



Institute
and Faculty
of Actuaries

Consultation on the Regulation of Chief Actuaries under the Solvency II regime

Part 2 - Detailed considerations

by the Regulation Board

Contents

	Page No.
Foreword from Des Hudson	3
Section 1 Background to the consultation	4
Section 2 Conclusions from the IFoA consultation dated 11 April 2014 on the Regulation of Actuarial Function Holders	5
Section 3 Proposed structure of the Practising Certificates regime	8
Section 4 Questionnaire	12
Section 5 How to respond to this consultation	20
Section 6 CPD	21

FOREWORD

We would like to invite you to participate in this second round of consultations by the Institute and Faculty of Actuaries (IFoA) on the regulation of roles which actuaries may perform under the Solvency II regime.

Our first consultation on the regulation of actuarial roles under Solvency II, published in April this year, addressed actuaries' roles in the actuarial function, the risk management function and internal audit function. The feedback we received differed for each of these areas; accordingly, our response differs by each area.

- We have decided that it is appropriate to introduce a compulsory Practising Certificate for our members who are approved as "Chief Actuary" under the Prudential Regulation Authority's Senior Insurance Managers Regime in both Life and non-Life undertakings.
- We also intend to introduce a Practising Certificate for our members responsible for the risk management role under Solvency II. This will be available on a voluntary basis.
- We have decided not to proceed with any additional regulatory intervention in relation to the internal audit function, recognising that this function will, most likely, not be performed primarily by our members.

The following consultation document describes the detail of the proposals as they relate to members responsible for the Chief Actuary function. This includes the impact on those in the Lloyd's environment. We are consulting separately in relation to the risk management proposals.

To this end, a number of open questions are asked and we would encourage you to provide comments to support your answers.

As with our earlier consultation, in addition to responses from IFoA members, we are particularly keen to hear from those who make use of actuaries and their advice, such as insurance company boards. We would again also be pleased to hear from fellow regulators.

We intend to update our Practising Certificate regime in time for the inception of Solvency II on 1 January 2016. This will enable those members affected by the proposals to take steps to apply for the required Practising Certificate in the summer of 2015 ensuring applications are processed well in advance of the implementation date.

We thank you for taking the time to consider these proposals and look forward to receiving your comments.



Desmond Hudson

Chair of the Regulation Board of the Institute and Faculty of Actuaries

Section 1

Background to the Consultation

As a professional body incorporated by Royal Charter, the IFoA's aim primarily is to ensure the protection of the public interest by establishing a suitably proportionate, risk focussed and targeted regulatory framework. This framework will enable users of actuarial services to have confidence in the advice they receive from our members. It will also help our members to move into roles for which they are appropriately qualified by demonstrating the breadth and depth of their experience. We have considered the requirements of the Solvency II Directive with a particular focus on the protection of the public interest. We have been concerned to ensure that our proposals are of benefit to insurance company boards in their assessment of appointments to the roles established by Solvency II and the Prudential Regulation Authority (PRA) and in assisting those boards with their ongoing assurance of confidence in the role holders.

On 11th April 2014, the IFoA published a [consultation](#)¹, in response to the introduction of the Solvency II [Directive](#)². The purpose of that consultation was to canvass views to inform our approach to the regulation of our members who may perform significant functions under the Directive.

That consultation exercise attracted a range of responses which have informed this current consultation. We have published the feedback on our [website](#)³.

We focussed the earlier consultation on three functions (using the terminology in the Directive) :

- Actuarial function;
- Risk management function; and
- Internal audit function.

Given the differing skills required of each role, the range of professionals performing the roles and the range of responses received, we have broken down this second stage of the consultation process into two distinct consultations (using the terminology now adopted by the PRA) :

- (1) Chief Actuary role; and
- (2) Chief Risk Officer role.

As mentioned in the foreword, we have decided not to proceed with any additional regulatory intervention in relation to the Head of Internal Audit, so will not be consulting further on this now. We will, however, keep this decision under review and, should circumstances change, we may reconsider this approach.

