



Institute
and Faculty
of Actuaries

Summary of Consultation Responses

Exposure Draft ED36:
Proposals for a new CPD Scheme

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1. Introduction



I am pleased to introduce this summary of the feedback received in response to the Institute and Faculty of Actuaries (IFoA) consultation paper,

Proposals for a new Continuing Professional Development (CPD) Scheme, issued by Regulation Board in January 2020.

The proposed Scheme set out to modernise the IFoA's approach to CPD, adopting elements of an outcomes approach, while removing requirements to record and audit. The objective was to protect the public interest in ongoing competence and to support Members in carrying out more meaningful learning with a view to maintaining their competence and developing further skills for the future.

The consultation was sent to all Members of the IFoA. Other key stakeholders, including other regulators and actuarial bodies were also invited to comment.

The consultation closed on 17 April 2020 and a large number of responses and comments were received. It was fantastic to see such high levels of engagement.

Thank you to all who took time to provide extremely comprehensive responses, and thanks also to those who took part in the consultation meetings and the surveys conducted at the research stage. I chaired one

of the webinar meetings and found it hugely informative.

There has been considerable support for the proposed Scheme, and the majority of changes to the requirements were very much welcomed. Your feedback did however lead Regulation Board to reconsider the need to keep a record of CPD activities. A record is a good starting point for a Reflective Practice Discussion, and as such, all Members will be required to keep their own record, in whatever form they prefer, to support these discussions.

Your other comments have been considered carefully by the IFoA and the Board, and will help us shape the material we produce to support the Scheme.

The introduction of the Scheme later this year will mark a key development in IFoA CPD requirements. Your support of this change demonstrates the profession's commitment to maintaining high standards in the quality of actuarial work through continued lifelong learning.

I hope you will find the consultation responses useful and informative. It is published in full save, as is our normal practice, where a respondent has requested confidentiality.

Thank you for your interest.

Neil Buckley

Chair of IFoA Regulation Board

2. Overview of the consultation, responses and feedback

2.1. The IFoA recently consulted upon a proposals for a new Continuing Professional Development Scheme (CPD Scheme). The consultation package can be found on the IFoA's website.¹ This document explains the outcome of that consultation process and sets out the IFoA's response to the feedback received.

Headline results

- 2.2.** The consultation had a very high rate of responses, with over 220 people and organisations responding to it.
- 2.3.** A significant majority of respondents support the proposals, with almost 88% considering the proposed Scheme to be an improvement on the current CPD requirements. The proposed requirement was also firmly backed by 93.49%².
- 2.4.** Amongst the most supported aspects of the proposed Scheme was the introduction of 'non-practising' status by 88.84% and allowing a broader range of activities to count towards meeting the requirement at 97.67%.
- 2.5.** The Scheme was welcomed by many for being more forward thinking, progressive, and modern.
- 2.6.** A summary of the results of the questionnaire are included at Appendix 1. In depth analysis of the more detailed comments is then set out at Appendix 2, along with the IFoA's response.

IFoA Response

- 2.7.** The IFoA were pleased to see the proposed Scheme welcomed by so many. Many respondents sent extremely positive comments and gave their support for the introduction of the Scheme.
- 2.8.** The IFoA intends to introduce the Scheme with it taking effect from 1st September 2020 alongside more detail on the practicalities.
- 2.9.** In light of some of the feedback, the IFoA were however persuaded that two changes to the proposed Scheme would improve it. First, the introduction of a requirement that Members keep a record of their CPD activities to support their Reflective Practice Discussions. Second, that it be made clearer that Members are required to have such a Discussion every CPD year with someone appropriate, regardless of whether they are also selected for one with the IFoA.
- 2.10.** The Scheme has therefore been amended, and is included at Appendix 3, with the version at Appendix 4 showing the changes.
- 2.11.** The responses also flagged a number of areas where further clarification about the new Scheme would be helpful. Those included:
- The criteria and process for applying for 'Non-Practising' status;
 - The programme of Reflective Practice Discussions and requirements; and
 - The corresponding changes to requirements for Practising Certificate (PC) Holders.
- 2.12.** Further guidance is being developed by the IFoA and will be shared in the lead up to the

¹ www.actuaries.org.uk/upholding-standards/regulatory-communications-and-consultations/current-consultations/consultation-p

² Further details on these stats are provided in Appendix 1.

new arrangements taking effect. The guidance will aim to support Members in meeting their obligations under the Scheme. In particular it will look at how to assess Learning Outcomes, the benefit that different types of activities can bring and how to hold Reflective Practice Discussions with 'Appropriate Persons'.

2.13. A programme of online events and other materials are also being produced to help members to prepare for the changes.

Background to the proposals

2.14. As explained in the consultation paper the IFoA has long had a scheme that sets out specific requirements for its Members in CPD, which builds upon the principles in the [Actuaries' Code](#)³.

2.15. The IFoA decided to review its approach to CPD which included looking at alternative possible approaches. Following this review, proposals were put to Regulation Board for a proposed Scheme.

2.16. The proposed Scheme was included in the consultation package published on 24 January 2020. It set out that:-

- All Members were subject to a requirement to carry out 15 hours of CPD activities every CPD year, including 2 hours of Professional Skills Training;

- The following Members would be exempt from the requirements:-
 - Students, whose requirements are set out in the Personal and Professional Development Scheme;
 - Those employed by an organisation accredited under the Quality Assurance Scheme, that opted to implement the outcomes focused QAS CPD Scheme;
 - Those with 'Non-Practising' status, who were not carrying out technical actuarial work;
- A wider range of activities could be counted as CPD;
- A sample of Members would be asked to participate in a 'Reflective Practice Discussion' with the IFoA to talk through their CPD activities, what they gained from them and how they could develop further; and
- Members would have to declare their compliance with the Scheme annually when renewing their Membership.

2.17. The questions posed in the Consultation Paper sought views on the above aspects of the proposals and invited comment and suggestions on the proposed Scheme as a whole.

³ The principles-based mandatory ethical Code applying to all Members of the IFoA, that prescribes, at principle three that "Members must carry out work competently and with care."

3. The consultation process

- 3.1. The consultation was published on 24 January and closed on 17 April 2020.
- 3.2. All Members were notified of the launch, along with a number of other interested parties.
- 3.3. Two consultation meetings were held in the form of webinars. Over 260 people joined over the course of the two meetings.

4. Conclusions and final proposals

- 4.1. The IFoA considered all of the comments and suggestions provided during the consultation process. This was one of the best responses, in terms of numbers, to an IFoA regulatory consultation, and a wide range of views were expressed.
- 4.2. The support for the proposed Scheme was extremely strong. On that basis the proposed Scheme will be implemented, subject to two amendments.
- 4.3. A compelling commentary was provided on the merits of recording CPD Activities. In particular that the Reflective Practice process would be more effective if Members were able to refer to a record.
- 4.4. The proposed Scheme has therefore been amended to require Members to keep a record in support of the Reflective Practice Discussions. However, the form of the record and the level detail included will be for the Member to decide.
- 4.5. Many respondents also suggested that the Scheme was not sufficiently clear that Members should have Reflective Practice Discussions every year, even if not selected for one with the IFoA. The proposed Scheme has been amended to make this clearer.
- 4.6. Details of the Scheme were also questioned by a number of respondents. The IFoA hopes that these can largely be addressed through guidance and further material that supports Members in being able to comply with the Scheme.

4.7. Many of the comments demonstrated where further clarity is required and other comments will shape the construction of the processes needed to implement the Scheme. Consideration was also given to the various alternative approaches that were proposed.

4.8. The IFoA's final proposal for the CPD Scheme is set out at Appendix 3, this recommendation having been approved by the IFoA's Regulation Board. The amendments that have been made are shown in the version included at Appendix 4.

5. Next Steps

Implementation of the Scheme

- 5.1. The Scheme will take effect from 1st September 2020. This means the first CPD year will run from that date until 31st August 2021. Special arrangements are being made for Practising Certificate Holders who currently have their own unique CPD years. More information on the details around those arrangements will be provided.
- 5.2. From 31st August 2021, Members will be asked to declare compliance with the CPD Scheme on renewal of their membership. The programme of Reflective Practice Discussions will also commence from that date.

Additional material and detail

- 5.3. In the meantime the IFoA will be producing material to better explain criteria around "Non-Practising" status, and will be carrying out a pilot of Reflective Practice Discussions with a view to firming up the detail and the process in advance of the programme coming into effect.

Appendix 1

Results of the Consultation

Summary of respondents to the consultation

- 1.1. A total of 215 people completed the online questionnaire, and a further 14 responses were received via email.
- 1.2. The names of those who responded to the consultation are included in a list at Appendix 4. Those individuals/organisations that asked for their details to remain confidential are not included in the list.
- 1.3. A report of the results to the questions in statistical form is included at Appendix 5.
- 1.4. The detailed responses to the consultation are set out at Appendix 6 (responses to the questionnaire) and Appendix 7 (other responses). Where respondents asked for their comments to be kept confidential they have not been included in these documents, but their feedback has been considered.
- 1.5. The vast majority of respondents to the questionnaire (82.55%) were based in the UK. All respondents were Members of the IFoA, with the majority (86.9%) holding Fellowship. Most practised in Life Insurance, followed by General Insurance, Pensions and Finance and Investment.
- 1.6. Most respondents were employed in an insurance company or re-insurer (51.71%), followed by actuarial consultancies, and 'other' types. Most were employed by organisations that employed large numbers of IFoA Members (31.22% reporting employment of over 101 Members).
- 1.7. The vast majority (a total of 197, being 92.92%) were providing their personal views in responding to the consultation and 18 responses were submitted with organisation's views. Most of the responses sent by email, were providing organisation's

views. This means a total of 23 organisations were represented in the consultation.

- 1.8. The Financial Reporting Council also provided feedback privately.

Summary of questionnaire responses

- 1.9. The overwhelming majority of respondents agreed that the proposed Scheme was an improvement to the IFoA CPD requirements currently in place, with 87.9% of respondents either strongly agreeing or agreeing⁴.

The proposed CPD requirement

- 1.10. The proposal to prescribe a single requirement for all Members was firmly backed by 93.49%⁵.
- 1.11. Most respondents also agreed that 2 hours of Professional Skills Training was a reasonable requirement for Members. 34.42% strongly agreed with this, and 46.51% agreed.
- 1.12. A very large percentage of respondents agreed that additional requirements for specific roles should be embedded within the criteria relating to that role, for example in the case of Practising Certificate holders. 39.07% strongly agreed with the proposition and 53.02% agreed.

Introducing 'Non-Practising' status

- 1.13. The proposal to introduce the status of 'Non-Practising' and exempt 'Non-Practising' Members from the CPD requirement was met with support. The majority agreed with the proposal (46.51%) and a very large number also strongly agreed it (42.33%).
- 1.14. Whilst most respondents agreed (40.93%) and many strongly agreed (23.26%) that those Members holding 'Non-Practising' status should be shown on a

⁴ With 48.37% strongly agreeing and 39.53% agreeing.

⁵ With 43.26% strongly agreeing, and 50.23% agreeing.

public register, interestingly over a third disagreed (36.28% in total).

1.15. When it came to the criteria for 'Non-Practising' status most respondents agreed with the proposal (70.70% agreeing and 15.35% strongly agreeing), however as this paper will go on to report many of those that agreed caveated such in their comments (see paragraph 1.32 in Appendix 2).

1.16. Around the same number of respondents also agreed that 'Non-Practising' was an appropriate description for the status (70.70% agreeing, 17.67% strongly agreeing).

1.17. Again, whilst there was strong support for an additional requirement for those with 'Non-Practising' status to indicate that status when holding themselves out as an IFoA Member (45.50% agreed and 25.12% strongly agreed), a large proportion did not agree with this (24.17% disagreed and 6.16% strongly disagreed).

Removing the requirement to record CPD

1.18. There was a varied response to the proposal to remove the requirement to record CPD. The proposal was not supported by over a third of respondents (25.23% disagreed and 12.62% strongly disagreed). Despite the majority supporting the removal of the requirement (33.18% agreed and 28.97% strongly agreed), the commentary provided by respondents set out some valid arguments for continuing to keep a record in some form, albeit leaving the form of the record up to the Member (no longer requiring use of the IFoA's system) and not requiring evidence of attendance to be provided at any stage.

1.19. As a result the proposed Scheme has been amended to include a requirement that Members keep a record of their CPD Activities to support their Reflective Practice Discussions.

Introducing Reflective Practice Discussions

1.20. A large number of respondents agreed with the proposal for Reflective Practice Discussions with 60.93% agreeing and 12.09% strongly agreeing. Over half of respondents also provided reasons for their response to this question, with many stating that their support of the concept was subject to the detail of the discussions being released. Helpfully, many respondents also provided their views on what the programme of discussions should look like, which is discussed further at paragraph 1.63 in Appendix 2.

1.21. Most respondents also agreed that the discussions will improve the IFoA's support of Members in their professional development (56.74% strongly agreed). However almost a third did not agree that this would be the case (26.51% disagreeing, and 4.65% strongly disagreeing).

1.22. In considering the responses it appeared that the Scheme was not sufficiently clear that Members have to take part in a Reflective Practice Discussion every year, irrespective of whether they are selected for a discussion with the IFoA or not. The Scheme has accordingly been amended.

1.23. To differentiate these discussions from the ones held with the IFoA, the requirement specifies that the discussion be held with an "Appropriate Person", which is defined in the glossary.

Broadening the types of activities

1.24. There was overwhelming support for the proposal to broaden the scope of activities that could be counted as CPD. 66.51% of respondents strongly agreed and 31.16% agreed, making this the most supported detail of the proposed Scheme.

Introducing a declaration of compliance

1.25. The proposal to introduce a requirement to make a declaration of compliance was also widely support, with 55.81% strongly agreeing and 39.07% agreeing.

1.26. The remaining questions were open ended and invited views and comments.

Conclusions

1.27. The proposed Scheme has therefore received very strong support from the respondents. There are no aspects of the proposed Scheme that have not received support from the majority of respondents. Subject to the two amendments detailed above, respondents very much agree with the introduction of the proposed CPD Scheme as set out.

Appendix 2

Summary of detailed responses and IFoA feedback

- 1.1. Many of the questions asked the respondent for further information on their views. This option was more often used by those that disagreed with the proposals, however many supporters also provided suggestions or offered explanations to their response.
- 1.2. The responses provided by email also contained many comments and insight into how respondents had reached their conclusions.
- 1.3. This section summarises the comments made and draws out the main themes.

