

Continuing Professional Development Scheme Disciplinary Procedures (“CPD Scheme Disciplinary Procedures”)



Date: 31/12/2024



The Insurance Institute

NOTE:

Throughout this document, the Insurance Institute's Continuing Professional Development Scheme Disciplinary Procedures will be referred to as the 'CPD Scheme Disciplinary Procedures'.

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1. The Professional Standards Committee (PSC)

The Professional Standards Committee (PSC) is a sub-committee of the Board of the Insurance Institute ('the Institute'), established pursuant to Article 76 of the Articles of Association of the Institute.

Among other functions, the PSC is responsible for disciplinary matters arising from Continuing Professional Development (CPD) compliance failures by members of the Institute.

The PSC considers each case referred to it by reference to the Institute's CPD Scheme, exercising its judgement in a fair, consistent and impartial manner.

The PSC confirms CPD fails incurred by members, applies sanctions (up to and including the suspension of professional designations and/or grandfathered status) and grants members an appeal window in order to have the PSC decisions reviewed by a separate PSC Appeal Panel.

Apart from the Chair of the PSC, the PSC Appeal Panel will comprise a different grouping of individuals to hear any appeals made by members against sanctions applied by the PSC.

2. The CPD Corrections Officer (CPDCO)

The CPD Corrections Officer (CPDCO) is an individual appointed internally by the Institute to oversee the annual review of members CPD records in order to identify possible irregularities or potential compliance issues.

The CPDCO will:

- Review the CPD records of members to identify those who did not submit an annual CPD return or whose return failed to meet the CPD requirements applicable to members in a given calendar year.
- Arrange for a random sample of members to be drawn from those members who did submit annual CPD returns for audit purposes.
- Audit the CPD records of members in the random sample to identify members whose CPD return
 - a) Contained only Institute sourced CPD (where all documentation is present) and whose submission is therefore valid and members informed accordingly.
 - b) Contained Institute and 3rd party sourced CPD (where all documentation is present) and whose submission is therefore valid and members informed accordingly.
 - c) Contained any 3rd party sourced CPD where any documentation was absent and whose submission is therefore invalid.

2. The CPD Corrections Officer (CPDCO) continued

- Liaise with those members under c) above and
 - i. Inform them of their audit status i.e. potential fail and potential sanctions.
 - ii. Correct CPD records based on up to date information provided by members as appropriate.
 - iii. Prepare documentation and present same to the PSC.
 - iv. Inform members of PSC decisions and sanctions.
 - v. Liaise with members and a PSC Appeal Panel in relation to any subsequent appeals.
 - vi. Inform members of the outcome of any appeal process.
 - vii. Note the member's employer (as noted on the member's Institute record), is also informed of both the potential fail/sanctions and the final fail/sanctions.

3. Failure to Comply with the CPD Scheme

Failure to comply with the CPD Scheme can result in Disciplinary Action.

See list below for examples of instances where a member fails to comply and could incur a CPD fail and its consequential disciplinary Action. (Note, this is **NOT** a definitive list.)

- Failure to make an annual return in any given year.
- Failure to undertake and complete the required number of accredited CPD hours (including the compulsory Ethics hour(s) and function hour(s), for your designation(s), by 31st December each year.
- When logging their minimum 15 hour CPD requirement, they logged;
 - more than 4 hours per topic per day, which counted towards their annual minimum 15 hour CPD requirement
 - more than 8 hours in any one day. which counted towards their annual minimum 15 hour requirement.
 - duplicate CPD content (as a guide, if the content is 50% or more the same, between two or more CPD events, that is considered duplicate content).
- Submitting an annual CPD return which, in the judgement of the PSC is false or misleading.
- Failure to follow the designation acceptance procedure as set out under Insurance Institute's CPD Scheme.
- Failure to maintain Insurance Institute membership via payment of the annual membership subscription (including any subscription upgrades).
- Failure to co-operate with the Insurance Institute, when audited/randomly selected for audit or otherwise, such as when queries arise in connection with a member's CPD log as recorded with the Institute.

