

Guide to the CPD Scheme & FAQ

August 2021

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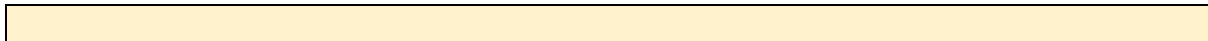
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1. Introduction

This guide aims to explain and support the revision to the CPD scheme described in Actuarial Standard of Practice PA-1 Continuing Professional Development (ASP PA-1) which was approved by Council in June 2021 to apply from 1st September 2021. This new version was developed by a Working Group of the Society, exposed to informal and formal consultation and finally approved by Council. It represents a significant evolution from the previous scheme. While it preserves some of the salient features of that previous scheme, it has been designed to be simpler, leave more discretion to members, and to respond to an environment where much CPD is done remotely. The requirement to have verifiable CPD has been dropped and the classification of CPD largely removed. There are now only two categories of members obliged to do CPD (“R” and “G”), although there remains a category (now called “E”) for actuaries on extended leave or who are retired. There is now provision to allow members to average their CPD over two years, subject to some conditions.

The rules of the scheme are set out in ASP PA-1 which can be found on the [website of the Society](#). This guide aims to expand on and give context to the scheme. If there is conflict between this guide and the ASP, then the latter applies. However, the Society would like to be made aware of any such conflict.

Throughout this guide there are excerpts from the ASP shown in text boxes highlighted thus:



and FAQs are shown in 3*1 tables, for example:

FAQ 1
Q: What do the letters for the three CPD Categories “R”, “G” and “E” stand for?
A: R stands for “Reserved”: i.e. members with a specific role with added responsibility G stands for “General”: all members subject to the usual requirements E stands for “Extended Leave”: members not working
The full definitions are given in section 3 below.

There is a separate email address for matters relating to CPD (cpd@actuaries.ie) and Society staff will try to answer any queries to this promptly. The Society may use such queries to add to the FAQs (but anonymised).

Any other suggestions for improvements to this guide are welcome.

The Society believes that the undertaking of CPD is an essential part of being an actuary and that it should be viewed as an opportunity as well as an obligation.

2. What is CPD?

Section 1 of ASP PA-1 gives a good introduction to what CPD is and its purpose:

1	Introduction
1.1	The purposes of the CPD requirements set out in this ASP are: <ul style="list-style-type: none">1.1.1 to ensure that all <i>applicable members</i> develop and maintain the knowledge, skills and attributes they need; and1.1.2 to ensure that others can confidently trust that they have done so.
1.2	The principles underlying the CPD requirements are as follows: <ul style="list-style-type: none">1.2.1 It is important to continue to develop as professionals. Consequently, all <i>applicable members</i> must complete CPD each year and keep records that allow them to demonstrate that they have done so.1.2.2 <i>Applicable members</i> need to discuss, share and debate ideas with others, including those outside their normal work colleagues and clients.1.2.3 <i>Applicable members</i> need to consider their own developmental needs and plan future learning.1.2.4 There is a full range of activities that can contribute to a <i>member's</i> development. It may be necessary and desirable for <i>applicable members</i> to undertake CPD activities from outside the actuarial profession, including those provided by employers.
1.3	The requirements contained within this ASP represent a minimum. All <i>members</i> are required by the Code of Professional Conduct to have sufficient knowledge and experience to carry out their duties competently. The requirements in this ASP should not be taken as being sufficient for this purpose. In particular <i>members</i> undertaking new roles may find that they need to devote considerably more time to learning that role than the CPD requirement.

Requirements to do CPD are common to professions generally and the levels asked by the Society are typical of the levels looked for by other Irish professions.

Actuarial professions around the world also ask their members to do CPD and in particular, as of writing¹, it is expected that having a CPD scheme will become a requirement for members of the Actuarial Association of Europe.

The reason that the Society and other professional bodies set requirements is so users of actuaries' work can have confidence that the actuaries keep themselves up to date.

CPD is also for the benefit of those doing it and those doing it are best placed to judge whether it is useful to them. What benefits one, may be pointless to another. However, to aid members and to

¹ Summer 2021

bring some clarity, the Society has defined two criteria that members should ensure are met for all activities that they claim as CPD:

3.1.2 All CPD must be *identifiable* and *appropriate*. CPD excludes day-to-day work activities that form a routine part of a *member's* role. *Members* must not count work activities as CPD unless they can demonstrate that the activities in question are non-routine and contribute in a substantive way to their professional development.

Both these concepts of being identifiable and appropriate are worthy of further comment.

Identifiable: When referring to CPD means CPD that can be identified as relating to a specific activity at a particular time.

The concept of identifiable CPD means that each item of CPD claimed must be capable of being specifically referred to. Some examples of items that meet and do not meet this criterion may be useful.

Examples of items that meet the criterion:

- ★ Attending a meeting or webinar of the Society or other Actuarial Association
- ★ Reading a specific actuarial or other scientific paper
- ★ Presenting on a relevant issue to other people, including the time spent preparing for that
- ★ Taking a course to expand one's knowledge at a college (in person or online), including both the lectures and the homework necessary
- ★ Watching a video on a subject on actuvue or another platform
- ★ Focused conversations with fellow actuaries on a specific subject where you gained further understanding

Examples of items that do not meet the criterion:

- ★ General reading of newspapers
- ★ Unspecified private study
- ★ Presenting a presentation that you have presented before (so no new learning thereby)
- ★ General chats with other actuaries without any CPD-relevant focus or purpose

Appropriate: when referring to CPD means any CPD that might assist a member in carrying out their job or a reasonable potential future job by way of increasing knowledge or acquiring and/or enhancing skills or attributes.

Members will be fairly clear about what assists them in carrying out their current jobs. As always judgement is required and while it is not absolutely necessary that the member does learn something new to claim the CPD (refreshing knowledge and checking that your knowledge of a subject is indeed comprehensive can be worthwhile) mere repetition of something you know should not be counted.

