



## PRA Solvency II regulatory reporting - frequently asked questions

These frequently asked questions (FAQs) list have been put together by the PRA to help insurance firms with questions they may have on the submission of Solvency II information.

Firm should note that the submission of the Solvency II templates should follow the requirements of the Delegated Regulation (EU) 2015/35 and Implementing Regulations 2015/2450 and 2015/2452, which are directly binding on firms. This document should be read in conjunction with the EIOPA guidelines and answers to questions. Any subsequent comment by EIOPA could supersede any answer provided by the PRA in this document.

Technical queries on the reporting material should be presented to EIOPA through relevant trade bodies or alternatively directly to EIOPA using the Q&A form accessible via this link <https://eiopa.europa.eu/regulation-supervision/q-a-on-regulation>.

Questions have been submitted by industry representatives of the working group, and directly by firms, which the PRA has answered as below. The questions and answers have been grouped into the following subjects:

- A. Accessing regulations, requirements, guidelines and expectations relating to Solvency II reporting.
- B. Scope of reporting requirements
- C. Format and validation of templates.
- D. Interaction with the PRA.
- E. Solvency II templates various. (For questions that relate to a wide range of templates.)
- F. Solvency II templates <specific templates>. (For questions that relate to specific templates – for convenience these are listed in template ID order.)
- G. Regular supervisory report (RSR) and Solvency and financial condition report (SFCR).
- H. National specific templates (NSTs).
- I. Reporting Governance.
- J. Non-Pillar III.
- K. Non-Solvency II

To raise further questions with the PRA, firms can contact either:

- a) their usual supervisory contact; or
- b) contact the PRA Firm Enquiries Function at [PRA.FirmEnquiries@BankofEngland.co.uk](mailto:PRA.FirmEnquiries@BankofEngland.co.uk) or 020 3461 7000; or
- c) their relevant representative on the PRA regulatory reporting industry working group.

Question number	Reference	Question	PRA response
A1	Accessing regulations, requirements, guidelines and expectations relating to Solvency II reporting	Where can firms find the latest set of Solvency II reporting templates?	<p>The official Solvency II reporting templates and instructions can be found in Commission Implementing Regulation (EU) 2015/2450 <a href="https://eiopa.europa.eu/Publications/Technical%20Standards/ITS_Reporting_Amended_LWrite.docx">https://eiopa.europa.eu/Publications/Technical%20Standards/ITS_Reporting_Amended_LWrite.docx</a></p> <p>The official Solvency II disclosure templates and instructions can be found in Commission Implementing Regulation (EU) 2015/2452 (<a href="http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015R2452&amp;from=EN">http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015R2452&amp;from=EN</a>)</p> <p>The Reporting templates in Excel format can be accessed by <a href="https://eiopa.europa.eu/regulation-supervision/insurance/reporting-format">https://eiopa.europa.eu/regulation-supervision/insurance/reporting-format</a> and then clicking 'Annotated templates'. Please note that location of information on the EIOPA website is subject to change, therefore firms should check the EIOPA website.</p>
A2	Accessing regulations, requirements, guidelines and expectations relating to Solvency II reporting	Where can firms find guidance on completing each of the Pillar 3 reports (presumably there will be PRA handbooks)?	<p>Firms might find the following EIOPA guidelines and technical standards of assistance:</p> <ul style="list-style-type: none"> <li>• Guidelines on Reporting and Public disclosure - EIOPA-BoS-15/109 EN (<a href="https://eiopa.europa.eu/GuidelinesSII/EIOPA_EN_Public_Disclosure_GL.pdf">https://eiopa.europa.eu/GuidelinesSII/EIOPA_EN_Public_Disclosure_GL.pdf</a>)</li> <li>• Guidelines on Financial Stability reporting - EIOPA-BoS-15/107 EN (<a href="https://eiopa.europa.eu/GuidelinesSII/EIOPA_EN_FS_GLs.pdf">https://eiopa.europa.eu/GuidelinesSII/EIOPA_EN_FS_GLs.pdf</a>)</li> </ul> <p>The links in (A1) above might also be of assistance to firms.</p> <p>The following PRA supervisory statements might also be of assistance to firms in regard to Solvency II Pillar 3 reporting:</p> <ul style="list-style-type: none"> <li>• SS37/15 'Solvency II: internal model reporting codes and components' – issued August 2015 and updated February 2016 (<a href="http://www.bankofengland.co.uk/pr/ Documents/publications/ss/2016/ss3715update.pdf">http://www.bankofengland.co.uk/pr/ Documents/publications/ss/2016/ss3715update.pdf</a>)</li> </ul>

Question number	Reference	Question	PRA response
			<ul style="list-style-type: none"> <li>• SS36/15 – ‘Solvency II: life insurance product reporting codes’ – issued August 2015 (<a href="http://www.bankofengland.co.uk/pr/Documents/publications/ss/2015/ss3615.pdf">http://www.bankofengland.co.uk/pr/Documents/publications/ss/2015/ss3615.pdf</a>)</li> <li>• SS40/15 – ‘Solvency II: reporting and public disclosure - options provided to supervisory authorities’ – issued October 2015 (<a href="http://www.bankofengland.co.uk/pr/Documents/publications/ss/2015/ss4015.pdf">http://www.bankofengland.co.uk/pr/Documents/publications/ss/2015/ss4015.pdf</a>)</li> <li>• SS44/15 – ‘Solvency II: third-country insurance and pure reinsurance branches’ – issued November 2015 (<a href="http://www.bankofengland.co.uk/pr/Documents/publications/ss/2015/ss4415.pdf">http://www.bankofengland.co.uk/pr/Documents/publications/ss/2015/ss4415.pdf</a>)</li> <li>• SS38/15 – ‘Solvency II: consistency of UK generally accepted accounting principles with the Solvency II Directive’ – issued August 2015 (<a href="http://www.bankofengland.co.uk/pr/Documents/publications/ss/2015/ss3815.pdf">http://www.bankofengland.co.uk/pr/Documents/publications/ss/2015/ss3815.pdf</a>)</li> </ul> <p>The following links on the PRA website might be of assistance:</p> <ul style="list-style-type: none"> <li>• <a href="http://www.bankofengland.co.uk/pr/Pages/regulatorydata/insurance/reporting.aspx">http://www.bankofengland.co.uk/pr/Pages/regulatorydata/insurance/reporting.aspx</a> (BoE website / PRA / Regulatory data / Insurance firms Solvency II / Regulatory reporting).</li> <li>• <a href="http://www.bankofengland.co.uk/pr/Pages/regulatorydata/insurance/technical.aspx">http://www.bankofengland.co.uk/pr/Pages/regulatorydata/insurance/technical.aspx</a> (BoE website / PRA / Regulatory data / Insurance firms Solvency II / Detailed technical information).</li> <li>• Policy Statement PS38/16 – response to the PRA’s consultation CP40/16 (contains details of the PRA’s National Specific Templates and instruction Logs).</li> </ul>
B1	Scope of reporting (Groups)	Do groups headed by Mixed Activity Insurance Holding Companies (MAIHC) need to submit	Yes the groups headed by Mixed Activity Insurance Holding Companies (MAIHC) are required to submit via BEEDS the templates in Commission

