

31 March 2026

Our Ref: CDD/CPD/CIR

By email only

To: Chief Executives of all authorized insurers, Responsible Officers of all licensed insurance agencies and licensed insurance broker companies

Dear Sir/Madam,

CONTINUING PROFESSIONAL DEVELOPMENT (“CPD”) REQUIREMENTS

CPD Compliance Reporting Arrangements for Assessment Period 2025/2026 and subsequent assessment periods

This circular sets out the CPD compliance reporting procedures applicable to the Assessment Period 2025/2026 and subsequent assessment periods.

I. IMPORTANT DEADLINES

By way of recap, the key deadlines for each assessment period stipulated by [Guideline on Continuing Professional Development for Licensed Insurance Intermediaries](#) (GL24) are as follows:

31 July – Deadline for individual licensees¹ to complete their CPD hours required for the relevant assessment period.

30 September – Deadline for individual licensees to submit their CPD Declarations either directly to the Insurance Authority (“IA”) via [Insurance Intermediaries Connect](#) (“IIC”) or to their appointing principals².

31 October – Deadline for appointing principals to report the CPD compliance status of their appointed individual licensees to the IA.

II. CPD REPORTING PROCEDURES

Starting from the Assessment Period 2025/2026, all individual licensees are required to report their CPD compliance status either via the self-reporting function in their IIC individual

¹ Individual licensees refer to licensed individual insurance agents, technical representatives (agent) and technical representatives (broker).

² Their appointing authorized insurers, licensed insurance agencies or licensed insurance broker companies, as the case may be.

accounts, or by submitting their CPD Declarations to their appointing principals for onward submission to the IA via the principal's IIC supervisor accounts. In other words, **submission of CPD Declarations by email or post by individual licensees** (including those whose licence are under suspension due to the absence of any principals) **will no longer be accepted**.

Both individual licensees and appointing principals can check and view the required CPD hours for the relevant CPD assessment period via their respective IIC accounts (details are set out in ANNEX 1 and ANNEX 2 respectively).

1) Direct submission of CPD Declarations by Individual Licensees to the IA via IIC

Where individual licensees choose to submit their CPD Declarations directly to the IA via IIC, the submission must be made by 30 September following the end of the relevant assessment period.

The detailed procedures for self-reporting via an IIC individual account are set out in ANNEX 1. Individual licensees may also refer to the [user guide of IIC](#) for details of the currently available functions.

To encourage early completion of CPD requirement and to avoid congestion near the deadline, the CPD self-reporting function in IIC will be enabled from 1 April of each year and closed³ on 1 October (i.e. upon the end of the reporting period on 30 September).

(a) Individual licensees who have attained sufficient CPD hours on or before 31 July:

Between 1 April and 30 September - individual licensees who have attained sufficient CPD hours on or before 31 July, can submit their CPD Declaration via IIC by reporting their compliance status as “Yes” for the relevant assessment period.

(b) Individual licensees who fail to attain sufficient CPD hours on or before 31 July:

Between 1 August and 30 September - individual licensees who fail to attain sufficient CPD hours on or before 31 July, should submit CPD declaration via IIC by reporting their compliance status as “No” for the relevant assessment period.

Between 1 October and 15 November - individual licensee who (on or before 30 September) self-reported their compliance status as “No”, can update and provide additional documentation via IIC to demonstrate that any shortfall has since been rectified.

Where individual licensees submit their CPD Declarations directly to the IA, their appointing principal should verify whether the reported CPD compliance status is consistent with their internal compliance monitoring records. Where discrepancies are identified, the relevant appointing principal should advise the individual licensees concerned to amend their reported CPD compliance status as appropriate.

³ The self-reporting function will be closed on 1 October each year, but for individual licensees who have reported “Non-compliant” on or before 30 September, they could still update and provide all of their attendance records (including those for rectification).

2) Submission of CPD Declarations via the appointing principals to the IA

Where individual licensees choose to report their CPD Declarations via their appointing principals, they must do so by 30 September, and the appointing principals concerned must submit the CPD compliance status to the IA via their IIC supervisor accounts by 31 October.

