

B. Claims																													
FOAP Core Process(s)										6.2 Recording Claims in the Ledger 6.3 Claims Settlements																			
										Risk Register Control																			
										Key Control																			
Ref	FOAP Major Process	FOAP Major Process Objective (s)	Risk Register Control	Key Control (High Level Control)	Owner(Area)	Owner	Manual/Automated	Detective/ Preventative	Risk Reference	Process WGSW	Acceptable Risk	Control Reference	Primary Control (As Is)	Control Type <small>(Automated, Manual, Accounts Receivable, Accounts Payable, Inventory Management, Other Development)</small>	Owner(Area)	Owner	Manual/ Automated	Detective/ Preventative	Suggested Control (To be)	Comment	Action	Future FOM Development?							
6.2.1	Manage Master data	Ensure all changes to master data are valid	Access to change master data (policy and vendor Master file) in FDM and Agresso is restricted. All changes to master data in FDM and Agresso are appropriately approved. Periodic access reviews are completed and any invalid access to FDM and Agresso are disabled.	- Access to change master data (policy and vendor Master file) in FDM and Agresso is restricted. - All changes to master data are appropriately approved	Non Finance		Automated	Preventative	N6.2.1.1	New vendor accounts set up on Agresso and FDM or changes to existing accounts may not be valid/authorised.	N	C6.2.1.1	All requests to set up new vendor accounts on FDM and Agresso are authorised.	Authorisation	Coverholder Operations	Peter Cobden	Manual	Preventative	Amend process for adding a new vendor - perform a search in Agresso for the supplier name/bank account details (Preventative control) Periodic review of vendors including address/banking details to ensure only 1 vendor code per supplier per currency (Detective control)	There are no system controls available to prevent duplicate vendor account set up in Agresso. A manual check is required to confirm the vendor account is not already set up before completing a new request. Although the setting up of new vendors' accounts is set to move from Finance to Claims teams and Finance will be excluded from the process, this control recommendation would still valid.	Update the process and add new controls.	n/a							
				- New Claims vendors are incorrectly set up on the system either data input error or fraudulent entry - ClaimCenter payment process relies on the vendor details including bank account information being correct					N6.2.1.1	New vendor accounts set up on Agresso and FDM or changes to existing accounts may not be valid/authorised. - New Claims vendors are incorrectly set up on the system either data input error or fraudulent entry - ClaimCenter payment process relies on the vendor details including bank account information being correct	N	C6.2.1.2	Quarterly approval of sample of changes to UK CL Supplier Master File. Automatic report generated from Agresso showing changes. Sample matched back to requests to ensure accurate data entry.	Validation	Coverholder Operations	Peter Cobden	Manual	Detective	Ensure all changes in Agresso are approved by an independent reviewer who checks all details back to source documentation. This would be a preventative control and the same control as performed by the Accounts Payable team.	Set up of vendors to move Claims team and Finance will be excluded from the process. However control suggestions still valid	Preventative control for manager approval of new Claims Vendors on the Agresso Support task list-completion date TBC.	n/a							
6.2.2	Import Claims Data	Ensure claims data import from Wei is accurate and complete							N6.2.2.1	Access to the claims data input and posting may not be restricted.	N	C6.2.2.1	Access to systems/applications is appropriately restricted. Only authorised individuals have access to: i. FDM Control Sheets used to upload claims data from source to FDM. ii. Posting Engine Sheets used to post claims data or claims adjustments from FDM to Agresso.	Access	Finance		Automated	Preventative	n/a	This control is the same across all processes where access is required on FDM and Agresso.	n/a	n/a							
									N6.2.2.2	Claims data from Wei may not be loaded into FDM completely and accurately.	N	C6.2.2.2	Automated email confirmation for successful load /failure of claims data into FDM is sent to the person who uploaded the data.	Validation	Automated		Automated	Preventative	n/a	n/a	n/a								
									Reconciliations of finance systems to source claims data(Wei).	Reconciliations of finance systems to source premium data data(Wei).	Finance		Manual	Preventative	N6.2.2.3	Claims data may not be loaded into FDM completely and accurately.	N	C6.2.2.3	Finance complete pre-posting analysis and review of the claims amounts on the FDM pivot. Any errors are investigated and corrected before the adjustment is posted to Agresso. Where applicable the claims analysis includes: reconciliation of claims amounts to source data i. Wei ii. review of unusual amounts/movements.	Validation	Finance		Manual	Detective	n/a	The posting of claims journals from FDM to Agresso is significantly manual via posting engine sheet and prone to human errors. Finance should consider making this process automated	n/a	Automating the posting of journals from FDM to Agresso.	