As to what might assist them with reasonable future jobs, it is a very important part of an actuary's development that they learn in preparation for new responsibilities. Again, judgement is required. For example, an actuary might be learning in the hope that they could be promoted to a more responsible role or make a sideways step to a different type of role inside their current company.

That would be appropriate CPD even if the actuary did not achieve the role on a particular occasion. However, somebody with a retirement dream of having a micro cider brewery should not claim time spent reading about orchard management as CPD!

3. Who has to do CPD?

The current scheme has very slightly widened the scope of who has to do CPD, from the previous scheme. The application at the start of the ASP is:

Such Fellow, Associate, Affiliate and Student members of the Society of Actuaries in Ireland as specified in section 2.1 below.

This extends the application to all Students and Affiliates as well as the previous scope of all Fellows and Associates but section 2 of the ASP clarifies and tempers this.

2 CPD categories and exemptions/averaging

2.1 Fellow and Associate *members* fall into one of three categories for the purpose of determining the amount and type of CPD they are required to complete to satisfy the *Society's* requirements. Student and Affiliate *members* are also required to satisfy the *Society's* requirements if they fall into Category R.

The CPD categories are:

- Category R All Fellow, Associate, Affiliate and Student *members* who
- (a) hold a practising certificate issued by the *Society*; or
 - (b) act as Reviewing Actuary for the purposes of compliance with:
 - regulations made under Section 51A of the Pensions Act, 1990, or
 - the *Domestic Actuarial Regime*, or
 - “Reserving Requirements for Non-Life Insurers and Non-Life and Life Reinsurers”, as issued by the *CBI* in 2014; or
 - (c) have been appointed to a *CBI* Pre-Approval Controlled Function role, including but not limited to Head of Actuarial Function (for the purposes of compliance with the *Domestic Actuarial Regime*), Executive director, Non-executive director or Chief Risk Officer.
- Category G All Fellow and Associate *members* who are working, on a paid or voluntary basis, and who are not in Category R. All Affiliate members who carry out *actuarial services* and are working, on a paid or voluntary basis, and who are not in Category R.
- Category E All Fellow and Associate *members* who are not in work or seeking work (because, for example, they are retired or on a career break). This does not include actuaries who work only in a part-time or voluntary capacity or whose work is wholly non-actuarial. The period of not working must be at least 90 days.

2.2 For *members* who fall within one of the first two categories, the requirement for competence is not waived merely because the *member* works in a non-actuarial area, works less than full-time or works in a voluntary unpaid capacity.

- 2.3 Requests for exemption from some or all of the requirements of this CPD Scheme will be considered on a case-by-case basis. Exemptions will be granted only in exceptional circumstances (such as long-term illness) and may be subject to such conditions as the *Society* decides.
- 2.4 All *members* must ensure that their CPD category is correctly recorded in the “My CPD” section of their profile on the *Society’s* website.

So, Students and Affiliates come under scope if and only if they are doing certain types of work.

For Students, it is if they are doing Category R roles. This is comparatively rare but does happen and clearly if any actuary is doing an important role, they must stay current. If the student in question is doing actuarial exams, then the study for those exams does count as CPD². However, the role-specific requirement that is part of the Category R requirements needs to be met, and it is quite possible that this will not form part of the student’s exam work (though it may).

For Affiliates, it is wider. Some Affiliates carry out elements of actuarial work, some do not but have an interest in actuarial matters. Those who do actuarial work are expected to behave in the same way as other members doing similar work and do CPD as if Fellows or Associates of the Society. Any Affiliate in doubt should contact the Society.

FAQ 2

Q: Do all Fellows and Associates come under the CPD scheme no matter what they are doing?

A: Technically yes, they do. BUT those who come under Category E (Extended Leave) for the whole of a CPD year have no requirements placed on them. The ASP has the concept of Applicable member:

Applicable Member(s): means any *member* or *members* of the *Society* who at any point during any *CPD year* are in Categories R or G as specified in section 2.1 and applies for that *CPD year*.

² This is true also for Associates taking actuarial exams.

FAQ 3

Q: I am a retired Fellow but I do unpaid volunteer work. Does doing anything bring me into scope?

A: Generally no. Judgement is required here but if the volunteer work meets all of the following tests, then it would be reasonable to claim that it does not take you out of the Category E status:

- a) The work is unpaid (or remuneration is trivial)
- b) The work is not connected with the actuarial profession or financial services
- c) You are not giving financial advice
- d) You are not representing yourself as an actuary
- e) The organisation you are serving would not expect you to carry out any program of keeping yourself up to date

Examples of such volunteering might be:

- ★ Chairing a Narrowboat Society
- ★ Work in a hospice
- ★ Involvement in a sports club or social club (including acting as a treasurer)
- ★ Giving mathematical tuition
- ★ Involvement in political activity including activism
- ★ Community gardening or conservation volunteering
- ★ Local history research

4. How should I seek CPD?

The most obvious source of CPD is the events run by the Society. If you work in a mainstream specialism of the Society, it is likely that there would be enough Society events in terms of numbers of hours each year to meet your requirements. Your employer may also have relevant training they wish you to do.

Simply showing up (or logging in) to what is available may not be optimal. There are two tools that you might wish to consider using to guide your CPD, namely the Society's Competency Framework and Reflective Practice. They are discussed below.

On the other hand, it can be of value to gain exposure to matters that are outside your immediate identified needs. A walk on the wild side may be of benefit. It is also the case that interaction with other professionals at physical meetings can be of benefit, not least through networking opportunities. Sometimes there are unknown unknowns to discover.

FAQ 4

Q: Do computer-based courses required by my employer on such matters as money laundering, gender bias and communication with the press count as CPD?