General proposal for a new CPD Scheme

- 1.4. In response to being asked whether they agreed that the proposed new scheme was an improvement to the requirements currently in place, many offered a summary of their reasoning. Only a very small minority (total 13.03%) of respondents disagreed with this statement and gave the reasons for such, but many of those who agreed also provided comment.
- 1.5. A large number that agreed that the proposed Scheme was an improvement felt so because it put more emphasis on learning and moved the focus away from the bureaucracy of recording and auditing which many opined had created a perception of CPD being a 'tick box exercise'. Many stated the proposed Scheme was a better use of Member's time and that the Reflective Practice Discussion would be more beneficial to Members than mandating that a particular record and evidence be kept.
- 1.6. The proposal to broaden the types of activities that can be counted as CPD was cited by many as a reason to support the proposals, with a number of respondents stating that it was good to see the IFoA giving recognition to varied means of learning.

- 1.7. Many respondents commented that the proposals also put more focus on the individual's needs and development by allowing the Member to choose what topics to learn about, rather than mandating such.
- 1.8. There were many requests for further detail and clarity, in particular around the Reflective Practice Discussions and who would be eligible for 'Non-Practising' status, with some respondents stating they didn't wish to fully support the proposals without those details being released.
- 1.9. Many respondents welcomed the simplification of the proposed Scheme, with some counselling caution that the benefits of simplification could be undone with complex guidance.
- 1.10. With respect to the introduction of the 'Non-Practising' status, many voiced concern about particular Members being exempt from the CPD requirement. Many also stated they did not think it correct to base the criteria of the status on those doing technical actuarial work.
- 1.11. A lot of concern was expressed at the proposal to remove the recording requirement and disciplinary consequences, with many of those that disagreed with the proposals citing this as the main reason for their lack of support. Many thought that by not mandating recording many Members simply wouldn't do any CPD, and this could undermine trust in the profession.

Feedback from the IFoA

- 1.12. The IFoA was pleased to see such widespread support for the proposed Scheme, particularly given the proposals were constructed after listening to Members and gathering views on where they felt the current arrangements fell short.
- 1.13. The IFoA will not lose momentum in the drive for simplicity and ensure that the principles based approach is not undermined by overly complex guidance.

1.14. However the need for more detail and further guidance is recognised, and the IFoA hopes therefore to be able to publish more information about the arrangements around applying for 'Non-Practising' status and more detail on what the programme of Reflective Practice Discussions will look like in due course.

The proposed CPD requirement

1.15. There was strong support for the proposition of a single CPD requirement for all Members, however a number of respondents stated that support was on the condition that Practising Certificate holders continued to have an additional requirement set out elsewhere.

1.16. The majority of respondents commented that the single requirement kept the scheme simple, transparent and avoided confusion. Some went so far as to say setting out a single requirement also suggested an element of equitability amongst the Membership.

1.17. Some of the comments suggested it hadn't been clear that Practising Certificate holders would continue to have an additional requirement, or that students were exempt.

1.18. Many suggested (regardless of whether they supported the single requirement or not) that there were other factors that should be taken into account when determining how much CPD a Member should do. Such factors included where a Member was based, their level of seniority or experience, how often they have to exercise judgement, or the nature of their employment e.g. as a sole practitioner, working for a consultancy, or a large insurance company.

1.19. Similar comments were provided in response to the question whether any additional requirements for specific roles should be embedded in the criteria relating to that role (for example Practising Certificate holders).

1.20. There was a lot of support on the basis this would make the CPD scheme as

simple as possible. Many stated this would make the requirements clearer for Members as well as Practising Certificate holders.

1.21. There was some concern expressed that this attempt to make the CPD scheme simpler could make the Practising Certificate scheme more complicated.

1.22. When asked whether 15 hours of CPD activities, including 2 hours of Professional Skills Training, was a reasonable requirement, the overwhelming majority agreed.

1.23. There were a number of comments made about how the requirement was described. Some stated that the requirement shouldn't be billed as 'reasonable' given the Scheme was attempting to encourage Members to give more consideration to what learning was appropriate to their individual needs. Many suggested that the requirement should be treated as a minimum upon which the Member builds.

1.24. Those who supported the requirement described it as 'meaningful', 'not overbearing', and 'not onerous'. A number suggested that it was not costly to meet and was in line with what other professional bodies prescribe.

1.25. There was strong support for continuing to prescribe a Professional Skills Training requirement, and the relaxation of the definition was welcomed by many.

1.26. Some respondents disagreed with the proposals to stop mandating that Members attend external events. A number were concerned this could lead to group think, reduced networking opportunities and give employers, who often pay for CPD activities, an excuse not to fund Member's requests for such.

1.27. For those that did not agree with the proposed requirement, many stated given the types of activities that can be counted have been broadened, the requirement to do 15 hours was too low.

Feedback from the IFoA

- 1.28.** The IFoA was glad that the proposed requirement was welcomed by so many. The hours based requirement had been considered carefully with respect to what was appropriate for the membership both in terms of what was an appropriate volume of learning for Members and what was appropriate in light of what other professions require.
- 1.29.** On the factors that are taken into account when determining what the CPD requirement should be, the IFoA thanks respondents for offering up so many alternative options. It is hoped that the flexibility of the new Scheme and the introduction of the concept of reflective practice will allow Members to tailor their CPD plan to their own individual needs.
- 1.30.** The IFoA agrees that external training is important and will continue to encourage Members to look outside of what their employer is offering by way of training. However, in the spirit of affording Members more choice in their activities the IFoA is committed to not mandating any subjects, other than Professional Skills.
- 1.31.** Further amendments have been made to the Practising Certificates Scheme to provide clarification. In particular that Practising Certificate holders who work in organisations that adopt the QAS CPD Scheme are exempt from the additional CPD requirement in the Practising Certificate Scheme. More details on the Practising Certificate Scheme will be communicated to the certificate holders.

'Non-Practising' Status

- 1.32.** Whilst the proposal for the introduction of 'Non-Practising' status was supported by most respondents, with a total of 88.84% strongly agreeing and agreeing, a great deal of feedback was provided highlighting a wide range of views on the criteria behind the status.
- 1.33.** The proposal was welcomed by respondents noting that it was a sensible

method by which those who shouldn't be subject to a CPD requirement would be categorised as exempt.

- 1.34.** Many felt it was a good mechanism by which those who wanted to retain their Fellow or Associate membership could do so whilst being exempt from CPD if they met the criteria. Many recognised it would be used by retired Members, and so long as the status was denoted on a public register, there would be a low risk to the public interest.
- 1.35.** The prospect of the public register was supported by two thirds of respondents.
- 1.36.** The status was recognised by many as being a much more appropriate method to deal with those on parental or sick leave.
- 1.37.** In the case of those that disagreed entirely with the proposition, it was often in the belief that all Members should have to carry out CPD regardless of the work they are doing.
- 1.38.** It was suggested by many that more support be given to Members who cease having the status. Many respondents said that such Members should be offered help to ensure they are able to catch up on any developments, knowledge and training that might be necessary for them moving back into a so called 'practising' role.
- 1.39.** When considering the criteria set out for 'Non-Practising' status again despite there being strong support for the proposed wording (86.05% agreed or strongly agreed), a number of respondents expressed some reservations or concerns about how this might be applied.
- 1.40.** Some respondents stated that Members are often appointed to positions on the basis of their technical knowledge and past experience, for example, pension scheme trustees and Non-Executive directors. The positions don't always require them to carry out technical actuarial work. Respondents opined however that such Members are appointed on the basis of having done this work previously.

1.41. One respondent stated that there might be a risk in creating a ‘two tier’ definition of what it meant to be an actuary. Many suggested there was a risk to the public interest in allowing such Members to be exempt from the CPD requirement. One respondent suggested the IFoA provide clarity around the expectations of ‘Non-Practising’ Members in order to address this. Some respondents suggested that consideration be given as to the expectations of the user of the Member’s work or their employer.

1.42. Many respondents requested more guidance and clarity around what constitutes ‘technical actuarial work’. Some stated the criteria should in fact be narrowed so that only those not carrying out ‘actuarial work’ be eligible for the status and thus the exemption.

1.43. Comments were made that given there is no requirement to carry out technical CPD, it did not follow that only those carrying out technical actuarial work should be subject to the CPD requirement.

1.44. Many opined that ‘technical actuarial work’ is sometimes incorrectly considered to be restricted to the traditional fields of actuarial work. Some suggested it would be at odds with the IFoA’s objective of supporting Members already in or those looking to move in to those non-traditional roles, if the IFoA then labelled them ‘Non-Practising’.

1.45. With respect to what the status was called, the overwhelming majority agreed ‘Non-Practising’ was appropriate (total 88.37%), but a number did express reservations.

1.46. There was some concern that the title could wrongly be linked to ‘Practising Certificate holders’. Some suggested it was inappropriate to call those on a break ‘Non-Practising’ and that those Members should be recognised as only adopting the status temporarily. Some felt that it was unprofessional, and that it could be condescending.

1.47. The public’s perception was also cited as a concern, as it might not be clear to anyone outside the IFoA what the term actually meant. A few respondents also expressed concerns that labelling a Member of the IFoA ‘Non-Practising’ might detract from the value an actuary can bring to a particular role.

1.48. There was strong support for the suggestion that ‘Non-Practising’ Members should indicate that status when holding themselves out as an IFoA Member (total 70.62% agreeing and strongly agreeing), but it should be noted nearly a third (30.26%) did not agree with this.

Feedback from the IFoA

1.49. There will always be differing views on where the boundaries lie around who should be subject to a CPD requirement and who should not. The IFoA was therefore pleased to see so much support for the proposition of ‘Non-Practising’ status and the criteria for that status.

1.50. The responses indicate a demand for clear guidance on eligibility and a robust application process.

1.51. Further information and clarification will be produced around the definition of Technical Actuarial Work for the purposes of Non-Practising status applications.

1.52. Clarity will also be provided around how the status is billed. Users of actuarial work and the public are entitled to understand what the status means, otherwise a public register will not be useful in demonstrating who is subject to the CPD requirement.

Removing the requirement to record CPD

1.53. The proposition that the requirement to record CPD activities be removed from the IFoA’s CPD scheme was also strongly supported by two thirds of respondents, but was not supported by one third.

1.54. Some respondents expressed concern that the IFoA would no longer have

a mechanism by which to check that Members were meeting the hours based requirement. Many stated that without this check in place the IFoA would struggle to determine who was complying with the requirement and who was not.

1.55. Some explained that they did not think it appropriate to prescribe an hours based requirement then not require any evidence of meeting that.

1.56. For some, there was also concern expressed that removing the recording requirement might lead to the IFoA's CPD Scheme not being recognised by other actuarial or professional bodies.

1.57. For the majority of respondents that supported the removal, many of them welcomed this flexibility for Members, noting that Members would continue to have the option to record their CPD activities on the IFoA website because the facility would remain open.

1.58. A number of respondents stated that the requirement to record was unnecessary, bureaucratic and was a distraction that caused disengagement from the true focus of CPD – what is learned.

1.59. Overall, whilst there was support for the removal of the requirement as it stands, many respondents asserted the value of a record as part of the Reflective Practice Discussion process.

Feedback from the IFoA

1.60. The IFoA is committed to supporting Members in making better use of their time, to carry out more meaningful learning. The IFoA believes that that more meaningful CPD will come from focusing on what individuals get out of activities than on keeping a log of the number of hours and evidence of attendance.

1.61. Nonetheless the IFoA was persuaded that it would be beneficial for Members to keep a record of activities in order to assist their Reflective Practice Discussions. The Scheme has been amended accordingly.

1.62. For those that wish to continue recording on the IFoA website, the facility will still exist to do so and will be revamped so that it supports outcomes focused CPD and reflective practice activities (although the IFoA will no longer check the details of what is logged).

Introducing Reflective Practice Discussions

1.63. There was a huge amount of support from respondents for the introduction of Reflective Practice Discussions. Many recognised the value in the concept, and welcomed the change in focus of CPD to the outcomes of the activities. Some considered it was a better means of holding Members accountable for maintaining their competence.

1.64. Many respondents provided helpful suggestions as to how the programme of discussions should be run including how Members are selected, who the discussion should be with and what the outcomes should be. It was also highlighted that care should be taken on the part of the IFoA to ensure that the correct support was provided to Members selected for the discussions, as being selected could cause some stress.

1.65. Naturally, there was concern expressed by both those that supported the proposition and those against it around the details of the programme. Many were worried that the programme would be resource intensive for the IFoA, which could have an impact on subscriptions or could limit the number of discussions being held, which in turn could be detrimental to the effectiveness of the Scheme.

1.66. For those that disagreed with the proposal, most stated that they did not see the value in the discussions, particularly with a person unknown to them at the IFoA. Many also stated that the discussion would only be of use if it was with an actuary.

1.67. Some respondents felt that the discussions duplicated what was already going on with their employers, in firms and

companies, and it was unnecessary to also hold them with the IFoA.

Feedback from the IFoA

1.68. The responses demonstrate that many understand the concept of the discussions and the reasoning behind them, but the IFoA recognises that there is still some work to do around explaining that benefit and how it is anticipated this will work in practice: both in relation to the Reflective Practice discussions arranged by Members with peers or colleagues and in relation to the supported discussions held with the IFoA's team.

1.69. The IFoA also recognised from the feedback that the requirement to hold discussions away from the IFoA could be better articulated. As a result the wording of the Scheme has been amended slightly, to state such discussion should be held with an 'Appropriate Person'.

1.70. The IFoA is committed to building a programme of discussions that is appropriate for IFoA Members and a good use of IFoA resource. The discussions are a critical part of the proposed Scheme so it is imperative that they are effective.

1.71. The IFoA will be reaching out to the employers of Members to look at collaborative ways in which guidance can be put together to assist in this discussions being held at work as well as with the IFoA.

1.72. From the beginning of the process, when the Member is selected by the IFoA for a discussion, to the end, when they leave with a better understanding of their own learning needs and achievements in the year, the IFoA's overarching aim is to support. Therefore much will be done to ensure appropriate measures are put in place to make Members feel comfortable with the process.

1.73. More information on Reflective Practice will be made available in the lead up to the new Scheme coming into force.

Broadening the types of activities

1.74. The broadening of the types of activities that could count towards CPD requirement was welcomed by nearly all respondents, indeed only 13 out of 215 respondents disagreed with this.

1.75. Some respondents remarked that they had concerns that there would be little quality control on the activities that Members are counting toward their CPD.

Feedback from the IFoA

1.76. The IFoA was pleased that this part of the proposal received so much support, given it was a change many Members had requested for many years.

1.77. The IFoA firmly believes that the professional is best placed to determine what a suitable means of learning is for them. What is appropriate for the individual is affected by so many factors. So long as the Members can demonstrate a relevant learning outcome then that activity should count as CPD.