4. Disciplinary Action

4.1 Identifying CPD Scheme Fails

A member's failure to comply with CPD Scheme is typically identified in the following ways:

Non payment of Membership (Group A)

- After 31st December, each year, the Institute will identify any member who has not paid their Institute Membership for the preceding year(s). Note a member must maintain their membership of the Institute, in order to maintain the currency of their Institute designation.
- This cohort of members are referred to as 'Group A' for ease of reference below

Year-end Audit (Group B)

- 1st February each year, when all members CPD logs are closed for prior year CPD logging – any members who did not fulfil their CPD requirements as per their Institute CPD record are potential fails.
- This cohort of members are referred to as 'Group B' for ease of reference below.

Detailed Audit (Group C)

- March (approximately) each year, when the Institute selects a random sample of CPD logs to undertake a more intensive audit – any members who appear to have fulfilled their CPD requirements as per their Institute CPD record but who are missing specific CPD or documentation.
- This cohort of members are referred to as 'Group C' for ease of reference below.

4.2 Types of fails that a Member can incur (Groups A,B & C)

A 1st fail will arise when a member fails to comply with the Institute's CPD Scheme for the first time, in any given 5 year period.

A 2nd fail will arise when a member fails to comply with the Institute's CPD Scheme for a second time, in any given 5 year period.

4.2.1 1st Fail (Groups A & B)

What happens when a member incurs a 1st fail?

- The CPDCO discovers that a member's CPD record shows a potential first fail.
- A formal first fail communication (as detailed under the CBI MCC) will be issued to the member.
- A notification to the member's employer (as noted on their member record) of the initial proposed disciplinary action. This does not apply to Group A (Non payment of Membership).
- The member is granted 10 working days in which to submit evidence of their compliance to the CPDCO in order to have their CPD record corrected (as appropriate).
- If no submission or if an unsuccessful submission for the correction of a CPD record is made by the member, the PSC will meet and ratify the findings of the CPDCO and apply sanction(s) as appropriate, giving the member 10 working days in which to appeal the decision and sanction(s).
- The PSC decision and sanction(s) are binding unless the member makes an appeal.
- If an appeal is received, a PSC Appeal Panel will meet to review the appeal and reach a final decision, which is binding. With the exception of the PSC Chair who also chairs the PSC Appeal Panel, the PSC Appeal Panel will not comprise any members of the PSC who were involved in the original PSC discussions and sanction decisions.
- The PSC sanctions can include:
 1. A compliance failure is noted on the member's Institute record.
 2. The imposition of a requirement to undertake the deficit CPD or the successful completion of module CIP-02 ('Compliance and Advice') by examination.
 3. A notification to the member's employer (as noted on their member record) of the confirmed PSC disciplinary action determined by the PSC and resulting need for the employer to note same on their Internal Register of Accredited Persons. This does not apply to Group A (Non payment of Membership).

4.2.2 2nd Fail (Groups A & B)

What happens when a member incurs a 2nd fail?

- The CPDCO discovers that a member's CPD record shows a potential second fail.
- A formal second fail communication (as detailed under the CBI MCC) will be issued to the member.
- A notification to the member's employer (as noted on their member record) of the initial proposed disciplinary action.
- The member is granted 10 working days in which to submit evidence of their compliance to the CPDCO, in order to have their CPD record corrected (as appropriate).
- If no submission or if an unsuccessful submission for the correction of a CPD record is made by the member, the PSC will meet and ratify the findings of the CPDCO and apply sanction(s) as appropriate, giving the member 10 working days in which to appeal the decision and sanction(s).
- The PSC decision and sanction(s) are binding unless the member makes an appeal.
- If an appeal is received, a PSC Appeal Panel will meet to review the appeal and reach a final decision, which is binding. With the exception of the PSC Chair who also chairs the PSC Appeal Panel, the PSC Appeal Panel will not comprise any members of the PSC who were involved in the original PSC discussions and sanction decisions.
- The PSC sanctions can include:
 1. Compliance failure is noted on the member's record.
 2. The imposition of a requirement to undertake the deficit CPD in full or to successfully undertake/retake and pass by examination module CIP-02 'Compliance and Advice' should the member want to reinstate their designation or grandfathered status.
 3. The suspension of the professional designation or Grandfathered status held by the member under the Institute's CPD Scheme.
 4. The removal of the member from the Institute's published Register of Compliant Persons.
 5. A notification to the member's employer (as noted on their member record) of the confirmed PSC disciplinary action determined by the PSC, and resulting need for the employer to note same on their internal Register of Accredited Persons.