A: Probably but you should use judgement. It is not unknown for employers to make mandatory courses that have no application to some of their employees. If there is no possibility of you gaining anything other than ticking a box from the training then the fact that it is mandatory does not stop it being valueless (to you) and you should not claim it. However, many such courses can provide insights and be of value, even if not directly relevant. In such case a claim is reasonable.

Unless the subject matter changes significantly or you gain greater understanding from the repetition, subsequent iterations on the same subject should not be claimed.

4.1 The Society's Competency Framework

The Society has developed a tool to assist actuaries in their personal development. The Competency Framework can be found on the Society's website at

<https://web.actuaries.ie/about/sai-competency-framework>

It is based on the idea that, in addition to their knowledge about their field of work, a professional also needs to develop relevant skills and attributes. By using this tool actuaries may be able to identify training needs.

4.2 Reflective Practice

Reflective practice is a process whereby you gain insight into your professional development by engaging with another person who can discuss your current and potential future position and what learning might assist you in developing to meet the challenges you might face.

Such a discussion is mandatory for those who are also Institute and Faculty of Actuaries (IFoA) members and are required by the IFoA to do CPD (see below). The Society did consider whether it should be mandatory for our members and decided that there could be instances where it was not

useful (members about to retire for example). However, it is believed that many members could benefit from doing reflective practice from time to time, and so members are encouraged to consider this approach. There are good resources available on the subject on the IFoA website and the Society also has a note on the subject available on its website.

4.3 Who provides CPD?

As mentioned, the Society provides lots of CPD opportunities. These are advertised by regular emails (if you are not getting these you should check that the Society has your current email address) and on the “Events” section of the website, which also includes details of events put on by other organisations.

Some possible sources are worthy of special mention.

Firstly, actuvew is a special resource for actuaries. Most of the Society’s webinars are posted there and there is a great deal of content. It is currently free to use for Society members. You need a password which will have been notified to you by email but if you do not have it the Society can send you one on request. The Society also has its own YouTube channel <https://www.youtube.com/channel/UCbqwt3Slk9Thscb1RW8mRUw>

Secondly the IFoA offers a great deal of CPD, some free to IFoA members, some requiring fees. It holds annual residential conferences for each main actuarial specialism which are heavily attended and represent a great chance to network.

Lastly, the Society has corporate membership with the Irish Management Institute which has an extensive library (physical and virtual) and program of events and courses. You can find details here: <https://web.actuaries.ie/events/IMlpartnership>

4.4 Service to the Society

Many members of the Society give voluntary service to the Society at some time in their careers e.g. serving on Committees or Working Groups. It is estimated that at any one time up to a third of Fellows have some form of active engagement with the Society.

Most of this service is likely to be suitable to be counted as CPD. A very valuable part of the Society’s work is done by the Practice Committees (Life Insurance, General Insurance, Pensions, and so on, the list can be seen [here](#)). Their work is very likely to be relevant to those who work in their area. However, the Member Services and Professional Committees may also help in your personal and professional development. The current scheme places no limit on the amount of this CPD that may be claimed which is a change from the previous scheme which limited it.

4.5 Access

It is each member’s responsibility to carry out such CPD as is required, both to meet the requirements of ASP PA-1 and those of the Code of Professional Conduct. CPD is provided by the Society in both physical meetings (when safe) and online. A frequent form of online presentation is through webinars. Much of what is presented is made available later as video content through actuvew and there is also an extensive library of older past events through podcasts which can be listened to. In addition, the Society regularly informs members of other events, including events that are not specific to mainstream areas of actuarial practice.

Therefore, the Society believes that there should be ample opportunity for all members to access sufficient CPD. Nevertheless, if there are particular reasons that an individual member believes that

they cannot access sufficient CPD, they should raise this with the Society (at cpd@actuaries.ie) as soon as possible. The Society will endeavour to remedy the situation if it is reasonably within its power to do so.

5. Outline of the Requirements

The requirements are clearly set out in the ASP.

Section 3 of this Guide, above, deals with who has to do CPD and outlines the 3 CPD categories. The amount of CPD required is detailed in section 3.1 of the ASP.

3.1 General requirements

3.1.1 *Applicable members* must complete sufficient CPD allocated to each CPD year to meet the requirements of sections 3.1.3 and 3.1.4 but subject also to the provisions of section 3.4. There is no CPD requirement for *non-applicable members*.

3.1.2 All CPD must be *identifiable* and *appropriate*. CPD excludes day-to-day work activities that form a routine part of a *member's* role. *Members* must not count work activities as CPD unless they can demonstrate that the activities in question are non-routine and contribute in a substantive way to their professional development.

3.1.3

If, throughout the CPD year, the member is in:	Minimum amount of CPD	Role Relevant CPD: (see section 3.2)	Professionalism CPD: (see section 3.3)
Category R	25 hours (including <i>Role-Relevant</i> and <i>Professionalism CPD</i>)	5 hours for each role that causes the <i>member</i> to be in Category R	2 hours
Category G	20 hours (including <i>Professionalism CPD</i>)	Nil	2 hours
Category E	Nil	Nil	Nil

3.1.4 *Applicable members* who change CPD category during the CPD year are required to complete CPD according to a time weighted average of the requirements of the Categories they were in. If any requirement when averaged is less than 30 minutes it shall be rounded down to zero. If all the CPD requirements for an *applicable member* are rounded to zero then that member will be considered to not be an *applicable member* for that CPD year.

It should be noted that these are annual requirements. There is some capacity to average CPD across years. This is discussed below.

5.1 Professionalism CPD

The Society requires applicable members (as defined in the ASP) to undertake Professionalism CPD training every CPD year. This is defined in section 3.3 of the ASP.

3.3 Professionalism CPD Requirements

3.3.1 *Applicable members* who are in Category R or G for the whole *CPD year* must complete 2 hours of *professionalism CPD* in each *CPD year*. This requirement is reduced by a time weighted average for any period in the *CPD year* that the *applicable member* is in Category E.

