

Guidelines of Certification Application for ECF on Compliance (ECF-Compliance)

Introduction

This document is developed to provide more specific guidelines for the Certification application of the **Enhanced Competency Framework on Compliance (ECF-Compliance)**. It includes information related to (A) Eligibility Criteria, (B) Application Procedure, and (C) Recertification Arrangement for the application(s) of the following professional qualifications:

Core Level

- Associate Compliance Professional (ACOP)

Professional Level

- Certified Compliance Professional - General Compliance Stream (CCOP(GC))
- Certified Compliance Professional – Investment and Insurance Compliance Stream (CCOP(IIC))

A. Eligibility Criteria

1. Relevant Practitioner

The ECF-Compliance is targeted at “**Relevant Practitioners (RPs)**”, engaged by an **Authorized Institution (AI)**¹. The ECF-Compliance is intended to apply to staff whose primary responsibilities involve performing the compliance function (other than AML/CFT compliance).

Specifically, it is aimed at RPs located in the Hong Kong office of an AI who perform the compliance job roles as listed in the Table below.

¹ An institution authorized under the Banking Ordinance to carry on the business of taking deposits. Hong Kong maintains a Three-tier Banking System, which comprises banks, restricted license banks and deposit-taking companies. Authorized institutions are supervised by the HKMA.

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Table – Job roles of the ECF-Compliance

	Role 1 – General Compliance	Role 2 – Investment and Insurance Compliance
Key Tasks	<ul style="list-style-type: none"> • Assist senior management in meeting their responsibility in terms of understanding, monitoring and managing compliance related matters • Establish compliance review programmes to ensure compliance with applicable legal and regulatory requirements and codes of conduct • Handle non-compliance issues and monitor the remedial actions taken • Develop and implement transactions monitoring and surveillance infrastructure on general banking activities • Maintain communication with internal stakeholders and liaise with regulators to understand potential risk areas and monitor regulatory developments • Provide training and advice to the business units on compliance related matters 	<ul style="list-style-type: none"> • Report to and advise senior management on matters concerning compliance with relevant regulatory requirements including sales suitability, financial need analysis requirements and cross border selling restrictions • Investigate suspicious activities and handle non-compliance incidents whilst monitoring the remedial actions taken • Provide regulatory advice and analysis (and raise queries where appropriate) in relation to the life cycle of investment and insurance products • Develop and implement transactions monitoring and surveillance infrastructure on investment and insurance business activities • Liaise with local regulators on a regular basis to ensure open lines of communication, maintain reporting obligations and handle requests

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The definition of RPs takes into account differences among AIs in how compliance practitioners are assigned within their organisational structures. Functional roles, rather than the functional titles of staff members, are considered when assessing the qualification of RP. To facilitate the determination of whether a staff member falls under the scope of RPs, please refer to the key roles/ tasks outlined in Annex 1 as per the HKMA's circular on "[Guide to Enhanced Competency Framework on Compliance](#)" dated 26 September 2022.

It should be noted that the ECF-Compliance is **not** intended to cover staff members performing the following functions:

- (a) Staff performing solely AML/CFT roles within an AI, as they are already subject to the ECF-AML/CFT. Please refer to the HKMA's Guide to ECF - AML/CFT for details on these roles. In some cases, the responsibilities of compliance and AML/CFT roles may overlap. AIs should consider the relative weight of roles and responsibilities relevant to compliance and AML/CFT roles performed by staff members when assessing whether they should fall under the ECF-Compliance or ECF-AML/CFT or both;
- (b) Staff performing compliance functions within an AI that are not related to regulatory compliance (e.g. financial/ accounting risk);
- (c) Staff performing specialised functions within an AI for ensuring compliance with prudential regulations (e.g. capital and liquidity requirements) and for risk areas that are covered under other ECF modules (e.g. liquidity risk, credit risk and operational risk that are covered under the ECF on Treasury Management, ECF on Credit Risk Management, and ECF on Operational Risk Management respectively);
- (d) Staff in the compliance function within an AI who are performing solely clerical and administrative duties or other incidental functions ²;
- (e) Staff in the legal or internal audit function of an AI;
- (f) Senior management or relevant compliance committee members ³ other than the manager or person-in-charge of the compliance department; and

² Examples of other incidental functions include arranging meetings to discuss compliance related issues and preparing minutes of meetings that involve the discussion of compliance related issues.