¹ <http://www.actuaries.org.uk/research-and-resources/documents/solvency-ii-consultation-paper>

² https://www.abi.org.uk/~/_media/Files/Documents/Publications/Public/Migrated/Solvency%20II/Solvency%20II%20Directive.pdf

³ http://www.actuaries.org.uk/Completed_Consultations_and_Discussion_Papers

Section 2

2.1 Conclusions from the IFoA consultation dated 11th April 2014 on the Regulation of Actuarial Roles under the Solvency II Regime

We propose to address the regulation of the Chief Actuary by introducing a compulsory Practising Certificate (PC). Any IFoA member fulfilling a Chief Actuary role as described in the PRA's Consultation 26/14 "[Senior insurance managers regime: a new regulatory framework for individuals](#)"⁴ would be required to obtain a PC from the IFoA. This would apply equally in a Life or non-Life undertaking.

An IFoA member performing the external actuary role as described in para 2.1 of the [PRA's Consultation CP24/14 Solvency II: further measures for implementation](#)⁵ will also need to hold an IFoA PC.

We intend therefore to amend our Practising Certificate regime to include the following types of Practising Certificates:

- (1) Chief Actuary (Life)
- (2) Chief Actuary (non-Life with Lloyd's)
- (3) Chief Actuary (non-Life without Lloyd's)

The Chief Actuary (Life) PC will cover those businesses offering all long term classes of insurance together with general insurance Classes 1 and 2 as defined in The Financial Services and Markets Act 2000 (Regulated Activities) Order 2001 ("the Order"). Both of the Chief Actuary (non-Life) PCs will cover all of the general insurance classes as defined in the Order.

Under this definition, accident and health business will therefore be covered under all three PCs.

Any IFoA member fulfilling a Chief Actuary role for a non-Life Syndicate at Lloyd's will require to hold a Chief Actuary (non-Life with Lloyd's) PC. In the case of Life Syndicates at Lloyd's, either the Chief Actuary (non-Life with Lloyd's) or a Chief Actuary (Life) PC would be acceptable.

The existing PC for those members providing UK Actuarial Opinions for Lloyd's syndicates will remain. We will keep this under review to monitor the appetite for this Certificate in the post Solvency II environment. We again recognise the importance of ensuring alignment with both the PRA's and Lloyd's proposed approaches to approval of such roles. It is envisaged that a member with a Chief Actuary (non-Life with Lloyd's) PC will not require a separate PC to provide the Actuarial Opinion for a Lloyd's syndicate although the converse is not the case.

For the avoidance of doubt, the existing Life With Profits Actuary PC will also continue.

We recognise that the Chief Actuary function may on occasion be performed by more than one person (such as in a job share situation). In certain circumstances, we understand that it will be permissible for different individuals to be responsible for discrete parts of the required work. In such circumstances, each member who is fulfilling part of the Chief Actuary role, and approved as such by the PRA, will need to hold a relevant PC.

⁴ <http://www.bankofengland.co.uk/prd/Documents/publications/cp/2014/cp2614.pdf>

⁵ <http://www.bankofengland.co.uk/prd/Pages/publications/cp/2014/cp2414.aspx>

We also appreciate that some members may perform more than one Solvency II role. This may be particularly relevant for those members who act within a composite undertaking. In such cases, members may need to obtain both a Chief Actuary (Life) PC and a Chief Actuary (non-Life) PC if they are responsible for both areas of the business. Accordingly, we recognise that it is appropriate to allow for a process of dual approval. We are committed to ensuring that this dual approval process is not unduly burdensome either in terms of financial or resource costs.

For now, we propose to require members holding Chief Actuary roles only for undertakings regulated by the PRA to hold a PC. As at the date of this paper, it is not clear what approach other EU regulators will adopt. The IFoA does not wish to cause any unintended consequences such as introducing conflicting, confusing or duplicate regulation. We will review the geographical extent of the proposals within 3 years when the position across the EU is clearer.

2.2 Reasons

The reasons why we are proposing the introduction of a compulsory PC for PRA approved Chief Actuary roles are as follows:

- Our understanding is that the role will, most typically, be performed by Fellows of the IFoA. There is, therefore, likely to be a public expectation that the IFoA will regulate the roles. This will include such an expectation from users of the advice provided by the role holder. That said, we do appreciate that, particularly in non-Life organisations, responsibility for the Chief Actuary function may currently be undertaken by members who are not Fellows. We will consequently particularly welcome comments on the proposal to include Fellowship as part of the criteria.
- There is an existing PC regime which is familiar to current Actuarial Function Holders in Life Insurance undertakings and which we believe works effectively. We do not think it would be appropriate, having regard to the public interest, to remove this requirement for Chief Actuaries acting under the Solvency II Directive.
- The Directive includes a requirement for the actuarial function to be carried out by “persons who have knowledge of actuarial and financial mathematics, commensurate with the nature, scale and complexity of the risks inherent in the business of the insurance or reinsurance undertaking, and who are able to demonstrate their relevant experience with applicable professional and other standards.” We recognise that it can be difficult for those who are not actuaries to assess how well this requirement is met. This may be particularly true for the Boards of smaller insurers who may not have the necessary skills to exercise this judgment. We are strongly of the view that a PC issued by the IFoA for the Chief Actuary roles would assist Boards in that assessment.
- We think it appropriate to align the IFoA regime with the PRA’s approved person regime in the first instance. This will provide Boards with a simple, robust tool to assist the Board to demonstrate their assessment of fitness and propriety of the Chief Actuary role as is required by the PRA.
- It is a useful disciplinary tool for the IFoA to be able to remove a PC (after due process). This will enable us to prevent a member who falls below a reasonable standard from carrying out this critical role.

The consultation feedback supported this approach. Among the Life community a strong majority supported the proposals whilst feedback amongst the non-Life community was mixed. Overall, a clear majority of respondents supported the introduction of a PC for the actuarial function holder. It is

fair to say that we would have liked to have received more feedback generally from members in the non-Life community and more generally from non-members. We therefore encourage members to share this consultation with their Boards and Executive and Non-Executive Directors.

Section 3

3.1 Proposed structure of the Practising Certificate Regime

We will incorporate the three new Chief Actuary PCs within the IFoA's current Practising Certificate regime. As such, they will be renewable on an annual basis and members will need to demonstrate their continued compliance with a number of defined criteria. We will be seeking suitably experienced volunteers from the non-Life practice area to join the Practising Certificate Committee to ensure that the applications are processed fairly.

As with the existing regime, we propose that the standards necessary to obtain a PC would comprise both generic and technical elements.

3.2 Generic Criteria

The generic criteria which all successful applicants for a Chief Actuary PC would need to meet would broadly be similar to the existing PC regime generic criteria and would apply to the PRA approved Chief Actuary as follows:

- The applicant must be a Fellow of the IFoA. This would include members who qualified by examination and those admitted under the terms of a Mutual Recognition Agreement with another actuarial organisation. For information on mutual recognition see the IFoA's [website](#)⁶.

Note: Given the European implications of the Directive, there may be some relaxation of this requirement in respect of members of other actuarial associations who meet the Mutual Recognition Agreement requirements except those requirements which relate to demonstrating experience of UK work.

- For first time applicants for a PC, a current holder of an IFoA Chief Actuary PC must attest to the professional suitability of the applicant to fulfil the role of a certificate holder. This will enable the PC Committee to form a view on this important aspect of the role.

Note: As a transitional measure to reflect the fact that there has not been a history of holding PCs for non-Life roles, the requirement for the attestor for a first time applicant to hold a Chief Actuary PC would be relaxed in the first year. Instead, in the first year, we propose that the attestation of suitability can be given by any Fellow with 5 years post qualification experience provided that the attestor is not a person over whom the applicant has influence in the workplace. This relaxation will be reviewed after the first year of operation. We anticipate by then there will be sufficient Chief Actuary PC holders across all parts of the industry to enable the relaxation to be removed and the usual attestation requirements will be applicable.

- The applicant will be required to undergo credit and criminal record checks as considered necessary to ascertain their fitness and propriety.
- Any adverse Disciplinary Tribunal finding, court or regulatory authority judgment or finding will be taken into account by the Practising Certificates Committee (PCC). The PCC will need to be satisfied that the Chief Actuary is a suitable person to hold a certificate despite the fact of an adverse finding.

⁶ <http://www.actuaries.org.uk/members/pages/mutual-recognition-qualifications>

3.3. Technical Criteria

We propose that successful applicants for Life and non-Life Chief Actuary PCs will demonstrate breadth and depth of relevant experience reflecting the Solvency II requirements as detailed in Article 48 of the Directive.