Question number	Reference	Question	PRA response
		anything on BEEDs?	Implementing Regulations (EU) 2015/2450 for intra group transactions, ie templates S36.01.01; S36.02.01; S.36.03.01 and S.36.04.01 together with (the templates specifying the content of the submission) S.01.01.04 and S.01.02.04.
C1	Format and validation of templates (submission dates)	Will the PRA publish a Solvency II reporting timetable for the year, with a full set of PRA submission deadlines (preferably incorporating not just Pillar 3 but other Pillars e.g. ORSA deadlines, modelling submissions etc.) The timetable could be filterable by Pillar.	<p>See the following links on the BoE website:</p> <ul style="list-style-type: none"> <li>For firms with a December year end - <a href="http://www.bankofengland.co.uk/pradocuments/solvency2/solvency2siiregrep31decye.pdf">http://www.bankofengland.co.uk/pradocuments/solvency2/solvency2siiregrep31decye.pdf</a></li> <li>For firms with a non-December year end - <a href="http://www.bankofengland.co.uk/pradocuments/solvency2/solvency2siiregrepnondecychedules.pdf">http://www.bankofengland.co.uk/pradocuments/solvency2/solvency2siiregrepnondecychedules.pdf</a></li> </ul> <p>These are located on BoE website via : Home &gt; PRA &gt; Regulatory Data &gt; Insurance firms – Solvency II &gt; Regulatory Reporting , then under the ‘Reporting schedules’ section of that page.</p> <p>The PRA expects firms to submit internal model outputs at the same time as annual QRTs.</p> <p>Timetables do not apply for ORSA.</p>
C2	Format and validation of templates (XBRL)	Does the PRA have any plans to allow smaller firms to report in a format other than XBRL (and then convert these submissions using a tool)?	<p>No, all directive firms to report Solvency II templates via XBRL. The PRA will not convert submissions into XBRL for firms. Firms will require a reporting solution which will complete the conversion to XBRL prior to sending submissions to the PRA.</p> <p>National Specific Templates are to be submitted as set out in the PRA’s Policy Statement PS38/16 - response for consultation paper CP40/16.</p> <p>For non-directive firms the format of reporting is set out in PRA rulebook / Non-SII firms / Insurance Company reporting 9.1.</p>
C3	Format and validation of templates	How many decimals have to be set in the attribute “decimals” in the XBRL instance?	<p>Firms should refer to the Bank of England’s Solvency II XBRL filing manual.</p> <p><a href="http://www.bankofengland.co.uk/pradocuments/solvency2/XBRLfiling">http://www.bankofengland.co.uk/pradocuments/solvency2/XBRLfiling</a></p>

Question number	Reference	Question	PRA response
	(taxonomy)		<a href="#">manual.pdf</a> The Solvency II taxonomy page of the Bank of England's website may also be a useful source of information.  <a href="http://www.bankofengland.co.uk/pr/Pages/solvency2/taxonomy.aspx">http://www.bankofengland.co.uk/pr/Pages/solvency2/taxonomy.aspx</a>
C4	Format and validation of templates (NSTs)	What format should be used to submit National Specific Templates (NSTs)?	National Specific Templates are to be submitted as set out the PRA's Policy Statement PS38/16 - response for consultation paper CP40/16.
C5	Format and validation of submissions	In what format the firm is required to submit their Financial Stability reporting?	The Financial Stability reports need to be sent per the taxonomy in XBRL via BEEDS.
D1	Interaction with the PRA	What is the process and timeframe for feedback from the PRA on submitted reporting?	<p>There will be areas where feedback may be provided to a firm by the PRA. This areas include but are not limited to:</p> <ul style="list-style-type: none"> <li>- Validation errors relating to XBRL submission and data checks</li> <li>- Queries related to plausibility checks on the submitted data</li> <li>- Queries related to review of data by normal supervisory contacts</li> </ul> <p>Firms will be contacted by their usual supervisory contact if the PRA have any feedback on submitted reporting. Where feedback on reporting pertains to several firms, the PRA might do this via a wider form of communication.</p>
D2	Interaction with the PRA	Will the PRA be looking to provide any more guidance on quarterly reporting?	No guidance specific to quarterly reporting is planned; the firm should raise any specific queries with their normal supervisory contact.
D3	Interaction with the PRA (plausibility checks)	Can the PRA please confirm if there will be any controls in BEEDS to reconcile the list of assets/derivatives to the balance sheet? If so, can the PRA please advise which ones, so that we can look to capture in our systems?	The cross checks between the assets / derivatives and the balance sheet will be validations imposed by EIOPA with the introduction of taxonomy 2.1 and are detailed on the EIOPA website. The PRA encourages firms to check that the item-by-item asset and derivative data reconciles to the balance sheet regardless of whether the EIOPA or the PRA formally

Question number	Reference	Question	PRA response
			<p>checks this.</p> <p>The PRA is obliged by EIOPA to carry out data quality checks on the submissions over and above the validations specified and published by EIOPA. Therefore, firms may be contacted and asked to review their data based on the PRA checks. However, the PRA will not be publishing or sharing plausibility checks.</p>
E1	Solvency II templates: various (proportionality)	Impact of proportionality on use of allocations and assumptions throughout QRTs ('best efforts basis' for historical data, roll forward of TP, allocation of expenses etc.)	<p>Where the Solvency II reporting templates require data to be allocated to specified groupings (e.g. lines of business, asset class, type of expense, accident / underwriting year, development year, size band, open / closed / reopened claims, currency, type of cash-flow) firm judgement in interpreting the reporting requirements might be needed for this allocation.</p> <p>EIOPA does respond to and publish Q&amp;As on allocations frequently. Therefore the PRA encourages firms to use the EIOPA Q&amp;A process and their published Q&amp;As for questions on allocations.</p> <p>Where allocation judgements are made they should be applied consistently over reporting periods. There is an onus on firms to explain allocation decisions in its regulatory supervisory report if the firm considers that its national supervisory authority would need to know these allocation decisions in order to fully understand the information the firm has reported.</p> <p>If it is a firm's practice to include an element of 'roll forward' in the calculation of non-life claims or premium provisions (e.g. as reported in templates S.17.01, S.18.01 and S.19.01) then it should explain the use of 'roll forward' when in the section of the regulatory supervisory report where methodology and assumptions underlying the best estimate calculation is discussed. The firm should also, in the regulatory supervisory report, discuss any uncertainties arising from the use of 'roll over'.</p>