³ Given that the main responsibilities of senior management or relevant compliance committee members (other than the manager or person-in-charge of the compliance department) may not be limited to managing the compliance risk of an AI, they are not captured within the scope of the ECF-Compliance. However, such persons may choose to acquire the ECF certification(s) which is(are) of interest and relevance to them.

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(g) Staff employed by an AI in Hong Kong whose primary function does not involve serving the AI in Hong Kong (e.g. regional office staff who are based in Hong Kong serving the compliance function for an overseas office) and staff based in the subsidiaries of AIs or overseas branches of AIs who are serving the compliance function for Hong Kong and/or overseas offices. That said, it should be noted that AIs have a responsibility to ensure that the relevant staff based in the subsidiaries and overseas branches receive adequate compliance training, including those applicable in overseas jurisdictions.

For the avoidance of doubt, a staff member is not required to work full time in the compliance function or perform all of the roles specified in the job description in order to be classified as an RP. AIs are expected to adopt a principles-based approach when determining whether a staff member with multiple job roles falls within the definition of RPs. If a staff member's job responsibility covers a majority of the key tasks detailed in ECF-Compliance's role description, the staff member will be considered in scope. AIs should refer to the key tasks listed in Annex 1 to assess the significance of the compliance role performed by the staff member. AIs are expected to justify their decisions made in this regard. The following is a non-exhaustive list of criteria that can be taken into consideration when assessing whether a staff member should be classified as an RP:

- Proportion of time spent on compliance related matters;
- Extent to which the staff member reports to senior management and/ or governance committees on compliance related matters;
- Level of authority/ seniority of the staff member in making decisions on compliance related matters; and
- Organisational structure of the AI. For example, a staff member with roles and tasks dedicated to compliance may be working in other functions such as Legal or Risk Management.

Please refer to the HKMA's circular on "[Guide to Enhanced Competency Framework on Compliance](#)" dated 27 September 2022 for more details.

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2. Other Certification Requirements

Upon fulfilling the below requirements, RPs may apply to the HKIB for certification as an **Associate Compliance Professional (ACOP)** or a **Certified Compliance Professional – General Compliance Stream (CCOP(GC))** or a **Certified Compliance Professional – Investment and Insurance Compliance Stream (CCOP(IIC))**.

(a) Core Level

ACOP:

- Successful completion of Module 1 to Module 3 of the Core Level training programmes and passing the examination; or
- Grandfathered for ECF-Compliance (Core Level)

(b) Professional Level

CCOP(GC):

- On top of the Core Level qualification, successful completion of Module 4 of the Professional Level training programme and passing the examination plus 5 years of relevant work experience* in the general compliance function as specified in Annex 1; or
- Grandfathered for ECF-Compliance (Professional Level) in CCOP(GC)

CCOP(IIC):

- On top of the Core Level qualification, successful completion of Module 4 and Module 5 of the Professional Level training programmes and passing the examinations plus 5 years of relevant work experience* in the investment and/or insurance compliance function as specified in Annex 1; or
- Grandfathered for ECF-Compliance (Professional Level) in CCOP(IIC)

The 5 years of relevant work experience* required for CCOP(GC) and CCOP(IIC) certification should be accumulated within the 10 years immediately prior to the date of application for certification, but it does not need to be continuous.

