

Enhanced Competency Framework on Compliance (ECF-Compliance) Frequently Asked Questions

Grandfathering

1. What are the grandfathering criteria?

A RP may be grandfathered on a one-off basis based on the years of qualifying work experience and/or professional qualification. Such work experience need not be continuous. Please refer to the guidelines below for reference.

a) Core Level:

- Possessing at least 3 years of relevant work experience on or before 31 January 2024 in the general compliance function (for Role 1) or in an investment and/or insurance compliance function (for Role 2) as specified in the Annex 1 of HKMA Guide; and
- Employed by an Authorized Institution (AI) at the time of application.

b) Professional Level:

- Possessing at least 8 years of relevant work experience on or before 31 January 2024 in general compliance function (for Role 1)* or in the investment and/or insurance compliance function (for Role 2)* as specified in the Annex 1 of HKMA Guide; of which at least 3 years must be gained from respective Professional Level job roles (taking up middle to senior level positions in compliance function) gained from AIs; and
- Employed by an AI at the time of application.
- RPs who have sufficient work experience both in Role 1 – General Compliance and Role 2 – Investment and Insurance Compliance (i.e. 8 years of experience in each role can apply for both CCOP(GC) and CCOP(IIC) certifications).

Applications for grandfathering are handled and assessed by HKIB.

** the majority of work experience gained from different job roles will affect the certification title (i.e. CCOP(GC) or CCOP(IIC)).*

2. How does a RP know if he/she is eligible to apply for grandfathering?

The grandfathering application requires the Human Resources Department (HR) of the concerned AI(s) to verify and endorse the relevant work experience reported by the RP (e.g. name of employer, job position, employment period, total number of years of experience in the relevant functions). An endorsement by the RP's current employer would indicate that he/she has met the eligibility criteria on relevant experience before it is passed to HKIB for processing and vetting.

During the application review process, HKIB may request the RPs to provide employment records or additional information to substantiate the application for grandfathering.

3. Can my current employer certify my previous working experiences for the submission of grandfathering application?

Yes. Regarding information related to a RP's previous employment, the current employer is encouraged to provide necessary assistance to the RP in the application for grandfathering or certification (e.g. confirming whether such information is consistent with the curriculum vitae provided by the RP at the time of his/her job application). Applications without HR verification will not be accepted.

4. I have adequate years of relevant experience, but I have left the banking industry, am I eligible for grandfathering?

Grandfathering is applicable for existing RPs who are performing compliance function and are employed by an AI in Hong Kong at the time of grandfathering application. For other individuals who have the relevant work experience but are not working in an AI in Hong Kong or those staff of an AI who are not performing compliance function during the grandfathering period, they may submit application to HKIB for grandfathering within three months from the date of joining the compliance function of an AI and becoming a RP. However, they should have met all the applicable grandfathering criteria on or before 31 January 2024.

5. If I have worked in non-AIs for few years, should this experience be counted into relevant work experience?

As for work experience related to compliance gained from non-bank financial institutions and/or regulators, they will be considered on a case-by-case basis by taking into account the level of involvement in performing compliance related key tasks. Please refer to the key tasks listed in Annex 1 of the "Guide to ECF-Compliance" issued by HKMA to assess the significance of the compliance role performed.

6. Would overseas / non-AIs work experience be recognised in a grandfathering application?

In general, relevant overseas work experience in the compliance function from the banking industry and/or relevant work experience in non-bank financial institutions, regulators (e.g. HKMA, Securities and Futures Commission, Insurance Authority etc.) and/or professional services firms providing compliance related services will be considered on a case-by-case basis by taking into account the level of involvement in performing compliance related key tasks. The work experience acquired from frontline business processes and operations, internal audit and risk management functions will also be considered on a case-by-case basis.

7. When could I receive the result of grandfathering application for Core Level or Professional Level?

It will take approximately 90 days under normal circumstances to process the grandfathering and certification application (including the election done by the Executive Committee) upon receipt of the completed application form and full set of supporting documents.

