LEGAL SERVICES BOARD

Summary of Decision

The purpose of this summary sheet is to provide a high-level and accessible overview of the Legal Services Board's ("LSB") decision. Readers are recommended to read the formal decision notice below for further details. This summary is not and should not be taken as a formal part of the LSB's decision notice under the Legal Services Act 2007 ("the Act").

This decision notice relates to an application from the Institute of Chartered Accountants in England and Wales (ICAEW) for approval of alterations to its Continuing Professional Development Regulations (CPD Regulations).

The amendments seek to formalise the ICAEW's existing guidance concessions, clarify CPD record-keeping and evidence requirements, strengthen monitoring and escalation arrangements and update terminology to reflect current statutory, regulatory and organisational arrangements.

Following assessment of the ICAEW's application, the LSB has concluded that the changes do not meet the conditions for refusal under paragraph 25(3) of Schedule 4 to the Act. The LSB's decision is to grant the application in full. We have set an expectation for the ICAEW to monitor and report on the impact of the changes. Further details are set out in paragraph 13 below.

The decision notice explains our assessment of the main issues that we considered in reaching our decision.

Decision notice

The Institute of Chartered Accountants in England and Wales (ICAEW)'s application for approval of alterations to its Continuing Professional Development (CPD) Regulations.

1. The Legal Services Board **(LSB)** has granted an application from the **ICAEW** for approval of alterations to its Continuing Professional Development (CPD) Regulations.

2. The LSB is required by Part 3 of Schedule 4 to the Legal Services Act 2007 ("**the Act**") to review and grant or refuse applications by approved regulators to make alterations to their regulatory arrangements.

3. This decision notice sets out the decision taken, including a description of the alterations to the regulatory arrangements and why those alterations are being made. Information on the statutory framework under which approved regulators make such applications to the LSB for approval can be found on the LSB website[1].

Chronology

- The application was received on 07 October 2026.
- The LSB confirmed receipt of the application on 07 October 2026.
- The 28-day initial decision period for considering the application ends on 03 November 2026.
- This decision notice is effective from 03 November 2026.
- The decision notice will be published on the LSB's website by 05 November 2026.

Background

4. On 07 October 2026, the ICAEW submitted an application[2] to the LSB to approve changes to its Continuing Professional Development (CPD) Regulations.

5. ICAEW's CPD Regulations are applied to ICAEW individuals and firms it regulates to provide accountancy, financial and legal services. For legal services, ICAEW regulates individuals and firms to carry out probate activities and the administration of oaths (reserved legal activities under the Act). ICAEW was designated as an approved regulator and licensing authority in relation to the administration of oaths under the Legal Services Act 2007 (Approved Regulator) Order 2020[3]. In September 2025[4] the LSB approved an application from ICAEW to give effect to this designation, enabling ICAEW-authorised

[1] https://legalservicesboard.org.uk/our-work/statutory-decision-making/alterations-to-regulatory-arrangements/statutory-framework-for-applications-to-the-lsb-for-approval-of-changes-to-regulatory-arrangements
[2] Application for approval of proposed alterations to ICAEW CPD Regulation October 2026
[3] https://www.legislation.gov.uk/uksi/2020/271/introduction/made
[4] Decision Notice - ICAEW - Administration of Oaths and First tier Complaints

practitioners to carry out the administration of oaths. This expanded scope of practice is reflected in some of the ICAEW's proposed changes to the CPD Regulations, as shown in paragraph 8(c) of this decision notice.

6. The current CPD Regulations set minimum annual CPD hours according to the nature of a person's role. The ICAEW's approach to CPD is self-directed based upon the 'reflect, act, impact and declare' (RAID) principles supported by an annual declaration of compliance as part of the membership renewal process, subject to monitoring and enforcement. This means those within scope must reflect on their development needs and create a plan for meeting them and complete annual minimum CPD hours, applied to most professionals, which includes a minimum of one hour of ethics training, retain evidence, confirm compliance and cooperate with compliance checks. The application states that actioning development needs can take many forms e.g. technical reading, attendance at conferences, courses and seminars, online learning and workshops with peers. Firms must ensure that applicable requirements are met and that appropriate records are maintained.

7. The ICAEW's application states the proposed alterations dealing with CPD are refinements intended to improve clarity and regulatory effectiveness – they do not alter the existing policy position or minimum-hours framework, as summarised above. It explained that the proposed changes are the outcome of operational experience and monitoring by its Quality Assurance Department (QAD).

Summary of proposed changes

8. The ICAEW's application explains that the proposed alterations, as they relate to legal services:

    a) Expand scope of accredited legal services to include administration of oaths.

    b) Codify existing guidance that gives concessions from minimum CPD requirements to those whose only relevant role is as a statutory director of a micro-entity, sole trustees in certain low-risk circumstances, or where gross income is less than £1000. Those people in this position would still be required to keep records of CPD compliance and provide them on ICAEW's request.

    c) Clarify CPD verification, including for ethics training, and record-keeping and evidence requirements.

    d) Clarify the role of the ICAEW Practice Assurance Committee, including referrals to the Conduct Department when a member fails to cooperate with QAD or comply with CPD requirements, rather than to the Committee itself.

    e) To reflect organisational changes to ICAEW's internal departmental and team names.