The IA notes that most of the appointing principals have adopted sound CPD governance and controls, including internal target dates for completion earlier than 31 July. To facilitate early reporting by principals, the submission function in IIC supervisor account is also enabled from **1 April** each year.

Although CPD completion progress may differ among individual licensees, appointing principals are encouraged to submit CPD Lists in stages throughout each assessment period and reporting period. This phased, batch-by-batch submission approach enables both principals' control function and the IA to monitor CPD compliance and overall progress in a timely and effective manner. As such, appointing principals can:

Between 1 April to 31 July - report the compliance status of their appointed individual licensees who have already fulfilled CPD requirements by submitting completed CPD Lists via IIC by phrases.

Between 1 August and 31 October - report the compliance status for the remaining unreported appointed individual licensees (including those newly appointed after 31 July) by submitting completed CPD Lists via IIC.

Detailed procedures for individual licensees to report their CPD Declaration to their appointing principal(s), and for appointing principals to onward report CPD compliance status to the IA via IIC, are set out in ANNEX 2.

III. CPD COMPLIANCE AND PENALTY FRAMEWORK

Generally, individual licensees are required to complete a minimum of 15 CPD hours in each assessment period, including at least 3 CPD hours on topics that count as "Ethics or Regulations"⁴.

Further, starting from the Assessment Period 2025/2026, individual licensees serving as responsible officers of licensed insurance broker companies are required to complete not less than 2 CPD hours in each assessment period on topics related to their management responsibilities and control functions as set out in section 92(2) of the Insurance Ordinance. These 2 CPD hours fall within the scope of "Ethics or Regulations" and can be counted towards the 15-hour CPD requirements for the relevant assessment period.

To uphold industry standards, the IA reminds all licensees that compliance with CPD requirements is mandatory. The IA will not hesitate to take appropriate disciplinary action, whether directly or through a Section 84 Agreement, against any licensees who fail to meet this

⁴ Except for travel agents licensed to carry on regulated activities in restricted scope travel insurance business who are only required to earn 3 CPD hours.

obligation. Details of the applicable CPD Penalty Framework for each assessment period can be found in ANNEX 3.

Separately, the IA notes with appreciation the industry's strong improvement in CPD compliance over the past few years, which has now reached 99.9% in the most recent Assessment Period 2024/2025. This reflects the sustained commitment of licensees and appointing principals to upholding professional standards. The IA encourages the industry to build on this strong momentum and achieve full compliance in the coming assessment periods.

IV. ENQUIRIES

- For matters concerning the information contained in this circular and the CPD Lists, please send your enquiries by email to cpd@ia.org.hk.
- For matters concerning use of IIC Individual Account or principals' Supervisor Account, please send your enquiries or applications by email to licensing@ia.org.hk.

Yours faithfully,

Alan Wu
Acting Head of Conduct Supervision
Insurance Authority

c.c. The Hong Kong Federation of Insurers
Professional Insurance Brokers Association
The Hong Kong Confederation of Insurance Brokers

Encl.

ANNEX 1

Detailed procedures for CPD self-reporting by individual licensees via IIC to the IA

A. Checking the number of required CPD hours

As an individual licensee, you can check the number of CPD hours you have to complete for the current assessment period through your IIC individual account. Simply click the “*CPD Requirement and Compliance Status*” option from the vertical menu on the left and you will be able to view the number of CPD hours you are required to earn and your reported compliance status.

B. Submission of CPD Declaration via IIC

As an individual licensee, you can submit your CPD Declaration to the IA via IIC, by following the steps below:

- 1) Log into your IIC individual account and click “*CPD Declaration*” option from the vertical menu on the left.
- 2) If you have fulfilled the required number of CPD hours as shown in Part C of the CPD Declaration, then:
 - Select “Yes”¹ in Part C;
 - Complete the “Declaration” in Part E;
 - Press “*Submit*” on the last page of the e-Declaration Form;
 - An One-Time-Password (“OTP”) will be sent to your mobile phone. Input the OTP received and press the “*Submit*” button;
 - The “Status” at the front page will change from “New” to “Submitted on [Date of submission]”, indicating a successful submission.

