

11 July 2025

Our Ref: CDD/CPD/CIR

By email only

To : Responsible Officers of All Licensed Insurance Broker Companies

Dear Sir/Madam,

Compulsory CPD requirement on Responsible Officers of all insurance broker companies effective from 1 August 2025

Today, we formalize the introduction of compulsory CPD requirement applicable to Responsible Officers of all licensed insurance broker companies (“RO-CPD requirement”) via the revision of the Guideline on Continuing Professional Development (“CPD”) for Licensed Insurance Intermediaries (“GL24”)¹.

This circular provides a summary of the background to this initiative, outlines the implementation details of the RO-CPD requirement, and reiterates the consequences of non-compliance.

Background

As mentioned in the circulars dated 28 June 2024 and 7 March 2025, the Responsible Officer (“RO”) of a licensed insurance broker company typically plays a dual role in the day-to-day operation, i.e. engaging in regulated activities and assuming management responsibilities of the broker company under Section 92(2) of the Insurance Ordinance (Cap. 41) (“IO”). Furthermore, licensed insurance broker companies are subject to a range of regulatory requirements under the Insurance (Financial and Other Requirements for Licensed Insurance Broker Companies) Rules (Cap. 41L), including those relating to share capital, net assets, professional indemnity insurance, separate client account and financial reporting, etc. These obligations, coupled with the RO’s dual responsibilities, make the role increasingly important and complex.

Given the critical role that ROs play in overseeing both regulatory compliance and operational management, it is considered appropriate for ROs of all licensed broker companies to complete at least two CPD hours dedicated to management and control functions in each assessment period.

¹ The revised GL24 could be accessed on the IA’s website via the following link:
https://www.ia.org.hk/en/legislative_framework/guidelines.php

To prepare for this, the IA launched a pilot scheme on RO CPD training in Assessment Period 2024/25, with the aim of raising awareness amongst ROs about the importance of their management and control responsibilities. The pilot scheme was well received by the industry with positive feedback. Building on this success, the IA decides to formalize it as a compulsory CPD requirement for ROs of all licensed insurance broker companies.

Details of RO-CPD requirement

Starting from 1 August 2025, each RO of the licensed insurance broker company is required to complete at least 2 CPD hours specifically focused on management and control functions. For the avoidance of doubt, these 2 CPD hours fall under “Ethics or Regulations” category and can be counted towards the existing 15-hour CPD requirements that each RO must fulfill for each Assessment Period.

The RO-CPD course will be organized by the IA and delivered through the two broker industry bodies, the Professional Insurance Brokers Association (“PIBA”) and The Hong Kong Confederation of Insurance Brokers (“CIB”). Further details on the training schedule for the Assessment Period 2025/26 will be announced in due course.

Consequence of non-compliance

ROs of all licensed broker companies are required to comply with the compulsory RO-CPD requirement by attending any session of the RO-CPD course run by the IA through either of the two broker bodies in each assessment period.

Failure to comply with this requirement, without reasonable excuse, will result in disciplinary action as set out in “Penalty Framework for Non-compliance with CPD” (refer to [the circular issued on 23 July 2021](#)). In addition, such non-compliance will not only adversely affect the individual’s ongoing fitness and properness to continue acting as the RO, but will also prompt the IA to apply greater regulatory scrutiny to the broker company with which the RO is associated.

If you have any questions concerning the information contained in this circular, please send your enquiries by email to cpd@ia.org.hk.

Yours faithfully,

Alan Wu
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Insurance Authority

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