



Disciplinary Committee

9 September 2025, 11:00 – 14:30
Staple Inn, London

Attending:

David Heath (DH), Chair
Jeremy Hill (JH)
Robert Garvin (RG)
Catherine Boyd (CB)
Rosalyn Hayles (RH)

Executive Staff:

Jenny Higgins (JAH), Head of Disciplinary Investigations Team
Julia Wanless (JW), Judicial Committees Secretary
Alison Simpson (AS), Case Manager

In attendance:

Paul Brooks, Convenor of Adjudication Panels
Peter Wrench, Convenor of Disciplinary Tribunal Panels

Item	Title
1.	Welcome and apologies DH welcomed everyone to the meeting and noted there were no apologies.
2.	Declaration of Conflicts of interests No conflicts were declared.
3.	Chair's update DH advised that the Regulatory Board had held a strategy day on 2 September. He had been unable to attend due to a prior commitment, however any updates from the Board would be circulated to the Committee in due course.
4.	Executive's Update The Committee noted the Executive Update which included information on Executive resourcing, an upcoming FRC oversight visit to the Executive, updates from the Regulatory Board, Convener drop-in sessions and the Regulatory Appointments Committee.
5.	Minutes and Actions The minutes of the June 2025 meeting were approved, with no redactions required. The action sheet was noted. Action: Executive to publish minutes of June 2025 meeting.



Item	Title
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6.	Objectives update
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The Committee discussed the paper which provided an update on the status of the 2025/26 objectives of the Committee that were agreed at the June 2025 meeting.

The Committee discussed and agreed the removal of two of the 2025/26 objectives that had previously been agreed at the June 2025 meeting. The two objectives, and the reason for their removal, are:

- Ensure the Disciplinary Scheme and processes are updated to align with the transition to ARGAs – This objective has been removed for the 2025/26 year as it is now known that the draft bill on Audit and Corporate Governance will not be introduced in this Parliamentary session. The Committee will revisit this objective if progress is made with the draft bill.
- Consideration of how the IFoA's aim of being a global body may impact on the disciplinary process – as noted in the June 2025 Committee minutes, the Committee discussed and agreed at that meeting that the issue of global membership was a wider issue for the IFoA when determining what the global strategy for the organisation will be. The Committee discussed and agreed to remove this objective for the 2025/26 year and to revisit it next year once the new IFoA strategy is in place.

Action: Executive to remove the above objectives from the Committee's 2025/26 objectives and forward workplan.

7.	Review of DEI guidance for disciplinary cases
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The Committee reviewed the standalone Diversity, Equity and Inclusion (DEI) Guidance, introduced in August 2023 alongside the new Disciplinary Scheme. This early review was planned due to the Guidance being a new addition to the suite of Guidance provided by the Committee to support the Scheme. Input from the IFoA's DEI Business Partner, former Diversity Action Group members, Panel members, Legal Advisers, and members of Council was considered. Feedback highlighted concerns about the clarity of the Guidance's purpose and its potential confusion with other documents that impose obligations on Members. While the Committee's DEI Guidance is distinct from the DEI changes to the Actuaries' Code, and does not confer any obligations on Members, it has been suggested that the status and purpose of the document were unclear.

The Committee was asked to consider the input obtained by the Executive and decide if they wished to make any changes to the DEI Guidance.

The Committee noted that the DEI Guidance differs from other procedural guidance (e.g. on Sanctions or Costs) and may not be consulted at the appropriate stages of the disciplinary process.

The Committee discussed and agreed that some of the contents of the DEI Guidance would be addressed more effectively through mandatory training being delivered to the Disciplinary Panel Pool members. It was agreed that to ensure that the principles of DEI are truly embedded into the disciplinary process, it is of vital importance that all decision makers are sufficiently knowledgeable on the matter and are aware of issues such as the impact of unconscious bias in decision making.



Item	Title
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It was discussed that Panel members are most likely to review a particular Guidance document when they reach the relevant point in the disciplinary process, for example consulting the Sanctions Guidance when considering the issue of sanction. As such, there is a risk that the material in the DEI Guidance is lost or not applied at the appropriate time. The Committee agreed that while the DEI Guidance reflects a strong commitment to DEI principles, its standalone format may limit its effectiveness.

As a result, the Committee agreed to withdraw the standalone DEI Guidance and incorporate its key elements into existing Guidance notes, ensuring they are referenced at the appropriate decision-making points.

It was agreed that embedding DEI principles would be more effective through mandatory training for Panel members and by integrating relevant DEI content into existing Guidance notes. This approach ensures DEI considerations are applied consistently and practically throughout the process.

