The Professional Provident Society Insurance Company

1) The initial reporting requirements just after the detection of the incident will need to be considered as this could take resources away from dealing with the actual incident. This time lines and frequency needs to be reasonable.

2) The reporting time lines must also considered in order to allow enough time for the investigations to take place thus sufficient and accurate information can be provided.

3) There should not be any duplication of reporting therefore FI’s should only be required to report to one authority and one template.

4) All information shared with the authority must be dealt with in a confidential manner.

5) A list of well-defined triggers must be provided by the authority, keeping in mind that it won’t be an exhaustive list.