Note: the self-reporting function is enabled on 1 April each year, and you can report your compliance status via IIC at any time thereafter before the function closes on 1 October each year.

- 3) If you fail to fulfill the required number of CPD hours as shown in Part C of the CPD Declaration on or before 31 July, then you must report your CPD non-compliance status starting from 1 August, up until 30 September, taking the following steps:
 - Select “No” in Part C;
 - Input the total shortfall of CPD hour(s);
 - If your CPD shortfall has subsequently been fully made good, click “Yes” and input the last “made good” date and upload all the supporting document(s) for the CPD hour(s) you have earned (including all CPD hours completed within the current assessment period and those made good thereafter);

¹ For an individual licensee who is also a responsible officer (RO) of a licensed insurance broker company, selecting “Yes” means he/she has simultaneously completed the compulsory RO-CPD requirement (if any).

- If your CPD shortfall has NOT been fully made good, click “No”, input the updated shortfall of CPD hours (if any part of the shortfall has been made good) and upload all the supporting document(s) for the CPD hour(s) you have earned (i.e. all CPD hours completed within the current assessment period), if applicable;
 - Complete Part D to explain why you were unable to fulfill the required number CPD hours and what action(s) you propose to take in order to fulfil the required number of CPD hours;
 - Complete the “Declaration” in Part E;
 - Press “Submit” on the last page of the e-Declaration Form;
 - An OTP will be sent to your mobile phone. Input the OTP received and press the “*Submit*” button;
 - The “Status” of the e-Declaration Form at the front page will change from “New” to “Submitted on [Date of submission]”, indicating a successful submission.
- 4) If you are an individual licensee who self-reported in your first submission that your CPD shortfall hours had not been fully made good, but you subsequently make good any part (or all) of the shortfall and would like to update the “made good” status, you may do so up to 15 November. You can repeat this process until ALL shortfall hours have been made good. Simply log into your IIC account, click “*CPD Declaration*” option from the vertical menu on the left and go through the following steps:
- If you have made good the full CPD shortfall, select “Yes” and input the last “made good” date and upload the supporting document(s) for the CPD hour(s) you have earned (i.e. those CPD hours being made good after last submission);
 - If part but not all of the CPD shortfall has been made good, click “No” and input the updated shortfall of CPD hours and upload all the supporting document(s) for the CPD hour(s) you have earned (i.e. those CPD hours being made good after last submission);
 - Press “Submit” button;
 - An OTP will be sent to your mobile phone. Input the OTP received and press the “*Submit*” button.

C. Withdrawal of CPD Declaration previously submitted via IIC and resubmission of new CPD Declaration via IIC

If you, as an individual licensee, have to resubmit your CPD Declaration (due to the wrong information being included in the first submission), you will have to withdraw the previous CPD Declaration and submit a new CPD Declaration. To do this:

- 1) Log into your IIC individual account and click the “*CPD Declaration*” option from the vertical menu on the left;
- 2) Go to the final page of the e-Declaration Form and press “*Withdraw this Declaration*” at the right bottom corner;
- 3) Input the reasons for withdrawing the previous declaration, then press “OK” to confirm;
- 4) An OTP will be sent to your mobile phone. Input the OTP received and press the “*Submit*” button;

- 5) After withdrawal, the “Status” of the e-Declaration Form at the front page will change back to “New” and you may submit another CPD Declaration following the steps of “Submission of CPD Declaration via IIC” indicated above.
- 6) Withdrawal can only be made on or before **30 September**.

ANNEX 2

Detailed procedures for CPD reporting by appointing principals via IIC to the IA

A. Information on CPD hours available in IIC

Appointing principals can view the CPD hours requirement and the reported compliance status for each of their individual licensees for the current assessment period in IIC, by taking the following steps:

- i. logging into their IIC Supervisor or Admin accounts;
- ii. clicking the *“Search for Licensees’ CPD Requirement and Compliance Status”* option from the vertical menu on the left; and
- iii. inputting the licence number of the individual licensee to be searched and pressing the *“Search”* button.