- 8. Upon the commencement of the grandfathering application (i.e. 1 February 2023), I might not fulfil the minimum relevant work experience for the grandfathering application. However, I will be able to accumulate and fulfil such minimum work experience on or before the deadline (i.e. 31 January 2024), how and when should I submit my application?**

It is necessary for you to possess the minimum relevant work experience upon your submission of the grandfathering application. Such fulfilment of relevant work experience and submission of grandfathering application should be made on or before 31 January 2024.

- 9. Does HKIB accept batch submissions of the application forms from AIs?**

Yes, AIs may submit the application forms of their RPs by batch together with one single payment for the total application fee. Please provide the details of a representative as the key contact person regarding the applications in a cover letter.

Certification

- 10. If I have completed both Module 4 and Module 5, can I apply for CCOP(GC) and CCOP(IIC) certification?**

Yes. You can apply for CCOP(GC) and CCOP(IIC) certifications if you have fulfilled the requirement of the working experience for each of these professional qualifications.

- 11. Is it mandatory for Relevant Practitioners (RPs) to obtain the ECF certification?**

The ECF-Compliance is not intended to be a mandatory licensing regime. However, AIs are encouraged to adopt the ECF-Compliance as part of their overall efforts in supporting relevant employees' on-going professional development and appropriate measures to monitor and maintain the competence levels of their compliance staff. Meanwhile, an individual working in AIs undertaking compliance roles is also encouraged to apply for the relevant certifications.

- 12. Are the ACOP / CCOP(GC) / CCOP(IIC) certifications available to Compliance practitioners currently not working in banks?**

ACOP / CCOP(GC) / CCOP(IIC) certifications are only applicable for RPs who are currently working in the compliance function of AIs located in Hong Kong. Those who are currently not working in banks may submit the certification application to HKIB within three months from the date of joining the compliance function of an AI and becoming a RP.

- 13. If there is a change of job or industry, and/or personal information after being certified as ACOP / CCOP(GC) / CCOP(IIC), shall I inform HKIB?**

ACOP / CCOP(GC) / CCOP(IIC) holders should notify HKIB of any change of job or industry, and/or personal information upon renewal of their certifications. This would serve to re-confirm the status of a qualified RP. All current Individual Members are obliged to maintain an updated profile with the institute.

14. What are the relevant job roles for candidates to be considered as Relevant Practitioners?

As specified in the “Guide to ECF-Compliance” issued by HKMA, it is aimed at RPs performing compliance function (other than AML/CFT compliance) in AIs. For details of the job roles and tasks, please refer to Annex 1 of the “Guide to ECF-Compliance” issued by HKMA.

15. I am a HKIB professional member who is holding ECF-AML professional qualification, do I need to pay the certification fee if I also possess ECF-Compliance professional qualification?

If you are currently as a valid HKIB professional member (i.e. AAML/ CAMLP), the certification fee will be waived for the ACOP/ CCOP(GC) / CCOP(IIC).

16. I obtained ACOP/ CCOP(GC) / CCOP(IIC) in August this year. When and how will I be notified to renew my ACOP/ CCOP certification?

ACOP / CCOP(GC) / CCOP(IIC) certification is subject to annual renewal on a calendar year basis from 1 January to 31 December. Irrespective of the date of your first certification as ACOP / CCOP(GC) / CCOP(IIC) with HKIB, your certification will expire on 31 December of the same year. You are required to renew your certification annually and a renewal notice will be emailed to all certification’s holders in December.

However, if you fail to renew the certification before 31 January of each calendar year, your certification will be suspended, and your name and status information will not appear on the Certified Individuals (CI) Register published on HKIB website. As a result, you will not be allowed to include the professional qualification on your name card or CV. Default or Resigned Members (“Former Members”) who have ceased to be a member of the Institute may apply to reinstate their HKIB membership by paying the current year’s subscription plus the re-registration fee (“Reinstatement Fee”). For details, please refer to HKIB Member’s Handbook.