1.78. The IFoA will produce more guidance around assessing learning outcomes, particularly on those with reference to future roles.

Introducing a declaration of compliance

1.79. Again, there was very strong support for the introduction of a declaration of compliance.

1.80. Some doubted its effectiveness in driving Members to ensure that they have met their requirements, but many welcomed it straightforward mechanism by which the Member's mind could be focussed on the requirements.

Feedback from the IFoA

1.81. The IFoA thinks it important to allow Members to check in once a year, to bring focus to their CPD requirement. This will be introduced in September 2021.

Are there any aspects of CPD that you think have been overlooked in these proposals?

1.82. There were no common themes in the responses given to this question, however some interesting points were made.

1.83. First, it was suggested that the importance of developing soft skills had not been sufficiently highlighted in the consultation package and a request was made that moving forward the IFoA stress to Members that these skills are just as important as technical skills, and provide more support in developing them.

1.84. There were questions from many respondents, including other bodies, as to how the scheme would be recognised by other bodies' schemes and vice versa.

Feedback from the IFoA

1.85. The IFoA will assist Members in developing their soft skills and produce material accordingly.

1.86. The IFoA will liaise with the other bodies to discuss recognition of their schemes, however it was important that the IFoA construct a scheme that is first and foremost suitable for IFoA Members' needs.

Do you have any additional or alternative ideas about how the IFoA ought to regulate CPD?

1.87. Many respondents left comments in answer to this question, with most expressing concerns mentioned elsewhere in the consultation package. There were however some interesting suggestions on how the IFoA could regulate CPD.

1.88. One respondent suggested that IFoA Members that robots be used to audit the records of CPD activities instead of IFoA Executive staff.

1.89. Another respondent suggested that tests be set up online to allow Members to demonstrate their competence, knowledge

and be challenged on what they were learning.

1.90. It was suggested that Practising Certificate holders be responsible for the training of junior IFoA Members, with a view to bettering the competence of their colleagues.

1.91. Another respondent suggested that the requirement for the Reflective Practice Discussion could be met in house, if the IFoA produced some guidance or rules around what the discussions might look like. An appropriate person could be identified to have the discussion with, and the IFoA could audit the outcomes of the discussions.

1.92. The IFoA has been encouraged to make more use of smaller actuarial societies and regional communities, supporting them in putting on more events and also potentially allowing Members to meet their obligations for Reflective Practice Discussions or preparing for them.

1.93. There were many requests for case studies and examples from the IFoA as to what CPD looks like for different Members. Many asked for examples of the varying activities that could count, the learning outcomes that could be identified, and the process of reflecting on those activities.

Feedback from the IFoA

1.94. The IFoA thanks respondents for these suggestions, all of which will be considered when thinking about how the CPD Scheme is implemented and the material that is produced to support it.

Are there any impacts of the proposals that you feel have not been considered in this paper? If so, please explain what those are.

1.95. A number of respondents thought that the proposals would have varying impact on Members depending on their employment status and who their employer was. It was suggested that for those that

worked in large consultancies with good processes in place around development and appraisals and support for training, the Scheme would likely slot in with what they have in place.

1.96. However, many work for organisations that are not as supportive, where they may struggle to justify the expense of particular activities, and thus face challenges in partaking in activities that would meet their learning needs. Those in smaller organisations or sole practitioners may also find it problematic finding someone to have Reflective Practice Discussions with. This could lead to a disparity in how the proposed Scheme impacts Members.

1.97. Many respondents stated that the IFoA did not appear to have considered the impact of introducing Reflective Practice Discussions on Member's working lives. Some felt that the discussions could take a lot of time to prepare for and again, different employers may have different opinions on whether work time could be used for this purpose.

1.98. Some suggested that the IFoA should also consider the personal impact on the Member at being asked to take part in such a discussion in that it could cause stress, angst, and concern.

1.99. Many stated as mentioned above that the IFoA should consider the impact of the proposals on the CPD events being organised. Many think that employers may see the proposed Scheme as an excuse not to pay for Members to go to external events, thus leading to a reduction of opportunities to learn, network and share ideas.

Feedback from the IFoA

1.100. The IFoA will again take these concerns on board in preparing guidance for Members to support them in complying with the proposed CPD Scheme. In particular care will be taken over the guidance around the Reflective Practice Discussions. The IFoA will endeavour to offer care and support to mitigate any negative impact on

Members. The IFoA will also consider further what can be done to integrate the discussions with Member's working lives.

1.101. The provision of IFoA events and Member's attendance at external events should not be affected by the proposed Scheme, and the IFoA is committed to bettering its offering of events and material, to ensure that Members have access to useful, valuable learning opportunities.

Do you anticipate that there would be any practical or resource implications caused by the introduction of the proposed Scheme? If yes, what sort of implications do you anticipate?

1.102. Most comments made in response to this question cited the introduction of the Reflective Practice Discussion. Many were concerned by the resource required at the IFoA to effectively implement the programme noting that the effectiveness of the discussions would depend on the skills of the person conducting them and the number of discussions that could be held.

1.103. Again, the resource of the Members were raised as a concern in preparing properly for the Reflective Practice Discussions.

1.104. It was mentioned by many that the removal of the auditing regime would open up resources both of the Members and the IFoA, and that this was welcomed.

Feedback from the IFoA

1.105. The IFoA will ensure that sufficient resource is available to implement an effective programme of Reflective Practice Discussions, the details of which are now being considered.

If you wish to provide any other feedback not already covered then please do so here.

1.106. Many positive comments were made by respondents, celebrating the IFoA's

attempt to modernise, simplify and better the CPD scheme.

1.107. There were many requests for further details and guidance particularly on Reflective Practice Discussions, the activities that can develop soft skills, the

disciplinary consequences of breaking the Actuaries Code and examples of what that breaches are, and how Practising Certificate Holders transition to a new process around CPD.



Continuing Professional Development (CPD) Scheme

Version: 1.0, effective from 1 September 2020

Purpose: This CPD Scheme sets out the requirements applying to **Members** in relation to Continuing Professional Development. Those supplement the relevant provisions of the **Actuaries' Code**.

1. Application of CPD requirements

1.1. The requirements in this CPD Scheme apply to all **Members** except:

1.1.1. **Student Members;**

1.1.2. **QAS Members;** and

1.1.3. **Non-Practising Members**

1.2. **Members** that are on parental leave or absent from work for health reasons will be deemed to be **Non-Practising Members** for the purposes of the requirements of section 2 of this CPD Scheme.

1.3. When a **Member's** status in terms of paragraph 1.1 above varies during a CPD Period, the requirements set out in section 2 below will apply on a pro-rata basis using the dates that their status changed.

2. CPD requirements

2.1. **Members** must carry out 15 hours of **CPD Activities** during each **CPD Period**.

2.2. Two of those hours must constitute **Professional Skills Training**.

3. Monitoring and Reflective Practice

3.1. **Members** should participate in a **Reflective Practice Discussion** with an **Appropriate Person** every **CPD Period** regardless of whether they are selected in terms of paragraph 3.2 below or not.

3.2. **Members** must, if selected to do so, also participate in a **Reflective Practice Discussion** with the **IFoA**.

3.3. **Members** must keep a record of their **CPD Activities** for the previous **CPD Period**. This record will help support their **Reflective Practice Discussion(s)**. This may be facilitated using the **IFoA's Optional Recording System**.

4. Interpretation and application

- 4.1. This CPD Scheme uses the word “must” to mean a specific mandatory requirement. It uses the word “should” to indicate that, while the presumption is that **Members** will comply with the provision in question, there may be some circumstances in which **Members** are able to justify non-compliance.
- 4.2. In the event of any inconsistency between this CPD Scheme and the **Actuaries’ Code**, the **Actuaries’ Code** prevails.

Term	Definition
Actuarial Work	Work undertaken by a Member in their capacity as a person with actuarial skills on which the intended recipient of that work is entitled to rely. This may include carrying out calculations, modelling or the rendering of advice, recommendations, findings, or opinions.
Actuaries’ Code	The ethical professional code for Members issued by the Institute and Faculty of Actuaries.
Appropriate Person	An individual identified by the Member, who understands the nature of the Member’s Actuarial Work, their development and their Learning Outcomes. Such an individual could be a peer, a colleague, a line manager or a volunteer of the IFoA, amongst others.
CPD Requirements	The requirements imposed upon Members in relation to Continuing Professional Development including this CPD Scheme and the wider development and learning requirements of the Actuaries’ Code.
CPD Activities	Activities that involve development and learning relevant to a Member’s Actuarial Work (current or future) or professional development, which address a personal development need and have an identifiable Learning Outcome. Those activities can be wide ranging and include, for example, lectures, seminars, workshops, webinars, personal reading and research. It could also potentially include carrying out Actuarial Work where that has a relevant Learning Outcome.
CPD Period	The period between 1 September and 31 August.
IFoA	The Institute and Faculty of Actuaries.
Learning Outcome	Knowledge and/or skills which the Member gained as a result of taking part in an activity.

Member	A member of the IFoA
Non-Practising Member	A Member that has been registered, following application, with the IFoA as 'Non-Practising'. This may include, for example, Members that are: retired from actuarial practice; not carrying out technical Actuarial Work; or on a career break.
Optional Recording System	The IFoA's non-mandatory CPD recording system, available for use by Members to assist with keeping track of CPD Activities and recording Learning Outcomes
Professional Skills Training	CPD Activities with a Learning Outcome related to managing professional ethical challenges.
Reflective Practice Discussion	A discussion to allow the Member to reflect on the CPD Activities carried out during the previous CPD Period, Learning Outcomes achieved and how they have applied what was learnt; as well as to discuss how they intend to approach future development and learning, including anticipated other work and/or roles.
Student Member	A Member that is not a Fellow, Associate, Affiliate, Honorary Fellow, or Certified Actuarial Analyst.
QAS Member	A Member that is employed by an organisation or part of an organisation accredited under the Quality Assurance Scheme, that is registered with the IFoA as being part of the QAS CPD Scheme
QAS CPD Scheme	The outcomes focused CPD scheme available to organisations accredited under the Quality Assurance Scheme.



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3. Monitoring and Reflective Practice

3.1. **Members** should participate in a **Reflective Practice Discussion** with an **Appropriate Person** every **CPD Period** regardless of whether they are selected in terms of paragraph 3.2 below or not.

3.1.3.2. **Members** must, if selected to do so, also participate in a **Reflective Practice Discussion** with the IFoA.

~~1.1. Members should prepare for such a Reflective Practice Discussion every CPD Period.~~

~~3.2.3.3. Members must ensure they are in keep a position to explain how they have met record of their CPD Requirements Activities for the previous CPD Period where asked by the IFoA to do so. This record will help support their Reflective Practice Discussion(s).~~ This may be facilitated using the IFoA's Optional Recording System.

4. Interpretation and application

- 4.1. This CPD Scheme uses the word "must" to mean a specific mandatory requirement. It uses the word "should" to indicate that, while the presumption is that **Members** will comply with the provision in question, there may be some circumstances in which **Members** are able to justify non-compliance.
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Actuaries' Code	The ethical professional code for Members issued by the Institute and Faculty of Actuaries.
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QAS Member	A Member that is employed by an organisation or part of an organisation accredited under the Quality Assurance Scheme, that is registered with the IFoA as being part of the QAS CPD Scheme
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Appendix 5

List of respondents

This is a list of all individuals, businesses and organisations that responded. Some respondents requested their names or their organisation's name remain confidential, so are not reported here.

Responses were submitted through different means. In cases where correspondence was received via email and it was not clear that it was a formal response, the contributor has been acknowledged and their comments considered, but their email not included.

Individuals

	Andrew Hammacott
Deborah Cooper	Kathryn Morgan
Alicia Rollo	Matthew Wilmot
Jenny Condron	Fiona Morrison
Willis Towers Watson	Alastair Clarkson
Julian Hough	Tim Taylor
Aidan Smith	David Robinson
Alexandra Bertomeu-Gilles	Malcolm Slee
Doug Huggins	Seamus Creedon
James Maule	Paul McHugh
Helen Howell	Peter Boreham
Jason Fish	Michael Rae
Richard Lamb	Zahra Hosseinzadeh
Emma Moon	Simon Dudley
Colin Dickie	Michael Callan
Sarah Elwine	Grant Mitchell
Nick Foster	Daniel Robinson
Colin Czapiewski	Robert David Campbell
Carole Dick	Elgon Corner
David Lamb	Steve Jones
Ben Thomas	Ashok Gupta
Darren Michaels	Alan Rankine
Amy Fulham	Paul Martin
Mike Clark	Nicholas Yeo

Craig Scott

Rachel O'Connell

Dhairya Parikh

Steve Nicholson

Raj Chaurasia

Christo Geyer

Daniel Fryett

Antonia Balaam

David Salisbury

Jeremy Hill

Dziwana Shawa

Frank Munro

Mark Graham

Philip Wadsworth

Stephen Hainsworth

Souvik Jash

Chris Dolman

Stuart Palmer

Ian MacKenzie

Farooq Hanif

Stephanie Lane

James Lawson

Clare Keeffe

Steph Willcox

Rebecca Sardar

Patrick Cleary

Christopher Makomereh

Richard Varley

Businesses and organisations

Financial Reporting Council

Mercer Ltd

Canadian Institute of Actuaries

Willis Towers Watson

XPS Pensions Group

Government Actuary's Department

The Blockchain Actuary

Lane Clark & Peacock (LCP)

Pension Protection Fund

Hymans Robertson LLP

Ario Advisory

Hammacott Services Limited

Standard Life Aberdeen plc

Nicholas Actuarial Solutions

Standard Chartered Bank

Actuaries Institute (Australia)