3.3.2 This is included in the overall CPD requirement as specified in section 3.1.3 above.

3.3.3 *Professionalism CPD* is any event or activity that enhances understanding of professional obligations by doing any of the following:

- Enhances *members'* understanding of principles of ethical behaviour and how to apply these in making professional judgements;
- Equips *members* to make reasoned and justifiable decisions in resolving ethical dilemmas;
- Enhances *members'* understanding of what it means to act in the public interest;
- Helps *members* to demonstrate ethical behaviour in conducting professional life; and
- Enables *members* to recognise ethical dilemmas and take appropriate action.

One significant change from the previous scheme is that the Professionalism CPD requirement is reduced for any period spent on extended leave. Previous versions of the scheme had a flat rate requirement. There is more detail on what happens when changing CPD category below.

FAQ 5

Q: Does training on Diversity and Inclusion issues potentially count as Professionalism CPD?

A: Yes. However, if this is mere repetition of what you already know, then you should not claim it.

The Society holds CPD events (and provides videos) that are explicitly badged as Professionalism CPD. This means that if you do them, they automatically can be claimed as such. The Society also gives a list of professionalism CPD resources on the relevant page of the website:

<https://web.actuaries.ie/standards-regulation/continuing-professional-development>

The IFoA also has Professionalism CPD resources available for members.

FAQ 6

Q: Does Professionalism CPD have to be case study work?

A: No. It is very important that at least some of the Professionalism CPD should engage you in active consideration of issues. It has been felt that case study work is a very good way of doing this.

However, like everything else, repetition can make stale and lower marginal gains. Experience has also shown that round-table discussions are not as effective in an online format as in the flesh. The Society will put on case study sessions from time to time and it is probably a good idea to take part in some of these but this need not be every year.

Some other activities that would count as Professionalism CPD might be: -

- ★ Watching videos in which ethical or professionalism issues get discussed
- ★ Participating in formally arranged discussions about professionalism issues
- ★ Studying disciplinary cases
- ★ Preparing Professionalism CPD events

5.2 Averaging

An innovation in the current scheme is that averaging is now permitted without pre-approval. This is designed to allow members who have particular personal or work issues in a CPD year to move the burden of CPD to another (CPD) year where they can meet their obligations more easily. It is believed that it is the continuing nature of doing CPD over a member's career that brings benefits. This is not the same as the pro-rata process of calculating the CPD requirement in a particular CPD year when a member changes category. That is described below under "Changing Category".

Professionalism CPD and Role-Relevant CPD may not be met through averaging and must be done every CPD year.

The averaging can take place in two forms, colloquially known as backwards and forwards averaging, though these are not the terms used in the ASP. Backwards averaging means the proffering of excess CPD from the previous CPD year towards the current year's requirement.

3.4.1 *Applicable members who were also applicable members in the previous CPD year and completed more than the required amount of CPD in the previous CPD year, may count the excess in the previous CPD year (up to a maximum of 10 hours) towards the current CPD year's requirements.*

3.4.4 Sections 3.4.1 and 3.4.2 do not apply to requirements relating to Role Relevant and Professionalism CPD, which must be completed in each CPD year.

So, for example, a member who has done 35 hours in 2021/2022 can count 10 hours of this for 2022/2023. This member does not need to do anything to exercise backwards averaging. They make the CPD declaration at the end of 22/23 in the usual way.

FAQ 7

Q: I am in CPD Category G. I did 30 hours in 2021/2022 and 20 in 2022/2023, what is my requirement in 23/24?

A: It is still 20 hours. The excess of requirements in 2021/2022 can only be carried forward for one year.

FAQ 8

Q: Is excess CPD over requirements from 2019/2021 able to be used in the same way, even though it is from a previous scheme?

A: Yes, but remember that the requirement for 2019/2021 is 30 hours for Category G members and 37.5 hours for Category R members. The maximum excess CPD that may be brought forward is 10 hours.

FAQ 9

Q: I am Category G and did 27 hours CPD in 2022/2023 including 5 hours Professionalism CPD. What can I carry-over into 2023/2024?

A: 7 hours but you still have to do the 2 hours of Professionalism CPD in 2023/2024 as averaging does not apply to Professionalism CPD.

Forwards averaging (as one might imagine) is the commitment to do more CPD in the next year, this can be used if a Category G member does not meet requirements in the current year. To avail of this, members need to contact the Society (by email to cpd@actuaries.ie) to let us know before the year end. This notification is just that, a notification. It is not a request needing approval. Forwards averaging is not available to Category R members.

3.4.2 A Category G or E *applicable member* who does not complete sufficient CPD to meet requirements in the current *CPD year* may inform the *Society* that they wish to have the current *CPD year* and the next considered together. This must be done before the end of the *CPD year*. In this case the *applicable member* will be required to meet the sum of the two years' requirements over the course of those two years.

FAQ 10

Q: Why is it required to contact the Society to avail of forwards averaging but not backwards?

A: Because the Society otherwise has no way of knowing whether the shortfall on the current year is because of an intent to use forwards averaging or a mistake by the member.

FAQ 11

Q: Previous schemes offered three-year averaging. Is this still available?

A: No. In the most recent previous version of the scheme (applying until 31.8.21) such averaging was only available in exceptional circumstances and ideally needed to be applied for in advance. The current scheme's provisions should give sufficient flexibility for most circumstances. The Society might be willing to consider special circumstances on a case-by-case basis. In all events members who are not able to meet the CPD requirements should discuss this with the Society as soon as practical.

FAQ 12

Q: I am in Category R. What averaging can I avail of?

A: You cannot apply averaging to your Role-Relevant CPD or your Professionalism CPD. Both of those must be done every year. Nor can you take advantage of the "forwards averaging" as described in section 3.4.2. However, you can utilise the backwards averaging (as per 3.4.1) if you have done more CPD than required in the previous year.