For ease of reference, Article 48 states:

Insurance and reinsurance undertakings shall provide for an effective actuarial function to:

- (a) coordinate the calculation of technical provisions;*
- (b) ensure the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions;*
- (c) assess the sufficiency and quality of the data used in the calculation of technical provisions;*
- (d) compare best estimates against experience;*
- (e) inform the administrative, management or supervisory body of the reliability and adequacy of the calculation of technical provisions;*
- (f) oversee the calculation of technical provisions in the cases set out in Article 82;*
- (g) express an opinion on the overall underwriting policy;*
- (h) express an opinion on the adequacy of reinsurance arrangements; and*
- (i) contribute to the effective implementation of the risk-management system referred to in Article 44, in particular with respect to the risk modelling underlying the calculation of the capital requirements set out in Chapter VI, Sections 4 and 5, and to the assessment referred to in Article 45.*

A member applying for any Chief Actuary PC will need to demonstrate that:

- they have a sufficient breadth of recent work experience within insurance-with recent being defined as being “not more than 10 years ago”; and
- as in the current PC regime, they have relevant experience, post qualification, in 3 of the last 4 years and in 3 of the last 12 months which will enable them to fulfil the requirements of the role as detailed in Article 48 in particular.

The breadth of experience should include experience in valuing the assets and liabilities of insurers and in all, or almost all, of the technical areas below:

- considering appropriate bases and methodologies for valuing the assets and liabilities of insurers;
- considering the appropriateness of pricing bases for insurance contracts;
- considering appropriate reinsurance arrangements for insurers;
- measuring , managing and mitigating issues and risks to which an insurer is exposed;
- assessing the requirements for capital for insurers; and

- analysing the matching of assets and liabilities and advising on investment strategy (Life PC only).

3.4 Lloyd's

The technical criteria for the Chief Actuary (non-Life with Lloyd's) PC will be the same as for the other practice areas described above except that a material amount of experience must be gained in the Lloyd's or London Market environment.

In addition, it is expected Lloyd's syndicates will continue to be required to produce a formal Statement of Actuarial Opinion (SAO) on technical provisions for solvency. There will remain a need for a Lloyd's PC in respect of these opinions and the technical criteria would be unchanged from the current PC.

The wider Chief Actuary (non-Life with Lloyd's) PC would cover the requirements for SAOs and as such a holder would not also need to hold a Lloyd's PC.

It is expected these requirements would apply equally to both Life and non-Life syndicates. However, in the case of Life syndicates, a Chief Actuary (Life) PC would also be acceptable.

We propose to review all of the above criteria within the next 3 years to ensure that they remain fit for purpose as our experience of the Chief Actuary role and of the PRA's approval regime evolve.

3.5 Exercise of Discretion

As with the existing PC Scheme, the PC Committee may exercise its discretion and grant a PC where an applicant can demonstrate sufficient alternative recent and relevant technical experience.

3.6 Continuing Professional Development (CPD) requirements

We propose that Chief Actuary PC holders will need to undertake additional Continuing Professional Development (CPD) in line with other IFoA members who hold a PC. The CPD Scheme for 2014/15 can be found on the IFoA [website](#)⁷. Currently, applicants for a PC must comply with the requirements of Category 1 of the IFoA's CPD Scheme. This requires 30 hours of CPD to be completed in each certificate year.

Additionally, applicants must have completed Category 1 CPD requirements in the year leading up to the first PC application.

We recognise, however, that we will need transitional arrangements to ensure that members taking up responsibility for the Chief Actuary function for the first time are able to comply. We recommend therefore that the requirement to undertake an increased amount of CPD for the year leading up to the award of a member's first Chief Actuary PC will be relaxed in the initial period. Given the importance of the role and the significant changes which will be required to working practices, we encourage all affected members to take up additional CPD as may be required over the course of 2015.

3.7 Transitional arrangements

Any Lloyd's PC or Life PC issued in the year prior to 1st January 2016 would continue in force until its stated renewal date. Thereafter, provided the holder remains in, or is appointed to, a

⁷ <http://www.actuaries.org.uk/research-and-resources/documents/cpd-continuing-professional-development-scheme-20142015>

Chief Actuary role, he/she would need to obtain a new style Chief Actuary PC or a Lloyd's PC as relevant.

Section 4

Questionnaire

We invite your comments on the above proposals. It would be helpful if you would provide your comments by responding to the following questions.