Actuarial Society of South Africa

Society of Actuaries in Ireland

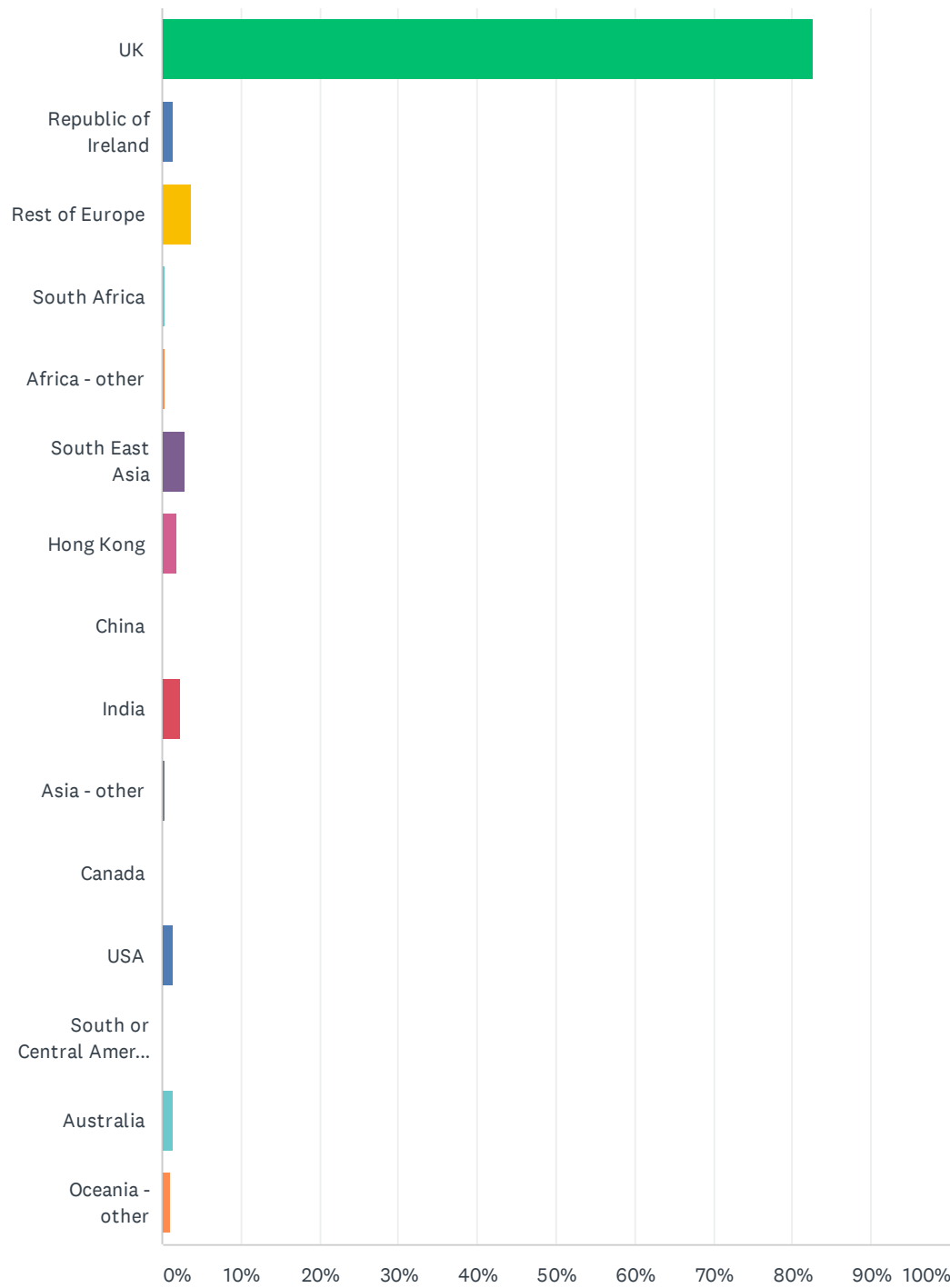
PricewaterhouseCoopers LLP

Appendix 6

Questionnaire Results

Q3 Region

Answered: 212 Skipped: 3

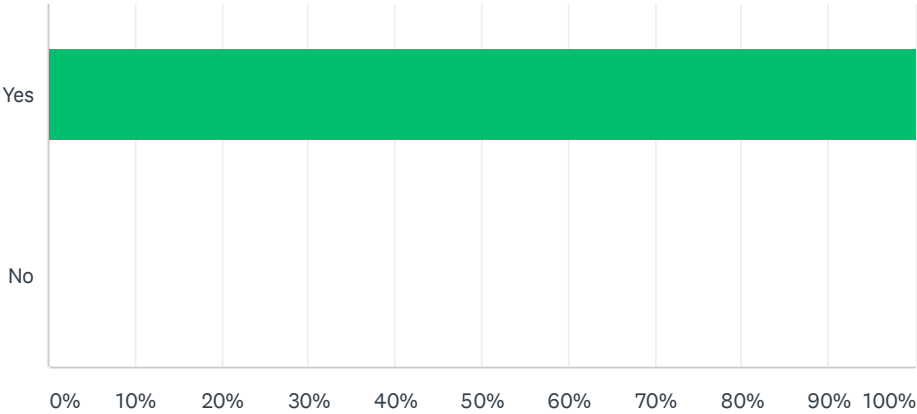


CPD Review Consultation

ANSWER CHOICES	RESPONSES	
UK	82.55%	175
Republic of Ireland	1.42%	3
Rest of Europe	3.77%	8
South Africa	0.47%	1
Africa - other	0.47%	1
South East Asia	2.83%	6
Hong Kong	1.89%	4
China	0.00%	0
India	2.36%	5
Asia - other	0.47%	1
Canada	0.00%	0
USA	1.42%	3
South or Central America	0.00%	0
Australia	1.42%	3
Oceania - other	0.94%	2
TOTAL		212

Q4 Are you a member of the IFoA?

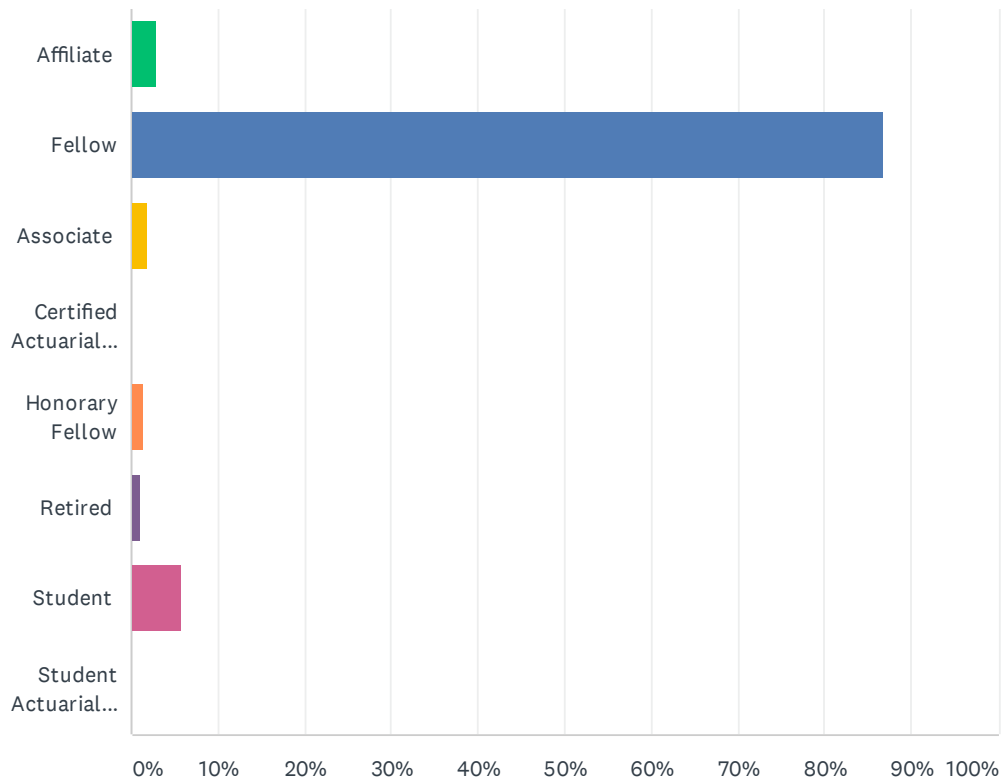
Answered: 214 Skipped: 1



ANSWER CHOICES		RESPONSES	
Yes		100.00%	214
No		0.00%	0
TOTAL			214

Q5 If yes, which category of membership do you hold?

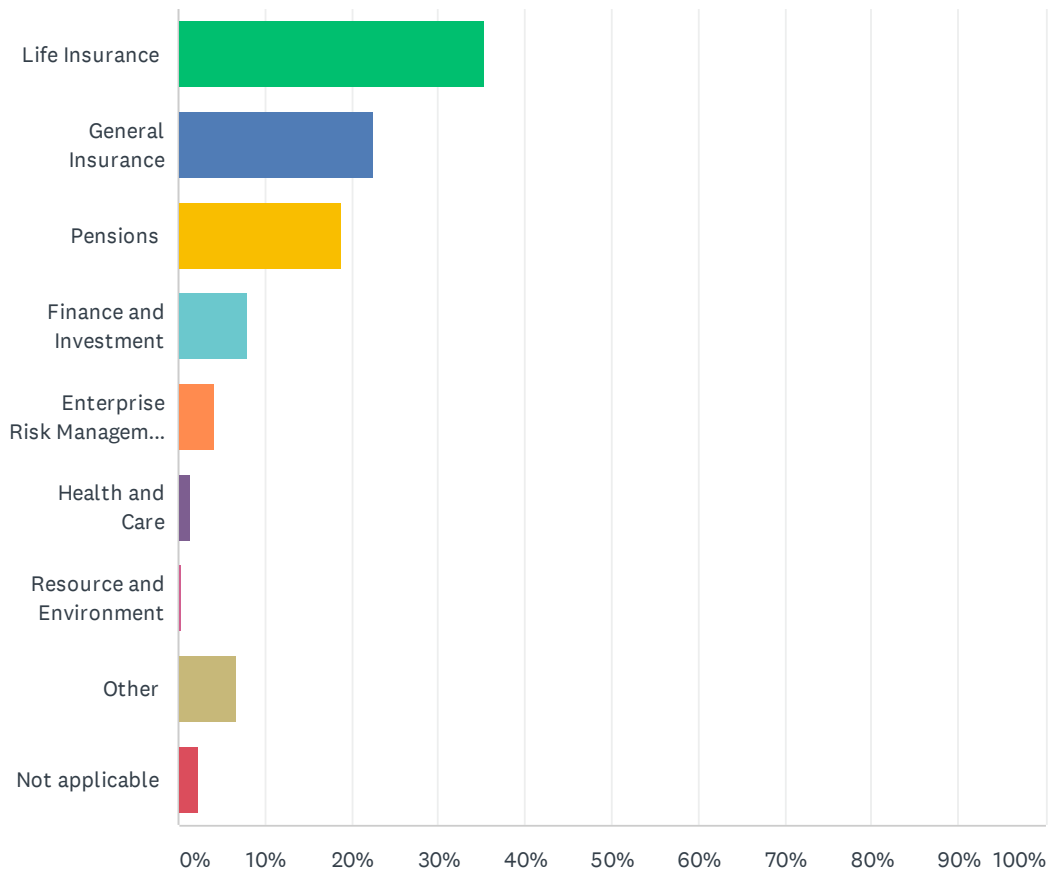
Answered: 206 Skipped: 9



ANSWER CHOICES	RESPONSES	
Affiliate	2.91%	6
Fellow	86.89%	179
Associate	1.94%	4
Certified Actuarial Analyst	0.00%	0
Honorary Fellow	1.46%	3
Retired	0.97%	2
Student	5.83%	12
Student Actuarial Analyst	0.00%	0
TOTAL		206

Q6 If you are an actuary, what is your main practice area?

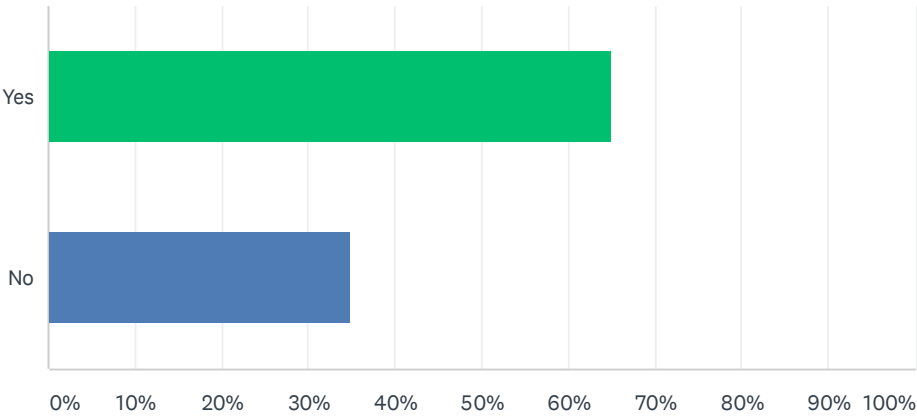
Answered: 212 Skipped: 3



ANSWER CHOICES	RESPONSES	
Life Insurance	35.38%	75
General Insurance	22.64%	48
Pensions	18.87%	40
Finance and Investment	8.02%	17
Enterprise Risk Management	4.25%	9
Health and Care	1.42%	3
Resource and Environment	0.47%	1
Other	6.60%	14
Not applicable	2.36%	5
TOTAL		212

Q7 Do you want your name to remain confidential?

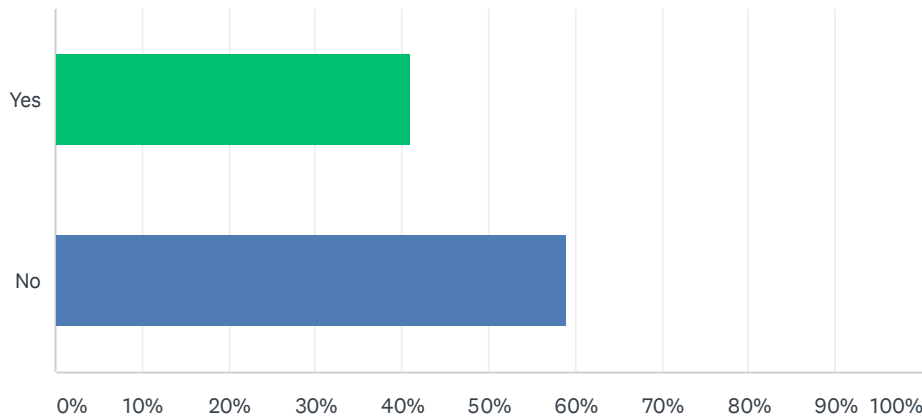
Answered: 212 Skipped: 3



ANSWER CHOICES		RESPONSES	
Yes		65.09%	138
No		34.91%	74
TOTAL			212

Q8 Do you want your comments to remain confidential?

