metamodel applicable to all data exchanges, from highly aggregated data points to very granular data sets.

DPM methodology defined as ISO standard

Enabling subsequent semantic harmonisation of data dictionaries across different domains

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3.1 Future - OIM xBRL

- As technology advances and requirements change, it may be expected that the OIM standard will continue to evolve.

- It will be possible to report the same data with the same validation conformance and precise context across a range of different formats backed by conformance suites and interoperable software. An integrated digital reporting ecosystem

- Once fully adopted, technical implementation of frameworks for filers should be easier.

- Adoption of OIM xBR-CSV will facilitate higher data granularity and data volumes in regulatory data reporting, which is the indicated direction of travel from ESAs.

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3.2 Future -DPM 2.0

■Common data model between EBA, EIOPA should lead to efficiencies in solution implementations.

■Strong candidate as data model for ESCB iReF.

■Provides opportunity for semantic integration across regulatory agencies.

■Potential as a conformed data model across divergent supervisory data sets.

■Opportunities for automation and optimization across analytic processing.

■Supports future CDC and European reporting integration.

■Increase common understanding for different supervisory areas and filers.

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Internal Models

Tim Nagle

Templates for (Partial) Internal Models

S.25.05	Solvency Capital Requirement - for undertakings using an internal model (partial or full)
S.26.01	Solvency Capital Requirement - Market risk
S.26.02	Solvency Capital Requirement - Counterparty default risk
S.26.03	Solvency Capital Requirement - Life underwriting risk
S.26.04	Solvency Capital Requirement - Health underwriting risk
S.26.05	Solvency Capital Requirement - Non-Life underwriting risk
S.26.06	Solvency Capital Requirement - Operational risk
S.26.07	Solvency Capital Requirement - Simplifications
S.26.08	Solvency Capital Requirement - for undertakings using an internal model (partial or full)
S.26.09	Internal model - Market & credit risk and sensitivities
S.26.10	Internal model - Credit event risk Portfolio view details
S.26.11	Internal model - Credit event risk for financial instruments
S.26.12	Internal model - Credit risk Non-Financial Instruments
S.26.13	Internal model - Non-life & Health Non-SLT
S.26.14	Internal model - Life & Health risk
S.26.15	Internal model - Operational risk
S.26.16	Internal model - Model Changes
S.27.01	Solvency Capital Requirement - Non-life and Health catastrophe risk

- Significant changes to the detail required for internal model reporting
- Due to the 2023/894 - ITS, NCAs have started identifying mistakes in the LOG files. EIOPA acknowledges these mistakes, and they will be amended in the next ITS revision.
    - However, until they are amended, EIOPA can only provide clarifications as to what is expected in these data cells using the Q&A process.
    - The Q&A file for IMs currently has 48 observations.

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S.25.05 key changes

- S.25.05.01 (S.25.05.04 for groups)
  - Fixed breakdown of Internal Model risk types, rather than free-form
  - A corresponding further breakdown of each risk type in S.26 should match
  - Assumptions required to aligned internal model and reporting risk types should be consistent over time (see S.26.08)
  - Partial internal models are reported on the same template as full internal models;
    - C0070 "amount modelled" should be filled in with results of the partial internal model, otherwise blank
  - Replaces S.25.02 and S.25.03

		Solvency Capital Requirement	a
		C0010	
Risk type			
Total diversification	R0020		
Total diversified risk before tax	R0030		
Total diversified risk after tax	R0040		
Total market & credit risk	R0070		
Market & Credit risk - diversified	R0080		
Credit event risk not covered in market & credit risk	R0190		
Credit event risk not covered in market & credit risk - diversified	R0200		
Total Business risk	R0270		
Total Business risk - diversified	R0280		
Total Net Non-life underwriting risk	R0310		
Total Net Non-life underwriting risk - diversified	R0320		
Total Life & Health underwriting risk	R0400		
Total Life & Health underwriting risk - diversified	R0410		
Total Operational risk	R0480		
Total Operational risk - diversified	R0490		
Other risk	R0500		

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S.26.08 – S.26.16 New Templates

- S.26.08 gives a further breakdown of S.25.05 results into sub-risk types
  - Total market & credit risk should match in S.25.05 and S.26.08, and so on, as per ITS.
- Each risk type is then further broken down
  - These breakdowns should sum together to give the "total _____ risk"
- S.26.08.01.02 (04.02) –
- 22 of 48 observations in the Q&A file concern S.26.08; please read carefully;
  - Many of the observations are about how diversification is reported, with an equivalent observation repeated for each diversification field in S.26.08-16