9. The ICAEW's application states the alterations also ensure consistency with existing policy and guidance.

10. The ICAEW intends that the amendments take effect on 1 November 2026 to coincide with the start of its CPD year – except for legal services for which implementation is subject to

LSB approval. It will publish the amended CPD Regulations with updated guidance for members and firms.

Key Issues

Monitoring impact of changes

11. As stated in Part C of the application, the ICAEW expects that the changes will have a positive impact on several of the Regulatory Objectives including: (i) promoting and protecting the public interest (ii) promoting and protecting the interests of consumers; (iii) encouraging an independent, strong, diverse and effective legal profession; and (iv) promoting and maintaining adherence to the professional principles. Its basis for this is that the proposals will improve clarity and introduce better procedures as the basis for monitoring compliance.

12. In connection with protecting and promoting the interests of consumers, the application notes the changes are expected to benefit consumers by improving clarity and assurance around CPD compliance, supporting competent delivery of regulated legal services, strengthening record-keeping and monitoring, and providing clearer routes for proportionate action where practitioners do not cooperate. We acknowledge the positive impact the proposals are intended to have on consumers, while at the same time providing further clarity, in so doing aiding transparency and consistency for those subject to CPD requirements.

13. Although the ICAEW shared in Part E of the application (Equalities Impact Assessment) that it does not expect any significant impact on the profession, it stated that it will monitor the implementation of the new rules through QAD checks, undertakings and referrals, together with feedback from members, firms and internal teams. We expect the ICAEW to keep the LSB updated on its monitoring process of potential impacts of its proposals on users of legal services and inform the LSB if it considers any changes to be necessary.

Decision

14. The LSB has considered the application against the criteria in paragraph 25(3) of Schedule 4 to the Act and is satisfied that there are no grounds to refuse this application and accordingly the application is granted in full.

15. **Annex A** to this decision notice contains the amendments to the regulatory arrangements approved by the LSB.

Summary of expectations

16. For the reasons set out in this decision notice, the LSB expects the ICAEW to keep the LSB updated on its monitoring process of potential impacts of its proposals on users of legal services and inform the LSB if it considers any changes to be necessary.

Richard Orpin, Chief Executive
Acting under delegated authority granted by the Board of the Legal Services Board

03 November 2026

Annex A - approved alterations

Continuing Professional Development Regulations

INTRODUCTION

These regulations set out the requirements on ICAEW members, firms and other persons and bodies in relation to continuing professional development. They are effective from 1 November ~~2023~~ 2026 and shall apply to CPD Years commencing on or after 1 November ~~2023~~2026. The previous version of these regulations was in force from 1 November 2023 until 31 October 2026 and shall apply to CPD Years ending 31 October 2024, 2025, and 2026.

1. For the purpose of these ***regulation***s, the following definitions will apply:

Audit Regulations means the *Audit Regulations* and Guidance of *ICAEW* for the time being in force and any subsequent editions

~~***Committee*** the *Practice Assurance Committee*~~

~~***Conduct Committee*** is a disciplinary committee of *ICAEW* which considers allegations reported to it by the *Conduct Department*~~

Conduct Department is the department within *ICAEW*'s ~~Professional Standards~~ Regulation & Conduct Division which is responsible for assessing complaints, investigating conduct matters and reporting allegations to the Conduct Committee

CPD means continuing professional development

CPD Category means one of the categories set out in the Schedule to these *regulations* setting out the *CPD* hours requirements for *Members* and *Relevant Person*s

CPD Year means the 12 month period between 1 November and 31 October of the following year

Disciplinary Bye-laws and IDRs means the Disciplinary Bye-laws and Investigation & Disciplinary Regulations which set out the tests for liability to disciplinary action, and the process which will be followed by the ~~Conduct Department~~ *Conduct Department* ~~and the disciplinary committees and the orders which can be made by the disciplinary committees~~

~~***Disciplinary committees*** means any of the *ICAEW* disciplinary committees; the *Conduct Committee*, the Disciplinary Committee and the Appeal Committee~~

Head of ~~Committees and Tribunals~~Adjudication means the person within *ICAEW*'s ~~Professional Standards Department~~ Regulation & Conduct Division who manages the ~~Committees and Tribunals~~ Adjudication team which administers the ~~*Practice Assurance*~~*PA Committee*

ICAEW means the Institute of Chartered Accountants in England and Wales

Local Audit Regulations means the Local Audit Regulations and Guidance of *ICAEW* for the time being in force and any subsequent editions

Member means a person who has been admitted as a member of the Institute of Chartered Accountants in England and Wales

