

Getting professional about ethics: An independent report for the CII

professionalismfirst. 

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The Chartered Insurance Institute (CII) Professionalism in Practice

As the premier professional body for the financial services profession, the CII promotes higher standards of integrity, technical competence and business capability. With over 93,000 members in more than 150 countries, the CII is the world's largest professional body dedicated to this sector.

Success in CII qualifications is universally recognised as evidence of knowledge and understanding. Membership of the CII signals a desire to develop broad professional capability and subscribe to the standards associated with professional status.

The CII works with businesses to develop bespoke, company-wide solutions that ensure competitive advantage by enhancing employees' technical and professional competence.

Individually, CII's members are able to drive their personal development and maintain their professional standing through an unrivalled range of learning services and by adhering to the CII's Code of Ethics & Conduct.



www.cii.co.uk

INVESTOR IN PEOPLE

Personal Finance Society

The Personal Finance Society (PFS) is part of the CII Group and is the leading professional body for financial advisers and those in related roles. With nearly 25,000 members, it promotes the highest standards of professionalism in the financial services profession, and sets the standards for technical knowledge, customer service and ethical practice across the entire financial advice community.

To achieve its aims, the Society provides its members with access to technical qualifications, learning materials, support services and practical benefits. PFS is uniquely placed, as a campaigning organisation, to support consumer demands for reliable, professional advice.

www.thepfs.org

OpenRoad

Open Road is an independent consultancy founded in 2007 by four senior and highly experienced communications professionals. As specialists in corporate communications, public affairs and corporate responsibility they offer integrated solutions that deliver results.

www.theopen-road.com

Foreword

A hallmark of a professional is the ability to inspire public trust in their services, and ethical standards are paramount to this. Thus we must consider any real or perceived lack of ethical standards to be the most serious of threats.

Over the past year, the CII has been conducting a fundamental and independent review of our existing capacity to support best practice in ethics and integrity as part of its broader 'new wave' professional body agenda. Our goal is to transform the CII into an organisation embodying the best characteristics of modern professionalism, including not only ethics but standards, continuing professional development, research and policy development.

Guiding the profession on a professionalism agenda will support members by helping them to improve ethics capability and standards, ultimately helping the public access better services and enhancing our professional reputation.

We began this review last year well before ethical standards in financial services – particularly in banking – hit the headlines. This review is based on a considered development of professionalism in our sector, not a kneejerk reaction to developments. It is fundamental to what professionalism is all about.

In March 2009, Hector Sants, Chief Executive of the FSA, reiterated the importance of ethics from the regulator's viewpoint. He said that managers of the future must take care to remind themselves of several simple, but often ignored, rules underlying the profession: amongst these, "ensure a healthy and ethical culture in your organisation".

Faced with this challenge, we are pleased to present the following report which summarises the findings of an independent review by Open Road, an external consultant.

Many of the recommendations detailed in this report will be implemented by the CII as part of a transition process to improve our current practices, in tandem with the launch of a new Code of Ethics this year.

It is vital that members understand and support this initiative. The driving force of this project has always been the public interest. Renewing ethical standards is a major step on our journey to restoring public confidence.

David McIntosh (Hon) QC
Chairman
CII Professional Standards Board

5 May 2009



1. Executive Summary

Open Road strongly endorses the move towards professionalism being led by CII. This is essential both in the public interest, and in the interests of CII members and the insurance and financial services industry generally. In summary the recommendations fall into six principal areas:

Training

The CII's current structure of training should give greater weight to questions of ethics and conduct. The review recommends that material on professional ethics should be incorporated into CII training courses and examinations at all levels, from Foundation to Fellowship. The best way to do this is generally by working material into existing training and examinations rather than creating free-standing ethical modules, so that ethics becomes part of mainstream development and skills.

Continuing Professional Development (CPD)

A flexible approach to CPD this should be maintained, but the CII should monitor CPD activity to ensure that opportunities for professional ethical development as part of CPD are available and being used.

Communications

The report supported a much stronger emphasis on communicating the importance of professional standards including a number of separate initiatives:

- A major launch for CII's revised member code, leading to an external communications campaign to stress the importance of professionalism and the steps CII is taking to promote it.
- The introduction of a mandatory declaration in membership renewal forms that the member has read and understood the new code.

The Corporate Dimension

The CII must work in partnership with firms in the insurance and financial services sectors to build professional ethics. It is clear that employers have a huge influence on the way in which employees behave, and many employers already devote time and resource to promoting high standards of behaviour. A working group should be created to promote alignment between the CII Code and those used in the corporate sector as well as co-operating more formally to jointly promote professional ethics.

Industry-wide Co-operation

One source of confusion, both for the public and people working in insurance and financial services, is the proliferation of professional qualifications. The CII should commit to working other relevant bodies (a process which is already underway) with a view to simplifying the language of qualification and examinations across the sectors. The CII should work equally closely with FSA.