4.3 Approximate timelines for the application of Disciplinary Action, and any appeals associated with same.

Approx timeline	Group A: Non payment of Membership for the preceding year. Members who have failed to maintain their Institute membership, for the preceding year, and who are therefore not entitled to use their Institute professional designation or may be placing their grandfathered status at risk.
After 31st December	The Institute will after 31st December each year: - Identify members who have not paid their Institute membership subscription for the preceding year. Write to said members to - Confirm that a subscription fee has not been paid and request payment for the new membership year. - Advise the member of their right to seek a correction of their CPD record (for the preceding year) by writing to the CPD Corrections Officer (CPDCO) at CPDCorrections@iii.ie, no later than 31st January of that year. - Advise the Member that their Designation/Grandfather Status will be suspended with effect from 31st December of the preceding year, in the absence of receipt of payment and submission of the required CPD record for the preceding year.
January/February	Members who make a submission to have their CPD record corrected and which is successful and pay said membership subscription, will be deemed to have passed the audit successfully. Members who do not pay their Institute subscription, or make no submission and/or members who make an unsuccessful submission to have their CPD record for the preceding year corrected as appropriate, will have their Professional Designation/Grandfather status (within the Institute's CPD Scheme) suspended from 31st December of the preceding year. High level details of such members, will be presented to PSC, for their sign off/approval. Members are then informed of the PSC decision and sanction(s) and members are granted a further 10 working days appeal period during which they may appeal any CPD Scheme fail findings, PSC decisions and sanctions. After the expiry of the 10 working day appeal period; - The PSC Appeal Panel meet to consider appeals made in respect of the PSC decisions and sanction(s) as applied in January/February - The PSC Appeal Panel makes final decisions regarding appeals and sanctions - The decisions and sanction(s) of the PSC Appeal Panel are binding A communication is issued to Members; - To advise them of the PSC Appeal Panel outcome, for those who submitted appeals to the PSC Appeal Panel and

4.3 Approximate timelines for the application of Disciplinary Action, and any appeals associated with same. (continued)

Approx timeline	Group A: Non renewal of Membership for the preceding year. Members who have failed to maintain their Institute membership, for the preceding year, and who are therefore not entitled to use their Institute professional designation or may be placing their grandfathered status at risk.
January/ February	2. To confirm the application of the previously indicated PSC decisions and sanction(s) for Members who fall into this cohort - To confirm that their Designation Grandfather status (as maintained under the Institute's CPD Scheme) has been suspended with effect 31st December 2024 - To advise that the suspension of a Member's designation or Grandfather status (as warranted by the Institute's CPD Scheme), may have implications for the Member in terms of any MCC role they may currently operate in - To contact memberservices@iii.ie, now or at any stage in the future, to determine their next steps/action required, should they want to; - Pay their Institute membership subscription - Reinstate their institute professional designation and/or Grandfather status (under the CPD Scheme)(which may require the completion of any CPD hours and/or the completion of Insurance Institute module(s) by examination, as set out in the Institute's CPD Scheme.