Member Firm means

(a) a *Member* engaged in public practice as a sole practitioner; or
(b) a partnership engaged in public practice of which more than 50 per cent of the rights to vote on all, or substantially all, matters of substance at meetings of the partnership are held by *Member*s; or
(c) a limited liability partnership engaged in public practice of which more than 50 per cent of the rights to vote on all, or substantially all, matters of substance at meetings of the partnership are held by *Member*s; or
(d) any body corporate (other than a limited liability partnership) engaged in public practice of which:
    (i) 50 per cent or more of the directors are *Member*s; and
    (ii) more than 50 per cent of the nominal value of the voting shares is held by *Member*s; and
    (iii) more than 50 per cent of the aggregate in nominal value of the voting and non-voting shares is held by *Member*s

Other Firms means firms which:

(a) Have been granted a dispensation to use the description "Chartered Accountants" under the Regulations governing the use of the description Chartered Accountants and *ICAEW* general affiliates; ~~and~~or
(b) Are registered by *ICAEW* for audit, local audit, investment business, ~~probate~~ legal services or as a Licensed Practice which are not *ICAEW Member Firm*s

QAD means *ICAEW*'s Quality Assurance Department which will be responsible for carrying out monitoring checks to ensure that *Members* and *Relevant Person*s (who are not exempt) are in compliance with the requirements of regulation 6, *regulation* ~~7~~8 and that *ICAEW Member Firm*s and *Other Firms* are in compliance with *regulation* ~~17~~20

Practice Assurance (PA) Committee is the committee to which any disputes relating to undertakings requested by *QAD* under these *regulations* will be referred in the first instance

Principal Bye-laws means the bye-laws setting out the rights and obligations of *Members* including the obligation to undertake *CPD*

Regulated Individual means a person who is not an *ICAEW Member* but who is authorised or licensed by *ICAEW* as:

(a) A responsible individual (RI) for the signing of statutory audit reports; or
(b) A ~~Key Audit~~ Lead Partner for the signing of local public audit reports; or
(c) An insolvency practitioner; or
(d) A ~~Probate~~ legal services authorised individual; or
(e) A licensed practitioner under the Licensed Practice Scheme.

Reciprocal Member means an *ICAEW Member* who gained *ICAEW* membership or membership of a *Reciprocal Member*ship *Body*, under a reciprocal membership agreement made between a *Reciprocal Member*ship *Body* and *ICAEW*

Reciprocal Membership Body means a professional body which has entered into a reciprocal membership agreement with *ICAEW*

Reciprocal RI/~~KAP~~Lead Partner means a *Reciprocal Member* who is also a responsible individual (for statutory audit) or a ~~Key Audit~~ Lead Partner (for local public audit)

Relevant Person includes:
(a) A *Regulated Individual*;
(b) A *Reciprocal RI/~~KAP~~ Lead Partner*; and
(c) A *Reciprocal Member*

Trusts of a low risk or personal nature includes the following:
(a) Will trusts – acting in a personal capacity/as an unpaid executor
(b) Trustee of intestate estate – acting in a personal capacity/as an unpaid executor
(c) Bare trusts – including to open a bank account for a child
(d) Parental trusts
(e) Pilot trusts with less than £100
(f) Co-ownership trusts to hold shares of property
(g) Insurance policies
(h) Personal injury trusts/special needs trusts

Equivalent entities in jurisdictions outside of the UK would be included in this definition.

Who is subject to these *regulations*?

2. These ***regulations*** apply to:
   (a) All ***Members*** and ***Relevant Persons*** who are not exempt pursuant to ***regulations*** 5 and 7
   (b) All ***ICAEW Member Firm***s; and
   (c) All ***Other Firms***.

3. ***Members*** and ***Relevant Persons*** (unless they are exempt) are responsible for complying with the requirements set out in ***regulations*** 6 and 8, and their annual renewal of ***ICAEW*** membership (or the annual renewal or continuation of their licence/registration by ***Regulated Individuals***) shall be treated as confirmation that they are in compliance. The requirement set out for ***Member Firms*** and ***Other Firms*** in ***regulation*** 20(a) does not derogate from that responsibility.

4. ***Members*** and ***Relevant Persons*** (unless they are exempt), ***ICAEW Member Firms*** and ***Other Firms*** are required to co-operate with ***ICAEW***, its staff, the ~~***Practice Assurance***~~ ***PA Committee*** and any ~~***disciplinary committee***~~disciplinary committee carrying out functions related to ***Principal Bye-law*** 56 and/or these ***regulations***.

5. ***Members*** and ***Relevant Persons*** shall be exempt from the requirements of **regulation** 8 if they, during a ***CPD Year***:
   (a) do not carry out or undertake, for reward or without reward, any accountancy or finance work or provide any accountancy, finance or non-reserved legal services; and
   (b) do not act as a trustee, other than as a trustee of a ***trust of a low-risk or personal nature***; and
   (c) do not act as a director of a body corporate; and
   (d) do not act ~~or~~ in any other capacity which carries with it an equivalent level of legal or financial responsibility as a trustee, other than as a trustee of ***a trust of a low-risk or personal nature***, or a director of a body corporate.