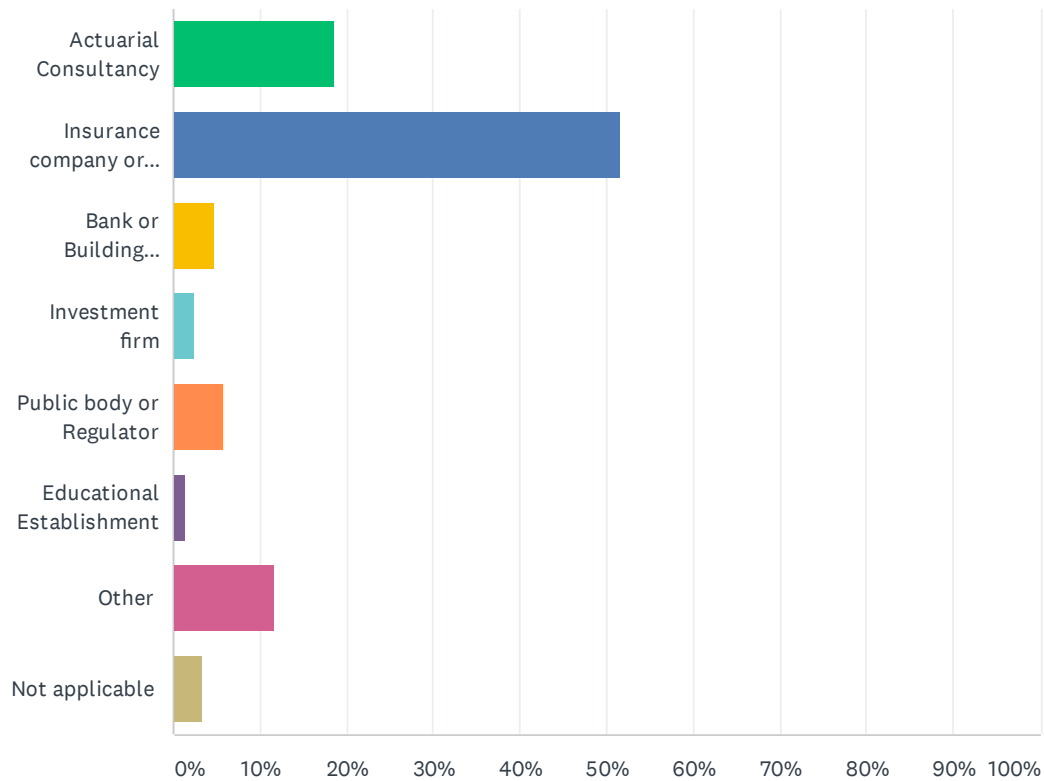
Answered: 212 Skipped: 3



ANSWER CHOICES		RESPONSES	
Yes		41.04%	87
No		58.96%	125
TOTAL			212

Q10 Type of organisation (choose one option only)

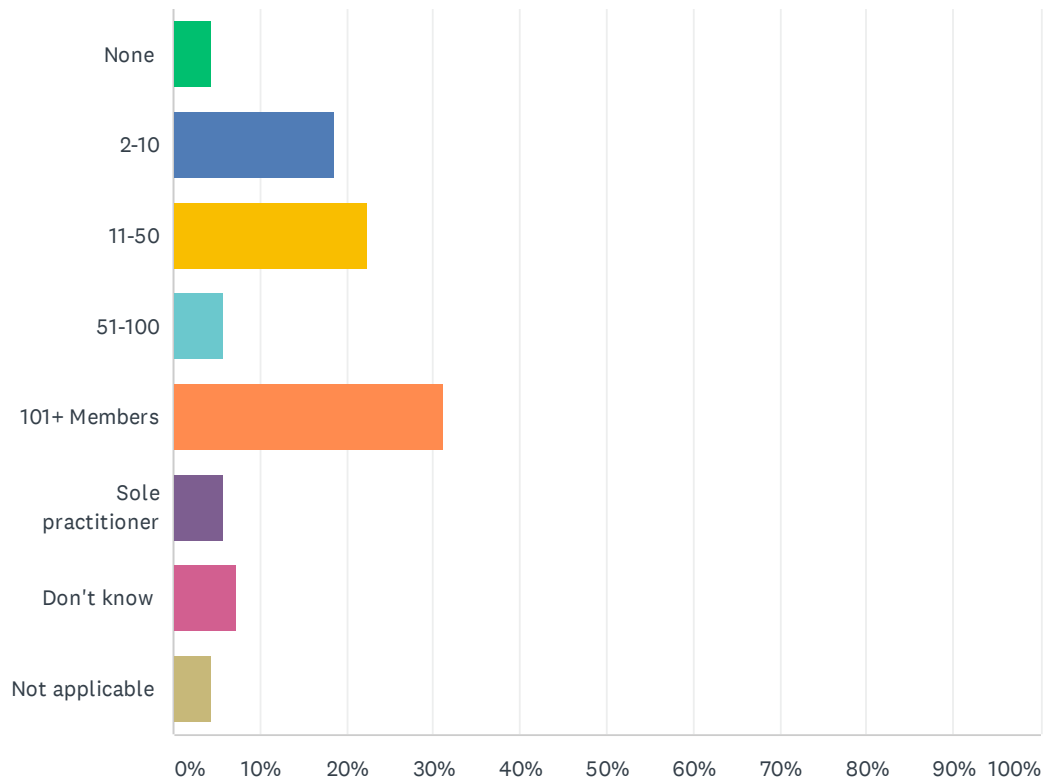
Answered: 205 Skipped: 10



ANSWER CHOICES	RESPONSES	
Actuarial Consultancy	18.54%	38
Insurance company or re-insurer	51.71%	106
Bank or Building Society	4.88%	10
Investment firm	2.44%	5
Public body or Regulator	5.85%	12
Educational Establishment	1.46%	3
Other	11.71%	24
Not applicable	3.41%	7
TOTAL		205

Q11 How many IFoA members (if any) does your organisation employ?

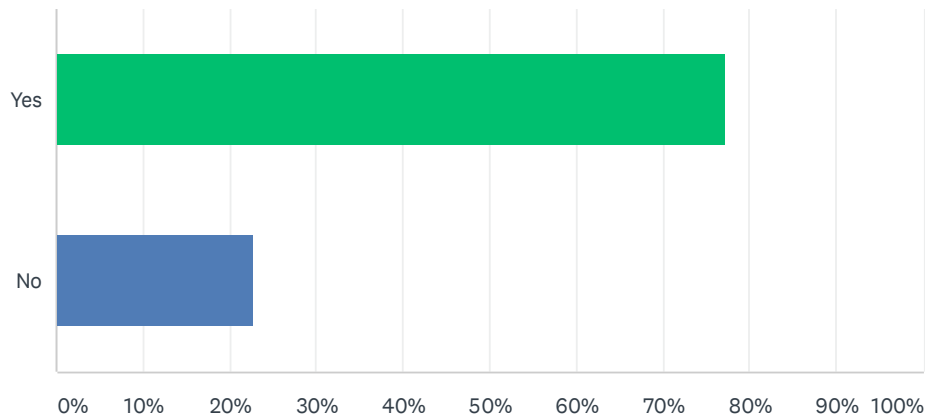
Answered: 205 Skipped: 10



ANSWER CHOICES	RESPONSES	
None	4.39%	9
2-10	18.54%	38
11-50	22.44%	46
51-100	5.85%	12
101+ Members	31.22%	64
Sole practitioner	5.85%	12
Don't know	7.32%	15
Not applicable	4.39%	9
TOTAL		205

Q12 Do you want the name of your organisation to remain confidential?

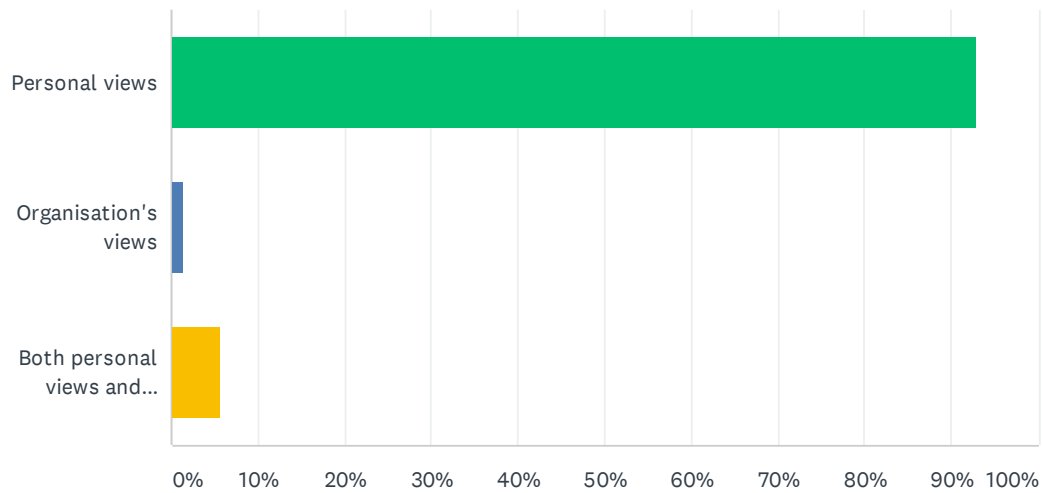
Answered: 201 Skipped: 14



ANSWER CHOICES		RESPONSES	
Yes		77.11%	155
No		22.89%	46
TOTAL			201

Q13 Do these comments represent your own personal views or your organisation's views?

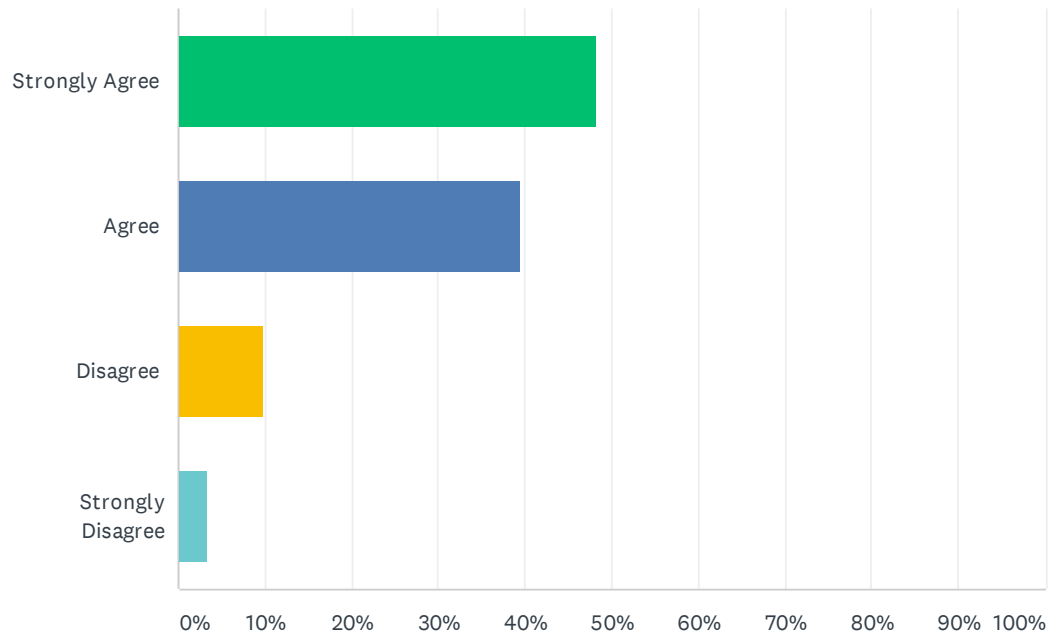
Answered: 212 Skipped: 3



ANSWER CHOICES	RESPONSES	
Personal views	92.92%	197
Organisation's views	1.42%	3
Both personal views and organisation's views	5.66%	12
TOTAL		212

Q14 To what extent do you agree or disagree that the proposed new scheme is, overall, an improvement to the IFoA CPD requirements currently in place?

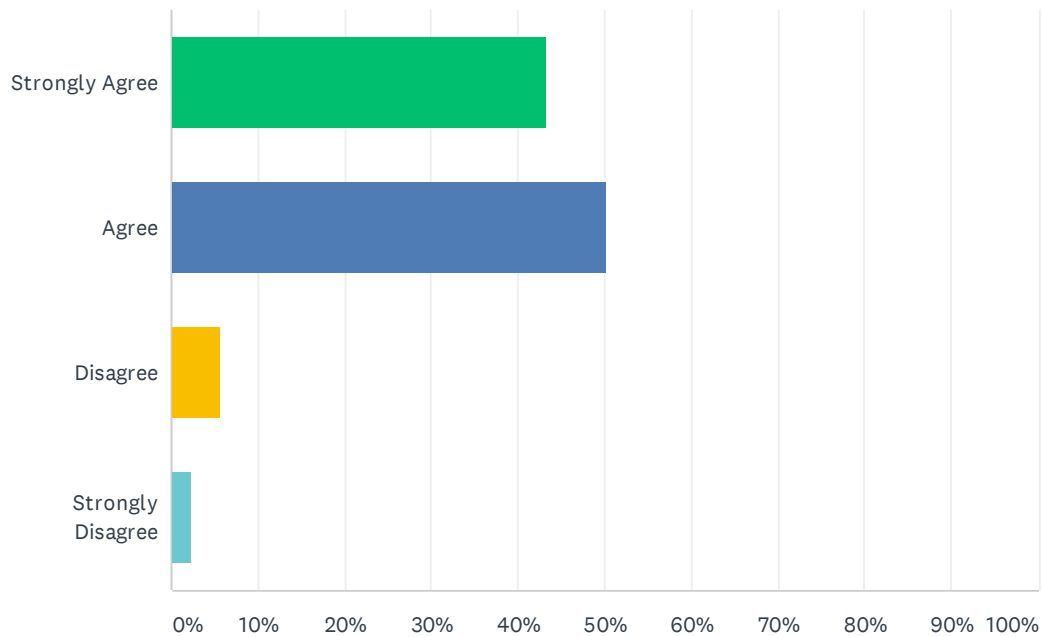
Answered: 215 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly Agree	48.37%	104
Agree	39.53%	85
Disagree	9.77%	21
Strongly Disagree	3.26%	7
Total Respondents: 215		

Q15 To what extent do you agree or disagree with the proposal to prescribe a single requirement for all Members?