Actions:

- **Executive to liaise with the IFoA's DEI Business Partner to source appropriate DEI training for Disciplinary Panel Pool members.**
- **Executive to request Panel Pool members to complete relevant modules in the Inclusive and Effective Volunteering Course in the IFoA's VLE.**
- **Executive to remove the standalone Disciplinary Committee DEI Guidance.**
- **Executive to incorporate relevant sections of the DEI Guidance into other Guidance notes as appropriate.**

8. Amendments to Guidance and Regulations

JW introduced the paper proposing changes to the Timeframes Guidance and the Appeals Regulations. The Committee considered and agreed proposed changes as follows:

Timeframes Guidance

The Timeframes Guidance currently states that the Judicial Committees Secretary should advise the Respondent and Case Manager of the outcome of Panel hearings within two working days of the conclusion of the hearing. The Committee noted that, for Adjudication Panels (paragraph 7.2), it is not always feasible to meet this expectation, due to the drafting process.

The Committee took into account feedback that Adjudication Panels differ from other hearings as they are held in private and do not allow oral submissions. Their outcomes take effect only after the written determination is served or accepted by the Respondent, rather than at the conclusion of a hearing. It noted concerns from the Adjudication Panel Convener and the Disciplinary Tribunal Panel Convener about providing Adjudication Panel outcomes before Panels have finalised the written determination, potentially setting unrealistic expectations and causing confusion or distress.

The Committee agreed to remove paragraph 7.2 of the Guidance relating to the timeframe for Adjudication Panel outcomes. The Committee noted that written Adjudication Panel determinations were still expected to be served within 21 days of the conclusion of the hearing.



Item	Title
	<p><i>Appeals Regulations</i></p> <p>The Committee noted that the IFoA has received its first appeal applications under the new Disciplinary Scheme, which has revealed a practical issue with how Appeal Tribunal Panel hearings are currently scheduled. Under the existing Appeals Regulations, parties are notified of the hearing before confirming whether they wish to make oral submissions. This sequence can lead to scheduling inefficiencies. The Committee agreed amendments to invite parties to confirm their intention to make oral submissions earlier in the process before the hearing is scheduled, specifically within seven days of receiving the Appeals Assessor's determination. The Committee agreed that this will allow hearings to be listed more appropriately in terms of duration and availability. The regulations would also need minor numbering adjustments to maintain consistency.</p> <p>Actions:</p> <ul style="list-style-type: none">• Executive to remove paragraph 7.2 of the Timeframes Guidance and publish the updated version.• Executive to make approved amendments to the Appeals Regulations and publish the updated version.
9.	<p>Case Update report</p> <p>JAH summarised progress made on the investigation of cases since the June 2025 meeting, as outlined in the report.</p> <p>JW summarised the Panels which have taken place since the last meeting and confirmed the dates of the upcoming hearings.</p> <p>The Committee noted the contents of the report and the updates provided.</p>
10.	<p>Determinations Review Sub Committee (DRSC)</p> <p>AS introduced the report and the Committee were invited to note the contents and to approve the action list.</p> <p>The Committee noted the report and approved the action list.</p> <p>The Committee also discussed and agreed that, in light of the earlier discussions regarding the embedding of DEI considerations in the IFoA's disciplinary process, when considering the determinations, the DRSC should consider whether the determination raised any DEI considerations or concerns.</p> <p>Action: Executive to add the matter of considering DEI in relation to determinations to the DRSC review template.</p>



Item	Title
12.	Feedback JAH/JW introduced the papers which summarised feedback received from Panel members. The Committee noted the feedback and approved actions suggested by the Executive. Actions: <ul style="list-style-type: none">• Where a Respondent provides a large number of additional documents, the Clerk Team will ask that the Respondent provides a collated and indexed bundle for the Panel.• Executive to update the feedback forms to ask Panel members whether any DEI issues were raised during the hearing and if so, were they handled effectively.
13.	Risk register AS advised the Committee that no changes had been made to the Risk Register since the June 2025 meeting. The Committee noted the Register and agreed that no changes were needed.
14.	Matters to raise with Regulatory Board No matters arising from this meeting require to be raised with Regulatory Board.
15.	Schedule of Guidance/Regulations Noted.
16.	Schedule of DC term times Noted.
17.	Discussion with Paul Brooks and Peter Wrench The Committee engaged in a helpful and productive discussion with Paul Brooks, Convener of Adjudication Panels, and Peter Wrench, Convener of Disciplinary Tribunal Panels. The Conveners commented that, overall, the Disciplinary Scheme worked well. The Committee and the Conveners discussed some recent issues that had arisen during hearings. It was noted that these were specific to the cases in question and were unlikely to reoccur.
18.	AOB None.

For information

Dates of Next Meetings:

- Tues 9 Dec 2025
- Wed 4 March 2026

Forthcoming Hearings: Details of hearings are published [here](#)