Access to Insurance Initiative
A global programme for sound regulatory and supervisory frameworks

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“Risk-based Supervision in Inclusive Insurance”

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Moderated by Hannah Grant, A2ii
1. Why Does RBS Matter in Inclusive Insurance Markets?
2. A Shared Point of Departure: Definitions
3. Proportionate Approach to Regulation and Implementation
4. Planning for RBS in an Inclusive Insurance Market
5. Country examples – Albania & Burundi
6. Discussion: questions and contributions
INSANITY

Insanity is doing the same thing over and over and expecting a different result.

_Einstein_
Your Current Solvency Regime: Defined

- Rigid, formulaic minimum capital requirements applied to all insurers.

- Rigid, formulaic capital requirements that include simple risk factors applied to all insurers.

- Capital requirements based on comprehensive set of risk factors tailored to the complexity of the individual insurer.

or somewhere in between?!
RBS Defined

A structured process aimed at identifying the most critical risks that face each company and, through focused review by the supervisor, assessing company’s management of risks and company’s financial vulnerability to potential adverse experience.

Source: World Bank

Principle of proportionality (Solvency II)

The principle of proportionality requires that supervisors assess compliance with a regulatory framework in a manner proportionate to the nature, scale and complexity of the risks inherent in the business of insurers.
Financial Inclusion Defined

The condition whereby all working age adults have effective access to credit, savings, payments, and insurance from formal providers.

Microinsurance Defined

Any form of protection against risks designed for and accessed by low-income people, provided by different categories of carriers operating on basic principles of insurance and funded by premiums. (IAIS 2007)
Inclusive Insurance: Defined

- Emerging term.

- Reflects underlying objective of financial inclusion: increasing access to affordable and appropriate insurance products.

- Less reliance on “low income” and insurance products designed for low income or under-served people.

- Addresses particular risks and insurance needs specific to the under-served population.

- Not just “scaled down” traditional insurance.
3. Proportionate Approach to Regulation and Implementation

An example...

- Proportionate approach to regulation minimizes need for actuaries while defining areas where actuaries are needed or not.

- Approach will depend on unique local insurance market (a “one size fits all” approach will not work).

- Each regulator needs to assess characteristics of market, including existing regulations, balancing need for actuarial services with available supply.
IAIS Guidance

- Prudential supervision should be risk based and proportionate.

- ICPs 13-17: reinsurance, valuation. Investment, ERM and capital adequacy apply to all insurers.
Getting “Risk” Oversight Right as a Regulator

- What risks – to insurers, customers, or supervisory objectives – are posed by a particular situation?
- What are likelihoods of risk being realized and consequences if realized?
- What alternatives are there?
- What are costs/benefits of each alternative?
- Which alternative offers lowest cost – financial and intrusion- while mitigating risks?
Albanian Financial Supervisory Authority (AFSA)

Established in 2006

- Securities Commission (Parliament, 1996);
- Insurance Supervisory Authority (Ministry of Finance, 1998);
- Inspectorate for Supervising Private Voluntary Pension Funds (Prime Minister, 1999).

Integrated supervisory and regulatory authority

- Supervisory and regulatory functions (complete cycle);
- Prudential supervision and market conduct;
- Insurance, capital and investment funds, private pension funds, and other.

Financial Stability

- Central Bank and AFSA the financial regulators;
- Tri-party group to advise on issues of financial stability.
Early identified issues

• very small market mainly non-life oriented
• domination of compulsory MTPL / fixed tariffs & unfair competition (now liberalized)
• low contribution to the country’s financial market assets
• low penetration and density compared to the region
• limited investment alternatives
• weak risk management and corporate governance practices
• low public awareness and financial education
• high potential for further development
• continuously increasing interests of foreign strategic investors (since 2007)
Reforms & developments

Conditions for effective supervision

Risk focused supervision
- Integrated risk-focused inspection manual - new methodology
- Early warning system (RADAR – work in progress)
- Risk based solvency requirements (partly)

Legal changes & strategy
- Draft-law to back up the risk-focused methodology - completed
- Implementing EU directives, IAIS principles
- AFSA law – strengthening independence and sup. capacities
- MTPL law – changes in progress