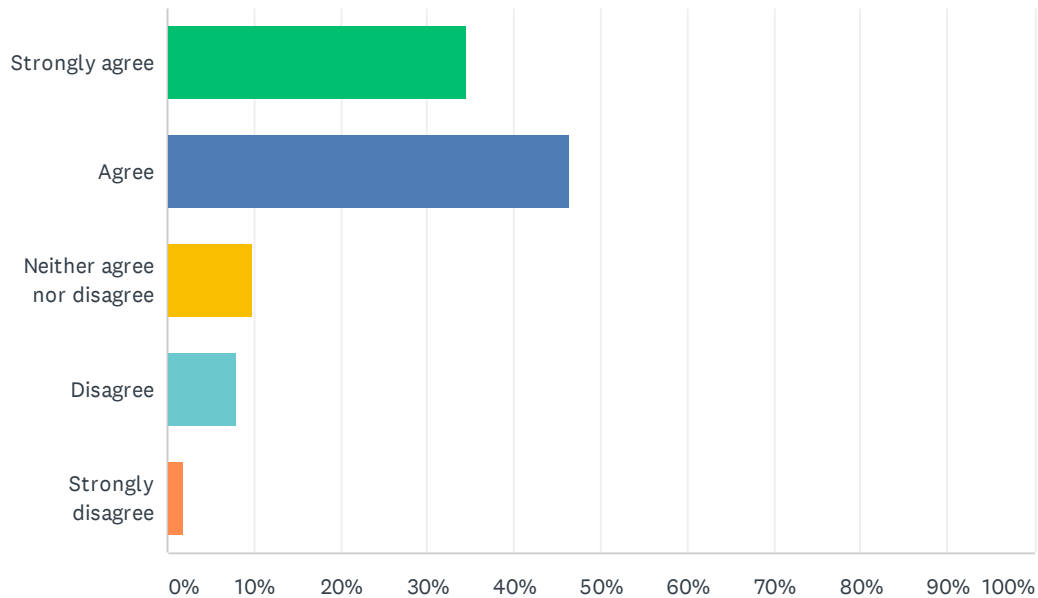
Answered: 215 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly Agree	43.26%	93
Agree	50.23%	108
Disagree	5.58%	12
Strongly Disagree	2.33%	5
Total Respondents: 215		

Q16 To what extent do you agree that 15 hours of CPD Activities including 2 hours of Professional Skills Training is a reasonable requirement for members of the Profession?

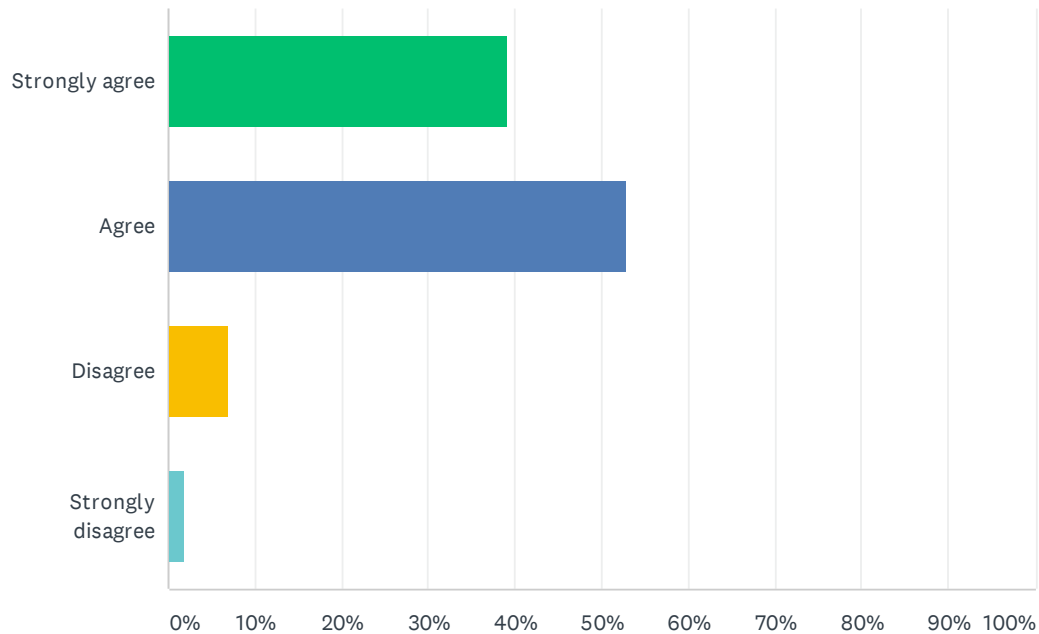
Answered: 215 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly agree	34.42%	74
Agree	46.51%	100
Neither agree nor disagree	9.77%	21
Disagree	7.91%	17
Strongly disagree	1.86%	4
Total Respondents: 215		

Q17 To what extent do you agree that any additional requirements for specific roles should be embedded within the criteria relating to that role (for example Practicing Certificate holders)?

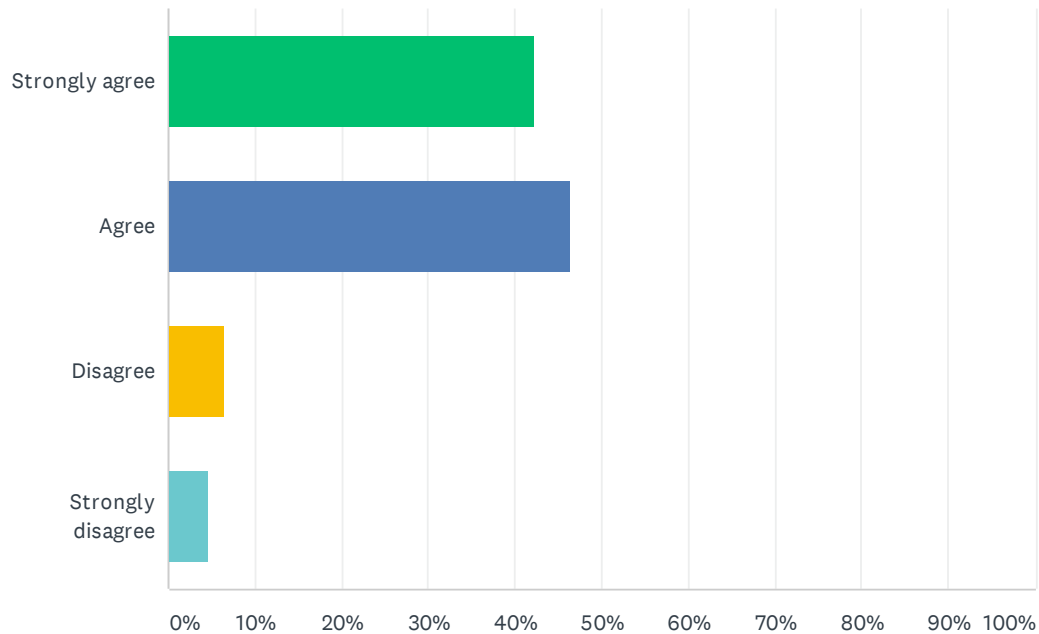
Answered: 215 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly agree	39.07%	84
Agree	53.02%	114
Disagree	6.98%	15
Strongly disagree	1.86%	4
Total Respondents: 215		

Q18 To what extent do you agree with the proposals to exempt from the CPD Scheme Members that meet the requirements of Non-Practicing status?

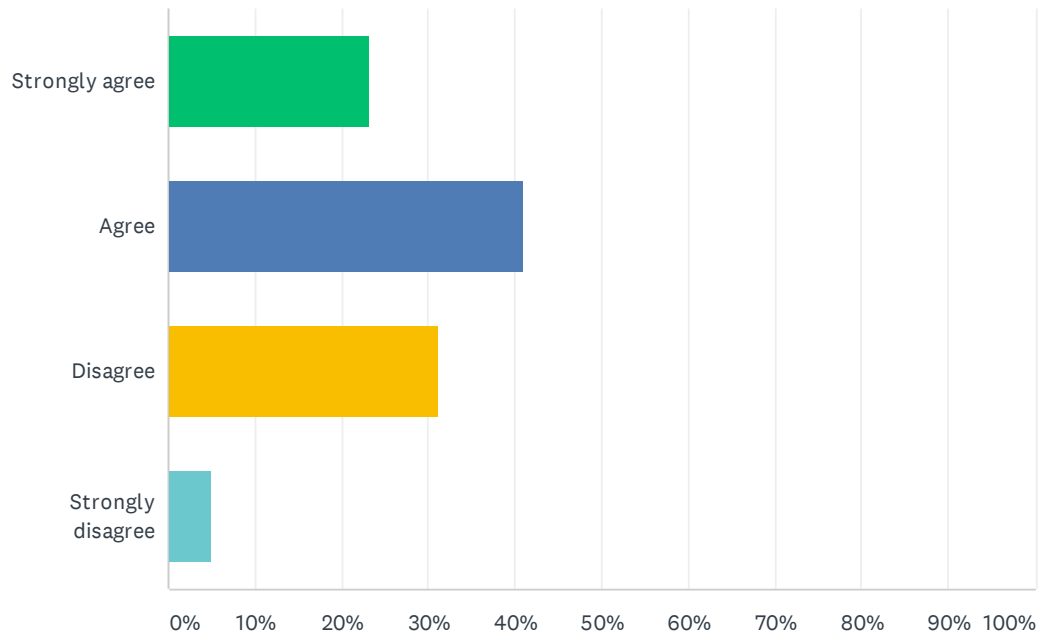
Answered: 215 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly agree	42.33%	91
Agree	46.51%	100
Disagree	6.51%	14
Strongly disagree	4.65%	10
Total Respondents: 215		

Q19 To what extent do you agree that those holding non-practicing status (except those on sick or parental leave) should be shown on a public register?

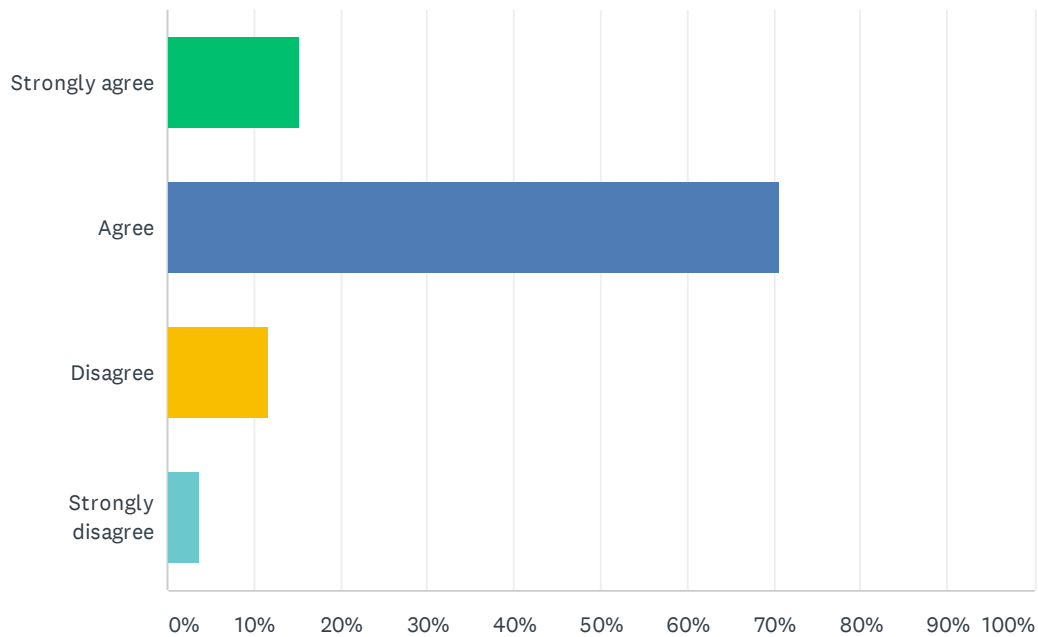
Answered: 215 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly agree	23.26%	50
Agree	40.93%	88
Disagree	31.16%	67
Strongly disagree	5.12%	11
Total Respondents: 215		

Q20 Do you agree that the proposed criteria for 'Non-Practicing' is appropriate?

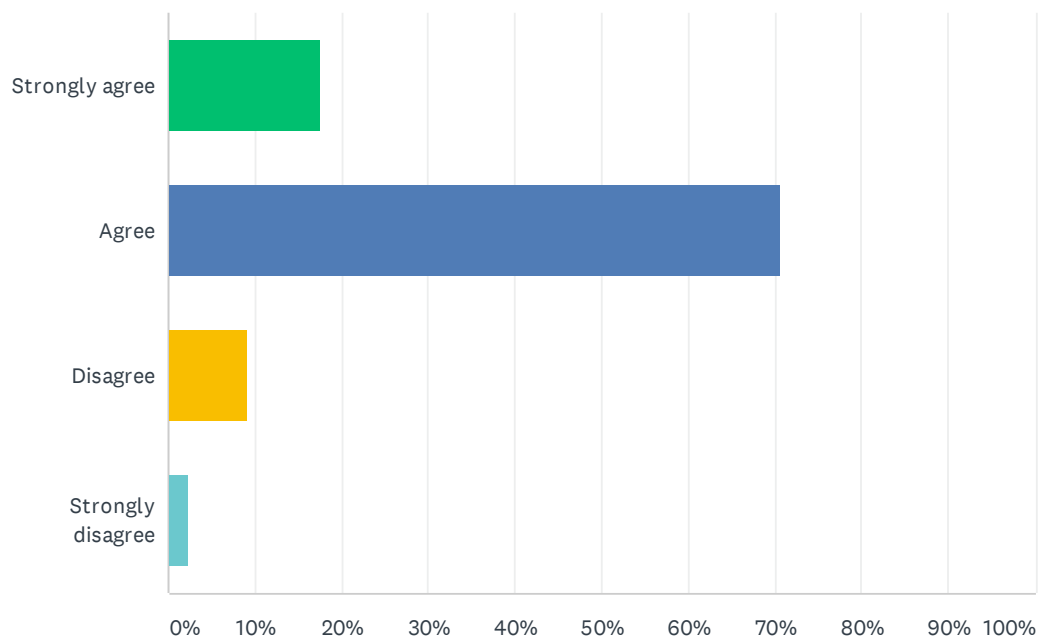
Answered: 215 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly agree	15.35%	33
Agree	70.70%	152
Disagree	11.63%	25
Strongly disagree	3.72%	8
Total Respondents: 215		

Q21 Do you agree that 'Non-Practising' is an appropriate description for that status?