An online version of the questionnaire can be found on the IFoA's website at: <http://www.actuaries.org.uk/regulation/pages/consultations-and-discussion-papers>. In order to more efficiently analyse the results, survey respondents are encouraged to complete the online survey – even if you need to leave some fields blank. We do appreciate that some respondents will wish to respond in an alternative form. If you choose to respond in that way, we may contact you to request an electronic version of your response. Our email address is: chiefactuaryconsultation@actuaries.org.uk

The following questions about you help us understand who our respondents are

1. ***About you**

Name	
Name of firm	
Position held	

2. ***Are you a member of the Institute and Faculty of Actuaries?**

Yes		No	
-----	--	----	--

3. ***Do you want your name to remain confidential?**

Yes		No	
-----	--	----	--

4. ***Do you want the name of your organisation to remain confidential?**

Yes		No	
-----	--	----	--

5. ***Do you want your comments to remain confidential?**

Yes		No	
-----	--	----	--

6. If you are a member of the Institute and Faculty of Actuaries, which category of membership do you hold?

Student		Honorary Fellow	
Affiliate		Student Actuarial Analyst	
Associate		Certified Actuarial Analyst	
Fellow			

7. If yes, what is your primary practice area? (If more than one, please indicate all that apply)

Life		Health and Care	
General Insurance		Education	
Pensions		Retired	
Finance and Investment		Other	
Enterprise Risk Management			

8. Do you hold a Practising Certificate issued by the Institute and Faculty of Actuaries?

Yes		No	
-----	--	----	--

9. If yes, which area of practice does it cover?

Pensions		
Life		
Lloyd's		

10. What type of organisation do you work for?

Actuarial Consultancy		Bank	
Life Insurance Company		Investment Firm	
Non-Life Insurance Company		Other	
Lloyd's Managing Agent			
If other, please comment:			

11. If your organisation is an actuarial consultancy, what is the size of your organisation?

Sole practitioner	26-40 Fellows or Associates	
2-10 Fellows or Associates	40+ Fellows or Associates	
11-25 Fellows or Associates		

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

Personal views	Organisation's views	
Both		

The following questions are in relation to your views on the consultation paper

13. Do you agree that a member of the IFoA holding the PRA approved Chief Actuary role in Life and non-Life undertakings should require a Practising Certificate?

Yes	No	
Comments		

14. Do you agree that the IFoA's Practising Certificate proposals should be aligned with the PRA's approved person regime?

Yes	No	
Comments		

The following questions 15-17 are in relation to the types of Practising Certificates introduced.

15. Do you agree with the proposal to introduce a Chief Actuary (Life) Practising Certificate?

Yes	No	
Comments		

16. Do you agree with the proposal to introduce a Chief Actuary (non-Life with Lloyd's) Practising Certificate?

Yes	No	
Comments		

17. Do you agree with the proposal to introduce a Chief Actuary (non-Life without Lloyd's) Practising Certificate?

Yes	No	
Comments		

18. Do you agree that where members perform more than one Solvency II role there should be a process of dual approval resulting in two Practising Certificates?

Yes	No	
Comments		

19. Do you agree that we should review the geographical extent of the proposal within 3 years once the approach of other regulators is clearer?

Yes	No	
Comments		

20. Do you agree that the Chief Actuary Practising Certificate should be renewed annually as in the existing regime?

Yes	No	
Comments		

21. Do you agree that Chief Actuary Practising Certificate holders should be required to undertake additional Continuing Professional Development (CPD) in line with other IFOA members who hold a Practising Certificate?

Yes	No	
Comments		

22. Do you agree with the proposed CPD transitional arrangements for members taking up responsibility for the Chief Actuary role for the first time?

Yes	No	
Comments		

23. Do you agree with our conclusion that the PRA approved Chief Actuary will typically be performed by Fellows of the IFoA?

Yes	No	
Comments		

24. Do you agree that a Practising Certificate issued by the IFoA would provide support to insurance company boards in their assessment of fitness and propriety as required by the PRA?

Yes	No	
Comments		

The following questions relate to the proposed generic criteria

25. Do you agree with the proposed generic criteria for Practising Certificates?

Yes	No	
Comments		

26. Do you agree that the proposed Practising Certificate should only be issued to Fellows of the IFoA?

Yes	No	
Comments		

27. Do you agree that the holder of an IFoA Chief Actuary Practising Certificate should attest to the professional suitability of a first time applicant to fulfil the role of a Practising Certificate holder?