Enforcement and Discipline

Enforcement and discipline has an important symbolic value, but there should be a clear recognition of the difference between serious breaches of standards and technical errors.

A starting point to any understanding of British professions in the twenty-first century is an appreciation of what it has meant to be a profession up to this point. This is no easy task. There is no single, generally accepted definition of 'profession' in the English language. The term has various meanings, ranging from the strict interpretation of the traditional professions of medicine, law and accounting, to the very broad meaning of expertise and competency in any field – e.g., 'professional footballer'. One of the most common definitions is by Sir Alan Langlands: those occupations "where a first degree followed by a period of further study or professional training is the normal entry route and where there is a professional body overseeing standards of entry to the profession".¹

¹ Langlands, Sir Alan. "Gateways to the Professions." 2005. Department for Children, Schools and Family. Available from: <http://www.dius.gov.uk/Search?q=gateways%20to%20the%20profession&num=20>. Date accessed: 3 April 2009.

2. About This Report

In Spring 2008 the CII decided to undertake a review of its approach to professional ethics as a part of its wider work on the concept of new wave professionalism and what that means for the organisation and its members.

We commissioned a specialist consultancy, Open Road, to conduct an independent and full review of all aspects of our ethical approach and processes. Open Road has developed expertise in ethical issues through a long track record of working with companies, professional bodies, government organisations and independent charities such as the Institute of Business Ethics.

The review considered how to develop professional ethics across the industry and examines the full range of tools available to the CII to assist in this process, including training and education, member communications, structures, CPD and enforcement.

As part of its work, the Open Road team took the following steps:

- met senior staff from CII;
- met with members of the CII Professional Standards Board;
- conducted two focus groups with CII members (in Manchester and London);
- commissioned a quantitative survey of member attitudes; and
- discussed ethical issues with outside experts including industry organisations.

Open Road was given complete freedom to investigate all aspects of the way in which CII approached ethics. The recommendations were discussed with the Institute's Professional Standards Board, but remain the responsibility of Open Road. What follows is a summary of its report.

3. Professional Ethics and Why They Matter

Ethics is an off-putting term. To some people it sounds like a difficult subject that can only be understood by professional philosophers and academic experts. Others think of ethics exclusively as something which matters in one's personal life and has nothing to do with the world of work.

However understandable, neither of those views is correct. Ethics is about the way people behave and the standards of conduct they apply to their lives, be it at work or anywhere else. More importantly for the CII and its members, a system of ethics is a central part of being a professional, for one very important reason: it reassures consumers that when they seek professional advice from someone who has – inevitably – more knowledge than they do (whether that is knowledge of law, accountancy, architecture, medicine or financial services) they will be treated fairly.

Working with a system of ethics is just as crucial for the members of a profession as it is for their customers or clients. To use the language of marketing, a system of ethics (often written down in the form of a Code) is part of a professional brand. It shows the outside world, as well as other professionals, that an individual has worked at gaining qualifications and skills. It enables professionals to deal with one another on the basis of mutual respect.

A system of professional ethics that is recognised by the outside world has advantages for the professions as a group in a different way, and one that is highly relevant to the insurance and financial services sector. Without a clear and robust ethical framework, people are unlikely to have confidence in self-regulation. That matters, because the alternative is the imposition of external regulation by people who, by definition, are less knowledgeable than the professionals themselves.

In practice this is a not a black and white issue. These days, most professions have some degree of external regulation and some degree of self-regulation. Having a good standard of professional ethics keeps that balance about right.

There is another barrier to overcome. In any profession there will be people who believe that to be 'trained' in ethics is insulting or unnecessary – either because they have worked in the field for a long time, or because they believe that they have an instinctive feel for doing the right thing.

That attitude is understandable, but dangerous. The vast majority of people want to do the right thing; indeed, no system of professional ethics can be usefully based on the idea that the members of the profession are dedicated to the idea of breaking the rules. Yet humans make mistakes, and experience helps us all learn to handle difficult situations.

Professionalism benefits not only members, but also – and most importantly – it benefits the public interest, and should be supported for that reason alone.

4. Professionalism and Professional Ethics in Financial Services and Insurance

The CII is faced with a significant problem. Public confidence in financial services and – to a lesser extent – insurance has declined on the back of the recent financial crisis, rightly or wrongly, along with the industry as a whole. Greater emphasis on high standards of conduct and professional ethics is one way of tackling this perception and raising professional reputation.

To do this effectively is a daunting task. The CII is committed to improving levels of professionalism amongst its members, as it has made clear with its dedicated professionalism campaign, begun some time before the economic downturn. The objectives set out in the Open Road review are that all CII members should take pride in their membership and their status as professionals. They should aspire to go beyond the law in meeting standards of conduct; set an automatically high standard of competence and work in the best interests of the client and the public interest.