Question number	Reference	Question	PRA response
E2	Solvency II templates: various (Definitions)	Will the PRA publish a glossary of definitions under Solvency II for reporting, to define items such as “gross written premium”? This would also include bound but not incepted risks, which are currently excluded under the GAAP definition.	<p>All definitions are contained in the Implementing regulations laying down implementing technical standards (ITS) on reporting and disclosure templates (see (4) above). Definitions relating to contract boundaries can be found in Commission Delegated Regulation (EU) 2015/35 articles 17 and 18, also EIOPA guidelines on contract boundaries - EIOPA-BoS-14/165 EN (<a href="https://eiopa.europa.eu/Publications/Guidelines/Contract_boundaries_Final_document_EN.pdf">https://eiopa.europa.eu/Publications/Guidelines/Contract_boundaries_Final_document_EN.pdf</a>) might be of assistance.</p> <p>Where firms require further guidance on S2 definitions in the reporting requirements they should engage their usual supervisory contact and use the EIOPA Q&amp;A process. EIOPA frequently responds to definition queries. The PRA are interested to know of definitions that are not clear to firms and how firms are applying those definitions.</p>
E3	Solvency II templates: various (LEI codes)	Insurance undertakings should provide the Legal Entity Identifier (LEI) or, if not available, an Interim Entity Identifier (pre-LEI) as an ID Code in relation to the Issuer Code and Issuer Group Code. If a firm does not have an LEI or pre-LEI, does the PRA have an expectation of what the local identification code should be?	<p>The PRA has published its guidance on the Legal Entity Identifier (LEI) on the Bank of England’s website and this information can be accessed via the link below.</p> <p><a href="http://www.bankofengland.co.uk/pr/Pages/regulatorydata/insurance/technical.aspx">http://www.bankofengland.co.uk/pr/Pages/regulatorydata/insurance/technical.aspx</a></p>
F1	Solvency II templates S.02.01	Should cash equivalents (as per IFRS) held in funds (MMF, UCITS etc.) be recognised as an investment fund or cash and cash equivalents on balance sheet? This will impact the quarterly exemption for reporting D4.	<p>There is a specific third and fourth position of the CIC code (43) for money market funds in Annex VI of the Solvency II reporting regulations. CIC. Third position of the CIC code of ‘4’ is for Collective Investment Undertakings. Therefore the PRA understands that on the balance sheet template S.02.01 cash held in such funds will be reported under item ‘Collective investment undertakings’ (R0180). On the list of assets template S.06.02 cash held in such funds will be reported using this CIC code 43 at item ‘CIC’ (C0290).</p>
F2	Solvency II templates S.02.01	Valuation of Property, Plant & Equipment (PPE) What is the PRA’s view on the requirements	<p>As the SII Regulations are directly applicable European law, the PRA expects firms to comply with them. The PRA draws attention to Article</p>

Question number	Reference	Question	PRA response
	(valuation of assets )	<p>relating to the valuation of Property, Plant and Equipment? Article 11 bis V8 of the draft delegated acts states that undertakings shall not value financial assets or financial liabilities at cost or amortised cost. It also states that undertakings shall not value investment property, plant and equipment with cost models where the asset value is determined as cost less depreciation and impairment. The Technical Specification for the Preparatory Phase (Part 1) further re-iterates that the cost model permitted by IAS40 or IAS16, whereby investment property and property, plant and equipment is valued at cost less depreciation and impairment shall not be applied.</p> <p>No guidance is given in any of the literature of an appropriate approach to be taken where a fair value is not available. Given the obvious difficulties of trying to assess a true fair value of PPE we would assume that a depreciated cost model would be a suitable approximation but the above text appears to disallow this. Does the PRA have any view of the approach likely to be taken by the industry?</p>	<p>10 of those Regulations which sets out the valuation hierarchy to be used where market value is not available. As noted in the question, Article 16 para 3 of the Regulations explicitly prohibits the valuation of property, investment property, plant and equipment to be determined as cost less depreciation and impairment.</p>
F3	Solvency II templates S.02.01 (valuation of liabilities)	<p>Recognition of contingent liabilities (difference between SII and IAS37)</p> <p>In relation to Contingent Liabilities Solvency II differs to IAS 37 in respect of the treatment of possible and present obligations where the possibility of economic outflow is not probable (less than 50%). SII requires that these are</p>	<p>The SII Regulations have now been published in the Official Journal and are therefore final. The requirements – which are not guidelines but directly applicable European law – have not changed from those in earlier versions of the Regulations and are contained in Articles 11 (re recognition) and 14 (re valuation).</p> <p>The PRA agrees that the recognition requirements of Solvency II and UK</p>



Question number	Reference	Question	PRA response
		recognised on the Balance Sheet if material. This would result in more recognition on the Balance Sheet of contingencies than would be recognised under UK GAAP. The recognition of contingencies that have a remote possibility of occurrence appears unduly onerous. Does the PRA expect that this requirement may change in the final guidance?	GAAP are different.  Firms should refer to supervisory statement SS38/15 for further information on the consistency of UK generally accepted accounting principles with the Solvency II Directive.  <a href="http://www.bankofengland.co.uk/pr/Pages/publications/ss/2015/ss3815.aspx">http://www.bankofengland.co.uk/pr/Pages/publications/ss/2015/ss3815.aspx</a>
F4	Solvency II templates S.06.01, S.06.02, S.08.01, S.09.01, S.14.01 ('internal funds')	Does the PRA consider unit-linked funds to be 'internal funds' for the purposes of Assets D1 QRT?	Unit-linked funds are considered internal funds but there is no requirement for assets to be reported at individual unit-linked fund level. Firms should show the amount of each asset held in the unit-linked funds as a whole. Unit-linked fund assets can be grouped into one or many internal funds as appropriate for reporting purposes.
F5	Solvency II templates S.06.02 (issuer country)	Issuer Country – shall this be the country of the account location? Or country of the issuer of the currency?	For cash & deposits other than CIC 71 or CIC 75 the issuer country is defined as country of depository entity (not country of the account location). There can be cases where the country of depository entity is not the same as the country of account location (e.g. if cash is deposited with a branch located in country X of a bank localised in country Y, the country of depository entity is Y whereas the account location is X). Therefore we advise keeping with the language in the instructions.
F6	Solvency II templates S.06.02 (property)	How the firm should report actual property assets under Solvency II to their insurance clients?	The PRA can confirm that specific properties should be reported individually.
F7	Solvency II templates S.06.02 (if issuer name is fund manager), S.08.01 (counterparty name)	<b>S.06.02 (List of assets) and S.08.01 (Open derivatives)</b> The complexity of extracting some data attributes from source documents to an XBRL QRT should not be underestimated and a long lead time is needed to configure systems.	The PRA expects firms to complete all the applicable fields in the Implementing Technical Standards for reporting quantitative templates. Where a firm is not able to submit a data items required in a template (and the non-submission of the item passes EIOPA validation) the PRA expects the firm to explain in its regular supervisory report under Delegated Regulation (EU) 2015/35 articles 304(1)(b), 310(1) and 372(1):