5.3 Changing Category

Requirements for the CPD year in which a member changes CPD category are calculated by a time weighted average of the requirements of the categories held.

Example 1

Jean Genie started 2021/2022 in Category G but on 5th November received a promotion and changed Category to R and stays on this for the rest of the year. Averaging requirements are usually based on the nearer month so this would be treated as 2 months on G and 10 on R.

Jean's basic CPD requirement is $(10 \times 25 + 2 \times 20) / 12 = 24$ hours 10 minutes which includes 2 hours Professionalism (no pro rata needed as same requirement for G and R) and $(10 \times 5 + 2 \times 0) / 12 = 4$ hours 10 minutes of Role-Relevant CPD

Example 2

Thomas Jerome Newton is on extended leave from 1st September 2021 until 21st October 2021, he resumes work in Category G until 23rd February 2022 when he too is promoted to a Category R role.

Thomas's basic CPD requirement is $(2 \times 0 + 4 \times 20 + 6 \times 25) / 12 = 19$ hours 10 minutes
He has to do $(2 \times 0 + 10 \times 2) / 12 = 1$ hour 40 minutes of Professionalism CPD
And $(6 \times 0 + 6 \times 5) / 12 = 2$ hours 30 minutes of Role-Relevant CPD

FAQ 13

Q: Are there any requirements under the CPD scheme to be met before moving into a role requiring a Practising Certificate?

A: No. This is a change from the previous scheme. However, it should be noted that there is an overarching requirement under the Code of Professional Conduct that *“Members must ensure they have an appropriate level of relevant knowledge and skill to carry out a piece of work”*.

In moving into any new role, members should consider what they need to do to upskill or augment their knowledge. Sometimes this may involve a rapid learning process, sometimes this may be a very straightforward step (for example if somebody has been understudying for a role). There are rules concerning practising certificates which are available on the [website](#).

It is worth noting that there are some changes from previous practice in the current scheme:

- ★ For members who are not working throughout the year, there is no longer a minimum amount of CPD required. Under the previous scheme, if you had been on extended leave for 364 days of the CPD year and 1 day working, then there was a minimum of 5 hours of CPD required. This is no longer the case. In fact, any amounts less than half an hour get rounded down to zero.
- ★ Professionalism CPD is now subject to the pro-rata calculation. Working just for one day does not lead to a requirement of 2 hours CPD.

6. Category R

Category R members are those who are holding roles with particular responsibility. The definition has already been given in section 3 above but here it is again:

Category R	All Fellow, Associate, Affiliate and Student <i>members</i> who
	(a) hold a practising certificate issued by the <i>Society</i> ; or
	(b) act as Reviewing Actuary for the purposes of compliance with:
	○ regulations made under Section 51A of the Pensions Act, 1990, or
	○ the <i>Domestic Actuarial Regime</i> , or
	○ “Reserving Requirements for Non-Life Insurers and Non-Life and Life Reinsurers”, as issued by the <i>CBI</i> in 2014; or
	(c) have been appointed to a <i>CBI</i> Pre-Approval Controlled Function role, including but not limited to Head of Actuarial Function (for the purposes of compliance with the <i>Domestic Actuarial Regime</i>), executive director, non-executive director or Chief Risk Officer.

While this does include members who have practising certificates (and therefore have been approved by the Society to have a certificate), there are other roles where approval is the hands of the Central Bank of Ireland.

FAQ 14

Q: I do a similar role as that defined in Category R but in another country, do the category R requirements apply to me?

A: Not strictly, no.

The list given in the definition is definitive as far as ASP PA-1 is concerned. However, remember that the Code of Professional Conduct also applies. It would be sensible to consider what CPD you should do to make sure that you are sufficiently up to date and you might take the Category R requirements into account.

It is also very likely that such a role may carry with it CPD obligations with the actuarial association of that country, if you are a member of it. We strongly recommend that you join local actuarial associations of places where you do material work (and it may be obligatory). There may be a Mutual Recognition Agreement that will help you in this respect. If you have any questions on this issue, please contact the Society (info@actuaries.ie).

The extra requirement for Category R is given in section 3.2 of the ASP.

3.2 Role-Relevant CPD Requirements

3.2.1 *Applicable members* in Category R must undertake 5 hours of CPD activities relevant to each role that causes them to be in Category R within each *CPD year*. Where a *member* holds more than one such role, CPD activities may be relevant to one or more of those roles.

3.2.2 This is included in the overall CPD requirement as specified in section 3.1.3 above.

It is important to note that the Role-Relevant CPD must be done every year and cannot be averaged either forwards or backwards.

The other aspect of being a Category R member is that the forwards averaging of CPD other than Role-Relevant and Professionalism CPD is not available but backwards is.

FAQ 15

Q: The Role-Relevant CPD requirement is 5 hours per role held. I hold a Scheme Actuary Certificate: if I sign valuation reports for 3 pension schemes does that mean I have to do 15 hours?

A: No. If you are doing similar work for each role then it is probable that whatever CPD you do relevant to one scheme would also be relevant to all schemes.

To take a somewhat bizarre example, if your schemes were mostly typical pension schemes but you also signed for "The Lambeth Gravedigger Pension Scheme", you should not count an hour listening to a talk on gravedigger mortality towards the 5 hours for the other schemes.

Taking a more realistic example suppose a member is Head of Actuarial Function for a London Market reinsurer and a domestic personal lines writer. They might well do 3 hours of CPD that was useful for both and 2 hours that was only relevant to each company. This would make 7 hours of role-relevant CPD done that year (and needing to be supplemented by at least 18 hours of other CPD). The next year they might do 5 hours that was relevant to both companies.

FAQ 16

Q: I was in a Category R role before going on extended leave for 10 months. I expect to return to work soon, are there any special issues that I should consider before looking to take up my Category R role once more?