Do we think that this aspiration is something that the CII should take the lead on? Absolutely. It is of course the case that the financial advice side of the membership is accustomed to a high degree of external regulation from the FSA. However, the FSA's move towards more principles-based regulation is itself a challenge to the sector to take more responsibility for its own detailed standards of behaviour. As a professional body the CII must respond.

Not only does the CII have to respond: it ought to. This is a huge opportunity to show the public and outside stakeholders that the leading professional body is capable of putting its own house in order. Moreover, it is also likely to be more efficient. A robust and internally owned system of ethics is always likely to be superior to that imposed by an external body, whether it is a regulator or Parliament. This is because it will be based on a better understanding of the real ethical issues; it will be capable of being amended and revised to meet changing circumstances; and any penalties imposed on members will command more support within the profession than penalties imposed from outside, as they have been based on expert judgement (albeit with the involvement of lay members to reassure outsiders that justice has been done). Internal ownership will then be complemented by external challenge, and this can be sought from the regulator, the government or the public – or indeed all three.

Finally, the commercial advantage of an ethical approach must not be overlooked. Anyone who runs a business for the long-term knows that the way to success is sustainable repeat business from satisfied customers. Indeed, some CII members at the focus groups Open Road held argued strongly that this was a major factor in encouraging ethical behaviour to be taken seriously. We would not argue that ethics can or should be based purely on commercial advantage. But the idea that it is not only good business, but good for business, is a perfectly valid argument. Treating customers fairly – to use the FSA's own term – is not something that runs counter to good commercial instincts.

A profession which has the confidence and self-respect to take the lead in ethics will reap the benefits. The simple fact is that people are more likely to refer to, use and adhere to a code that they own and that they have helped develop and continue to hold the power to revise. What they need is an organisation to make that happen.

That this is a role for a body like the CII seems indisputable. It has the systems, the membership and the traditions necessary. It has also the infrastructure of enforcement and standards, a long-standing code (now revised and improved) and a commitment from its leadership to ethics.

5. Barriers to Progress

The need for a more professional approach, meeting the highest standard of ethics seen across the professions is clear – as are the benefits. However, there are obstacles to implementation, both practical problems and short-term disincentives that need to be overcome.

The greatest barrier of all in the development of the profession is the historical lack of expectation that it should be a profession at all, which will require a response from industry leaders if it is to be overcome. Parts of financial services and insurance are de-skilled industries often selling mass products – and many parts of the industry will remain so for the foreseeable future. All progress must therefore begin with a broad commitment to address some of the challenges facing the industry. This means buy-in across the profession, including senior leadership and companies as well as the mass membership. It also means a shift in public expectations – demand will most likely drive an improvement in the quality of supply in the medium-term.

Variable Skills Base

Insurance and financial services are set apart from the traditional professions because the industry lacks its own vocational degree or degrees. One of the consequences of this is that there is no single 'baseline' level of skills and understanding of expected conduct/ethical behaviours. However, all staff, at whatever skill level, should have a professional attitude and be committed to getting the best they can for their clients.

Diverse Membership

Insurance and financial services covers a broad spectrum. This not only means staff take on various and diverse roles, but also in companies with a range of business models, commercial pressures and regulatory environments. In particular, tension arises from differing levels of FSA regulation amongst various parts of the profession. However, this may have benefits if the regulated standards established in financial advice seep through into other parts of the profession.

Voluntary Membership

There is no requirement for CII membership or for any specific qualification to practice in insurance. There is also no protection of the role within the insurance/financial services sector, unlike for other professions. The CII therefore needs to work to make membership reputationally and commercially attractive, both to companies and individuals. An emphasis on high ethical standards can be (wrongly) perceived as running counter to that.

Relatively few commercial benefits to CII

The CII will always face the challenge of balancing the need to attract members with the need to, at the same time, drive up standards. Events focusing on ethics and conduct which are not perceived to be specific to members' everyday commercial concerns may need to be subsidised. However, the potential commercial benefit to the CII in the long term, if the new code of ethics influences external reputation and status in the public mind, ultimately driving increased membership, should not be overlooked.

Confusion about whose job it is to promote ethics

Financial services and insurance is a heavily regulated industry with many practitioners expecting strong regulation from the FSA rather than from CII. At the same time, members often work in firms with strong internal structures, and so the employer has traditionally been the main day to day influence on conduct. However, a professional body like CII clearly has a vital role in demonstrating leadership in self-regulation and setting high-level standards to which the whole profession should aspire.

Industry Commercial Structures

Parts of the industry have had issues which lead to debates over conflict of interest. There is always a danger that commercial incentives can sometimes lead to pressures for unethical behaviour. While this is outside the direct control of the CII it is important that conflicts of interests are appropriately identified and managed.