Cross border cooperation
- Cross-border cooperation via MoU signings
- FMA Austria, BQK Kosovo, ISA Macedonia
- Active participation in group supervision colleges

Management information system
- Web based electronic platform for supervisory filing (AMF IN-Reg) – live since 2011
- Increased analysis efficiency and reporting quality
- Crucial for EWS and Risk-focused supervision

Main pre-requisites for implementing RBS in Albania
- Risk/principle based legal framework - completed
- Support of the legal system – big challenge
- Reliance on the industry in many aspects (CG, RM, Fit & Proper, data quality) – big challenge

Policy, institutional and legal framework for financial market supervision

Financial market infrastructure
- Legal and court system
- Accounting, actuarial and auditing standards
- Basic economic, financial and social statistics

Efficient financial markets
- Long-term and short-term investment opportunities
The new methodology

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<th>Business Activities</th>
<th>Credit</th>
<th>Market</th>
<th>Liquidity</th>
<th>Insurance</th>
<th>Operational</th>
<th>Legal &amp; Regulatory</th>
<th>Strategic</th>
<th>Operational Management</th>
<th>Compliance</th>
<th>Internal Audit</th>
<th>Risk Management</th>
<th>Senior Management</th>
<th>Board of Directors</th>
<th>Net Risk</th>
<th>Direction of Risk</th>
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<tr>
<th>Capital</th>
<th>Earnings</th>
<th>Composite Risk</th>
<th>Direction of Risk</th>
<th>Time Frame</th>
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<tr>
<th>Risk Management</th>
<th>Business Risk</th>
<th>Aggregate Net Risk</th>
<th>Capital and Earnings</th>
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<tr>
<td>Strong</td>
<td>Low Low Moderate Moderate</td>
<td>Strong Low Low/Moderate Moderate/Above Average</td>
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<tr>
<td>Acceptable</td>
<td>Low Moderate High</td>
<td>Acceptable Low Moderate/Above Average High</td>
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<tr>
<td>Weak</td>
<td>Moderate High High</td>
<td>Weak Low/Moderate Above Average/High High</td>
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Aggregate Net Risk:
- Strong
- Acceptable
- Moderate
- Weak

Capital and Earnings:
- Strong
- Acceptable
- Moderate
- Weak
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5b. Country example - Burundi

Short presentation of ARCA (Insurance regulatory and supervisory agency)

• Created in 2001 and placed under the authority of the Ministry of Finance:
  - Operationalised in 2011 thanks to the support of the World Bank
  - Equipped with technical staff in March 2013
  - Legal and regulatory framework revised in 2014

• Mission (generally)
  - Ensure market supervision and promote insurance industry
  - Supervise application of insurance regulation
  - Ensure the protection of collective savings and supervise investments

• Financial stability:
  - Central bank and ARCA: regulators of the financial sector
Overview of the insurance market

- Small market size with 6 insurance companies;
  - 4 practice insurance operations “life” and “non-life”;
  - 2 other only “non-life”.
- Car insurance biggest market share (with observed unfair competition);
- Contribution to GDP almost inexistent:
- Low concentration level compared to East African Community average;
- Missing training and technical experts/ professionals (e.g. actuaries, accountant);
- Low capacities in the areas of risk management and governance;
- Problems in collecting data
Some developments

- Insurance law revised and complies with ICPs
- MoU with East African Association of Insurance Supervisory Authorities (EAISA) singes for cross-border supervision
- Manuel for cross-border supervision and insurance groups developed
- Capacity building for insurance practitioners in Burundi since 2014 (support from EAC and World Bank)
- Plans to implement a risk-based supervision approach
Some challenges to be met

- Efficient risk management program
- Effective corporate governance
- Need of actuaries
- Implementation of a risk-based supervision using CARAMELS (plan adopted in 2014)

Some remarks:

- ARCA wants to meet these challenges soon;
- CARAMELS is already used partially;
- Recruitment process to engage a trainer and to elaborate a RBS manual is in place.
6. Discussion: questions and contributions

Your RBS/Inclusive Insurance Action Plan

• What are the first three things you will do after this call to assess the application of RBS to an inclusive insurance market?

• How will you introduce or expand assessing risk in your current solvency regime?