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| **RESPONSE TEMPLATE FOR CONSULTATION PAPER ON**  **DATA SUBMISSION AND MINIMUM REQUIREMENTS**  **TO ENHANCE OPERATIONAL READINESS OF**  **TAKAFUL AND INSURANCE BENEFITS PROTECTION SYSTEM FOR GENERAL INSURER MEMBERS** |

**ISSUE DATE : 31 MARCH 2022**

**CLOSING DATE : 12 MAY 2022**

**General Instructions:**

1. A General Insurer Member (GIM) is only required to submit the soft copy of this response template to PIDM.
2. Additional supporting documents (if any) should be submitted as separate files.
3. The soft copy of this response template shall be submitted via email to [minrqtips@pidm.gov.my](mailto:minrqtips@pidm.gov.my) by **12 MAY 2022**. The GIM shall assign the file name of the soft copy as **SFF\_CP\_Response\_GIM’s Name**.
4. Please provide the names of two officers as point of reference for any clarification, in the columns below:

**Name of GIM** :

**Name of the Office-in-Charge**:

**Contact No.**  :

**Email Address**  :

**Alternate Office-in-Charge** :

**Contact No.** :

**Email Address**  :

**Date of this response** :

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| **Questions:**  1. In order to provide PIDM the information as per SFF:   1. Do you have any data that resides outside your organisation (i.e. data kept with outsourced service provider)? If yes, please provide a description of the data (e.g. type of date), and the data accessibility in terms of timing (e.g. available on demand, batch run, etc) 2. If there are inconsistencies or redundant values (e.g. 2 different records for the same certificate or policyholder, etc.), please advise on the data cleansing process and rectification work as well as the related governance for this process. Would the clean-up involve any manual adjustment, i.e. by changing the values manually? If yes, are there any reporting mechanism in place to capture such activity? 3. How are the results verified or validated?   2. On the generation of SFF data (reference to Part C), what are the potential challenges (including IT) that may be faced in producing the SFF data and what steps can be taken to mitigate them?  3. With respect to the proposed minimum requirements for the SFF data generation and submission to PIDM, we appreciate your advise on:   1. the extent of work involved for enhancement or system upgrade required, if any, to the GIM's information management system. 2. the anticipated cost of the enhancement or system upgrade, if required. 3. the duration of time needed to ensure readiness of your IT systems and infrastructure in order to comply with the minimum requirements. |

**Comment Box**

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| **Question:**  4. Please share with us the security measures / technologies that are recommended and acceptable for the protection and confidentiality of the personal information submitted. |

**Comment Box**

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| **Question:**  5. Please share any potential issue that may be faced in preparing and submitting the required data for submission of SFF files (i.e. any conversion of data required and/or related potential issues, etc.)? |

**Comment Box**

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| **Question:**  6. Apart from any surplus sharing or distribution between the takaful operator and the participants (the certificate owners), are there any other components that would be refundable to the certificate owners in the event of certificate termination? If yes, please provide details of these components; and advise if the data/information is readily available in the operator’s database or system, and the estimated timeframe required to extract such data.  *(Note: surplus sharing may consist of underwriting surplus and investment income)* |

**Comment Box**

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| **Questions:**  7. File 01: Certificate/Policy File *(in Appendix A)*   1. Refer to “Position (Column) 4: Sub Class / Product Name” of File 01  * Please indicate in the table below if there is any other sub class/product(s) that is not captured in the proposed sub class/product(s) list in the REMARKS column of Position (Column) 4: Sub Class / Product Name:  |  |  | | --- | --- | | **Class Code (refer Position (Column) 3)** | **Sub Class / Product Name**  **(refer Position (Column) 4)** | | Example: 01 | Fire XXX |  1. Refer to “Position (Column) 14: Distribution Channel” of File 01  * Please indicate if there are any other distribution channels, other than those listed under the “Remarks” column *(i.e. 01 = Direct client/Ceding company (excluding digital/internet channel, which is indicated as 05), 02 = Agent, 03 = Broker, 04 = Bancassurance/Banking Institution and 05 = Internet).*  1. Refer to “Position (Column) 21 Risk Arrangement” of File 01  * Please indicate if there is possibility of multiple type(s) of risk arrangement (e.g. quota share or facultative, etc.) for each of the takaful certificate/insurance policy. If yes, please specify what are the multiple type(s) of risk arrangements undertaken by GIMs.   8. File 04: Coverage File *(in Appendix A)*   1. Refer to “Position (Column) 2: Risk Item” \*[[1]](#footnote-1)of File 04  * Please indicate the type of risk item\* that is commonly recorded in your system, under each general takaful certificate or insurance policy (i.e. for each class of businesses underwritten by the GIM).  1. Others: 2. Please advise if there is any other field(s) that has been omitted/excluded from the listed SFF fields, that you opine would further facilitate payment of refundable prepaid contributions or premiums? If yes, please provide us with details of the additional field(s) for PIDM’s consideration. 3. Please let us know if there are any other components that would be refundable to certificate or policy owners in the event of certificate or policy termination. If yes, what are these components, and are these information readily available in your database or system, and the estimated timeframe required to produce such data? |

**Comment Box**

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| **Operational Process** | **Questions:** |
| **Generation of data for SFF files** | When SFF is implemented,   1. What would be the process to be undertaken in generating the data and compiling the data into SFF files? What would be the estimated time (working days) for the end-to-end process of generating data for SFF files? |
| **Internal review / validation of data in SFF files** | 1. Please share the internal review / validation process e.g. internal report / reconciliation that will be required for the data in SFF files, in order to ensure the data is complete and accurate before submission to PIDM. What would be the estimated time (working days) to conduct the internal review/validation of the SFF files? |
| **Follow-up for any issues identified** | 1. Do you foresee any issue if PIDM requires a dedicated staff to liaise with PIDM if there are issues relating to SFF files identified by PIDM? Would you prefer this dedicated staff to be the same staff that is in-charge of BNM’s ICSS/TOSS submission, in order to ensure consistency in data quality? For this purpose, please advise which department this dedicated staff will most likely come from. |

**Comment Box**

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| **Question:**   1. Please provide your comment on the proposal for the GIM to submit the SFF files to PIDM on an annual basis by 31 May of each year (upon completion of the trial run). Do you foresee any impediment in complying with the proposed timeframe? If yes, please elaborate on the impediments (including impact arising from MFRS17 implementation), and suggest a reasonable timeframe for the GIM to submit the required SFF files for PIDM’s consideration. |

**Comment Box**

1. \* “Risk Item” is referred as a person or property that is covered/insured under a general takaful certificate or insurance policy, e.g. an insured person in a PA policy, or a residential building in a Fire policy. [↑](#footnote-ref-1)