A: Yes.

Firstly, there is always your duty under the Code of Professional Conduct, specifically *"2.1 Members must ensure they have an appropriate level of relevant knowledge and skill to carry out a piece of work"*.

You should consider what you need to do in order to: -

- Get your knowledge and skills back up to speed
- Remind yourself of your responsibilities, and
- Ensure that you have not missed anything while you were away.

You may be best placed to deal with the first two and much will depend on your circumstances (for example are you leading a large team or are you a sole practitioner). For the third, it would make sense to talk to colleagues to see if anything has happened while you were away. In any case you might consider whether it is sensible on return to be signing the next day.

Secondly, you should also remember the requirements of ASP PA-2 Section 2.12 on Quality Assurance. It might be appropriate to give some thought as to whether more is needed in this area. If there is a peer review taking place, then it might be a good idea to mention to the reviewer that you have been away.

Lastly, there may be special requirements concerning resumption of role imposed by those who are gatekeepers to awarding license to carry out that role (including the Society). You should be sure that you are in compliance with these.

7. Category E

Category E applies to members who are not working for a period of at least 90 days. Typically, this includes members who are

- ★ Retired from all paid work
- ★ On maternity leave
- ★ Suffering long term sickness
- ★ On career breaks.

Please note that it does not include members who are unemployed but are seeking work. It might be expected that members in this situation would want to avail themselves of every opportunity to widen their skill sets and knowledge base.

The definition has been given above (in section 3) but is repeated below.

Category E All Fellow and Associate *members* who are not in work or seeking work (because, for example, they are retired or on a career break). This does not include actuaries who work only in a part-time or voluntary capacity or whose work is wholly non-actuarial. The period of not working must be at least 90 days.

The 90 days is expected to be a single continuous period.

FAQ 17

Q: I had two periods of absence during the year, each of two months. Can I reduce my CPD requirement by one-third?

A: Not normally.

In certain circumstances the Society would be likely to accept a reduction, for example, if a member was suffering from two bouts of a recurrent illness, or if a member, absent due to sickness, had a very short period at work but found they could not continue.

However, it should be appreciated that the recipients of actuarial advice are entitled to assume that the person who provided it has kept their expertise fully up to date. It might be necessary to do extra CPD where there have been multiple periods of absence, even if the absence was due to ill health.

FAQ 18 (Part 1)

Q: Leon started a career break on 1st July 2022 and expects it to last 6 months. How does this impact his CPD?

A: A career break needed to be 90 days or more to count, this meets that. So, a 2/12 reduction is applied to the 2021/2022 requirements and 4/12 reduction to the 2022/2023.

FAQ 18 (Part 2)

Q: For reasons beyond his control, Leon unexpectedly had to resume work on 15th September. What happens?

A: The extended leave does not fit the criteria any longer, so no abatement is permitted. If Leon only did 10/12th of the 2021/2022 requirement, we would expect that he does sufficient in 2022/2023 to ensure that the two years taken together would show 2 years' worth of CPD done.

FAQ 19

Q: I work part-time, three days a week. Can I reduce my CPD requirement to 60%?

A: No. In fact, if you are working very intermittently, you could consider doing more CPD to make up for the lack of practice.

By the same token, Category E is not really designed for somebody who takes 4 months off work every year. While they meet the definition and so are ASP PA-1 compliant, they should consider whether they are Code of Professional Conduct compliant.

7.1 Retirement

A number of members who have retired from full-time work pursue a career of a portfolio of non-executive directorships. This does not count as category E and is very likely to make the member Category R. The Society believes that such directorships are a very important element of the work that our members do and that this group has a high impact and visibility and therefore it is important that the skills and knowledge of these members remain current.

FAQ 2 in section 3 discusses the issue of voluntary work for members who would otherwise be retired.

8. Recording CPD & Other Administration Issues

8.1 Recording CPD

It is mandatory for members who are required to undertake CPD to record it on the Society's website. Each member has a personal section on the website that contains their personal details and there is a utility for inputting an entry for each item of CPD done.

Members are encouraged to do this throughout the year. It reduces the chance of forgetting details about events attended and the running total allows you to know how much you have done so you can see if you need to do more.

There is a utility under "My Reservations" that helps members complete CPD returns for events they have reserved (which of course, they must have attended in order to claim). Click on "My Reservations" and then for each event attended click "Create Return". You will need to add some details and then click "Save".

8.2 CPD Declarations

You will need to declare what CPD Category you are in at the start of the current Scheme and update if you change category.

FAQ 20

Q: Why are we being asked to manually declare which CPD category we are in? There is a simple mapping (New Category R = Old 1 + Old 2A; New G = Old 2B + Old 2C), could not this be done automatically?

A: This was considered. However, our experience has been that members do not always remember to keep categories up to date. This is perfectly understandable but it was felt that being able to confirm that the Categories were correct as 1st September 2021 would be very useful.

You also need to submit a compliance declaration at the end of the CPD year (or before if you wish and you have met all the requirements).

It is worth noting that the deadline for making the compliance declaration has been brought forward from 8 weeks to 4 weeks after the end of the CPD year.

FAQ 21

Q: Why has the deadline for making the compliance declaration been brought forward from 8 weeks to 4 weeks after the end of the CPD year?

A: The period of 8 weeks dates back to the start of the CPD scheme in 2006 when the record keeping and submissions were paper based. It is considered that 4 weeks is more than adequate when all that is required is to fill in a very short form online.
In addition, the change to the CPD year-end means that the period is no longer in a time of year when members are often on holiday.

FAQ 22

Q: In making the compliance declaration you are asked to confirm whether you have met the CPD requirements for the relevant period. I do not have enough CPD in that period to meet the requirements. What do I do?

A: The first thing you should do is to check that you have put into the system all the CPD you did in the period. You might look over your diary/Outlook Calendar to see if there are items in it you did not enter.