4.3

Approximate timelines for the application of Disciplinary Action, and any appeals associated with same.
(continued)

Approx timeline	Group B: Year end Audit Members who have failed to maintain their Institute membership, for the preceding year, and who are therefore not entitled to use their Institute Professional Designation or may be placing their Grandfathered status at risk.
January	The Institute will write to all Members falling in to this cohort, to advise that • they do not appear to have fulfilled their CPD requirement for the preceding year, • that they have until 31st January, to update their Institute CPD record. • and failing to meet their Institute CPD requirement will result in disciplinary action.
February	A communication is issued to the Member and the Member's Employer (as noted on their Institute record) to advise: 1. The potential CPD Scheme fail scenario. 2. The Disciplinary Action potentially applying which would be effective from 31st December of the preceding year. 3. The member's right to seek a correction of their CPD record, by writing to the CPD Corrections officer (CPDCO) at CPDcorrections@iii.ie, within 10 working days.
February /March	Members who make a submission to have their CPD record corrected and which is successful, will be deemed to have passed the audit successfully Members who make no submission and/or members who make an unsuccessful submission to have their CPD record corrected as appropriate, will have their records reviewed by the PSC when it meets in March
March	PSC meets to review CPD fails, make decisions and apply sanction(s) as appropriate. PSC decisions and sanction(s) are binding unless an appeal is made by the member and which is successful Members and Employers are informed of the PSC decision and sanction(s) and members are granted a further 10 working days appeal period during which they may appeal any CPD Scheme fail findings, PSC decisions and sanctions.
April	After the expiry of the 10 working day appeal period; • The PSC Appeal Panel meets to consider appeals made in respect of the PSC decisions and sanction(s) as applied in March • The PSC Appeal Panel makes final decisions regarding appeals and sanctions. • The decisions and sanction(s) of the PSC Appeal Panel are binding. • A communication is issued to members and employers(as noted on the member's Institute record) • To advise them of the PSC Appeal Panel outcome, for those who submitted appeals to the PSC Appeal Panel and • To confirm the application of the previously indicated PSC decisions and sanction(s) for the remainder of the Members who fall in to this cohort

4.3 Approximate timelines for the application of Disciplinary Action, and any appeals associated with same. (continued)

Approx timeline	Group C: Detailed Audit Members who have submitted CPD returns and who have been selected by random audit sample
March	The Institute randomly selects an audit sample of members who appear to have fulfilled their CPD requirements.
	For members selected for audit whose CPD record shows that the member's CPD requirements have been fully met, these will be informed that they were selected for audit and have successfully auto-passed the audit
	For members selected for audit whose CPD records may indicate a fail by reason of any of the following - Submitted 3rd party CPD where supporting evidence is missing. - Submitted the completion of CPD which is prohibited under the CPD Scheme: - Logging more than 4 hours per topic per day, which counts towards their minimum 15 hour CPD requirement - Logging more than 8 hours in any one day, which counts towards their minimum 15 hour CPD requirement - Did not complete any specified function CPD hour(s) or Ethics hour - Duplicate CPD content - Submitted a false or misleading CPD return These will receive a communication as will their employer (as noted on their Institute record) to advise - The potential CPD Scheme fail scenario - The disciplinary action potentially applying which would be effective from 31st December of the preceding year. - The member's right to seek a correction of their CPD record,
March/ April	Members who make a submission to have their CPD record corrected and which is successful, will be deemed to have passed the audit successfully.
	Members who make no submission and/or members who make an unsuccessful submission to have their CPD record corrected, will have their records reviewed by the PSC when it meets in April
April	PSC meets to review CPD fails, make decisions and apply sanction(s) as appropriate. PSC decisions and sanction(s) are binding unless an appeal is made by the member and which is successful.
	Members and Employers are informed of the PSC decision and sanction(s) and members are granted a further 10 working days appeal period during which they may appeal any CPD Scheme fail findings, PSC decisions and sanctions.
May	After the expiry of the 10 working day appeal period; - The PSC Appeal Panel meets to consider appeals made in respect of the PSC decisions and sanction(s) as applied in April - The PSC Appeal Panel makes final decisions regarding appeals and sanctions. - The decisions and sanction(s) of the PSC Appeal Panel are binding.