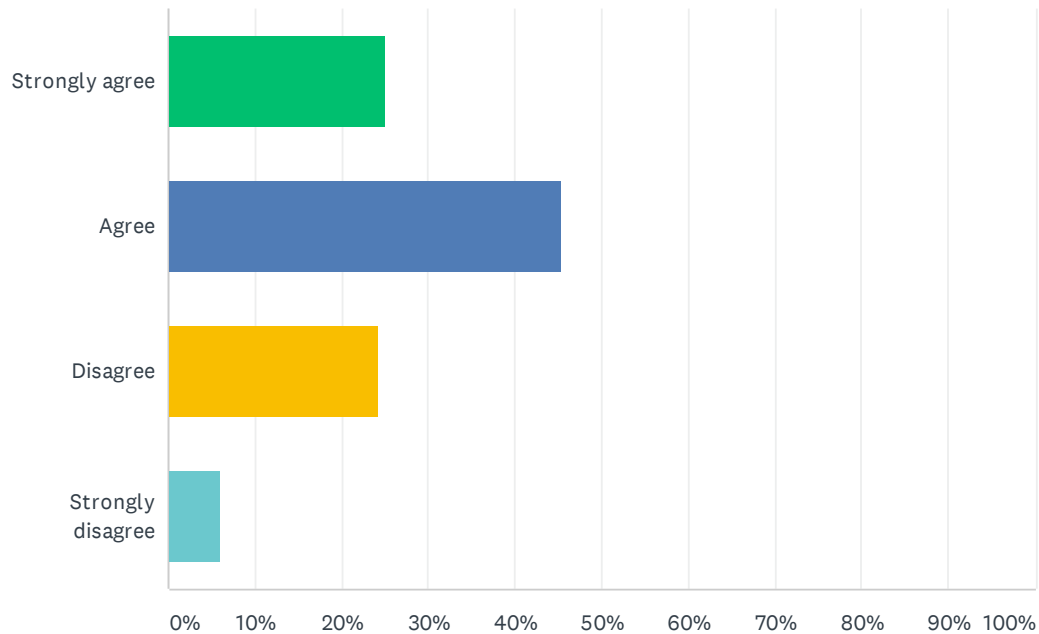
Answered: 215 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly agree	17.67%	38
Agree	70.70%	152
Disagree	9.30%	20
Strongly disagree	2.33%	5
Total Respondents: 215		

Q22 Do you agree that there should be an additional requirement for those with 'Non-Practising' Status to indicate that status when holding themselves out as an IFoA Member?

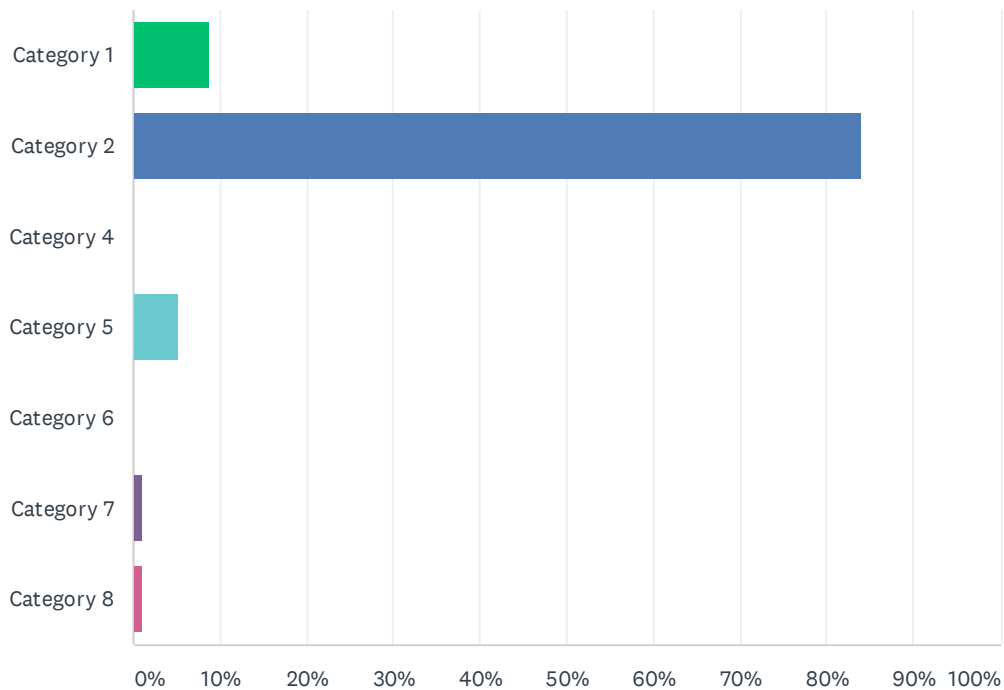
Answered: 211 Skipped: 4



ANSWER CHOICES	RESPONSES	
Strongly agree	25.12%	53
Agree	45.50%	96
Disagree	24.17%	51
Strongly disagree	6.16%	13
Total Respondents: 211		

Q23 If you are an individual IFoA Member: Please indicate your current CPD Category:

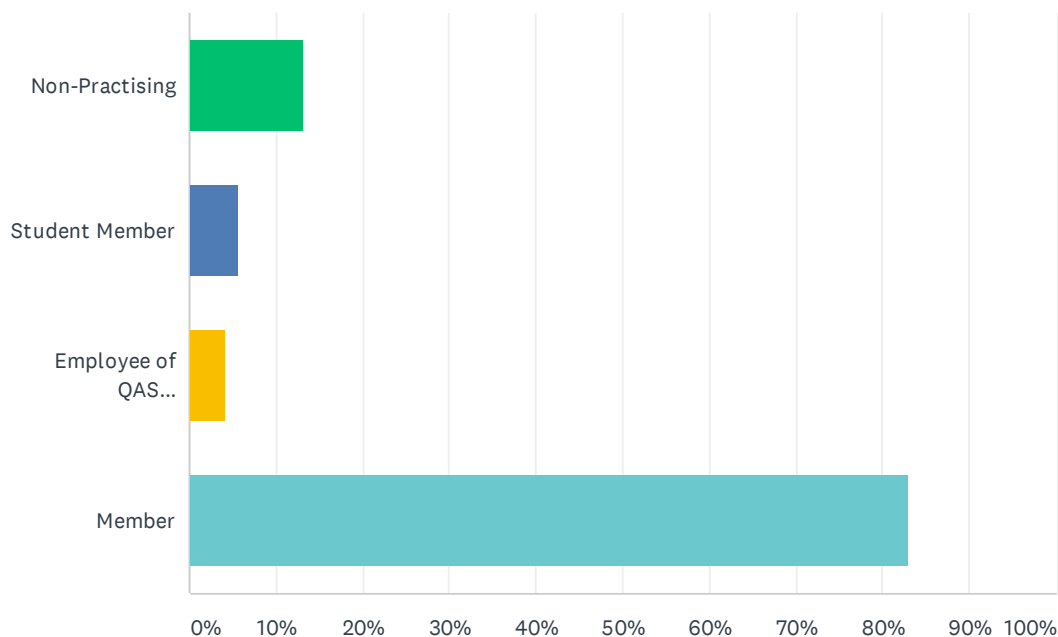
Answered: 207 Skipped: 8



ANSWER CHOICES	RESPONSES	
Category 1	8.70%	18
Category 2	84.06%	174
Category 4	0.00%	0
Category 5	5.31%	11
Category 6	0.00%	0
Category 7	0.97%	2
Category 8	0.97%	2
TOTAL		207

Q24 On the basis of the proposed new Scheme, please indicate which of the following would you currently fall into (tick all that apply):

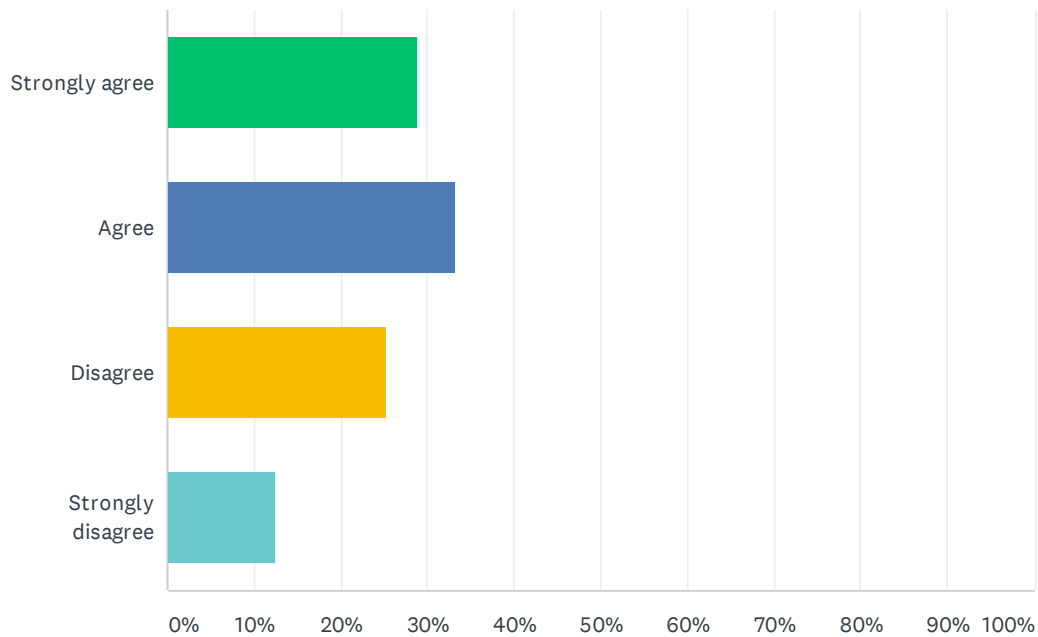
Answered: 213 Skipped: 2



ANSWER CHOICES	RESPONSES	
Non-Practising	13.15%	28
Student Member	5.63%	12
Employee of QAS organisation that implements the QAS CPD Scheme	4.23%	9
Member	83.10%	177
Total Respondents: 213		

Q25 Do you agree with removing the requirement to record CPD activities?

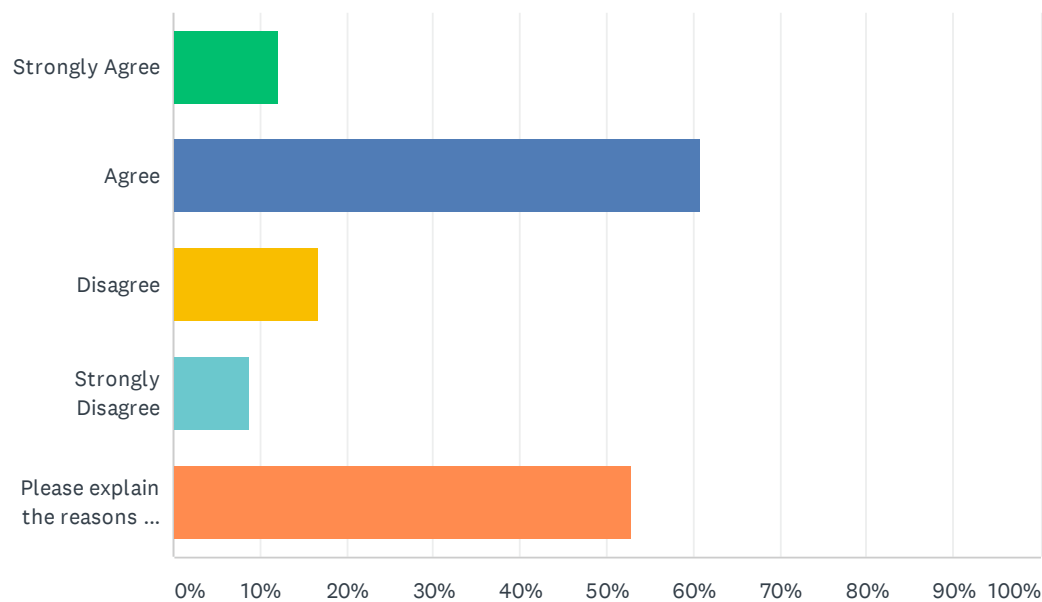
Answered: 214 Skipped: 1



ANSWER CHOICES	RESPONSES	
Strongly agree	28.97%	62
Agree	33.18%	71
Disagree	25.23%	54
Strongly disagree	12.62%	27
Total Respondents: 214		

Q26 To what extent do you agree or disagree with the proposal for reflective practice discussions?

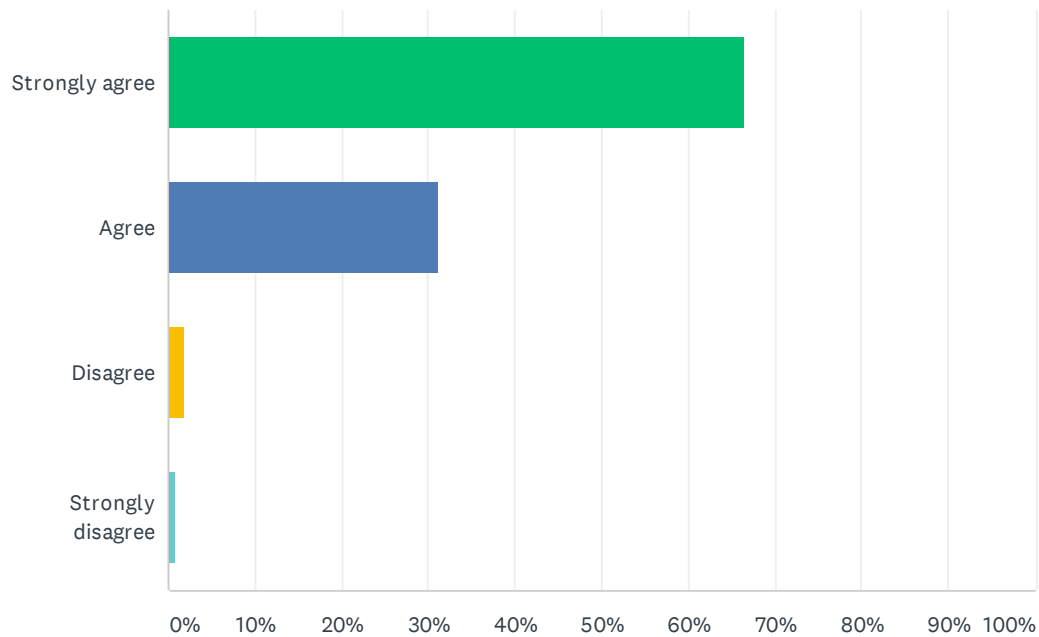
Answered: 215 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly Agree	12.09%	26
Agree	60.93%	131
Disagree	16.74%	36
Strongly Disagree	8.84%	19
Please explain the reasons for your response	53.02%	114
Total Respondents: 215		

Q27 To what extent do you agree with the scope of CPD activities being broadened?