Of course, if you do the check before 31st August and find you are short, then you can watch some *appropriate* videos on actuvieo or indeed find other relevant CPD. The verification requirement having gone makes it much easier to do this as you are no longer as dependent on external parties. It makes no sense to do irrelevant CPD just for the sake of meeting a quota but you should be able to find something that is useful to your needs.

If you still have a shortfall, consider your previous year's record. Do you have enough excess over what your requirements were to be able to count as compliant under "backwards averaging"? If that is the case, the only action needed is make sure that you tick the right box on the compliance declaration.

If that is not going to do the trick, then you should consider forwards averaging. To automatically avail yourself of this you must contact the Society before the CPD year end.

Details on both forms of averaging are given in Section 5.2 above.

If you are still not compliant after this, you should engage proactively with the Society at CPD@actuaries.ie

FAQ 23

Q: Do retired members have to make a CPD compliance declaration?

A: No. Only *applicable members* have to make a declaration. Any member who has been in Category G or R at any time during the year is included but if a member has been in category E throughout the year they are not included and need make no declaration.

Please note that retired members should update their CPD category to "E".

8.3 Compliance

After the CPD year end, the Society runs two checks, firstly to check that all members who should have completed a compliance declaration have done so and, secondly, that all members have done the CPD that they should have. Members whose records fail either test will be contacted. The Society's experience is that the vast majority of such cases are due to errors in completing the returns.

If any member is found to still be out of compliance after correction of errors, then normal practice is to invite them to make commitments towards some form of restoration. This might be in the form of being asked to give an undertaking to do extra CPD, possibly of a specified type, in the following year.

It is potentially a disciplinary matter if a member fails to comply with CPD requirements. However, it is absolutely not the Society's intention to "punish" members who make mistakes or find themselves

in a difficult position for reasons beyond their control. The Society's aim is to ensure that CPD is done but we accept that in some limited circumstances, some flexibility is needed.

Deliberately making false statements in any respect, including in CPD records and declarations, is a different matter and would be in contravention of the Code of Professional Conduct.

FAQ 24

Q: I retired during the year and even after allowing for the pro rata reduction for my period of retirement, I do not have enough CPD to count as being compliant. However, I am not intending to be anything other than retired going forward. What would the point of doing CPD be?

A: If that is genuinely the case, you could take such a line. You would not be compliant but the Society would be unlikely to take disciplinary action against you. However, you might wish to note that many people who retire find themselves back in work for various reasons, for example in non-executive directorship, part-time work, contracting or a part-time role. You might consider whether you wish to lose flexibility for the future over a few hours of CPD. A Category R role might well be denied to somebody who has not been compliant.

Similar comments might apply to members leaving membership of the Society. If you leave the Society in bad standing, you may find it difficult to be readmitted. If you wanted to join another country's actuarial association, it may ask the Society about your membership and whether you were fully compliant with all requirements.

8.4 Audit

Each CPD year a small percentage of members who should be doing CPD are selected at random for audit. In previous periods this audit included verifying that verifiable CPD was just that.

As there is no verifiability process in the current scheme, the audit process will be slightly different. Each member selected will have their CPD record looked at. The Society is likely to check that some of the CPD claimed has been done (for example if the member claims that they attended the annual convention it may look to see if they did). The Society will continue to keep records of attendance at Society events. If it is clear that a member is compliant, then all that will happen is that the member will be told that they were selected but that they need do nothing as the Society is satisfied with their records. However, if it appears that some CPD is not obviously appropriate and identifiable the member may be asked to justify their claim. It is for members to make this judgement but such judgement must be reasonable.

It is worth noting one provision of the scheme which has been preserved:

6.1 Any *applicable member* who fails to submit full and accurate information to the *Society* in accordance with paragraph 4.2 within four weeks of the end of the relevant *CPD year*, or such later date as the *Society* may at its discretion permit, may, as an alternative to referral under the *Society's* Disciplinary Scheme, be offered the opportunity to submit the relevant information before a later deadline subject to payment of an administration fee of such amount as Council of the *Society* may from time to time decide.

Those members who do not keep their records up to date can consume a very large amount of the Society's staff's time. It is only fair that such members are asked to contribute to this cost. This

feature is enforced each year. The current scheme is more flexible than previous schemes and reminders will be issued before any fine is imposed.

8.5 Practising Certificates

The Practising Certificate Committee oversees the process of granting and renewing certificates. The process is separate from the CPD scheme except that holders of practising certificates are one of the groups that fall into CPD category R.

Certificate holders, like all other members, are obliged to meet the requirements of the CPD scheme, and their CPD records are scrutinised by the Practising Certificate Committee. They are also subject to other requirements, such as work experience requirements, which are set out under the Practising Certificate scheme.

8.6 References

The Society is frequently asked by statutory bodies, potential employers and recruitment agencies to confirm that an individual member's CPD is up to date. Of course, the Society cannot communicate this unless it has the member's permission.

9. Membership of Other Actuarial Associations

The current scheme has rules about what happens if a member is also a member of other actuarial organisations.

3.5 Alternative arrangements for actuaries practising outside Ireland

3.5.1 The *Society* may at its discretion recognise the CPD requirements of actuarial bodies outside Ireland as being equivalent to the requirements of this ASP, in which event an *applicable member* in Category G who practises wholly or mainly in one of the countries concerned and whose practice is governed by those bodies may treat completing those requirements as fulfilling the requirements of this ASP. However, not later than four weeks after the end of the *CPD year*, the *member* must inform the *Society*, in such form as the *Society* may require, that they have adhered to the other actuarial body's CPD requirements.

This is essentially the same as existed under the previous scheme.

With the advent of online working, it should be clearly understood that “practises wholly or mainly in one of the countries concerned” does not refer to physical presence but to the work that is done. For example, if you are working on an Irish pension scheme from Detroit, that is Irish work.

