

## **Professional Guidance Notes**

Retirement Matters Committee

### **PGN Sub - Committee**



Roy Lennox (Chairman)

Mike Codron

Selwyn Feldman

Mick Jenkins

Gavin Finch

Stephen Walkers

Natasha Huggett-Henchie

# Past problems



- 1. Insufficient consultation and belated input 11th hour derailment
- 2. Lack of clarity of "PGN Purpose" disagreement on content
  - → → Difficulty in giving birth to PGN's

# **RMC - Proposal**



#### RMC proposes:

- 1. Clearer statement of PGN Purpose
- 2. Establishment of PGN Principles
- 3. Process of consultation and consensus building

# **PGN** Purpose - existing



- 1. Per Actuarial Website Note: "PGN Process"
  - "assist members in carrying out their professional responsibilities"
- RMC believes this broad statement requires specifics to give direction and focus for PGN production

# PGN Purpose – RMC proposal



RMC proposes the following amplification of the PGN Purpose:

"To assist members in carrying out their professional responsibilities by: providing guidance, where necessary, for any of the following purposes:

- (a) Managing identified **risks** to the profession (e.g. risks: inconsistency, incompleteness, etc.)
- (b) Protecting identified **interests of users** of the information (e.g. users: clients, regulator, general public)
- (c) To clarify matters of importance where identified uncertainty

## PGN Principles – RMC proposal



"PGN's should satisfy the following PGN Principles:

- (a) Achieve the **PGN Purpose** (specific purposes should be identified)
- (b) Do not unnecessarily impede professional judgement & discretion [Accordingly, PGN's should be **principles based**, and prescriptive only if this is necessary to achieve the PGN Purpose.]
- (c) Are concise
- (d) Accept legislation as given (i.e. no need to restate legislation)"

# **PGN** Consultation - existing



The Actuarial Website Note: "PGN Process" requires that:

- 1. PGN's must be approved by Council
- 2. The **need** for a guidance note must **first**:
  - (a) be identified
  - (b) the need must be motivated to and approved in principle by Council
- 3. The "drafting and consideration of a PGN" should:
  - (a) Involve relevant stakeholders
  - (b) Obtain input from experts
  - (c) Comply with legislative and regulatory requirements

## **PGN** Consultation – RMC proposal



RMC proposes the following consultation process:

- 1. Establish a group of "PGN Respondents"
  - a) Relevant Organisations (including regulator) RMC to request relevant decision maker to nominate an individual to consolidate and represent the views of members in the organisation
  - b) Independents RMC will seek to establish PGN Respondents for groups of independents (e.g. by region or peer review grouping)
- RMC will involve PGN Respondents from early stage (including identifying need for PGN, defining the purpose of PGN, contents, etc.)

NOTE: individual members can also provide input on PGN's to RMC

# Implications of RMC proposal



- RMC proposal is consistent with the Actuarial Society website note: "PGN process"
- 2. Some delay in producing PGN's must be expected while RMC:
  - a) Puts PGN Respondents in place
  - b) Applies the **PGN Principles** (either on a "clean sheet basis" or to existing PGN's to be decided)
- 3. Increased time to produce a PGN (more consultation)
- 4. But, hopefully:
  - a) Better focused PGN's that meet real needs and purposes
  - b) Better consensus building process
  - c) Quicker final approval by the profession and Council

# **Next Steps**



- 1. RMC to establish PGN Respondents group
- 2. RMC to apply the PGN Principles, either (to be decided by RMC):
  - a) On a "clean sheet basis"OR
  - b) To existing PGN's in some order of importance (e.g. PGN 201)
- 3. When applying the PGN Principles, RMC to identify and rank:
  - a) Professional risk areas
  - b) Areas where interests of users of the information are compromised
  - c) Important areas of uncertainty
- 4. RMC to involve PGN Respondents from an early stage



2009 Convention Lite and the Pensions, Health and Life Seminars
19-20 May 2009

Sandton Convention Centre Johannesburg, South Africa