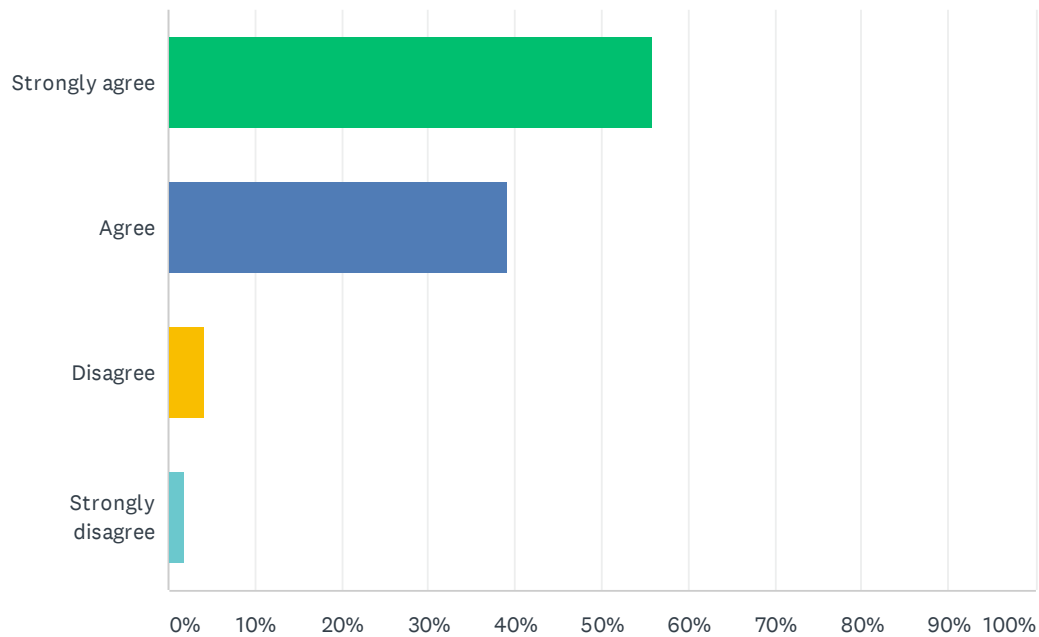
Answered: 215 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly agree	66.51%	143
Agree	31.16%	67
Disagree	1.86%	4
Strongly disagree	0.93%	2
Total Respondents: 215		

Q28 Do you agree with the requirement to make a declaration of compliance?

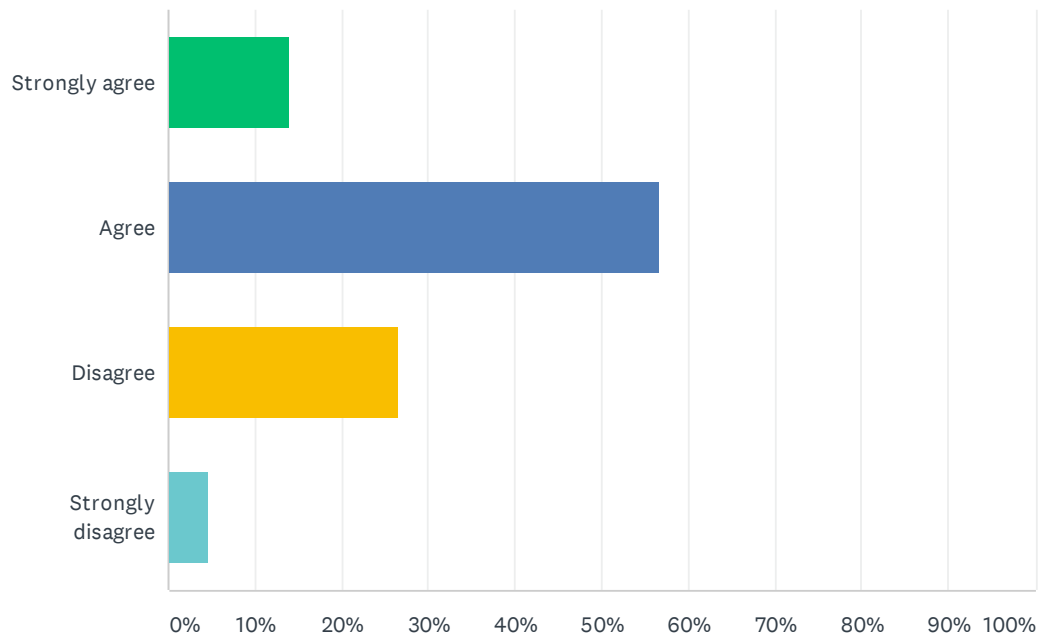
Answered: 215 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly agree	55.81%	120
Agree	39.07%	84
Disagree	4.19%	9
Strongly disagree	1.86%	4
Total Respondents: 215		

Q29 Do you agree that the reflective practice discussions will improve the IFoA's support of Members in their professional development?

Answered: 215 Skipped: 0



ANSWER CHOICES	RESPONSES	
Strongly agree	13.95%	30
Agree	56.74%	122
Disagree	26.51%	57
Strongly disagree	4.65%	10
Total Respondents: 215		

Appendix 7

Detailed responses to questionnaire

The detailed responses to the questionnaire are hosted in a spreadsheet available on the IFoA website:

www.actuaries.org.uk/documents/appendix-7-cpd-review-consultation

Appendix 8

Other responses

The following responses were submitted by email outwith the questionnaire format.

In cases where correspondence was received via email and it was not clear that it was a formal response, the comments were considered but have not been included here.

ACTUARIAL SOCIETY OF SOUTH AFRICA
RESPONSE TO THE IFoA's PROPOSED NEW CPD SCHEME

Compiled by the CPD Committee of the Professional Matters Board

Firstly, we congratulate the IFoA on these proposals. We see them as a big step towards authentic relevant CPD which should help members to deliver their professional promise. They move away from the old-tick box approach, which did not necessarily consistently add value to members.

However, we note some significant differences between the IFoA's proposed scheme, and ASSA's process, which has been up and running now for some years. Perhaps one could sum the IFoA proposals up as a continuing *education* process, whereas ASSA's version is more focused on broader *professional development*. Given the situation of the IFoA, its worldwide reach, and its substantial professional regulation, maybe the more limited scope of continuing education is appropriate?

We expand on these points by reference to questions 12 to 27 in the survey, as follows:

12. To what extent do you agree or disagree that the proposed new scheme is, overall, an improvement to the IFoA CPD requirements currently in place?

Strongly agree, as mentioned above.

13. To what extent do you agree or disagree with the proposal to prescribe a single requirement for all Members?

Strongly agree

14. To what extent do you agree that 15 hours of CPD Activities including 2 hours of Professional Skills Training is a reasonable requirement for members of the Profession?

Strongly disagree. The amount of time spent on CPD is less relevant than the value got out of it. Furthermore, theory indicates that the most useful CPD arises on the job at work, eg having difficulties then finding and implementing a solution, usually with colleagues. So each person's development plans and unplanned learning could be quite different. ASSA does not specify a particular number of hours, and 'polices' this by requiring each member to have a reflective practice discussion with a colleague, apart from any random monitoring by the office.

15. To what extent do you agree that any additional requirements for specific roles should be embedded within the criteria relating to that role (for example Practising Certificate holders)?

Strongly agree. It's up to the practice area to set requirements, but taking into account that they should be meaningful. So again just ramping up the hours will not necessarily add value. ASSA has just implemented a process whereby the reflective practice discussion for certificate holders must be with another certificate holder.

16. To what extent do you agree with the proposals to exempt from the CPD Scheme Members that meet the requirements of Non-Practising status?

Strongly Disagree. We see the profession providing a range of services in the public interest. These are on a continuum, or perhaps a multi-dimensional space, from traditional technical areas to new technical areas, wider fields, management etc. The profession supports all these people, and should require them all to do CPD appropriate for their roles. The IFoA proposal seems to move away from its stance of encouraging actuaries out into new and wider fields in the public interest.

17. To what extent do you agree that those holding Non-Practising status (except those on sick or parental leave) should be shown on a public register?

Disagree. As mentioned @16, this seems to create a 'lower class' of actuaries, who can 'only' do lesser, non-technical work. We don't think this is a message that the UK, SA or the IAA would like to send out.

18. Do you agree that the proposed criteria for 'Non-Practising' is appropriate?

19. Do you agree that 'Non-Practising' is an appropriate description for that status?

20. Do you agree that there should be an additional requirement for those with 'Non-Practising' Status to indicate that status when holding themselves out as an IFoA Member?

Disagree with 18,19 & 20, for the same reasons as 16 and 17.

23. Do you agree with removing the requirement to record CPD activities?

Disagree. We agree that a record of hours spent is not useful, and could be dispensed with. However, a journaling-type process around the creation, execution and review of a personal development plan should add value.

24. To what extent do you agree or disagree with the proposal for reflective practice discussions?

Strongly agree. We believe, supported by the theory, that a 'reality test' of going through one's development progress with a colleague or mentor or other person is vital. But this should not be limited to those monitored. We require every member to have a reflective practice discussion, and confirm at membership renewal that this has happened.

25. To what extent do you agree with the scope of CPD activities being broadened?

Strongly agree – but these could be expanded to include unplanned learning at work, which may be where the majority of development happens.

26. Do you agree with the requirement to make a declaration of compliance?

Strongly agree

27. Do you agree that the reflective practice discussions will improve the IFoA's support of Members in their professional development?

Too early to say. The IFoA still has to develop guidelines around their reflective practice discussions. This is also an area for development at ASSA and we would welcome cooperating for our mutual benefit.



IFoA CPD Consultation - PwC Response

In light of the recent IFoA consultation regarding changes to the CPD scheme, we the Actuaries at PwC UK, have prepared a response.

We are a financial services consultancy and host the largest actuarial department of the UK accounting firms. Across the world we have over 1,000 Actuarial consultants, with more than 300 partners and staff in the UK. We provide services to our clients across the life and non-life insurance, pensions, banking and corporate sectors of the economy.

Overall, we are in favour of the proposals in the CPD consultation, however, we do have the following observations:

- We are in strong agreement with widening the scope of CPD activities to one where no single activity is mandated so long as a learning outcome can be demonstrated (for example, 'on-the-job' training where skills are gained from the experience of performing them). However, we believe there is a danger that members may choose only CPD activities in areas they are already familiar with but which do not necessarily further their personal development or the needs of the profession. As such, a requirement to demonstrate a diversification of activities within the overall CPD hours could provide protection from the dangers of this.
- Whilst we agree with placing more trust on individual IFoA members, we feel retaining central recording of CPD would be a prudent minimum requirement. There is the risk that replacing the requirements to record activities and respond to CPD audits with an annual declaration of compliance could lead to an increase in individuals simply not completing their CPD hours.
- Whilst it is not and should not be a direct consideration when establishing the CPD framework, a reduction in oversight and widening the scope of acceptable activities could inadvertently lead to reduced funding to the IFoA through conferences and events such as GIRO, potentially causing a need for an increase in exam and subscription fees.
- While we are in favour of the proposal of a 'non-practicing' status, where CPD requirements do not need to be met, we have reservations about the move to declare non-practising members on a publically available register. We feel appearing on this register could potentially be viewed negatively and even be seen as a form of punishment. It's not consistent with the increase in trust the rest of the changes to the requirements appear to be trying to reflect. Further, a change in professional circumstances is a sensitive topic that individuals may not want publically shared. We do not think the IFoA should implement this change to the CPD requirements, providing instead an update to the actuaries' code which would require members with non-practicing status to declare it in relevant circumstances.
- It is difficult to offer a decisive view on reflective practice discussions as there is a lack of clarity around what these discussions may involve. The consultation was not clear, inter alia, on how they will be used, who they will be conducted by and how many members will be subject to them each year. It is difficult to formalise an opinion without a full understanding of the IFoA's intentions as we cannot determine if they will be of any benefit to members. If we assume that they will be used to generate feedback for the IFoA on work being carried out by actuaries in order to appropriately tailor the scope of future exams, training and events, then we are in favour of these discussions. However, if the intention of the IFoA is to use these

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discussions to ensure compliance with CPD requirements, as seems likely, we feel this isn't a sufficient approach and a more robust alternative is needed. As we mentioned above, we feel retaining central recording of CPD would be a prudent minimum requirement.

- We also believe that the widened scope of CPD activities would require a significant number of individuals with a breadth of knowledge and experience to conduct the reflective practice discussions. We are concerned where the funding for this will come from. We note that extending the existing mentor scheme to support the reflective practice discussions may be one option.
- We note that it's our belief that the current CPD requirements are unnecessary for larger firms, due to the breadth of experience likely to be provided to staff in such actuarial departments and the likelihood of greater resources to fund development and training in new areas. As such, the more relaxed scope set out in the CPD proposals meets the needs of such actuaries and addresses to some extent the burden the current process puts on them. However, for smaller firms and sole practitioners, with less access to training materials and less access to wide pools of colleague expertise to draw on, there is danger from having a more relaxed CPD process with a wider scope of related activities. Ensuring such members are supported in meeting their development and CPD requirements under the proposed changes so best practice is maintained will be crucial.

Dear Regulation Team,

CPD Review

This response to your consultation on your proposed CPD scheme is on behalf of the Society of Actuaries in Ireland (SAI). As we are only writing about matters where our interests intersect, we thought it best to make these comments by e-mail.

Recognition of other schemes

We note that you will no longer recognise the CPD schemes of other bodies.

We operate a CPD scheme that requires members to complete CPD activities that are **demonstrably relevant** to their professional development. It is underpinned by a requirement to submit details of CPD activities to the Society, monitoring of compliance in terms of both quantum and quality of CPD completed (monitoring can and does include requiring members to explain the relevance of activities completed) and potential disciplinary consequences in the event of non-compliance.

Not recognising our scheme imposes an additional regulatory burden on joint members living and working in Ireland, who may currently elect to comply with the IFoA scheme by complying with our scheme.

Moreover, it runs contrary to the IFoA's stated [regulatory policy](#):

"We will aim to achieve equivalence of regulatory outcomes, wherever in the world our members are practising. This does not mean necessarily that 'one size fits all' in terms of the regulation required in different parts of the world. In particular, we will take account of existing local as well as international standards and regulation."

"Where our non-UK members are also members of other actuarial associations, we will not, so far as possible, duplicate the regulation of that other association."

No CPD returns

We note also that you will not require members to submit details of CPD activities completed to the IFoA. Nonetheless, you are saying that you would confirm compliance with your scheme to us, where joint members living and working in the UK wish to have compliance with your scheme recognised for the purposes of compliance with ours. Naturally we are not making a determination on this point until you have finalised the details of your scheme, however we would question whether we could deem your confirmation as sufficient when (as we understand it), unless the member has engaged in a reflective practice discussion, your confirmation would be based solely on a declaration by the member that they have met the requirements of the scheme. You would have no records of CPD undertaken.

We encourage you to reconsider the proposal not to require members to submit details of CPD activities completed. We acknowledge that members see submitting returns as an administrative burden. However, we believe that the requirement to submit returns – knowing that they will be reviewed - contributes to higher rates of compliance.

On behalf of the Society of Actuaries In Ireland
Tony Jeffery



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