



Society of Actuaries in Ireland

Public Consultation on Revision of Death Registration Process

Response to Department of Social Protection

April 2021

The Society of Actuaries in Ireland (“Society”) is the professional body representing the actuarial profession in Ireland.

Actuaries use mortality data in pricing, underwriting and reserving for life assurance business, in funding for future pensions (State, occupational and personal) and in advising on healthcare issues. It is important for these purposes that the data used are complete, accurate and up to date.

The Society notes that practice in Ireland in relation to the registration of deaths is significantly out of line with other EU member states and recognises that this has caused difficulty in analysing the impact of COVID-19 and the timely development of public healthcare policy. We are supportive of moves to update and improve the process adopted, making use of technology where appropriate, provided this does not impose significant additional burdens on relatives of the deceased at a difficult time. We note that the proposed approach would bring the timescale for registration of deaths broadly into line with that in the UK, although it would still be slower than in many EU countries which require notification within 1 - 3 days of death.

The consultation document is silent on how the new requirements will be enforced, and the sanction imposed, if any, if they are not met, although this would need to be dealt with sensitively. The data provided shows that 15-20% of deaths are not currently registered within the existing 3 month period.

The Society is not in a position to comment on whether the process proposed is the optimum approach and hence has not answered the 5 questions posed in the consultation document.

The Society, as a user of mortality data, urges the Department of Social Protection to make this publicly and readily accessible as soon as it is validated, and with sufficient granularity of detail to enable researchers and others to make use of it, having due regard to the need to protect the privacy of personal data.

We would be happy to respond to any questions on this response. Please contact Philip Shier, Head of Actuarial Practice, at philip.shier@actuaries.ie.

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