

The Director
Board for Actuarial Standards

5th Floor Aldwych House
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London
WC2B 4HN

16 December 2008

Dear Madam

Generic Data Standards

I am pleased to enclose Buck Consultants' comments on the consultation paper issued by the Board for Actuarial Standards on a Generic Data Standard. We have provided comments solely from our perspective of providing actuarial advice to trustees and companies in respect of occupational pension schemes.

We are in agreement with the four overriding principles set out in the paper. The stress placed on the needs of the user of the advice flowing from the usage of the data is important as this is sometimes overlooked in actuarial work. However, while documenting the reasons to support judgments on whether data is material or proportionate is good practice it should not form part of a data standard.

Assessing data requirements and sources of data every time that actuarial information is required appears excessive, in particular for repetitive or regular tasks. A more appropriate requirement would be for an assessment to be carried out whenever a new task was commenced or a significant or material change was made to an existing task. We agree that overall data quality measures are unsuitable for inclusion in BAS standards for the foreseeable future.

We are in broad agreement with the principle that margins should generally not be incorporated in respect of data inadequacies or, if they are, should be disclosed. This should be differentiated from the issue of including margins in assumptions e.g. adopting a prudent approach to pension scheme funding.

Uncertainties resulting from the accuracy or completeness of the data are generally not on the same scale as those arising from other sources of uncertainty, such as investment or mortality assumptions, and we do not see a need to treat this in a similar way to other sources of risk.

The proposed principle relating to reporting should be dealt with as part of a reporting standard.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Martin C Rawe', written in a cursive style.

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