



Society of Actuaries in Ireland

The Society submitted an online response to 2 questions in the IFoA consultation on [APS-P1 Duties and Responsibilities of Members undertaking work in relation to pension schemes](#)

15. Do you think that Members' obligations under the revised APS P1 are clearly set out?

We have 2 comments in relation to this question:

In 3.1.1, the requirement that *"a Scheme Actuary, Equivalent Scheme Actuary and/or Other Actuarial Adviser should notify the Trustees, or another relevant party involved in the running of a Scheme, if they are aware that it is reasonably likely that a party's actions could adversely affect the security of members' benefits and/or financing of the Scheme"* appears to encompass any issue which might impact the funding or security of the scheme in any way. We suggest that the requirement might usefully be made narrower.

In 4.2, we consider that the clause *"to the best of their reasonably held knowledge"* is both cumbersome and too passive. There should be an onus on the Scheme Actuary or Equivalent Scheme Actuary to ascertain, or use best endeavours to ascertain, whether *"another person is undertaking work on behalf of their Firm for the Employer to that Scheme"*, so that they can be confident that there is no potential for conflict(s) of interest to arise.

18. Overall, for provisions of the revised APS P1 that apply to work outside of the UK, do you agree that they are relevant and appropriate?

Para. 6.8 of the existing APS P1 requires a member who would under the proposed APS be an Equivalent Scheme Actuary to consider the Conflicts of Interests requirements which apply to Scheme Actuaries and, *"to the extent that they are relevant, apply those principles as nearly as may be appropriate in the circumstances"*.

We note that this paragraph has been removed and that section 4 has wider application than was previously the case.

We are concerned that this may have unintended consequences for actuaries practising in Ireland, and indeed for the sponsoring employers and trustees advised by them.

In particular, 4.4 refers to departure *"exceptionally"* from the presumption set out in 4.3. However, in Ireland, there are many small pension schemes for which it would not be economically feasible or prudent to appoint separate advisers to the sponsoring employer and the trustees. Dual appointments are not uncommon and are subject to a rigorous professional regulation framework, including the provisions of the Society's [ASP Pen-13 Conflicts of Interests - Pensions Actuaries](#).