6. If, during a ***CPD Year***, ***Members*** and ***Relevant Persons***:
   (a) only carry out or undertake accountancy or finance work or provide accountancy, finance, reserved legal or non-reserved legal services without reward during a ***CPD Year***, and ~~(b) T~~this work does not involve working in a senior financial or executive role at, or acting as a trustee of, a charity; or
   (b) the total gross income of their paid accountancy and finance work is less than £1,000 per annum; or
   (c) only act as a statutory director of a micro entity as defined in Companies Act 2006;

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they will only be required to reflect on the nature of the work being undertaken and their professional development needs, create a plan for meeting those needs, and undertake any necessary training. ***Members*** and ***Relevant Persons*** within this regulation must retain records of all the ***CPD*** they have completed for each ***CPD Year*** for at least three years from the end of each ***CPD Year*** and supply it promptly together with a written summary of their reflection on their development needs, if requested by ***QAD***.

7. ***Reciprocal Members*** will be exempt from complying with these ***regulations*** if they have satisfied the ***CPD*** requirements and obligations relating to their membership of their ***Reciprocal Membership Body*** unless they are ***Reciprocal RIs/~~KAPs~~Lead Partners*** who are required by the ***Audit Regulations/Local Audit Regulations*** to comply with these ***regulations***.

CPD obligations required to be satisfied by Members and Relevant Persons

8. All ***Members*** and ***Relevant Persons*** who are not exempt under ***regulations*** 5 or 7, or who do not fall within the ambit of ***regulation*** 6, are required to:
   (a) Identify, at the start of every ***CPD Year***, the ***CPD Category*** in the schedule to these ***regulations*** which is ~~most~~ applicable to them (given the nature of the accountancy work or services they are carrying out or undertaking at that time and what they can then reasonably foresee carrying out or undertaking for the rest of that ***CPD Year***), and reflect on their professional development needs, how they can meet them and create a plan for fulfilling those needs during that ***CPD Year***;
   (b) Undertake at least the minimum number of ***CPD*** hours stipulated for the ***CPD Category*** which is ~~most~~ applicable to them, including the minimum number of relevant and verifiable ***CPD*** hours (where a ***Member*** falls within more than one ***CPD Category***, they must comply with the requirements of the ***CPD Category*** with the highest ***CPD*** hours requirement);
   (c) Undertake a minimum of one hour's verifiable ethics training either by:
      (i) completing the ***ICAEW*** ethics module created for use by ***Members*** and ***Relevant Persons*** during that ***CPD Year*** (or earlier ***CPD Years*** if not already completed); or
      (ii) undertaking alternative ethics training which satisf~~y~~ies specified learning outcomes aligned with the ***ICAEW*** Code of Ethics which can be evidenced; and
   (d) Retain records of all the ***CPD*** they have completed, including evidence of their ~~relevant and~~ verifiable hours, for each ***CPD Year*** for at least three years from the end of each ***CPD Year*** and supply it promptly together with a written summary of their reflection on their development needs, if requested by ***QAD***.

9. Relevant ~~and verifiable~~ ***CPD*** is any activity that meets a specific learning outcome(s) identified by ***Members*** and ***Relevant Persons*** subject to the ***CPD*** requirements in these ***regulations*** as necessary to remain up to date and competent in their professional role(s) and verifiable ***CPD*** is ***CPD*** which can be evidenced.

Requirements where a full CPD Year is not completed

10. ***Members*** and ***Relevant Persons***, who only become subject to these ***regulations*** for the first time after the start of a ***CPD Year***, will be required to comply with the obligations set out in ***regulation*** 8 on a pro rata basis for the remainder of that ***CPD Year*** unless they are subject to ***regulation*** 6.

11. ***Members*** and ***Relevant Persons***, who are exempt under ***regulations*** 5 or 7 at the start of a ***CPD Year*** but become subject to ***regulation*** 8 during that ***CPD Year***, will be required to reflect on their development needs and to comply with at least the minimum ***CPD*** requirements for their ***CPD Category*** on a pro rata basis for the rest of that ***CPD Year***.

12. ***Members*** and ***Relevant Persons***, who have an expectation at the start of a ***CPD Year*** of becoming exempt under ***regulations*** 5 or 7 for the rest of that ***CPD Year***, will be required to comply with the minimum ***CPD*** requirements for their ***CPD Category*** on a pro rata basis for the period prior to becoming exempt. ~~Dispensations~~ Allowances for not complying fully with ***regulation*** 6 or ***regulation*** 8 will also be given to ***Members*** and ***Relevant Persons*** who have significant, unexpected periods of absence from work during a ***CPD Year*** should they be referred to the ***PA Committee*** for non-compliance.

Requirements where a Member and Relevant Person changes CPD Categories during a CPD Year

13. ***Members*** and ***Relevant Persons***, who change their role during a ***CPD Year*** which puts them in a different ***CPD Category***, will still be required to comply with the minimum requirements of the ***CPD Category*** which applied to them at the start of that ***CPD Year*** but will be required to reflect on whether they should be doing more than the minimum required for that category in view of the change in nature of their role and when, during the ***CPD Year***, the change of role takes place.