It should also be noted that this is not a process of gaining exemption from the Society's requirements. It is a process of proffering adherence to another scheme as evidence of effective compliance with the Society's scheme. The idea is to save members from doing the “paperwork” twice. In practice CPD schemes around the world are very similar in what they ask for.

FAQ 25

Q: I work for a reinsurer based in Dublin but it underwrites risks all round the world. Does this take me out of the Society scheme?

A: No. However, if you found that nearly all your work was effectively in one country, you were a member of the actuarial association of that country and that as a result you were having to comply with the CPD scheme of that association then you could (if that country is on our list) proffer that compliance to the Society.

At present the other actuarial associations that the Society recognises for this purpose are

- ★ IFoA (U.K.)
- ★ Actuaries Institute (Australia)

Others might be accepted in the future, but please note that the Society will only accept actuarial organisations that are full members of the International Actuarial Association or Actuarial Association of Europe for this purpose.

FAQ 26

Q: I work "in" Ireland and belong to one of the actuarial organisations listed above. Will that organisation allow my compliance with the Society's CPD scheme to count as complying with theirs?

A: Not necessarily, you will have to check with the member association in question. The IFoA is discussed below in more detail but it no longer allows any of its members to offer compliance with other organisations' CPD schemes in place of compliance with its own.

FAQ 27

Q: I work in Freecloud which has no actuarial organisation requiring CPD but I belong to the Society and the IFoA. Can I choose which CPD scheme to comply with?

A: No. You can only proffer compliance with the IFoA scheme to the Society if you work in the U.K. The IFoA no longer accepts other actuarial associations' schemes at all.

FAQ 28

Q: Do I need to do CPD relevant to the country I work in?

A: Probably. Much actuarial work has country specific elements and you will probably need to make yourself familiar with them. However, some actuarial work is not country specific. It is not explicitly a requirement but you need to do what is necessary to equip yourself to do your job.

9.1 Membership of the IFoA

Very substantial numbers of Society members have membership of the IFoA ("Dual" members). Even if their work is exclusively in Ireland, the IFoA now requires them to follow the IFoA scheme. In practice this currently means that the IFoA requires Dual members to: -

- ★ Do 15 hours CPD including 2 hours of Professionalism CPD
- ★ Record the CPD somewhere but this need not be on the IFoA's website. This means that recording on the Society's system is sufficient.
- ★ Make an annual compliance declaration
- ★ Carry out an annual reflective practice review

The IFoA's CPD year also runs from 1st September to 31st August, which makes the compliance easier.

Members should note that, at the time of writing this guide, the IFoA CPD scheme does not explicitly have extra requirements for particular roles. However, this does not mean that you do not have to do extra CPD. In particular, note that the extra requirements for IFoA practising certificate holders have instead been moved to the details of their practising certificate scheme.

FAQ 28

Q: I work in the UK and I have in the past chosen to use compliance with the IFoA as meeting my Society obligation. I have been accepted as not doing technical actuarial work by the IFoA and so have no requirement to do CPD. What does this mean for my compliance with Society rules?

A: Even if you are not subject to an IFoA requirement to do CPD, you must meet the Society requirements if you are in Category G (or indeed in Category R). Category G is not limited to members who are performing technical actuarial work, as the Society believes that the users of members' work are entitled to expect that members keep up to date with the knowledge and skills required for their work, even if it is not technical actuarial work.

9.2 Mutual Recognition Agreements (MRAs)

The Society is party to a number of MRAs. Most significant is that within the Actuarial Association of Europe (AAE) which allows members of the Society to join as a full member of any of the full members of the AAE that are party to that MRA (as of writing³ this is all full members of the AAE but it might change).

It should be noted that the AAE MRA is expected to only be applicable to members doing the full "normal" CPD level (i.e. at least Category G in the case of the Society). Therefore, the AAE MRA does not apply to any members who are not compliant with the CPD scheme or who are Category E members.

FAQ 29

Q: I was Category 2C (wider fields) under the previous scheme. Does that mean I cannot use the MRA to work elsewhere in Europe?

A: The CPD element of the AAE's MRA is a new requirement (expected to be in force before 31.12.2021). So, the old Category 2C was not affected by the old MRA but would have fallen foul of the new version if it remained in place. As it stands there is no issue, you are in Category G and must meet its requirements.

³ Summer 2021

Appendix A: Glossary

Some definitions used in the ASP and the Guide

Actuarial Services: Services based upon actuarial considerations, provided to intended users, that may include the rendering of advice, recommendations, findings or opinions and may include part or all of a work assignment. For this purpose, services are based upon actuarial considerations if:

- the use of principles and/or techniques of actuarial science is central to the provision of the services, and
- the exercise of professional judgement is required.

Applicable Member(s): means any *member* or *members* of the *Society* who at any point during any *CPD year* are in Categories R or G as specified in section 2.1 and applies for that *CPD year*.

Appropriate: when referring to CPD means any CPD that might assist a *member* in carrying out their job or a reasonable potential future job by way of increasing knowledge or acquiring and/or enhancing skills or attributes.

CPD year: the year from each 1 September until the following 31 August.

CBI: the Central Bank of Ireland.

Domestic Actuarial Regime: “Domestic Actuarial Regime and Related Governance Requirements under Solvency II” as issued by the *CBI* in 2018 or (if applicable) as subsequently amended.

Identifiable: When referring to CPD means CPD that can be identified as relating to a specific activity at a particular time.

Member: A member of the Society of Actuaries in Ireland.

Professionalism CPD: CPD related to professional ethics as defined in section 3.3.3.

Role-Relevant CPD: CPD relevant to a role as defined in section 3.2.1, and is any CPD that might assist a *member* in carrying out that role by way of increasing knowledge or acquiring and/or enhancing skills or attributes.

Society: means the Society of Actuaries in Ireland.