Question number	Reference	Question	PRA response
		<p>Some illustrative examples relating to this issue are set out below:</p> <p><b>Counterparty name for derivatives</b> At time of execution of trades, within some asset managers systems a generic issuer/counterparty representative of the actual counterparty is stored. Through the trade settlement process the legal name of the contractual counterparty is only stored on the term sheets/contracts of the trades themselves in PDF formats. Therefore, this specific legal name is not currently easily extractable for some firms and hence would be an extremely manual process to source this information.</p> <p><b>Name of fund manager for investment funds</b> Fund manager information may be stored in internal systems in a format that cannot be directly mapped to the asset database. Therefore, extraction of this information from internal systems is an extremely manual process given the volume of line items. Further, there are currently challenges with sourcing this information from external data providers. The main data provider in the market does not treat the fund manager in the same way as other attributes of a security (e.g. Issuers or Company information). This data field is only available as a text field and does not contain a standard code that can be used to store / manage and refresh that data over time.</p>	<ul style="list-style-type: none"> <li>• the data item that has not been submitted;</li> <li>• the reason it is not submitted;</li> <li>• the information it has submitted for the data item instead; and</li> <li>• if applicable, any approximation made for that data item and the reason for the approximation selected.</li> </ul> <p>This general principle applies in the specific cases of an undertaking making approximations to provide information required under with instructions set out in:</p> <ul style="list-style-type: none"> <li>• S.08.01 for item ‘counterparty name’ (C0260) – i.e. the counterparty’s entity name in the LEI database or the counterparty’s legal name is not available.</li> <li>• S.06.02 for items; ‘issuer name’ (C0200), ‘issuer sector’ (C0230), ‘issuer group’ (C0240), ‘issuer country’ (C0270); where the information submitted under item ‘CIC’ (C0290) is a CIC with a third position code of “4” (collective investment undertakings) and the some of the following items of information of the fund manager is not available: name, sector, ultimate parent entity, or country of localisation. (The instructions set out in S.06.02 say that for collective investment undertakings the issuer name is the name of the fund manager.)</li> </ul>

Question number	Reference	Question	PRA response
		<p>The Solvency II reporting requirements treats Fund manager like an Issuer or Counterparty but firms cannot access the data in the same way at source, which leads to downstream issues in populating this field correctly.</p>	
F8	Solvency II templates S.06.02, S.11.01 (collateral)	<p>Firms are continuing to consider internally and discuss with asset managers how the LOG guidance should be interpreted.</p> <p>Changes to any assumptions/decisions made could require a long lead time to implement, given the complexity and volume of data collection.</p> <p>Some illustrative examples relating to this issue are set out below:</p> <p><b>3(a) Scope/definition of collateral</b></p> <p>(a) Interpretation that properties used to secure mortgages are not to be reported as collaterals</p> <p>(b) Interpretation that gilts provided to local governments as securities to obtain insurance licences be reported as collaterals</p>	<p>Supervisory authorities want to understand which assets on the undertaking's balance sheet could be seized by another party in specific circumstances. Therefore for the item 'assets pledged as collateral' (C0100):</p> <p>a) A property on the undertaking's balance sheet that is pledged as collateral against moneys borrowed by the undertaking should be interpreted as collateral and included in this item.</p> <p>b) Gilts provided to local governments as securities to obtain insurance licences should be reported as collaterals only if there is a trigger event under which the local governments in question have the right to seize (some of) the gilts.</p> <p>Please note that in the 'information on assets section' of Assets Held as Collateral template (S.11.01) the item 'Item Title' (C0150) and the issuer item (C0160 to C0230), loans to individual persons are not required to be individualised (though loans to members of the administrative, management or supervisory board are required to be identified as such).</p>
F9	Solvency II templates S.06.02, S.06.03, S.08.01, S.08.02 (CIC)	<p>Based on the guidance for application of CIC codes XL (not listed) and XT (not exchange traded), it is possible that across multiple firms the same standardised security type may be represented differently, and have potential</p>	<p>The PRA's understanding is that an asset that is exchange tradable but not listed on a stock exchange (first two positions of CIC is 'XL') or not exchange tradable (first two positions of CIC is 'XT'). An asset that meets the definition of 'XT' should never use 'XL'.</p>

Question number	Reference	Question	PRA response
		downstream effect on templates that use the CIC classification as it is.	
F10	Solvency II templates S.06.02 (custodian)	Can the PRA clarify what is meant by Sub-custodians and country of custody.	For the item 'custodian' (C0120), only the financial institution that has a contractual agreement with the undertaking to provide custody services to the undertaking for the asset(s) in question is to be reported. If the financial institution contracted to provide custody services to the undertakings decides to sub-contract those services, the names of the sub-contractors are not to be reported. For the item 'country of custody' (C0110), according to the instructions for this item, the country of custody will be the one corresponding to the legal establishment where the custody service was contractually defined. (An alternative way to express this is that the country of custody is the country of the legal jurisdiction governing the contract to provide custody services.)
F11	Solvency II templates S.06.02, S.06.03, S.08.01, S.08.02 (CIC)	It is unclear if Exchange Traded Funds (ETFs) should be categorised as CIC 4 and if so, if look-through is required as a result. If yes, more guidance may be needed whether these should be categorised based on the underlying exposures.	Exchange traded funds (ETFs) satisfy the definition of a Collective Investment Undertaking in Annex 6. Therefore for an ETF asset reported on S.06.02 the third position of item 'CIC' (C0290) is '4'. Accordingly the default position is that look-through and template S.06.03 apply to ETFs. However, EIOPA has said that <i>"By default all collective investment undertakings or investments packaged as funds have to be subject to look-through as described in the instructions document. Specific situations might be discussed with the National Supervisory Authority"</i> (see question number 21 in the 'Q&A on regulation' section of its website within the link to <a href="#">Answers to questions on the Final report on the ITS on the templates for the submission of information to the supervisory authorities (CP-14-052)</a> ).

