



# DUE PROCESS FOR MAKING A PUBLIC STATEMENT

This due process is applicable to a Public Statement made on behalf of the IAA in line with the IAA Communications Policy.

## 1. What Constitutes a Public Statement?

A Public Statement is a written statement presented on behalf of the IAA to an external group.

This due process for making a Public Statement applies to:

- Electronic or printed statements and presentation material used in conveying the statements.
- Statements submitted to multi-national organizations, such as those dealing with regulatory, legislative, professional and investigative issues. On some occasions statements to single country national bodies may also be appropriate.
- Statements to other professional groups.

This due process does not apply in instances where a single IAA committee wishes to comment on a technical issue falling only within the technical scope of that committee. In that case the relevant committee may respond, with due care, and make it clear that the committee response has not been subject to the IAA's due process for a Public Statement.

## 2. The Scope of a Public Statement

The IAA should seek to make a Public Statement on matters involving fields of actuarial expertise. A Public Statement by the IAA may also be desirable on broad conceptual issues of public policy in which actuaries have relevant but not exclusive expertise.

A Public Statement may promote legitimate professional interests where the IAA believes the profession can make a contribution.

A Public Statement should reflect the expertise of the profession. They need not be limited to statements of fact, but where an observation is based on opinion rather than facts, the opinion should represent a sufficient degree of consensus within the profession.

A Public Statement generally should not take positions on the social and political implications of issues. It may be appropriate, however, to point out economic, social and political implications insofar as these implications can be objectively determined.

### 3. Authority to Proceed

Once an issue has been identified or a request has been received on a matter on which the IAA may want to make a Public Statement:

- 3.1. The Secretariat will direct the request to the appropriate committee chairperson, with a copy to the chair of the Communications Subcommittee (CSC). The committee responsible for the public statement is referred to as the Responsible Committee (RC).
- 3.2. In cases where there is no clear RC, the Secretariat may, in consultation with the CSC and chairs of committees that have a direct interest in the matter, appoint a chairperson of an ad hoc task force.
- 3.3. The chairperson of the RC or of the ad hoc task force is referred to as the Responsible Person (RP).
- 3.4. The RP appoints a task force (TF) to develop the Public Statement.
- 3.5. The RP also draws up the mandate for the TF. The mandate should include, at a high level, the proposed content of the Public Statement and the timeframe to develop the Public Statement. The timeframe should consider time needed for drafting, additional time for comments, final preparation, peer review (if required by the CSC) and issuance.
- 3.6. The RP will inform the Secretariat of the TF members and the TF's mandate.
- 3.7. The Secretariat informs all FMAs and Committees that a process has been initiated to develop a Public Statement and provides the relevant details of the subject matter, the RC (if any), RP and TF.
- 3.8. The Secretariat also invites FMAs or Committees to nominate observers who will be kept informed of progress and invited to comment on any draft Public Statement. All members of the RC (if any) will automatically be included in the group of Observers.

### 4. Development of the Public Statement

- 4.1. The TF then drafts, under the supervision of the RP, the Public Statement within the required timeline.
- 4.2. The TF will consider any comments received from observers during the drafting process. The TF may escalate any unresolved issues to the RP and the CSC in the case of an ad hoc task force

## 5. Peer Review

- 5.1. At the outset, or at any time during the process to develop a Public Statement, the CSC may decide that the Public Statement will require a peer review prior to publication. Possible reasons to require a peer review could include:
  - a. the strategic importance of the issue; or
  - b. if the issue is known to be of interest to several Committees or Sections; or
  - c. if there are known conflicting views on the issue among FMAs, Committees or Sections.
- 5.2. In such cases the CSC, in consultation with the Secretariat, will appoint a suitably qualified peer reviewer.
- 5.3. The peer review is expected to be a high-level review, focusing primarily on the strategic position of the IAA, the position taken by the Public Statement, how any significant disagreements have been dealt with by the RP and the clarity and appropriateness of the response.
- 5.4. The peer reviewer will report his/her findings to both the RP and the CSC.
- 5.5. If, in the opinion of the CSC, there are any contentious issues raised by the peer reviewer, these will be resolved in consultation between the CSC and the RP.

## 6. Approval and Communication

- 6.1. The RC, or the CSC in cases where there is an ad hoc TF or where a peer review has been required, approves the final Public Statement for publication.
- 6.2. The RP will instruct the Secretariat to issue the Public Statement and communicate it appropriately.
- 6.3. The Secretariat will submit the Public Statement with a cover letter signed by the president and the name of the RP and a list of the TF members
- 6.4. The Public Statement will be posted on the IAA website as an official Public Statement and FMAs will be informed.

## 7. Fast Track Process

- 7.1. There may be exceptional circumstances in which the CSC may decide to omit or modify any portion of this process, in which case such decision will be communicated to all FMAs. Should any material objections be received, the CSC will revert to the full due process.