**In general, the HKIB will consider whether the nature of work experience is substantially the same as that described in the Compliance Role 1 and Role 2 in Annex 1 of the [“Guide to Enhanced Competency Framework on Compliance”](#). Relevant work experience may be obtained from AIs and/or non-bank financial institutions. As for work experiences related to Compliance gained from other non-banking industries, they will be considered on a case-by-case basis.*

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B. Application Procedure

1. Please follow the application procedure below:

- (a) Complete all the necessary fields in the relevant Certification Application Form for ECF-Compliance including applicant's signature and HR endorsement in relevant sections.
 - For Core Level: COM-G-023
 - For Professional Level: COM-G-025
- (b) Obtain endorsement from the Human Resources Department (HR) of the concerned Authorized Institution(s) with signature of Head of HR or equivalent and company chop on the HR Verification Annex of the above Application Form. **Applications can only be accepted with HR endorsement included.**
- (c) Applicants are required to fill in **ONE** completed HR Verification Annex form for **EACH** relevant position/functional title in the application.

Als are expected to support their staff's application for certification. Regarding information related to the RPs' previous employment(s), current employer should provide necessary assistance to the RPs in the latter's applications for ECF certification (e.g. by confirming whether such information is consistent with curriculum vitae provided by the RP at the time of job application).

If required, the HKIB may request applicants to provide employment records or additional information to substantiate their applications.

- (d) Read the [Privacy Policy Statement](#) set out on the HKIB's website before submitting the application.
- (e) Send the completed Application Form with HR department's endorsement, relevant supporting documents (e.g. copy of your HKID/Passport and copies of your examination result(s)) and payment evidence to the HKIB.

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2. Fee Payable

- A **Non-refundable** fee is required for **ACOP/CCOP(GC)/CCOP(IIC)** certification application.
- For details, please refer to the Fee Table of the respective ECF which is available on the HKIB's website.

3. Payment Method

- (a) Paid by Employer.
- (b) A crossed cheque or e-cheque made payable to "**The Hong Kong Institute of Bankers**".
(Post dated cheques will not be accepted.)
- (c) Credit card (Visa or Mastercard).

4. Submission of Application

Please complete and submit the **SIGNED** Application Form together with the required documents via email to cert.gf@hkib.org or by post/in-person to The Hong Kong Institute of Bankers (HKIB) at the following address:

"Certification Application for ECF-Compliance"

Department of Professional Assessment and Certification

The Hong Kong Institute of Bankers

3/F Guangdong Investment Tower

148 Connaught Road Central, Hong Kong

Note: Please ensure sufficient postage is provided when sending out the required documents.

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5. Approval and Election

- (a) The certification processing time, including the election process done by the HKIB committee members, will require **approximately 2 months**. If grandfathering is also applied together with certification by using the combined application form, the processing time will be **approximately 3 months**.

- (b) Upon successful completion of the certification process, **ACOP/CCOP(GC)/CCOP(IIC)** holders will be registered as **Certified Individuals (CI)** and be included in a public register on the HKIB's website. The HKIB will also grant the holder a professional membership. **ACOP/CCOP(GC)/CCOP(IIC)** professional qualification holders are then entitled to print the professional qualification on their business cards and curriculum vitae to signify their professional excellence.

- (c) Besides, the professional qualification holders' names will also be presented on the HKIB website and published in the Institute's journal "Banking Today" and Annual Report.

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C. Recertification Arrangement

1. Subject to the HKIB membership governance, if the applicant wants to maintain his/her **ACOP/CCOP(GC)/CCOP(IIC)** professional qualification, he/she is required to renew his/her certification annually and maintain valid membership status with the HKIB. The applicant must also be an RP who has met the annual **Continuing Professional Development (CPD)** requirements and pay the recertification fee.
2. **ACOP/CCOP(GC)/CCOP(IIC)** holders are bound by the prevailing rules and regulations of the HKIB as stipulated in the HKIB Members' Handbook. **ACOP/CCOP(GC)/CCOP(IIC)** holders are required to notify the HKIB of any material changes in their applications for recertification, including their contact details. The HKIB may investigate the statements **ACOP/CCOP(GC)/CCOP(IIC)** holders have made with respect to their applications, and that they may be subject to disciplinary actions for any misrepresentation (whether fraudulent and otherwise) in their applications.
3. (a) For the Core Level qualification, a minimum of **10 CPD hours** is required 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.