Question number	Reference	Question	PRA response
			<p>Also the PRA has issued a reporting clarification ‘Basis of preparation for look through approach for Collective Investment Undertakings – Template S.06.03’ on its website that sets out the basis of preparation on which it will accept look through reporting for Collective Investment Undertakings under template S.06.03. (See <a href="http://www.bankofengland.co.uk/pradocuments/solvency2/ciureporting18dec15.pdf">http://www.bankofengland.co.uk/pradocuments/solvency2/ciureporting18dec15.pdf</a> or via the following route on the Bank of England website: Home / Prudential Regulation Authority / supervision / insurance sector / Solvency II / News / Detailed Technical Information then scroll down to ‘Solvency II Reporting Clarifications’).</p> <p>If a firm considers look-through to be not appropriate for an ETF, it should discuss this with its regular supervisory contact. If look-through is not to be applied, the PRA might ask the undertaking to explain the reasons (perhaps in the narrative section of the regulatory supervisory report).</p> <p>EIOPA understands an exchange traded fund (ETF) to be a marketable security that trades like a common stock on a stock exchange and tracks an index, a commodity, bonds, or a basket of assets like an index fund.</p>
F12	Solvency II templates S.06.03	<p><u>Look-through treatment of Investment Trusts</u></p> <p>The schema detailed in Annex IV provides a definition of what should be considered as a CIV. This includes any vehicle defined as an alternative investment fund in Alternative Investment Fund Managers Directive. As a result, for the first time there is now a</p>	<p>The PRA has issued a reporting clarification ‘Basis of preparation for look through approach for Collective Investment Undertakings – Template S.06.03’ on its website that sets out the basis of preparation on which it will accept look through reporting for Collective Investment Undertakings under template S.06.03. (See <a href="http://www.bankofengland.co.uk/pradocuments/solvency2/ciureporting18dec15.pdf">http://www.bankofengland.co.uk/pradocuments/solvency2/ciureporting18dec15.pdf</a> or via the following route on the Bank of England website: Home /</p>

Question number	Reference	Question	PRA response
		<p>requirement for undertakings to apply look-through to market quoted vehicles such as Investment Trust holdings.</p> <p>For such vehicles, we believe this requirement is neither necessary nor indeed legally possible due to restrictions on what publically traded entities can disclose.</p> <p>For example, Investment Trusts are listed on the major stock exchanges and are traded as such. They do not typically provide full look-through data until after Working Day 30. This is after the reporting timeline required by NCA of Working Day 25. Unlike an OEIC or other collective investment vehicle, early access to the data cannot be secured by the undertaking signing an NDA due to the nature of the listing of an Investment Trust. Regulations regarding the disclosure and transparency of market sensitive information would be breached with undertaking having information not otherwise available within the public domain.</p> <p>In its Comments Resolution to CP-14-052, EIOPA notes that:</p> <p><i>specific situations where the look-through of specific funds do not lead to a better assessment of the risks, e.g. when the net asset value of the funds is highly uncorrelated to the value of a listed fund, will need to be addressed on a case-by-case basis by each NSA</i></p>	<p>Prudential Regulation Authority / supervision / insurance sector / Solvency II / News / Detailed Technical Information then scroll down to 'Solvency II Reporting Clarifications').</p>

Question number	Reference	Question	PRA response
		<p>Further, in its Feedback Statement for CP-14-052, EIOPA confirms:</p> <p><i>There are specific situations (difficult to implement through general rules) where due to the form of the investment, the asset should be excluded from the scope of the template and be classified as equity in S.06.02, even if they present some elements that could be similar to collective investments undertakings</i></p>	
F13	Solvency II templates S.06.03	Age of portfolio data for Look Through (S.06.03) - Whilst the rules don't say anything specifically about the age of the data that should be used for look-through within S.06.03, it has generally been taken that this data needs to be current as at the reporting date and this is presenting a number of challenges for life companies and fund managers alike. Can the PRA provide some guidance on this matter?	<p>Age of look-through data. On the issue of whether listed investment company shares should be treated as collective investment schemes under Solvency II and subject to look through reporting on template S.06.03, the PRA notes that under Annex VI of Commission Implementing Regulation (EU) 2015/2450 an alternative investment fund is a Collective Investment Undertakings and therefore by default is subject to look through reporting on template S.06.03. (The PRA understands alternative investment funds include investment trusts.) However, following a Q&amp;A issued by EIOPA the PRA has issued a reporting clarification on the basis of preparation for look through approach for Collective Investment Undertakings – Template S.06.03 (<a href="http://www.bankofengland.co.uk/pradocuments/solvency2/ciureporting18dec15.pdf">http://www.bankofengland.co.uk/pradocuments/solvency2/ciureporting18dec15.pdf</a>).</p> <p>This reporting clarification states that the PRA anticipates that firms may contact supervisors to discuss the scope of look through reporting on a case by case basis and sets out what the PRA asks firms to consider in regard to submitting template S.06.03.</p>
F14	Solvency II templates S.08.01	S.08.01 - Does the PRA potentially have a table outlining which category of CIC you'd expect in	The Complementary Identification Code (CIC) is not an item to be reported on the positions held part of the template S.08.01. Therefore if