Appointing principals may also download their CPD Lists showing all of their appointed individual licensees and the CPD hours each is required to earn, by:

- i. logging into their IIC Supervisor or Admin accounts;
- ii. clicking the *“Report”* option from the vertical menu on the left;
- iii. selecting *“CPD hours required for the Assessment Period yyyy/yyyy”* from the pull-down menu under *“Report Type”*; and
- iv. clicking *‘Download’*.

At the beginning of each assessment period (i.e. starting from 1 August of a year), the new CPD List will be made available for appointing principals to download, and it will be updated by the IA on a daily basis to reflect the status of appointed individual licensees for each appointing principal. The final CPD List showing the status of appointed individual licensees as at the end of an assessment period (i.e. 31 July of the following year) will be available in IIC on 1 August of the following year. To facilitate appointing principals’ monitoring of the CPD compliance status of their individual licensees newly appointed after 31 July, in the CPD Lists downloaded after 1 August of the following year, an additional list of newly appointed individual licensees after 31 July will be appended to the original list of appointed individual licensees as at 31 July. Appointing principals may also report CPD compliance for these newly appointed individual licensees as appropriate. Below is a sample summary table for reference:

Date / Period	Content of CPD List available on IIC
1 August 2025	<ul style="list-style-type: none">• Final CPD list for Assessment Period 2024/2025 available• New CPD list for Assessment Period 2025/2026 available
1 August 2025 - 31 March 2026	<ul style="list-style-type: none">• Daily revised CPD list for Assessment Period 2025/2026 (reflecting the status of latest appointed individual licensees)
1 April 2026 - 31 July 2026	<ul style="list-style-type: none">• Daily revised CPD list for Assessment Period 2025/2026 (showing compliance status of individual licensees who have self-reported/ been reported “Yes”)
1 August 2026	<ul style="list-style-type: none">• Final CPD list for Assessment Period 2025/2026 available• New CPD list for Assessment Period 2026/2027 available

1 August 2026 - 30 September 2026	<ul style="list-style-type: none"> • CPD list for Assessment Period 2025/2026 with an additional list of newly appointed individual licensees after 31 July 2026 appended to the original list of appointed individual licensees as at 31 July 2026, and with the daily updated CPD compliance status (both “Yes” and “No”) of the appointed individual licensees.
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B. Submission of CPD Lists via IIC Supervisor Account

Starting from 1 April, appointing principals may start to submit the CPD Lists in stages throughout the reporting period up till 31 October. Appointing principals should report to the IA the CPD compliance for their individual licensees (appointed as at 31 July, i.e. the end of each assessment period) who do not report their CPD Declarations through the self-reporting function in IIC and instead report their CPD Declarations to their appointing principals by uploading the completed CPD Lists via IIC , after verifying the compliance status of their individual licensees .

An appointing principal must, in its CPD List, indicate the compliance status for each of its individual licensees using the following codes:

Code	Explanation
Y	The individual licensee has completed his/her CPD hours for the current assessment period by 31 July and submitted his/her CPD Declaration to the principal by 30 September; and his/her compliance status has been verified by the principal against its internal training records and/or any available external CPD attendance records.
N-1	The individual licensee has not completed the CPD hours required for the current assessment period by 31 July.
N-2	The individual licensee failed to file the CPD Declaration and/or any documentary evidence indicating his/her CPD compliance status to the appointing principal by 30 September.
N/A	The individual licensee has not appointed the principal, as the principal responsible for reporting the individual licensee’s CPD compliance to the IA.
NR	The individual licensee is not required to complete any CPD hour for the current assessment period.

When submitting a CPD List to IA via IIC, an appointing principal should only include in the CPD List the appointed individual licensees that it is reporting on with the compliance code completed for each of these licensees.

If you are reporting on any of your individual licensees on or before 31 July, you will only be able to do so if their compliance code is “Y” i.e. they have completed the CPD hours they were required to complete.