Module Exemption**17. Can I apply for module exemption if I possess other similar qualification(s) other than the lists of eligible training programmes as provided by the HKMA?**

If learner would like to apply for modular exemption on Module 1 with other equivalent academic/professional qualification(s) in Compliance, he/ she will need to provide detailed information on such qualification with the syllabus mapping summary (e.g. training course syllabus, examination syllabus) and HKIB will review the application on a case-by-case basis.

18. Do I need to apply for exemption if I have successfully completed Module 1 and Module 2 of ECF on Operational Risk Management?

Yes. The exemption has to be applied. However, the exemption fee is waived due to the respective modules are identical in nature between these two ECF programmes.

19. If I have already been grandfathered for CCOP(IIC) and would like to further pursue CCOP(GC), what should I do?

Learner is required to complete the training and pass the examination for Module 4 if he/she wants to pursue the Professional Qualification of CCOP(GC). Meanwhile, he/she is also required to be an RP and fulfil at least 5 years of relevant work experience in the general compliance function as specified in the Annex 1 of the “Guide to ECF-Compliance” issued by HKMA.

Training

20. I don’t have any compliance background, can I enrol for the programme?

Yes, you can enrol for the ECF-Compliance Core Level programme without any compliance background if you meet any one of the following entry requirements:

- Be a student or graduate of an Associate Degree or a Higher Diploma in any disciplines; or
- Possess equivalent qualifications or above; or
- Be a mature applicant with 3 years of relevant banking experience with recommendations from employer

21. What is the award or certificate will be given to candidates once they have completed the training & examination or the certification process?

For Core Level

Type	Title	Requirements
Awards	Module Certificate with respective module title	<ul style="list-style-type: none"> • Successfully completed training & examination per module
Programme Certificate	Advanced Certificate for ECF on Compliance	<ul style="list-style-type: none"> • Successfully completed training & examination for Module 1 - 3
Professional Qualification	Associate Compliance Professional (ACOP)	<ul style="list-style-type: none"> • Relevant Practitioner who has completed the training & examination for Module 1 – 3

For Professional Level (For Module 4)

Type	Title	Requirements
Awards	Module Certificate	<ul style="list-style-type: none"> • Successfully completed training & examination for Module 4
Programme Certificate	Professional Certificate for ECF on Compliance (General Compliance Stream)	
Professional Qualification	Certified Compliance Professional – (General Compliance) (CCOP(GC))	<ul style="list-style-type: none"> • Relevant Practitioner with 5 years of Relevant Work Experience within 10 years immediately prior to the date of application for certification. • Completed the training &

		examination for Module 4
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For Professional Level (For Module 5)

Type	Title	Requirements
Awards	Module Certificate	<ul style="list-style-type: none"> Successfully completed training & examination for Module 4 & 5
Programme Certificate	Professional Certificate for ECF on Compliance (Investment and Insurance Compliance Stream)	
Professional Qualification	Certified Compliance Professional – Investment and Insurance Compliance Stream (CCOP(IIC))	<ul style="list-style-type: none"> Relevant Practitioner with 5 years of Relevant Work Experience within 10 years immediately prior to the date of application for certification. Completed the training & examination for Module 4 & 5

22. Is there any specified sequence for taking individual module of ECF-Compliance Core Level programme and ECF-Compliance Professional Level programme?

There is no specified sequence for them to take the modules under the ECF-Compliance Core Level programme and ECF-Compliance Professional Level programme.

23. Is there any arrangement if I am absent from a training session?

There is no make-up session arranged for any absentees. However, they may send the questions to the trainers through HKIB staff for clarification during their studying if any.

24. What should I do if I need to change the training date due to some unexpected circumstances?

Generally, any change of the training date is NOT allowed. However, if you are sick on the training date and cannot attend the training, you should inform the Institute and provide a supporting document (e.g. sick leave certificate) for our reference. You may be permitted to attend the next subsequent training, subject to the availability of seats.

25. Can I apply for a refund if I withdraw the training application?

Once the training application is confirmed, all fees are non-refundable and non-transferrable.

26. What language will be used for training and the study guide?

The study materials of the ECF on Compliance are offered in English only. Trainers may conduct the classes in either English or Cantonese.