4.3 Approximate timelines for the application of Disciplinary Action, and any appeals associated with same. (continued)

Approx timeline	Group C: Detailed Audit Members who have submitted CPD returns and who have been selected by random audit sample
May	• A communication is issued to members and employers(as noted on the member's Institute record) • To advise them of the PSC Appeal Panel outcome, for those who submitted appeals to the PSC Appeal Panel and • To confirm the application of the previously indicated PSC decisions and sanction(s) for the remainder of the Members who fall in to this cohort

4.4 Suspension and Reinstatement of a Professional Designation

The Insurance Institute's CPD Scheme applies to all professional designations awarded by the Institute regardless of whether the professional designation is listed in the CBI MCC.

The general insurance professional designations awarded by the Institute include:

- APA (Commercial General Insurance) (MCC recognised)
- APA (Personal General Insurance) (MCC recognised)
- APA (Private Medical Insurance) (MCC recognised)
- CIP (Certified Insurance Practitioner) (MCC recognised)
- CDip L.A. (Certified Diploma in Loss Adjusting) (MCC recognised)
- Certified Insurance Director (CID)
- MDI (Management Diploma in Insurance)
- CDip L.A. (Certified Diploma in Loss Adjusting) (MCC recognised)
- DLDC (Diploma in Life Disability Claims) (MCC recognised)
- DLDU (Diploma in Life Disability Underwriting) (MCC recognised)

General insurance professional designations previously awarded by the Institute include:

- Dip F.S. Ins (Financial Services Diploma)
- Dip PMI (Diploma in Private Medical Insurance) (MCC recognised)
- Dip L.A. (Diploma in Loss Adjusting) (MCC recognised)
- DLA (Diploma in Life Administration) (MCC recognised)

4.5 Suspension and Reinstatement of a Professional Designation (continued)

Life insurance professional designations awarded by the Institute to members who bridged with the LIA and/or IoB include:

- APA (Consumer Credit) (MCC recognised)
- APA (Life Assurance) (MCC recognised)
- APA (Loans) (MCC recognised)
- APA (Pensions) (MCC recognised)
- APA (Savings & Investments) (MCC recognised)

Professional Designations awarded by the Chartered Insurance Institute and are held by dual CII/III members of the Institute include:

- ACII (MCC recognised)
- FCII (MCC recognised)

Professional designations will be suspended with effect from 31st December in a given year, on the decision of the PSC (where a member makes no submission for the correction of a CPD record or whose submission has been unsuccessful). Professional designations will remain suspended where an appeal has been made to a PSC Appeal Panel which has not been upheld.

For a professional designation to be reinstated, please refer to the [CPD Scheme](#).

5. Data Protection & Privacy Policy and Confidentiality

5.1 Data Protection & Privacy Policy

Please refer to the Insurance Institute's Data Protection Policy by clicking on [this link](#).

5.2 Confidentiality

Members can be assured that the CPDCO, the PSC and the Institute will treat all communication exchanges and data arising from CPD record corrections and audits in the strictest confidence.

Any sensitive confidential information provided to the Institute in the course of a CPD record correction or audit will not be shared with employers (as noted on the member's Institute record).

A member's CPD compliance status (i.e. compliant, or in a fail scenario) will be shared with the employer (as noted on the member's Institute record) in order to allow the employer to fulfil their obligations under the Central Bank of Ireland's (CBI) Minimum Competency Code (MCC).

5.3 Written Communication

References to written communications in this document means email communication where an email address has been provided in the member's Institute record. It is the responsibility of members to maintain their up to date email address on their Institute record.

In the absence of an email address on the member's record, we will write to the postal address noted on the member's record.

The Institute may also place documentation into the member's Institute portal (under the "Exam Reports & Documents") for the member to login and review themselves.

It is the member's responsibility to ensure their Institute record, is always updated to reflect their current Employer.

6. Document Version Control Table

Date	Version Control	Brief summary of changes
December 2024	P.CPD Scheme Disciplinary Procedures v1	