(b) For the Professional Level qualifications, a minimum of **12 CPD hours** is required 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.
4. RPs are required to self-declare their CPD compliance to the HKIB at the time of recertification. Documentary evidence should be kept for random audit by the HKIB. The minimum 10 (Core Level) /12 (Professional Level) CPD hours requirements will be subject to periodic review in light of the latest developments in the banking sector. For details, please refer to the HKIB's website (<https://www.hkib.org>).

Any excess CPD hours accumulated within a particular year cannot be carried forward to the following year.
5. The recertification of **ACOP/CCOP(GC)/CCOP(IIC)** is subject to fulfilment of the annual CPD requirements starting from the calendar year (**from 1 January to 31 December**) following the year of certification.
6. The annual CPD requirements are applicable to RPs who gained the designation by trainings and examinations or grandfathering.

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7. The CPD requirements are waived in the first calendar year (**ending 31 December**) of certification.

For the avoidance of doubt, RPs who are captured under multiple ECFs are only required to fulfil the CPD hours for one of his/her certifications per year (i.e. whichever is greater).

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Annex 1 - ECF-Compliance: Key Roles and Tasks for Relevant Practitioners

(Quoted from the Annex 1 [“Guide to Enhanced Competency Framework on Compliance”](#))

Job Roles	Role 1 - (General Compliance)	Role 2 - (Investment and Insurance Compliance)
	Core Level <i>(For entry to junior level staff with less than 5 years of work experience)</i>	
Examples of functional title <i>(for reference only)</i>	Compliance Officer, Compliance specialist, Associate/Assistant Compliance Manager	
Key Tasks	<ul style="list-style-type: none"> • Assist in drafting, revising and updating the AI’s compliance policies, procedures, guidelines and compliance related documents to ensure congruence with its legal and regulatory obligations and the AI’s internal requirements • Assist in performing compliance testing and other reviews according to the compliance monitoring programmes to ensure the AI’s compliance with applicable legal and regulatory requirements, and codes of conduct • Assist in performing compliance assessments and reviews on business activities as mandated by the compliance function to identify, assess and monitor compliance risk and mitigate any conduct and reputational risk issues • Assist in compiling reports on compliance related matters and/or transactions monitoring to senior management • Conduct initial analysis and facilitate the investigation of suspicious activities and report any possible breaches of laws and regulations in business activities • Conduct initial investigation of non-compliance issues and monitor the status of remedial actions taken • Assist in providing general advice on laws, rules and standards to the business units and senior management • Assist in drafting, revising and updating whistleblowing policies and procedures for identifying and reporting potential and actual non-compliance issues • Maintain regular communication and interaction with operational risk, market risk and credit risk colleagues to understand current areas of heightened operational risk, market risk and credit risk. Assist line managers in maintaining these relationships to ensure a coordinated approach to managing risk in the organisation • Assist in liaising with local regulators on a regular basis to ensure open lines of communication, maintain reporting obligations and handle requests • Handle information requests from local regulators and coordinate with respective business units in responding to regulatory enquiries • Perform research and gap analysis on key legal and regulatory changes both in Hong Kong and relevant overseas jurisdictions 	

