



Policy on the Enforcement of the Code of Conduct and Ethics for Participants in the CIA Education System

Document 223160

Context and Purpose

The purpose of this policy is to outline the process and procedures for the monitoring and enforcement of the Canadian Institute of Actuaries (CIA) *Code of Conduct and Ethics for Participants in the CIA Education System* (Education Code). The goal is to ensure that persons who are participating in the CIA education system adhere to the high standards of conduct, practice, and qualifications of the actuarial profession, thereby supporting the actuarial profession in fulfilling its responsibility to the public.

Scope

This policy is applicable to all members of the CIA who are pursuing actuarial education through the CIA's education system (participants) and outlines the process and procedures related to a potential violation of the Education Code, which would be subject to review and assessment by the Education and Qualification Council (EQC), in accordance with this policy.

Following review and assessment by the EQC, any violation of the Education Code that is deemed to also be a potential offence¹, may be cause for further action under the CIA disciplinary process, and would be referred to the CIA Professional Conduct Board.

Policy Statements

1 - Adherence to the Education Code

- a. A participant must adhere to the Education Code throughout their time as a participant to the CIA education system.
- b. Attestation of adherence to the Education Code shall be expressed upon registration for an educational activity or examination provided by the CIA.
- c. Attestation of adherence to the Education Code shall be implied upon registration for an educational activity provided by a CIA-accredited university or other CIA education partner.

2 - Violation of the Education Code (including potential sanctions)

- a. A participant who has allegedly violated the provisions of the Education Code shall be subject to the review and assessment process and procedures outlined in this policy.

¹ An "offence", as defined in the CIA Bylaws, means Any violation of the *Bylaws, Standards of Practice, or Rules of Professional Conduct* of the Institute.

- b. Any violation of the Education Code that is deemed to also be a potential offence, may be cause for further action under the CIA disciplinary process, and would be referred to the CIA Professional Conduct Board.
- c. If a participant violates the Education Code, the CIA may:
 - i. Issue a warning – The participant would be issued a warning, reminding them of the importance of strict adherence to the Education Code and advising the participant of the possibility of further sanctions or disciplinary action for any future violations of the Education Code.
 - ii. Issue a ban from involvement in the CIA education system – The participant would be banned from taking any CIA-sponsored exams or applying for credit for any educational activity sponsored by the CIA, a CIA-accredited university, or other CIA education partner, for a specified period of time, to be determined solely by the EQC, based on the nature and gravity of the violation. The CIA would not recognize any examination or activity that is completed during the period of the ban.
 - iii. Implement other measures the EQC believes will appropriately address the violation.
 - iv. Refer the matter to the CIA Professional Conduct Board for further disciplinary action.

3 - Reporting a violation of the Education Code

- a. A person who believes they have evidence of a possible violation of the Education Code may submit a written report to the EQC detailing the alleged violation. Evidence supporting the alleged violation should be submitted with the report.
- b. All violation reports must be submitted to the attention of the CIA Director of Education and International Affairs within 15 days of learning of the alleged violation.
- c. Head Office shall notify the participant of the allegation against them.
- d. The EQC may initiate a review of a participant's conduct at any time, at its sole discretion, with or without the receipt of a violation report.

4 - Review and assessment of an alleged violation of the Education Code

- a. The CIA Director, Education and International Affairs will receive all violation reports and gather the relevant information regarding the alleged violation, for review by the EQC.
- b. The EQC will review the report and relevant information, including any advice or recommendations from Head Office, and determine whether there is sufficient evidence that a violation has occurred.
- c. If the EQC determines that a violation has occurred, Head Office shall notify the participant, within five days of the EQC's decision.
- d. The participant shall be provided with an opportunity to provide a response to the alleged violation, within 15 days of the notice.
- e. Within 15 days of receipt of the participant's information, or the expiry of the 15 day period for the participant to respond with additional information, the EQC will review any additional information and determine whether to
 - i. dismiss the report;
 - ii. seek additional information; or

iii. require appropriate remedial action or apply a sanction, in accordance with Section 2 of this policy.

f. The participant shall be informed of the EQC's decision, in writing, within 15 days.

5 - Appeal of a determination of a violation of the Education Code

a. A participant who is found guilty of a violation of the Education Code may appeal the EQC's decision, in writing, within 30 days of the date the participant was notified of the EQC's decision.

b. A request for appeal must include a statement of the basis of the appeal and any other materials in support of the participant's position.

6 - Appeal panel

a. An appeal panel shall be appointed by the CIA Executive Director consisting of themselves, the CIA Staff Actuary, Education, and three CIA members-at-large who are not members of the EQC.

b. A participant may request a hearing with the appeal panel within 30 days of the date the participant was notified of the EQC's decision.

c. The appeal panel shall review all information relevant to the violation, including a report from the EQC outlining its decision and rationale, and any additional information provided by the participant, and shall determine, by majority vote, whether to

i. uphold;

ii. reject; or

iii. modify the EQC's decision and related sanction.

d. The appeal panel shall render its decision and Head Office shall communicate the decision, in writing, to the participant within 45 days of the appeal panel's appointment.

7 - Appeal hearings

a. The format of a hearing shall be established by the EQC based on the nature of the subject matter, the number of participating witnesses (if any), and any other relevant circumstances.

b. No less than 30 days prior to the hearing, Head Office shall send written notice to the parties involved in the hearing, with the details regarding the date, time and format of the hearing.

c. In a case where an in-person hearing is required, it shall be conducted at the CIA's Head Office in Ottawa, or at such other location as may be selected by the CIA, at its discretion.

d. Travel costs and all other expenses incurred by the participants and their witnesses and representatives will be the sole responsibility of the participant.

8 - Cooperation with recognized organizations and universities

a. The EQC may disclose the results of its review and any remedial action or sanctions, to any other recognized actuarial organization or university having a legitimate interest, which may result in additional disciplinary action on the part these entities.

b. Upon request, the EQC may, at its discretion, provide to such entities, all or part of its information relevant to the violation.

9 - Notification of violation to law enforcement

- a. In accordance with its duty to protect the public interest, the CIA may disclose the violation to the relevant law enforcement authorities when there is potential that the violation was also a contravention of a law in Canada.

Exemptions

N/A

Escalation Procedures/Management of Non-compliance with this Policy

N/A

Definitions and Abbreviations

N/A

Associated Documents

[CIA Code of Conduct and Ethics for Participants in the CIA Education System](#)
[CIA Rules of Professional Conduct](#)

References

N/A

Monitoring, Evaluation, and Review

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Procedures

N/A