Consequences for a Member or Relevant Person who is assessed by QAD during a monitoring check not to be in compliance with regulation 6 or regulation 8

14. Any ***Member*** or ***Relevant Person*** who is found on a review by ***QAD*** to have:
    (a) Failed to identify themselves in a ***CPD Category*** and failed to comply with the minimum number of ***CPD*** hours they were required to undertake for the ***CPD Category*** they should have identified themselves to be in; or
    (b) Identified themselves in the wrong ***CPD Category*** with a lower minimum ***CPD*** hours requirement than the ***CPD Category*** they should have identified themselves to be in; or
    (c) Identified themselves in the correct ***CPD Category*** but failed to undertake the minimum required amount of ***CPD*** hours for that ***CPD Category***; or
    (d) Identified themselves in the correct ***CPD Category*** but failed to demonstrate that they have complied with the requirement to undertake a minimum number of relevant and verifiable hours for that ***CPD Category***; or
    ~~(d)~~(e) Failed to undertake a minimum of one hour's verifiable ethics training required under ***regulation*** 8(c); or
    ~~(e)~~(f) Failed to reflect on the nature of their professional development needs and created a written plan to address those needs and/or failed to undertake~~n~~ any necessary training as required under ***regulation*** 6. ~~where they are partially exempt from part of the requirements of ***regulation*** 8~~

    will be required to provide an undertaking to ***QAD*** to remedy any failures set out in (a)-(~~e~~f) during the ***CPD Year*** in which the non-compliance is detected in addition to the minimum requirements for compliance in that ***CPD Year*** and is required to inform their firm or their employer of their breach of these ***regulations***.

15. If any ***Member*** or ***Relevant Person*** fails to provide an undertaking to ***QAD*** to remedy any failures to comply with ***regulation*** 8 as set out in ***regulation*** 14(a) to 14(f) within 14 days of it being requested (without reasonable excuse for providing it within that time), or objects to providing an undertaking, the ***Member*** or ***Relevant Person*** will be referred by ***QAD*** to the ~~***Practice Assurance***~~***PA Committee*** which will:
    (a) Review the written report submitted to it by ***QAD*** together with any written representations made by the ***Member*** or ***Relevant Person*** as to why no undertaking has been given or should be given (checking that an opportunity has been given to the ***Member*** or ***Relevant Person*** to make written representations);
    (b) Determine whether it agrees with ***QAD's*** assessment that the ***Member*** or ***Relevant Person*** is in breach of ***regulation*** 8; and
        (i) if it agrees, the ***PA Committee*** will request the ***Member*** or ***Relevant Person*** to provide it with an undertaking within 14 days to remedy within that ***CPD Year***

any breach of ***regulation*** 8 (in addition to the minimum requirements on that ***Member*** or ***Relevant Person*** for that ***CPD Year***);

(ii) if it disagrees, the ***PA Committee*** will ask the ***Head of ~~Committees and Tribunals~~Adjudication*** to inform the ***Member*** or ***Relevant Person*** of its decision and that no further action is required

(c) Refer any ***Member*** or ***Relevant Person*** who fails to provide within 14 days an undertaking requested under ***regulation*** 15(b)(i) to the ***Conduct Department*** for investigation under the ***Disciplinary Bye-laws and IDRs***.

16. If any ***Member*** or ***Relevant Person*** fails to provide an undertaking to ***QAD*** to remedy a failure to comply with ***regulation*** 6 as set out in ***regulation*** 14(f) within 14 days of it being requested (without reasonable excuse for providing it within that time), or objects to providing an undertaking, and ***QAD*** considers that the ***Member*** or ***Relevant Person*** should have undertaken some training to meet their development needs, the ***Member*** or ***Relevant Person*** will be referred by ***QAD*** to the ***PA Committee*** which will:

(a) Review the written report submitted to it by ***QAD*** together with any written representations made by the ***Member*** or ***Relevant Person*** as to why no undertaking has been given or should be given (checking that an opportunity has been given to the ***Member*** or ***Relevant Person*** to make written representations);

(b) Determine whether it agrees with ***QAD's*** assessment that the ***Member*** or ***Relevant Person*** is in breach of ***regulation*** 6; and

(i) if it agrees, the **PA Committee** will request the **Member** or **Relevant Person** to provide it with an undertaking within 14 days to remedy within that ***CPD*** Year any breach of ***regulation*** 6 (in addition to the minimum requirements on that ***Member*** or ***Relevant Person*** for that ***CPD Year***);

(ii) if it disagrees, the ***PA Committee*** will ask the ***Head of Adjudication*** to inform the ***Member*** or ***Relevant Person*** of its decision and that no further action is required

(c) Refer any ***Member*** or ***Relevant Person*** who fails to provide within 14 days an undertaking requested under ***regulation*** 16(b)(i) to the ***Conduct Department*** for investigation under the ***Disciplinary Bye-laws and IDRs***.

~~16.~~17. Any ***Member*** or ***Relevant Person***, who is found on a subsequent review by ***QAD*** to have failed to comply with the undertaking they provided pursuant to ***regulations*** 14 or 15, will become liable to disciplinary action and will be referred to the ***Conduct Department*** for investigation under the ***Disciplinary Bye-laws and IDRs***.