Question number	Reference	Question	PRA response
		one line vs two? That would make our development work easier. E.g. CIC D1, D2 – 1 line?	a derivative is reported over more than line on the positions held part of the template, there is no need to report one CIC for one line and a different CIC for another.
F15	Solvency II templates S.08.01	Does the PRA expect same currency interest rate swaps (vanilla fixed for floating products) to be reported as one line or can they be reported as two lines? Do you have a different view with regards to this between interim and final measures?	Interest Rate and FX swaps are expected to be reported as one line item. The log file for S.08.01 allows firms to differentiate the combination of fixed/floating interest rate swaps in C0140. There are three currency fields C0370, C0410, C0420. In the general comments it states that for derivatives that have more than a pair of currencies, it shall be split into the pair components and reported in different lines. Hence if there are at most two currencies a single line should be used.
F16	Solvency II templates S.10.01	What is required for the Solvency II value of a securities lending/repo contract is unclear. A pure fair value approach is not something captured by companies today and would not be determined easily.	According to instructions set out in S.10.01 for item 'Solvency II value' (C0170), the amount to be submitted under this item, for contracts that are still open at the reporting date only, is the value of the repo or securities lending contract, following article 75 of Directive 2009/138/EC rules for valuation of contracts
F17	Solvency II templates S.12.01, S.13.01, S.17.01, S.18.01	Where in these templates are future outwards reinsurance premium cash out-flows that are included in the best estimate to be reported	<p>Future outwards reinsurance premium cash out-flows that are included in the best estimate are to be included within the amounts reported in the following templates, rows / columns :</p> <ul style="list-style-type: none"> <li>• S.02.01.01, R0270, C0010 and S.02.01.01, R0270, C0010 – 'total amount of reinsurance recoverables'.</li> <li>• S.02.02.01, R0050 – 'Reinsurance recoverables'</li> <li>• S.12.01.01, R0020 and S.12.01.02, R0020 – 'Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole'.</li> <li>• S.12.01.01, R0040 – 'Technical provisions calculated as a sum of BE and RM / Best Estimate / Total recoverables from reinsurance, SPV and Finite Re before the adjustment for expected losses due to counterparty default'.</li> </ul>



Question number	Reference	Question	PRA response
			<ul style="list-style-type: none"> <li>• S.12.01.01, R0080 and R.12.01.02, R0080 - ‘Technical provisions calculated as a sum of BE and RM / Best Estimate / Total Recoverables from reinsurance, SPV and Finite Re after the adjustment for expected losses due to counterparty default’.</li> <li>• S.12.01.01, R0090 and S.12.01.02, R0090 – ‘Technical provisions calculated as a sum of BE and RM / Best Estimate / [Gross] Best estimate minus recoverables from reinsurance, SPV and Finite Re’.</li> <li>• S.13.01.01, C0290 – ‘Total recoverable from reinsurance (after the adjustment)’ for life and health SLT.</li> <li>• S.17.01.01, R0050 and S.17.01.02, R0050 – ‘Total Recoverables from reinsurance, SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole’.</li> <li>• S.17.01.01, R0100 – ‘Technical provisions calculated as a sum of BE and RM / Best estimate / Premium provisions / Total recoverable from reinsurance, SPV and Finite Re before the adjustment for expected losses due to counterparty default’.</li> <li>• S.17.01.01, R0140 and S.17.01.02, R0140 – ‘Technical provisions calculated as a sum of BE and RM / Best estimate / Premium provisions / Total recoverable from reinsurance, SPV and Finite Re after the adjustment for expected losses due to counterparty default.’</li> <li>• S.17.01.01, R0150 and S.17.01.02, R0150 – ‘Technical provisions calculated as a sum of BE and RM / Best estimate / Premium provisions / Net Best Estimate of Premium Provisions’.</li> <li>• S.17.01.01, R0330 and S.17.01.02, R0330– ‘Technical provisions – total / Recoverable from reinsurance contract, SPV and Finite Re after the adjustment for expected losses due to counterparty default - total’.</li> <li>• S.17.01.01, R0340 and S.17.01.02, R0340 – ‘Technical provisions – total / Technical provisions minus recoverables from reinsurance, SPV and Finite Re- total’.</li> </ul>

Question number	Reference	Question	PRA response
			<ul style="list-style-type: none"> <li>• S.18.01.01, C0090 – ‘Total recoverable from reinsurance (after the adjustment)’ for non-life.</li> </ul>
F18	Solvency II Templates S.19	<p>What is the PRA’s position on the data split by currency in S.19? We have raised this question with EIOPA and understand that EIOPA offers NSA’s discretion.</p> <p>Can the PRA advise please?</p>	<p>Following clarification on the EIOPA website in the Q&amp;A on regulation section (see <a href="https://eiopa.europa.eu/Publications/Guidelines/Final%20report%20on%20the%20ITS%20on%20the%20templates%20for%20the%20submission%20of%20information%20to%20the%20supervisory%20authorities%20%28CP-14-052%29.xlsb">https://eiopa.europa.eu/Publications/Guidelines/Final%20report%20on%20the%20ITS%20on%20the%20templates%20for%20the%20submission%20of%20information%20to%20the%20supervisory%20authorities%20%28CP-14-052%29.xlsb</a>, number 393, date 6/11/2015, reference ‘Implementing Technical Standard and LOGS - Currency’ ), we can confirm that the PRA has exercised this discretion for S.16, setting out its expectation that firms report in the original currency of the contract in section 8 of the PRA’s supervisory statement SS40/15 (Solvency II: reporting and public disclosure - options provided to supervisory authorities).</p> <p>The PRA plans to extend that expectation to S.19.01 due to inter-relatedness of the two reports. Until that consultation process is complete, the PRA asks that firms also report S.19.01.01 in the original currency of the contract.</p>
F19	Solvency II templates S.21.02	How should net retention be derived in cases where sum insured is not derived	<p>EIOPA Q&amp;As number 607 ref ‘S.21.03’ date 01/04/2016 and number 769 ref ‘Reporting on peak and Mass Risks’ date 5/8/2016 are relevant to this question.</p> <p>The response to Q&amp;A number 607 include:  ‘In case of unlimited exposures, such as the case of the line of business motor vehicle liability insurance (line of business 4 in Delegated Regulations 2015/35 Annex I) ... For the reporting of the “Total sum insured” undertakings should use an estimation of the expected possible loss.</p> <p>As stated in instructions for {S.23.01 C0020/R0010-R0210}: for policies where there is no Sum Insured defined in the policy the undertaking</p>

Question number	Reference	Question	PRA response
			<p>should do their own estimations or use default values.</p> <p>The response to Q&amp;A number 769 includes:            'In the case of unlimited sum insured, the contracts should be reported in S.21.02 (if considering the below instructions they are the biggest) and in template S.21.03, considering the following:            - For the reporting of the 'Sum insured' undertakings should use an estimation of the expected possible loss (calculated using the same methods as used for the calculation of the premium, which should reflect the actual risk exposure).            '</p> <p>Following these EIOPA Q&amp;As the PRA expects the following from firms if reporting policies on S.21.02 where sum insured is not defined:</p> <ol style="list-style-type: none"> <li>1. The maximum possible liability used in the definition of net retention of a single underwriting risk (used to determine whether the underwriting risk is one of the biggest 20) is to be the 'amount underwriting model' as defined in the instructions at item C0120.'</li> <li>2. The item 'sum insured' (C0090) is to be the "amount underwriting model" (C0120) without taking original deductible into account.</li> <li>3. The information reported under item 'type of underwriting model' (C0110) is to be: "5-other" where the sum insured is unlimited, or most applicable of options "2" to "5" where the sum insured is not defined but is not unlimited.</li> <li>4. In the case of unlimited sum insured the undertaking should explain in the regular supervisory report that the type of underwriting model used is expected possible loss (calculated using the same methods as used for the calculation of the premium, which should reflect the actual risk exposure); and</li> <li>5. Where the sum insured is not defined the undertaking should explain in the regular supervisory report how it derived the amount reported under item 'amount underwriting model' (C0120). (Eg in the case of a motor liability policy: number of persons injured, nature of injuries</li> </ol>