6.2.3	Claims Analysis and Posting	Ensure claims amounts in the ledger is accurate and complete	Analytical reviews of claims activity, including current and historical claims trends Monthly analysis of claims amounts against budget and prior period by product category Management review of significant claims deviations from expectations.	- Analytical reviews of claims activity, including current and historical claims trends Monthly analysis of claims amounts against budget and prior period by product category Management review of significant claims deviations from expectations.	Finance		Manual	Preventative	N6.2.3.1	Claims calculations/ adjustments may not be accurate e.g. - Outstanding Claims (Gross/RU/Sidecar)/N107, - INBR (Gross/RU/Sidecar/N107), - Claims Handling Reserve, - Bad Debt (paid/CUS/BNIN) Claims posting process not started (via Posting Engine Sheet)	N	C6.2.3.1	Finance complete pre-posting analysis and review of the claims amounts on the FDM pivot. Any errors are investigated and corrected before the adjustment is posted to Agresso. Where applicable the claims analysis includes: reconciliation of claims amounts to source data i. Wei ii. review of unusual amounts/movements.	Review	Finance		Manual	Detective	n/a	The reconciliation is manual	Consider automating the system reconciliations. Finance would review the reconciliations and address reconciliation issues.	Automating the reconciliations and built some reconciliation reports for Finance to review.							
									N6.2.3.2	Claims calculated adjustments in FDM may not be posted completely into Agresso. e.g. - Outstanding Claims (Gross/RU/Sidecar) - INBR (Gross/RU/Sidecar/N107), - Claims Handling Reserve, - Bad Debt (paid/CUS/BNIN) Claims posting process not started (via Posting Engine Sheet) (via SharePoint)	N	C6.2.3.2	Automated email confirmation of successful posting of premium data from FDM to Agresso is sent to the person who posted the adjustment. If the process fails, reason for failure is given.	Validation	Automated		Automated	Preventative	n/a	n/a	n/a								
6.3.1	Settlement of Claims- ClaimCenter- direct payment	Ensure claims settlements are valid							N6.3.1.1	Claims settlements (ClaimCenter direct payments) may not be valid	N	C6.3.1.1	All claims are authorised by a claims Manager before payment is processed. Authorisation limits for each claims Manager are set within ClaimCenter workflow.	Authorisation	Claims Operations		Automated	Preventative	n/a	n/a	n/a	n/a							
									N6.3.1.1	Claims settlements may not be valid	N	C6.3.1.2	Claims with settlement amounts of at least \$250k require additional authorisations by Compliance after completing security checks.	Authorisation	Claims Operations		Manual	Preventative	n/a	n/a	n/a	n/a							
									N6.3.1.1	Claims settlements may not be valid	N	C6.3.1.3	Finance approves the release of payment in settlement of all approved claims. Before approving the release of payment Finance performs the following (where applicable): - review and confirm the claim was approved by someone who has the appropriate authority level to approve the claim (non ClaimCenter claim only as authority limits are built within ClaimCenter) by checking the approver against Group Claims Authority levels list sent from Group Claims Operations Manager (Steve Flood) to Coverholder Finance monthly and circulated to Payment Approvers. - agree the payee account details on the approved claim on ClaimCenter to the details on the payment request ensure that the payment is not a duplicate payment.	Authorisation	Finance		Manual	Preventative	n/a	n/a	n/a	n/a							
6.3.2	Settlement of Claims- Non ClaimCenter	Ensure claims settlements are valid							N6.3.2.1	Claims settlements (non ClaimCenter) may not be valid	N	C6.3.1.3	Finance approve the release of payment in settlement of all approved claims. Before approving the release of payment Finance performs the following (where applicable): - review and confirm the claim was approved by someone who has the appropriate authority level to approve the claim (non ClaimCenter claim only as authority limits are built within ClaimCenter) by checking the approver against Group Claims Authority levels list sent from Steve Flood to Coverholder Finance monthly and circulated to Payment Approvers. - agree the payee account details on the approved claim on ClaimCenter to the details on the payment request ensure that the payment is not a duplicate payment.	Authorisation	Finance		Manual	Preventative	n/a	n/a	n/a	n/a							
									N6.3.2.1	Claims settlements (non ClaimCenter) may not be valid	N	C6.3.1.2	Claims with settlement amounts of at least \$250k require additional authorisation by Compliance after completing security checks.	Authorisation	Claims Operations		Manual	Preventative	n/a	n/a	n/a	n/a							
									N6.3.2.2	Manual claims payment requests may not actioned by Service Company Finance or may not be paid within agreed timelines with the Claims team.	N	C6.3.1.4	All email requests for payments are sent to 'UK Claims Payment Team' mailing list, which is sent to all of Service Company Finance team. The emails are reviewed and the payments requests are processed for payment on a daily basis. Payment runs are scheduled twice a week on Tuesday and Friday with two Payment Approvers. If a payment request is urgent, an emergency manual payment can be made.	Review	Coverholder Operations	Peter Cobden	Manual	Preventative	n/a	There is no formal process for dealing with payments of urgent claims. Normally urgent payments requests should be processed within one working day. The Claims team should ensure requests are made in adequate time for the Finance team to meet Beasley's objectives of paying claims within SLA and to reduce the pressure on the payments team.	n/a	n/a							