~~17.~~18. Any ***Member*** or ***Relevant Person*** who is assessed by ***QAD*** to have failed to comply with any of the requirements of ***regulation*** 6 or ***regulation*** 8 twice within five ***CPD Year***s, will become liable to disciplinary action and will be referred to the ***Conduct Department*** for investigation under the ***Disciplinary Bye-laws and IDRs***.

19. Any ***Member*** or ***Relevant Person*** who fails to promptly provide to ***QAD***, if requested, records of all the ***CPD*** they have completed for each ***CPD Year*** for at least three years from the end of each ***CPD Year*** together with a written summary of their reflection on their development needs, will become liable to disciplinary action and will be referred by ***QAD*** to the ***Conduct Department*** for investigation under the ***Disciplinary Bye-laws and IDRs***.

Requirements for ICAEW Member Firms and Other Firms

~~18.~~20. All ***Member Firms*** and ***Other Firms*** will be required to:

(a) Ensure that all of their ***Members*** and ***Relevant Persons*** are in compliance with at least the minimum ~~relevant~~ total and verifiable hours requirement for their ***CPD Category*** for the professional work which their ***Members*** and ***Relevant Persons*** carry out for their firm;

(b) Maintain records of ~~at least~~ all the ***CPD*** completed, including evidence of the ~~relevant and~~ verifiable ***CPD*** hours undertaken, by all of their ***Members*** and ***Relevant Persons*** for each ***CPD Year*** for at least three years from the end of each ***CPD Year***;
(c) Make available to ***QAD*** on request their records for ***CPD*** carried out by their ***Members*** and ***Relevant Persons***.

Consequences for a Member Firm or Other Firm which is assessed by QAD during a monitoring check not to be in compliance with regulation 20

~~19.~~21. Any ***Member Firm*** or ***Other Firm***, which ***QAD*** has assessed during a review as failing to comply substantively with ***regulation*** 20(a), will be required to provide an undertaking to ***QAD*** that it will:
(a) Identify ~~whether any~~ which of its ~~other~~ ***Members*** ~~and~~ or ***Relevant Persons*** were not in compliance in the ***CPD Year*** which is the focus of ***QAD*'s** check; and
(b) Ensure that any such ***Members*** and ***Relevant Persons*** remediate any deficiencies found in their compliance with ***regulation*** 8 for that ***CPD Year*** during the ***CPD Year*** when ***QAD*'s** assessment takes place.

~~20.~~22. Any ***Member Firm*** or ***Other Firm***, which fails to comply substantively with ***regulation*** 20(b), will be required to provide an undertaking to ***QAD*** that it will remediate, within a reasonable period stipulated by ***QAD***, any failings identified within its records for that ***CPD Year*** and the ***CPD Year*** when ***QAD*'s** assessment takes place if the failings are continuing.

~~21.~~23. If any ***Member Firm*** or ***Other Firm*** fails to provide an undertaking to ***QAD*** within 14 days of it being requested (without reasonable excuse for providing it within that time), or objects to providing an undertaking, the ***Member*** or ***Relevant Person*** will be referred by ***QAD*** to the ~~***Practice Assurance***~~***PA Committee*** which will:
(a) Review the written report submitted to it by ***QAD*** together with any written representations made by the ***Member Firm*** or ***Other Firm*** on why no undertaking has been given or should be given (checking that an opportunity has been given to the ***Member Firm*** or ***Other Firm*** to make representations);
(b) Determine whether it agrees with ***QAD*'s** assessment that the ***Member Firm*** or ***Other Firm*** is in breach of ***regulation*** 20 and
(i) if it agrees, the ***PA Committee*** will request the ***Member Firm*** or ***Other Firm*** to provide it within 14 days with an undertaking to carry out the actions set out in ***regulations*** 21 and/or 22 within a reasonable period set by the ***PA Committee***
(ii) if it disagrees, the ***PA Committee*** will ask the ***Head of*** ~~***Committees and Tribunals***~~***Adjudication*** to inform the ***Member Firm*** or ***Other Firm*** of its decision and that no further action is required
(c) Refer any ***Member Firm*** or ***Other Firm*** which fails within 14 days to provide an undertaking requested under ***regulation 23(b)(i)*** ~~21(b)(i)~~ to the ***Conduct Department*** for investigation under the ***Disciplinary Bye-laws and IDRs***.

~~22.~~24. Any ***Member Firm*** or ***Other Firm***, which is identified on a subsequent review by ***QAD*** to have failed to comply with any undertaking provided pursuant to ***regulations*** 22 or 23 will become liable to disciplinary action and will be referred by ***QAD*** to the ***Conduct Department*** for investigation under the ***Disciplinary Bye-laws and IDRs***.

~~23.~~25. Any ***Member Firm*** or ***Other Firm***, which is identified by ***QAD*** to have failed to comply with any of the requirements of ***regulations*** 20(a) and 20(b) twice within five ***CPD Year***s, will become liable to disciplinary action and will be referred to the ***Conduct Department*** for investigation under the ***Disciplinary Bye-laws and IDRs***.

~~24.~~26. Any ***Member Firm*** or ***Other Firm*** which fails to comply with the requirement in ***regulation*** 20(c) will become liable to disciplinary action and will be referred by ***QAD*** to the ***Conduct Department*** for investigation under the ***Disciplinary Bye-laws and IDRs***.