Question number	Reference	Question	PRA response
			<p>involved, age of injured parties, annual care costs, amount of loss of earnings compensation, amounts of other damages awarded. In the case of medical expense insurance: length of hospital stay assumed, type of treatment assumed).</p> <p>6. The item 'net retention' (C0150) is to be based on the amount reported at item 'amount underwriting model' (C0120).</p>
F20	Solvency II templates S.21.02	What is the timing of information requested.	<p>The underwriting risks reported on template S.21.02 should be the biggest 20 risks (plus any additional risks needed so that the 2 biggest risks in each LoB are reported), based on net retention, that were in-force (or open):</p> <p>a) at the reporting reference date, or</p> <p>b) at some point during the 12 months prior to the reporting reference date and which the undertaking plans to renew during the 12 months following the reporting reference date.</p> <p>To be consistent with template S.21.03, by default the reference date shall be the end of the reporting year, however if duly justified, the undertaking may choose the reference date of collecting the information from the policy administration. This means that the underwriting risk portfolio can be based for example on the same reference date that is used to collect similar information for the renewal of reinsurance treaties and facultative cover. If the reference date is not the end of the reporting year, this should be explained in the Regular Supervisory Report. S.21.02 and S.21.03 should be based on the same reference date.</p>
F21	Solvency II templates S.21.02	If a policy has renewed during the reporting year (i.e. during the 12 months preceding the reporting date) and the policy details pre renewal and the policy details post renewal mean that both policies are among the top 20 risks, are the two policies reported on separate	If an underwriting risk is renewed during the reporting period, only the net retention relating to the underwriting risk with the latest renewal date during the reporting period is to be considered for being reported in template S.21.02

Question number	Reference	Question	PRA response
		lines or is just the post renewal policy reported.	
F22	Solvency II templates S.21.02	Please confirm that the underwriting risks reported are by policy rather than by location (even though a policy might covers multiple locations.)	Information on S.21.02 is reported at risk level and not policy level.  The instruction for item 'sum insured' (C0090) says "Where the policy covers a number of exposures / risks across the country the individual underwriting risk with the highest net retention shall be specified"
F23	Solvency II templates S.21.02	In cases where property policies state a general sum insured figure which is not driven by the underlying value of building, would the reported sum insured be a spurious number.	In cases where an underwriting risk being reported on template S.21.02 is a property policy that states a general sum insured figure which is not driven by the underlying value of buildings or property covered, or a non-property policy where the situation is similar, undertakings should use options 2 or 3 or 4 for the 'type of underwriting model' item at C0110.
F24	Solvency II templates S.21.02	What should be reported for item 'currency' (C0080)? The instructions say "reporting currency", but this is already reported in the basic information template.	The instruction set out in S.21.02 for item 'currency' (C0080) should read as: "Identify the ISO 4217 alphabetic code of the <del>reporting</del> <u>original</u> currency <u>of the risk</u> ."
F26	Solvency II templates S.21.02	How should reinsurance recoverables be taken into account	Only recoverables that can be directly attributable to the risk in question should be taken into account, e.g. facultative reinsurance, treaty risk excess of loss reinsurance, event excess of loss reinsurance. Whole account stop loss reinsurance should not normally be taken into account (unless it is possible to derive the amount that would be recovered relating to the risk in question under such reinsurance).  It should be assumed that the reinsurance recoverables will operate as the contract intended, i.e. any reinsurance exhaustion should be ignored and any non-payment by the reinsurer should be ignored.
F27	Solvency II templates S.22.01	What are the disclosure requirements under Solvency II?	The Commission implementing regulation, laying down technical standards with regard to the procedures, formats and templates for the disclosure of the solvency and financial conditions report according to the Directive 2009/138/EC, set out mandatory, directly applicable

Question number	Reference	Question	PRA response
			<p>requirements and as such they do not need to transposes into national law.</p> <p>Article 4(g) (solo level) and Article 5 (e) (groups level) require firms to disclose publically template S.22.01 which contains information on transitional measures. Thus there will be public disclosure of the transitional deduction to technical provisions. In addition, in accordance with the Article 296 of Delegated Regulations EU 2015/35, firms are required to provide further information on transitional measures applied in the narrative SFCR report.</p>
F28	Solvency II templates S.23.01.01	What is required to be entered in "Expected profits included in future premiums (EPIFP)" (R0770, C0060) in the Own Funds template (S.23.01.01)?	The definition of expected profits included in future premium (EPIFP) is provided in Article 1 (46) of the Delegated Regulation (EU) 2015/35. EPIFP is a component of reconciliation reserve as stated in the Delegated Regulation (EU) 2015/35 Act Article 70(2). As such it counts as Tier 1 capital. Article 260(2) gives a description of how EPIFP should be calculated. Article 309(6) asks for commentary in the regular supervisor report of the liquidity risk implications of EPIFP.
F29	Solvency II templates S.36 (Intra Group Transactions)	<p>Groups are expected to complete IGT QRTs for all:</p> <ul style="list-style-type: none"> <li>• significant transactions,</li> <li>• very significant transactions, and</li> <li>• transactions required to be reported in all circumstances</li> </ul> <p>What are the definitions/thresholds for each of the above?</p>	No thresholds/definitions are set in ITS. Firms should contact their supervisor to agree a threshold appropriate for that firm.
G1	RSR and SFCR (submission dates)	What is the process / requirements surrounding frequency of RSR reporting (3 - year update vs. annual reporting)?	All firms will need to complete a full Regular Supervisory Report (RSR) in relation to their financial year ending on or after 30 June 2016 but before 1 January 2017 (ref EIOPA guidelines on reporting and disclosure EIOPA-BoS-15/109 EN : guideline 38 para 1.54). Thereafter the PRA may consider whether to require a firm to submit its I RSR at the end of a financial year that is within three years of the previous RSR submission,