									N6.3.2.3	Manual payments may be made to an inactive bank account	N	C6.3.1.5	Deutsche bank performs payment checks before the payment is made and validates the vendor bank account is active prior to the payment request is sent to Payment Approvers. For other banking providers the bank will return rejected payments, shown as a credit on the bank statement.	Validation	Coverholder Operations	Eshira Low	Systematic	Preventative	Coverholder Operations team should check daily/twice-weekly for returned payments.	The bank accounts are regularly used by a number of internal and external suppliers and therefore it is not always obvious if a payment has been returned, it could be premium.	n/a	n/a							
									Monthly bank reconciliations Balance sheet accounts reconciliations are captured on the monthly Dashboard under control # 452 in the risk register.	Monthly bank reconciliations	Finance(Dublin)		Manual	Detective	N6.3.2.6	Payment may not be processed in Agresso after being paid	N	C6.3.2.6	Coverholder Finance prepare the payment journal based on the bank statement and payment requests. Coverholder Finance Manager review the payment journal and send to the Dublin Syndicate Finance team. The Dublin Finance team perform an additional review of the journal and post into Agresso.	Review	Coverholder Operations	Peter Cobden	Manual	Preventative	n/a	n/a	n/a		
														N6.3.2.7	Inaccurate posting of Cash manual payments journal may occur. The journal is based on the payments made out of the bank account rather than the requested payments sent to the bank. - possible a payment is rejected and therefore outstanding.	N	C6.3.2.7	Dublin Finance review the journal sent by Service Company Finance, confirming the bank account, VOR and currency and query other items prior to posting the journal.	Review	Dublin Finance	Gary Smith	Manual	Preventative	Check journal back to payment requests or base journal on payment requests rather than bank statement.	n/a	n/a	n/a		
									Monthly bank reconciliations Balance sheet accounts reconciliations are captured on the monthly Dashboard under control # 452 in the risk register.	Monthly bank reconciliations	Finance(Dublin)		Manual	Detective	N6.3.2.8	Duplicate of claims payments postings may occur- Dublin Finance review bank statement and post journals based on payments which are a mixture of manual postings and remittance Agresso postings.	N	C6.3.2.8	Dublin Syndicate team does not initiate claims settlement journals but will only post the journals requested by Coverholder Finance. This ensures that a journal is only processed once.	Segregation	Dublin Finance	Gareth Brennan	Manual	Preventative	n/a	n/a	n/a	n/a	
														N6.3.1.1	Claims settlements (non ClaimCenter) may not be valid	N	C6.3.1.3	Finance approves the release of payment in settlement of all approved claims. Before approving the release of payment, Finance performs the following (where applicable): - review and confirm the claim was approved by someone who has the appropriate authority level to approve the claim (non ClaimCenter claim only as authority limits are built within ClaimCenter) by checking the approver against Group Claims Authority levels list sent from Steve Flood to Coverholder Finance monthly and circulated to Payment Approvers. - agree the payee account details on the approved claim on ClaimCenter to the details on the payment request ensure that the payment is not a duplicate payment.	Authorisation	Finance		Manual	Preventative	n/a	n/a	n/a	n/a		
									6.3.3	Settlement of Claims-TPA Loss Funds	Ensure claims settlements are valid							N6.3.3.1	TPA Claims settlements may not be valid	N	C6.3.1.3	Finance approve the release of payment in settlement of all approved claims. Before approving the release of payment Finance performs the following (where applicable): - review and confirm the claim was approved by someone who has the appropriate authority level to approve the claim (non ClaimCenter claim only as authority limits are built within ClaimCenter) by checking the approver against Group Claims Authority levels list sent from Steve Flood to Coverholder Finance monthly and circulated to Payment Approvers. - agree the payee account details on the approved claim on ClaimCenter to the details on the payment request ensure that the payment is not a duplicate payment.	Authorisation	Finance		Manual	Preventative	n/a	n/a
6.3.4	Claims Settlement - Lloyd's Claims	Ensure claims settlement is valid	Monthly bank reconciliations Balance sheet accounts reconciliations are captured on the monthly Dashboard under control # 452 in the risk register. Control #425 is as follows: In the last quarter the balance sheet reconciliation dashboards have been completed. Any issues arising have been escalated to the HOGF and where appropriate actions are put in place to resolve and are being tracked to resolution.	Monthly bank reconciliations	Finance(Dublin)		Manual	Detective	N6.3.4.1	Lloyd's claims paid via Ichangring may not be posted to settlement advice data received from Ichangring. The claims settlement data from Ichangring is input into a daily settlement template which prepares the journal based on mapping code. If there are new items which do not map, the team investigate and amend as required. Template has various checks including that the journal total agrees with the daily settlement message sent from Lloyd's. The following journal is posted: DR Bank CR Holding BS account (74410)	N	C6.3.4.1	Syndicate Finance team reconciles the daily settlement summary to the detailed settlement advice data received from Ichangring. The claims settlement data from Ichangring is input into a daily settlement template which prepares the journal based on mapping code. If there are new items which do not map, the team investigate and amend as required. Template has various checks including that the journal total agrees with the daily settlement message sent from Lloyd's. The following journal is posted: DR Bank CR Holding BS account (74410)	Reconciliation	Dublin Finance	Gary Smith	Manual	Preventative	Postings are not necessarily made every day, will group and do in batches. There is not enough information provided on the report to enable the team to post directly to the settlement accounts.		Automate this process in FDM/ the data is available in BI								

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