Powers of variation

27. The ICAEW Chief Learning Officer shall have the power to vary or waive specific requirements of the above ***regulations*** in exceptional circumstances.

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Schedule

Please see associated guidance on icaew.com for further explanation on the terms used below.

PRACTICE MEMBERS

CPD Category 1

Members and Relevant Persons who work in any of the following areas are required to undertake 40 CPD hours relevant to their role and learning needs, of which 30 hours must also be ~~relevant and~~ verifiable.

(a) Those acting as responsible individuals or as Engagement Quality Reviewers on the audits of one or more Public Interest Entities
(b) Those spending 30% or more of their professional time on audit engagements for Public Interest Entities
(c) Those acting as ~~Key Audit~~Lead Partners or as Engagement Quality Reviewers on one or more Major Local Audits (as defined on the FRC's website)
(d) Those spending 30% or more of their professional time on audit engagements for Major Local Audits
(e) Those undertaking the role of Engagement Partner as defined under ISA 220 on the audits of central Government Departments or devolved administration
(f) Those spending 30% or more of their professional time on the audits of central Government Departments or devolved administration
(g) Those signing CASS audit or assurance reports and those who are spending 30% of more of their professional time on CASS audits (a CASS audit and CASS engagement team are defined on the FRC's website)
(h) Those who lead or manage, or spend 30% or more of their professional time on the delivery of internal audit or assurance services to Public Interest Entities and/or local bodies where the audit is a Major Local Audit and/or central government departments and/or devolved administrations
(i) Those working in audit regulatory roles, including monitoring and enforcement, within an accountancy professional body, a training organisation or an oversight body
(j) Insolvency practitioners who are authorised to take insolvency appointments
(k) Those who spend 30% or more of their professional time working on insolvency appointments or matters directly related to insolvency appointments
(l) Those providing direct or indirect tax services to Large Companies, listed or international companies or groups, or High Net Worth Individuals
(m) Those spending 30% or more of their professional time providing ESG assurance services to Public Interest Entities, local bodies where the audit is a Major Local Audit, central government departments and devolved administrations

PRACTICE MEMBERS

CPD Category 2

Members and Relevant Persons ~~and~~ who work in any of the following areas are required to undertake 30 CPD hours relevant to their role and learning needs, of which 20 hours must also be ~~relevant and~~ verifiable:

(a) Those acting as responsible individuals or as Engagement Quality Reviewers on the audits of one or more Large Companies
(b) Those who spend 30% or more of their professional time working on the audits of Large Companies

(c) Those undertaking the role of Engagement Partner as defined under ISA 220 on the audits of public sector bodies that do not fall into Practice Members CPD Category 1(c), (d), (e) and (f)
(d) Those who spend 30% or more of their professional time working on the audits of public sector bodies that do not fall into Practice Members CPD Category 1(c), (d), (e) and (f)
(e) Those who spend 30% or more of their professional time working on performance or value for money audits of public sector bodies
(f) Those who lead or manage a team providing internal audit or other assurance services, or who spend more than 30% of their professional time providing or being part of a team providing internal audit services or other assurance services for Large Companies or public sector bodies that do not fall into Practice Members CPD Category 1(h)
(g) Insolvency practitioners who hold non-appointment taking insolvency licences
(h) Those who spend more than 30% of their professional time working on insolvency or restructuring engagements which are not related to insolvency appointments
(i) Those who spend 30% or more of their professional time undertaking forensic accounting work
(j) Those who spend 30% or more of their professional time on engagements under ISAE 3000 or ISRS 4400 on behalf of a recipient of a grant from a public sector body as defined by ONS
(k) Those undertaking probate and/or oaths work
(l) Those undertaking designated professional body (Investment Business) licenced activities
(m) Those undertaking designated professional body (Consumer Credit) licenced activities
(n) Those carrying out non-reserved legal services
(o) Those working within corporate finance teams providing advice to individuals, public sector bodies or businesses
(p) Those providing direct or indirect tax services which are not limited to:
    - Simple Income Tax Self-Assessment returns for individuals and partnerships who are UK resident, UK domiciled, and not High Net Worth Individuals; and/or
    - VAT compliance (not advice) for entities that are not Large Companies, listed or international companies or groups; and/or
    - Payroll administration

    And do not fall into CPD practice category 1(l)
(q) Those who do not spend 30% or more of their professional time on audits falling within CPD Category 1(b), (d), (f) and (g) and CPD Category 2 (b), (d) and (e) but who spend more than 40% or more of their professional work time in aggregate on those engagements

PRACTICE MEMBERS

CPD Category 3

Members and Relevant Persons who are not exempt ~~who~~ and do not fall within any of the areas of work set out in CPD Categories 1 and 2 for practice members are required to undertake 20 CPD hours relevant to their role and learning needs, of which 10 hours must also be ~~relevant and~~ verifiable.