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<i>(Continued)</i>	<ul style="list-style-type: none"> • Prepare training materials on compliance related matters and assist in providing training to business departments/operation units in Hong Kong 	
Key Tasks		
Job Roles	Role 1 - (General Compliance)	Role 2 - (Investment and Insurance Compliance)
	Professional Level <i>(For staff taking up middle to senior level positions in the compliance function with 5+ years of work experience)</i>	
Examples of functional title <i>(for reference only)</i>	General Compliance Manager, Regulatory Compliance Manager	Investment and Insurance Compliance Manager
Key Tasks	<ul style="list-style-type: none"> • Develop, review, evaluate and update the AI’s compliance policies, procedures, guidelines and compliance related documents to ensure congruence with its legal and regulatory obligations and the AI’s internal requirements • Establish and review compliance monitoring programmes to ensure the AI’s compliance with applicable legal and regulatory requirements, and codes of conduct • Conduct independent compliance assessments and reviews as mandated by the compliance function to identify, assess and monitor compliance risk and mitigate any conduct and reputational risk issues • Report to and advise senior management on compliance related matters • Investigate suspicious activities and report any possible breaches of laws and regulations in business activities • Analyse areas of non-compliance and identify actions for improvement • Monitor the effectiveness of any remedial actions taken • Provide advice and recommendations on laws, rules and standards to the business units 	<ul style="list-style-type: none"> • Develop, review, evaluate and update the AI’s compliance policies, procedures, guidelines and compliance related documents to ensure congruence with its legal and regulatory obligations and the AI’s internal requirements • Establish and review compliance monitoring programmes to ensure the AI’s compliance with applicable legal and regulatory requirements, and codes of conduct covering the selling process • Report to and advise senior management on compliance related matters including sales suitability, financial need analysis and cross border selling restrictions • Investigate suspicious activities and report any possible non-compliance incidents related to AI’s investment and insurance business activities • Identify and handle non-compliance issues and monitor the effectiveness of any remedial actions taken • Provide advice on business initiatives, product development, and review and approve marketing materials for dissemination

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Job Roles	Role 1 - (General Compliance)	Role 2 - (Investment and Insurance Compliance)
	Professional Level <i>(For staff taking up middle to senior level positions in the compliance function with 5+ years of work experience)</i>	
<p><i>(Continued)</i></p> <p>Key Tasks</p>	<ul style="list-style-type: none"> • Maintain a strong understanding of new and emerging products and services and the compliance implications on the AI of such products and services • Develop, review, evaluate and update escalation and whistleblowing policies and procedures for identifying and reporting potential and actual noncompliance issues • Maintain regular communication and interaction with operational risk, market risk and credit risk colleagues to understand current areas of heightened operational risk, market risk and credit risk • Liaise with local regulators on a regular basis to ensure open lines of communication, maintain reporting obligations and handle requests • Develop and implement transactions monitoring and surveillance infrastructure on general banking activities • Track and capture key legal and regulatory changes both in Hong Kong and relevant overseas jurisdictions and notify relevant stakeholders to ensure the business operations of the AI could meet the relevant requirements • Provide advice and compliance related training to business units in Hong Kong 	<ul style="list-style-type: none"> • Provide advice and guidance on compliance related matters to relationship managers and investment and insurance product managers • Liaise with local regulators on a regular basis to ensure open lines of communication, maintain reporting obligations and handle requests • Develop and implement transactions monitoring and surveillance infrastructure on investment and insurance business activities • Track and capture key local and regulatory changes both in Hong Kong and relevant overseas jurisdictions and notify relevant stakeholders to ensure the business operations of the AI could meet the relevant requirements • Provide advice and training on investment and insurance compliance to business units in Hong Kong

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Annex 2 - ECF-Compliance: Competency Framework

(Quoted from the Annex 2 [“Guide to Enhanced Competency Framework on Compliance”](#))

	Role 1 – General Compliance	Role 2 – Investment and Insurance Compliance
	Core Level	
Qualification and Experience	<ul style="list-style-type: none"> Completion of Module 1 to Module 3 of the ECF-Compliance Core Level training programme⁴ 	
Certification title	<ul style="list-style-type: none"> Associate Compliance Professional (ACOP) 	
Exemption	<p>RP who has passed the following training programme(s) is eligible to apply for exemption on Module 1 of the ECF-Compliance Core Level training programme:</p> <ul style="list-style-type: none"> Certified Professional Risk Manager of the Asia Risk Management Institute (ARIMI); or Certification in Risk Management Assurance of the Institute of Internal Auditors (IIA); or International Diploma in Governance, Risk and Compliance of the International Compliance Association (ICA); or Professional Ethics and Compliance module under the Advanced Diploma for Certified Banker (Stage I) of the HKIB; or Bachelor’s or higher degree in law; or Certified Public Accountant of the Hong Kong Institute of Certified Public Accountants (HKICPA); or Full member of Association of Chartered Certified Accountants (ACCA); or Members of overseas accountancy bodies which are eligible for full exemption from the qualification programme for membership admission at the HKICPA under the HKICPA’s reciprocal membership and mutual recognition agreements (as listed on its website). <p><u>Remarks:</u> Other equivalent academic/professional qualifications in compliance may be considered for exemption on Module 1 on a case-by-case basis. RPs will need to provide detailed information on such qualifications (e.g. training course syllabus, examination syllabus) to the HKIB to facilitate their assessment. The assessment to determine if the RPs are qualified for exemption will be focused on:</p>	