Question number	Reference	Question	PRA response
			<p>and this will be discussed with firms by their usual supervisory contact. (ref. Delegated regulation Article 312 paragraph 1a (RSR submitted at least every 3 years) and 3 (submission of RSR at end of any financial year)). The PRA is currently considering how this will be incorporated into its supervisory approach and will announce its expectations of firms in due course.</p> <p>Please note that where there is no requirement for a full RSR to be submitted in relation to a given financial year, firms are required to submit a report setting out material changes that have occurred over the given financial year (ref Delegated regulation (EI) 2015/35 article 312(3) ).</p>
G2	RSR and SFCR (submission dates)	What are the requirements and timing for the Solvency II SFCR & RSR (Solvency and Financial Condition Report and Regular Supervisory Report) and actuarial report?	The narrative reports: SFCR and RSR will follow the same submission deadlines as annual quantitative reporting templates. The submission deadlines under Solvency II Directive have been transposed and are included in the PRA Rulebook: Solvency II firms: Transitional Measures Instrument 2015, Chapter 3: Reporting to the PRA and public disclosure. There is no separate requirement to submit a copy of an actuarial report under Solvency II.
G3	RSR and SFCR (format)	Supervisory Statement SS4/13 “Applying EIOPA’s preparatory guidelines to PRA- authorised firms” states that for the preparatory phase, narrative reports should be submitted in a Portable Document Format (PDF). Could you confirm if this will also be the format required for the narrative submissions post 1 January 2016 full implementation?	The PRA confirms that the narrative submission should be in a Portable Document Format (PDF) format.
G4	RSR and SFCR	Are there any sample reports available for either the Interim narrative submission or the full FSCR?	No pro forma reports are available. Narrative reporting requirements are prescribed in the Delegated Act and guidance is provided within the EIOPA guidelines.
G5	RSR and SFCR	What is the reporting timetable associated with	The PRA expects undertakings to submit their narrative reporting (SFCR

Question number	Reference	Question	PRA response
	(submission dates)	the RSR and SFCR reporting?	and RSR) on the same date as the submission of the annual QRTs.
H1	NSTs (submission dates)	When does PRA expect firms to submit the first set of national specific templates? E.g. NS.01-NS.11	The NSTs for firms with a December year end are first due for submission together with the first annual Solvency II returns in May 2017.
H2	NST NS.05	The NS.05 log file states that “For the avoidance of doubt ‘deposit accounting’ does not apply to this template for the reporting of premiums and claims. Can the PRA clarify?	It is the PRA’s intention that deposit accounting does not apply to NS.05. EIOPA has recently published Q&A 802 in its <a href="#">Q&amp;A on Regulation</a> . This will achieve consistency between S.05 and NS.05 for reporting of premiums and claims by treating all contracts issued by the undertaking as insurance contracts.
H3	NST NS.07	Is the data requested within NS.07 template for UK business only (i.e. policies written in the UK for risks located in the UK)?	The business to be included in NS.07 (which only applies for individual undertakings) is the entirety of the non-life business and non-life annuity business of a ‘general insurer’. The business included in NS.07 where the business year is the reporting year should also be the business included in S.05.01.01 for the individual undertaking.
I1	Reporting Governance – internal sign-off of Solvency II reporting submissions	We are interpreting the draft L3 guidelines to mean that quarterly reporting submissions may be approved by someone of sufficient authority to do so (e.g. CFO), instead of the full board. Does this align to the PRA's expectations?	Please see Guidelines on Reporting and Public disclosure - EIOPA-BoS-15/109 EN guideline 37 section 1.53 ( <a href="https://eiopa.europa.eu/GuidelinesSII/EIOPA_EN_Public_Disclosure_GL.pdf">https://eiopa.europa.eu/GuidelinesSII/EIOPA_EN_Public_Disclosure_GL.pdf</a> )
I2	Reporting Governance - External Audit	External audit assurance:  Supervisory Statement 4/13 states that the PRA has no expectation of a requirement for external audit of preparatory reporting; however, it is understood from other sources that the PRA is seeking an audited SII balance sheet from internal model and Category 1 and 2 firms. Could the PRA clarify its expectations and set out the scope of the audit requirements in	Please see: <ul style="list-style-type: none"> <li>PRA’s Policy Statement PS24/16 ‘Solvency II: external audit of the public disclosure requirement’ dated 09 September 2016 (<a href="http://www.bankofengland.co.uk/pr/Pages/publications/ps/2016/ps2416.aspx">http://www.bankofengland.co.uk/pr/Pages/publications/ps/2016/ps2416.aspx</a>). In particular please see Appendix 1 <b>PRA RULEBOOK: SOLVENCY II FIRMS AND NON-AUTHORISED PERSONS: EXTERNAL AUDIT INSTRUMENT 2016</b></li> <li>Supervisory statement 11/16 Solvency II: external audit of the public disclosure requirement (<a href="http://www.bankofengland.co.uk/pr/Documents/publications/ss/2">http://www.bankofengland.co.uk/pr/Documents/publications/ss/2</a>)</li> </ul>



Question number	Reference	Question	PRA response
		2015.	<p><a href="#">016/ss1116.pdf</a>)</p> <p>Please note that though the above applies to public disclosure, some of the amounts included in the reasonable assurance opinion are also included in the supervisory reporting.</p>
J1	Non-Pillar III (Approvals process)	What are the details surrounding application / approval process for items such as ancillary own funds?	<p>Please see BoE website / PRA / authorisations / Approvals and waivers under the Solvency II Directive / Solvency II approvals ( <a href="http://www.bankofengland.co.uk/pr/Pages/authorisations/siiapprovals/applying.aspx">http://www.bankofengland.co.uk/pr/Pages/authorisations/siiapprovals/applying.aspx</a> )</p>
K1	Non-Solvency II (ECB reporting of add-ons)	<p>What is the PRA position in respect of the ECB add-ons in the United Kingdom:</p> <ol style="list-style-type: none"> <li>1. How will insurance undertakings report the ECB add-ons information?</li> <li>2. If they have to report in two streams: <ol style="list-style-type: none"> <li>2.1 Who will they report the Solvency II QRTs to?</li> <li>2.2 Who will they report the ECB add-ons to?</li> </ol> </li> <li>3. What is the delivery format of each data stream?</li> </ol>	<p>The UK is not under an obligation to report to the ECB as it is not a mandatory requirement for non-Eurozone countries. The Bank of England is aware of the issue and is looking to determine its approach following the appropriate internal discussion and governance procedures. Should the Bank of England's decision result in particular requirements of insurance firms this will be made clear in the usual way. For clarity, there are no current, direct requirements for insurance firms with regard to ECB statistical reporting for insurance corporations.</p>