S.25.05

Risk type
Total diversification
Total diversified risk before tax
Total diversified risk after tax
Total market & credit risk
Market & Credit risk - diversified
Credit event risk not covered in market & credit risk
Credit event risk not covered in market & credit risk - diversified
Total Business risk
Total Business risk - diversified
Total Net Non-life underwriting risk
Total Net Non-life underwriting risk - diversified
Total Life & Health underwriting risk
Total Life & Health underwriting risk - diversified
Total Operational risk
Total Operational risk - diversified
Other risk

S.26.08

sum

Total market & credit risk
Market & Credit risk - diversified
Interest rate risk
Interest rate volatility risk
Inflation risk
Equity risk
Equity volatility risk
Property risk
Currency risk
Credit spread risk
Credit event risk (migration & default)
Credit risk sum (spread, migration & default)
Credit event risk not covered in market & credit risk
Credit event risk not covered in market & credit risk - diversified
Basis risk financial instruments
Derivatives risk
Participations
Liquidity risk
Pension risk
Concentration risk

S26.09 – S.26.16 New Template

■ The sub risk types or "level 2 components" in S.26.08 are broken down further

   ■ Sometimes the breakdown is percentiles: this can be either per row or per column depending on the risk type

      ■ Before, QRT only asked for the modelled Value at risk 99.5% result (1 outcome from the modelling)

      ■ Now 22 model outputs are required, corresponding to different percentiles

      ■ Mean and standard deviation of the modelled outputs also required

■ Further information available from the model output will also be required

   ■ This can include sensitivities, exposure ranking and so forth (depends on the risk type)

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S.26.13

- In the Q&A, two of the observations that stand out refer to the Nat Cat part of the Non-life underwriting risk template (S.26.13.01.10 and S.26.13.01.11).
- In general, do not populate C0020 and C0160 in S.26.13.01.10 and Z0010/Z-Axis in S.26.13.01.11 with sub-aggregates / intermediate aggregates.
  - An example would be "Terror Total" or "Cyber total" aggregated by some regions/attack types (in addition to the various individual Terror or Cyber scenarios).
  - In the special cases where it is requested by the Bank to report sub-aggregate risks, a special labelling procedure will be required (starting labels with AGG1_%,) which can be discussed further bilaterally.

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S.26.16 Model Changes

- Model changes are tracked in the undertakings model change log
    - This is submitted to the Bank currently and we do not see any change to this.

- Model changes will also be reported in S.26.16 for both major and minor changes
    - Note that solo and group model "change ID" need to be consistently reported
- Information from or about the approved model change policy (MCP) will also be required
    - S.26.16.01.02, changes to the MCP are also reported as a type of major change
    - S.26.16.01.03, C0300 "Threshold for accumulation" is the threshold for minor changes accumulating to a major change

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Queries

- **Step One:** Refer to the Implementing Technical Standards, and the Logs therein, which describe the information required to populate each template cell

- **Step Two:** Refer to the EIOPA Guidelines, EIOPA Q&A, published information and Central Bank Guidelines

- **Step Three:** Email to: InsuranceRegulatoryReportingQueries@centralbank.ie or submit Q&A to EIOPA

Resources

■ **EIOPA Guidelines:**

https://www.eiopa.europa.eu/document-library/guidelines_en

■ **Summaries of EU Legislation**:

http://eur-lex.europa.eu/browse/summaries.html

■ **Solvency II Implementing and Delegated Acts:**

https://www.eiopa.europa.eu/rulebook/solvency-ii-single-rulebook/delegated-regulation-eu-201535_en

■ **Implementing Technical Standards**

https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L:2023:120:FULL

■ **EIOPA Q&A:**

https://www.eiopa.europa.eu/tools-and-data/qa-regulation_en

■ **EIOPA Taxonomy webpage**

https://www.eiopa.europa.eu/tools-and-data/supervisory-reporting-dpm-and-xbrl_en

■ **CBI Reporting Requirements:**

https://www.centralbank.ie/regulation/industry-market-sectors/insurance-reinsurance/solvency-ii/reporting-requirements

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Resources cont'd.

- **Insurance Statistics page on the CBI website**

https://www.centralbank.ie/statistics/statistical-reporting-requirements/insurance-corporations

- **Insurance Legislation:**

https://www.centralbank.ie/regulation/industry-market-sectors/insurance-reinsurance/solvency-ii/legislation

- **Codes:**

https://centralbank.ie/regulation/how-we-regulate/codes

- **ECB Guideline**

https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32021O0835

- **ECB Regulation**

http://www.ecb.europa.eu/ecb/legal/date/2014/html/index.en.html?skey=ECB/2014/50

- **ECB add-on instructions webpage**

https://www.ecb.europa.eu/stats/financial_corporations/insurance_corporations/html/data_reporting.en.html

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Thank you for your attention

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