For those individual licensees with reported compliance code “N-1”, you may only report these after 31 July. When doing so, for each such licensee, please fill in the total CPD hour(s) shortfall as at 31 July in the column G; fill in “Yes” or “No” in column H to indicate whether the total shortfall CPD hours(s) had been rectified; and if the total shortfall CPD hour(s) had been rectified, fill in the last rectification date in column I.

For individual licensees who are not required to earn any CPD hours for the current Assessment Period, the compliance code 'NR' has been pre-populated in the CPD Lists. These individual licensees are not required to report their CPD Declarations to the IA for the corresponding assessment period.

For individual licensees who have self-reported their CPD Declaration via IIC directly to the IA, their reported compliance status will also be pre-populated in the CPD Lists. Appointing principals should verify the pre-populated compliance status self-reported by their individual licensees against the principal's own internal records and advise any individual licensee who has reported the wrong information to amend their CPD Declaration if necessary.

An appointing principal may delete from the CPD List it submits to the IA, the records of individual licensees (i) who are not required to earn any CPD hours during the relevant Assessment Period; or (ii) who have already self-reported their CPD Declarations directly to the IA via IIC; or (iii) whose compliance status have been reported by another appointing principal.

To submit its completed CPD List to the IA, an appointing principal should:

1. login to its IIC Supervisor or Admin account;
2. click the option "*CPD reporting*" from the vertical menu on the left;
3. click "*UPLOAD*" and select the completed CPD List;
4. click "*Validate and Submit*" to check the format and version of the CPD List, and submit the selected finalized CPD List to the IA.

If, following the submission of a completed CPD List to the IA, an appointing principal needs to amend the reported CPD compliance status of any of its appointed individual licensee(s), it should upload the CPD List containing only those individual licensee(s) with revised compliance status in the list, via the IIC.

C. Following up on N-1 cases

In relation to all individual licensees indicated by the appointing principal to be N-1 (i.e. the individual licensee has not completed the CPD hours required by 31 July) in the CPD List, the appointing principal should

- i. ensure and verify that the individual licensees concerned have rectified the shortfall hours as soon as practicable.
- ii. review whether the individual licensees with CPD non-compliance records still remain fit and proper to be continuously appointed.
- iii. provide assistance to individual licensees with 'N-1' status in disposing of their CPD non-compliance by entering into an s.84 Agreement, following the CPD Non-Compliance Penalty Framework set out in ANNEX 3.

ANNEX 3

Summary of Penalty Framework for CPD breaches for an assessment period (running from 1 August of a year to 31 July of the following year)¹

Shortfall of CPD hours	Penalties		
Shortfall of <u>less than 8 hours</u> Any shortfall for TR(Agents) carrying on restricted scope travel business	A fine of \$600 per hour of shortfall will be imposed, plus the shortfall must be rectified by 31 October.	Failure to rectify the shortfall by 31 October and/ or pay the fine will lead to a minimum suspension of 3 months (to continue thereafter until the shortfall is rectified and/ or the fine is paid).	If the shortfall is still not rectified and/ or the fine remains unpaid after the 3-month suspension, the licence may be revoked.
Shortfall of <u>8 hours or more</u>	A fine of \$600 per hour of shortfall will be imposed as well as a minimum suspension of 3 months (which will continue until the shortfall is rectified or the fine is paid).	If the shortfall is still not rectified and/ or the fine remains unpaid after the suspension of 3 months, the licence may be revoked.	

If an individual licensee, without reasonable excuse, fails to submit the CPD Declaration in the manner prescribed by the IA by 30 September, the IA will consider this reasonable cause to believe that the individual licensee is not fit and proper to be licensed as an insurance intermediary. This may result in an investigation by the IA against the individual licensee. Further, provision of false information in a CPD Declaration may result in revocation of licence and prohibition to apply for a new licence for 12 months.

¹ For details on the Penalty Framework for Non-compliance with CPD Requirements, please refer to [the circular issued on 23 July 2021](#).