Examination

27. Is there a limit on the number of attempts for the examinations?

There is no limit on the number of times one can take the training and resit the examinations due to failure. Nonetheless, the completion period of “Advanced Certificate for ECF on Compliance” and “Professional Certificate for ECF on Compliance” is 8 years per programme from the year in which the first module was completed.

28. When can the candidate obtain the examination results?

Candidates can check their examination results online through HKIB online platform. Candidates will receive email notification once the examination results are available. Results will be released within 4 weeks after the examination date for MC-type examinations, and around 8 weeks after the examination date of the last module in each examination diet for other types of examinations. The online examination results will be removed one month after they are released.

Candidates will also receive their results slip by email within two weeks after the examination result is released through HKIB online platform.

29. Can the candidate change the examination date?

In general, any change of examination date will NOT be allowed. However, special arrangements will be considered for exceptional circumstances (e.g. sick leave). Candidates should inform the Institute and provide a supporting document (e.g. sick leave certificate) for our reference. The candidate may be permitted to sit the next subsequent examination, subject to the availability of seats. HKIB will review this on a case-by-case basis.

30. How can the candidate appeal against his/her examination results?

By submitting a written request via email to exam@hkib.org, candidates may request a rechecking or remarking of their examination scripts within ONE MONTH after issuance of the examination results. Please note that there is a rechecking fee of HKD500 per module and remarking fee of HKD1,700 per module. Rechecking is only applied to the type of MCQ examination while remarking is applied to other types of examination.

Continuing Professional Development (CPD)

31. What is the Continuing Professional Development (CPD) requirement for both Core Level and Professional Level certification holders?

ACOP holders are required to complete a minimum of 10 CPD hours for each calendar year (ending 31 December), of which at least 5 hours should be on topics related to compliance, legal and regulatory requirements, risk management and ethics.

CCOP(GC) / CCOP(IIC) holders are required to complete a minimum of 12 CPD hours for each calendar

year (ending 31 December), of which at least 6 hours should be on topics related to compliance, legal and regulatory requirements, risk management and ethics.

The CPD requirements will be waived for the first calendar year (ending 31 December) of certification and grandfathering. For more details, please refer to HKIB webpage.

32. What if a RP fails to meet the annual CPD requirements?

Failure to comply with the annual CPD requirements will result in suspension of professional qualification(s) during which the RP concerned must stop using the professional qualification(s) in all business and social contexts, for instance, on name card and in personal profile, until the necessary documents confirming the fulfilment of CPD requirements are submitted. While a RP's professional qualification(s) is/are being suspended, his/her name and status information will not appear on the Register of Certified Individuals published on HKIB's website.

For cases where there are special reasons to justify the failure to meet the annual CPD requirements, for example, due to an extended sick leave, HKIB may consider reinstating the RP's certification on a case-by-case basis.

33. If I have attained multiple ECF professional qualifications, how many CPD hours are required?

For members holding more than one HKIB professional qualifications, they are only required to fulfil the maximum required CPD hours for one of his/her professional qualifications in a calendar year.

For example, one professional qualification requires for 10 CPD hours and another professional qualification requires for 12 CPD hours, the members are required to fulfil the maximum CPD hours (i.e. 12 CPD hours) ONLY. Nevertheless, the CPD hours that the members have obtained should also meet the specific topics requirement of each professional qualification they are holding even if the maximum CPD hours are exceeded.

34. If the ACOP/ CCOP(GC) / CCOP(IIC) holder works for another AI within a calendar year, could he/she combine the CPD hours he/she has previously earned?

ACOP/ CCOP(GC) / CCOP(IIC) holders can combine the CPD hours earned while working at different AIs.

35. Do ECF-Compliance Professional Qualification holders need to provide supporting documents when submitting application for certification renewal?

No, it is not necessary to provide supporting documents when submitting the application for certification(s) renewal. However, the ECF-Compliance Professional Qualification holders / HR of AIs are expected to be responsible for keeping records of completion of relevant programmes and CPD activities undertaken by ECF-Compliance Professional Qualification holders. HKIB reserves the right to request further documentation for confirmation purposes.

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