Yes	No	
Comments		

28. Do you agree with the proposed transitional arrangements to relax the attestation of suitability so that for the first year this can be given by any Fellow with 5 years post qualification experience (provided that the attester is not a person over whom the applicant has influence in the workplace)?

Yes	No	
Comments		

29. Do you agree that the applicant should be required to undergo credit and criminal record checks as considered necessary to ascertain their fitness and propriety?

Yes	No	
Comments		

The following questions relate to the proposed technical criteria

30. Do you agree with the proposed technical criteria for Practising Certificates in general?

Yes	No	
Comments		

31. Do you agree that, all applicants should demonstrate that they have experienced sufficient breadth of recent work in insurance (with recent being defined as not more than 10 years ago) and that they have relevant experience, post qualification, in 3 of the last 4 years and in 3 of the last 12 months which will enable them to fulfil the requirements of the role as detailed in Article 48?

Yes	No	
Comments		

32. Do you agree with the requirement to demonstrate breadth of experience in valuing the assets and liabilities of insurers?

Yes	No	
Comments		

Do you agree with the requirement to demonstrate breadth of experience in the following areas (Q33-37)?

33. Considering the appropriateness of the pricing bases for insurance contracts?

Yes	No	
Comments		

34. Considering appropriate reinsurance arrangements?

Yes	No	
Comments		

35. Measuring, managing and mitigating issues and risks to which an insurer is exposed?

Yes	No	
Comments		

36. Assessing the requirements of capital for insurers?

Yes	No	
Comments		

37. For Chief Actuary Life Certificates: analysing the matching of assets and liabilities and advising on investment strategy?

Yes	No	
Comments		

38. Do you agree that we should review the above criteria within the next three years to ensure that they remain fit for purpose as our experience of the Chief Actuary role and of the PRA's approval regime evolves?

Yes	No	
Comments		

39. Do you agree that the technical criteria for a Lloyd's syndicate Chief Actuary role should be the same as for the other practice areas except that experience must be materially gained in the Lloyd's or London Market environment?

Yes	No	
Comments		

40. Do you agree there will remain a need for a Lloyd's Practising Certificate for members signing the formal Statement of Actuarial Opinion on technical provisions for solvency and that the technical criteria should be unchanged from the current certificate?

Yes	No	
Comments		

41. Do you have any other comments on the proposals or wish to add anything to inform our thinking?

Yes	No	
Comments		

Section 5

How to respond to this Consultation

The deadline for responses is **4 February 2015**.

Responses should be sent to chiefactuaryconsultation@actuaries.org.uk

A link to an online version of the questionnaire can be found on the IFoA's [website](#).

You can also send a response by post to:

Solvency II - Chief Actuary (Part 2)

The Institute and Faculty of Actuaries

Level 2

Exchange Crescent

7 Conference Square

Edinburgh

EH3 8RA

Collation of results, analysis and publication

The survey responses will be collated by the IFoA Executive and then shared with the Working Party and/or the Regulation Board. A list of respondents and responses may be published by the IFoA in its feedback document. Please set out clearly if you do not wish your name and/or response to be published. Responses will not be personally attributed to any particular respondent. A standard confidentiality statement in an email message will not be treated as a request for non-disclosure.

Consultation Meetings

We also encourage members and interested stakeholders to attend one or other of the following two consultation meetings to discuss and comment on these proposals:

The first will be held at the Institute and Faculty of Actuaries, Level 2, Exchange Crescent, 7 Conference Square, Edinburgh EH3 8RA from 17:00 hrs on Monday, 12 January 2015. Refreshments will be served from 16:30 hrs: and

The second will be held at the International Dispute Resolution Centre, 70 Fleet Street, London, EC4Y 1EU from 17:00 hrs on Wednesday, 14 January 2015. Refreshments will be served from 16:30 hrs.

In order to gauge participant numbers, we should be grateful if you would please contact us at: <http://www.actuaries.org.uk/events> if you are planning to attend either of these meetings.

.

Section 6

CPD

IFoA members may be entitled to claim CPD hours for reading this consultation paper and completing the relevant questionnaire. Please check the CPD scheme for your particular category recording and eligibility requirements.

Thank you for your time and interest.