PRACTICE MEMBERS – OUTSIDE OF THE UK

If you are a member based outside of the UK, you will need to use your judgment to determine whether you are engaged in an equivalent role, with reference to the relevant national laws and regulations where appropriate.

MEMBERS NOT IN PRACTICE

CPD Category 1

Members and Relevant Persons who work in any of the following areas (including in an interim or consultancy role) are required to undertake 40 CPD hours relevant to their role and learning needs, of which 15 hours must also be ~~relevant and~~ verifiable:

(a) Those who are employed (or contracted to act) at Public Interest Entities as:
- Members of the management board (executive and non-executive directors); or
- Chief Financial Officer/Finance Director/other Head or Chief roles; or
- Members of the Audit Committee (if not members of the management board)

(b) Those who are employed at public sector bodies as Accounting Officers

(c) Those who are employed at local authorities as statutory officers

(d) Those who are employed (or contracted to act) at central government departments, devolved administrations, local bodies where the audit is a Major Local Audit as:
- Members of the management board (executive and non-executive directors); or
- Chief Financial Officer/Finance Director/other Head or Chief roles; or
- Members of the Audit Committee (if not members of the management board)

(e) Those who are employed at charities with incoming resources of >£100m/gross assets of > £1bn (Large Charities) as Chief Executive/Chief Financial Officer/Finance Director/other Head or Chief roles

(f) Those who act (and who are paid to act) as trustees of pension funds with incoming resources >£100m/pension trustee gross assets >£1bn or >10,000 members (Large Pension Funds)

(g) Those who are employed at pension funds with incoming resources of >£100m/ gross assets of >£1bn as Chief Executive/Chief Financial Officer/Finance Director/other Head or Chief roles

(h) Those who are subject to the FCA Senior Managers Certification Regime and are classified under the Senior Managers Regime (undertaking a Senior Management Function)

(i) Those who are working as Chief Internal Auditors (or equivalent) at Public Interest Entities, central government departments, devolved administrations or local bodies where the audit is a Major Local Audit.

MEMBERS NOT IN PRACTICE

CPD Category 2

~~ICAEW m~~Members and Relevant Persons who work in any of the following areas are required to undertake 30 CPD hours relevant to their role and learning needs, of which 10 hours must also be ~~relevant and~~ verifiable:

(a) Those who are employed at Public Interest Entities as Financial Controller/Financial Reporting Manager, or other manager level roles which do not fall into Non-Practice Members CPD Category 1(a)

(b) Those who are employed (or contracted to act) at Large Companies as:
- Members of the management board (executive and non-executive directors); or
- Chief Financial Officer/Finance Director~~, or~~/other Head or Chief ~~or Head~~ level roles; or
- Members of the Audit Committee (if not members of the management board)

(c) Those who are employed at public sector bodies which do not fall into Non-Practice Members CPD Category 1(d) as:
- Members of the management board (executive and non-executive directors); or

- Chief Financial Officer/Finance Director~~, or~~/other Head or Chief ~~or Head~~ level roles; or
- Members of the Audit Committee (if not members of the management board)
- Those who are employed at central government departments, devolved administrations, local bodies where the audit is Major Local Audit as Financial Controller/Financial Reporting Manager, or other manager level roles which do not fall into Non-Practice Members CPD Category 1(d)

(d) Those who act as trustees of pension funds which are not Large Pension Funds
(e) Those who act as Chief Executives/Chief Financial Officers/Finance Directors/Other Head or Chief roles at charities which are not Large Charities
(f) Those who hold financial management roles at Large Charities other than those roles set out in Non-Practice Members CPD Category 1(f)
(g) Those who act as Chief Executives/Chief Financial Officers/Finance Directors or in other Chief of Head of roles at pension funds which are not Large Pension Funds
(h) Those who hold financial management roles at Large Pension Funds other than those roles set out in Non-Practice Members CPD Category 1(g)
(i) Those who are subject to the FCA Senior Managers Certification Regime and are classified under the Certification Regime (not undertaking a Senior Management Function)
(j) Those working within internal audit departments at Public Interest Entities, central government departments, devolved administrations, local bodies where the audit is a Major Local Audit other than Chief Internal Auditors or equivalent), Large Charities or Large Pension Funds

CPD CATEGORY 3

All other Members and Relevant Persons working outside of practice who are not exempt and do not fall within CPD Categories 1 and 2 for members not in practice will be required to undertake at least 20 hours of CPD relevant to their role and learning needs, of which 5 hours must also be ~~relevant and~~ verifiable.

CPD CATEGORY – VOLUNTEERING AT CHARITIES

Those Members and Relevant Persons working/acting without reward as senior executives or financial positions at, or acting as trustees of, charities are required to undertake a minimum of one hour's verifiable ethics training either by:

- completing the ICAEW ethics module created for use by Members and Relevant Persons during that CPD Year (or earlier CPD Years if not already completed); or
- undertaking alternative ethics training which satisfies specified learning outcomes aligned with the ICAEW Code of Ethics;

and either:

- To undertake the annual ICAEW Charity Trustees Essentials CPD training (which will be made available free); or
- To undertake training to keep themselves up to date with developments impacting their work as charity trustees with similar learning outcomes.