⁴ Module 1 and Module 2 are identical for both ECF-Operational Risk Management and ECF-Compliance. Hence, an RP who has completed Module 1 and/or Module 2 under either of these ECF streams will not be required to complete the same module(s) when he/she undertakes the training programme under the other ECF stream.

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	Role 1 – General Compliance	Role 2 – Investment and Insurance Compliance
	Core Level	
	<ul style="list-style-type: none"> The content of the syllabus to ensure there is adequate coverage of the ECF Compliance syllabus; and The level of the examination (e.g. QF Level or academic level) of the compliance related training programmes/qualifications. 	
Grandfathering (on a one-off basis)	<ul style="list-style-type: none"> Possessing at least 3 years of relevant work experience⁵ in a general compliance function (for Role 1) or in an investment and/or insurance compliance function (for Role 2), which is related to the key tasks in Annex 1; and Employed by an AI at the time of application. 	
CPD requirements	<ul style="list-style-type: none"> A minimum of 10 CPD hours is required for each calendar year, of which at least 5 hours should be on topics related to compliance, legal and regulatory requirements, risk management and ethics Qualified CPD activities include: <ul style="list-style-type: none"> (a) attending seminars or courses (both on-line and in-person) provided by AIs, financial services regulators, professional bodies and academic and training institutions and the HKIB; (b) taking professional examinations; and (c) delivering training and speeches 	

⁵ In general, HKIB will consider whether the nature of work experience is substantially the same as that described in the compliance roles 1 and 2 in Annex 1. Relevant work experience is expected to be obtained from AIs. 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 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.

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	Role 1 – General Compliance	Role 2 – Investment and Insurance Compliance
Professional Level		
Qualification and Experience	<ul style="list-style-type: none"> • Completion of Module 4 of the ECF Compliance Professional Level training programme on top of the Core Level certification; and • Having at least 5 years of relevant work experience which in the general compliance function. 	<ul style="list-style-type: none"> • Completion of Module 4 and Module 5 of the ECF-Compliance Professional Level training programme on top of the Core Level certification; and • Having at least 5 years of relevant work experience which is accumulated within the 10 years immediately prior to the date of certification application in the investment and/or insurance compliance function.
Certification title	<ul style="list-style-type: none"> • Certified Compliance Professional – General Compliance Stream (CCOP(GC)) 	<ul style="list-style-type: none"> • Certified Compliance Professional – Investment and Insurance Compliance Stream (CCOP(IIC))
Grandfathering (on a one-off basis)	<ul style="list-style-type: none"> • Possessing at least 8 years of relevant work experience⁶ in the general compliance function which is related to the key tasks in Annex 1, of which at least 3 years are gained from respective Professional Level job roles; and • Employed by an AI at the time of application 	<ul style="list-style-type: none"> • Possessing at least 8 years of relevant work experience⁷ in the compliance function for investment and/or insurance business activities which is related to the key tasks in Annex 1, of which at least 3 years are gained from respective Professional Level job roles; and • Employed by an AI at the time of application
CPD requirements	<ul style="list-style-type: none"> • A minimum of 12 CPD hours is required for each calendar year, of which at least 6 hours should be on topics related to compliance, legal and regulatory requirements, risk management and ethics • Qualified CPD activities include: <ul style="list-style-type: none"> (a) attending seminars or courses (both on-line and in-person) provided by AIs, financial services regulators, professional bodies and academic and training institutions and the HKIB; (b) taking professional examinations; and (c) delivering training and speeches 	

⁶ Please see footnote 5.

⁷ Please see footnote 5.