Enforcement and Punishment

There is a clear symbolic importance in setting examples. However a distinction needs to be drawn between material and technical breaches. Enforcement needs to be sensitively handled. At the same time, high-profile disciplinary cases could play an important role in boosting the CII's reputation and also send a message about standards both internally and to external stakeholders.

Complacency

Until ethical education becomes more widespread people will not necessarily see ethical problems in what they are currently doing. There will be those who do meet high standards will take pride in doing so and reap commercial advantage but they may not be at the stage of seeing conduct failures by others as a problem for their own reputation and business activity.

It would be a mistake to let these challenges slow the drive towards greater professionalism.

None of these barriers is insurmountable.

The steps the CII has taken to identify professionalism and ethics as key areas to progress have already had an impact on members and other stakeholders, such as the FSA and other professional bodies. The essential building blocks (a new code, the role of the independently chaired Professional Standards Board, co-operation with other bodies and leadership) are all in place.

What is required now is a coherent and joined-up approach to conduct and ethics.

6. Professionalism and ethics – lessons from other professions

Ethics has been a vital element of professional standing ever since the first professions emerged. Recently, decline in public trust in the professions has driven a greater emphasis on the visibility of professional ethics and independent enforcement of standards. The professions have realised that they cannot stand still and rely entirely on traditional values and ethos. They have to meet the public's expectations in terms of conduct, and must be seen to do so.

The professions have realised that earning trust is not only a matter of professional pride but also delivers commercial benefits. More importantly, a profession that earns trust will ultimately have greater freedom to run its own affairs.

Modern professional bodies are therefore working harder than ever to build and maintain public trust.

Context

Most professional bodies fit within a multi-layered pattern of governance, sometimes of very long standing. For example the accountancy bodies work with the Financial Reporting Council; similarly regulatory activity in the medical profession in the hands of the General Medical Council and complements the role of the Royal Colleges. In architecture, this is the Royal Institute of British Architects (RIBA) with the Architect's Registration Board. The legal professions are self-regulated to a greater degree, but the Legal Services Act ensures that both professions in England and Wales will be overseen by the independent Legal Services Board from 2010. The relationship of insurance and personal finance services bodies to the FSA is not therefore exceptional.

All professional bodies work in a role of persuasion, encouragement and communication as well as dictating and setting standards.

Establishing Clear Standards of Conduct

All professions need to establish what good behaviour looks like. The main route to this is through a clear set of rules to ensure that practitioners meet high standards. Professional body practice varies in this regard. Established professions such as law and medicine both have extensive sets of rules to cover a wide range of situations. Codes are based around short sets of principles but are usually underpinned by more detailed guidance. These codes tend to be based around setting standards and ensuring the profession works in the public interest.

The preference now is for principles-based codes. There is a feeling that guidance based on principles is more helpful in achieving real goals to set out aspirational statements than attempting to build a comprehensive set of rules. The civil service has gone through a similar process in recent years in attempting to define the nature of good conduct in the public sector. Principles can be the start of a change of attitude or culture.

Training and Education

The basis of professionalism is knowledge: technical knowledge supplemented by a taught and embedded set of values. Most professional training starts at degree level through vocational degree courses. This is where the traditional professions such as law and medicine envisage the first stage of a professional's ethical development.

Indeed, the medical profession expects an increasingly large element of ethical training in undergraduate teaching. The usual practice for training provided by professional organisations is for ethics to be embedded within other training, as in the Legal Practice Course. Professional conduct and ethics are intended to be pervasive, impacting on all aspects of the design, delivery and content of the course.

Other professions make use of stand-alone modules. These include the SII's online training module and mandatory test as well as the Institute of Chartered Accountants of England and Wales (ICAEW)'s online self-taught course: the Structured Training in Ethics.

Continuing Professional Development

Most professions now expect members to ensure not only that they have professional knowledge but that it is kept current. CPD systems are therefore designed to ensure that a professional's skills and personal qualities are maintained

throughout their working life. Systems may allow for individuals to carry out CPD relevant to their career in general, or, as in accountancy, it may have to be relevant to the individual's current role.

Overall, systems tend to be fairly flexible, leaving a lot of scope for the individuals to manage their own career with only limited opportunity for a mandatory ethics element. Most CPD systems incorporate few compulsory elements. One of the rare exceptions to this is the compulsory CPD element for newly qualified solicitors.

Systems vary between being 'output' based, meaning they focus on what is learned and the actual benefits of CPD to development, and 'input' based, meaning the focus is simply on demonstrating and recording time and activity. The hours or points demanded vary considerably across the professions – solicitors are required to complete 16 hours per year, SII members 35 and accountants 36. Content is designed to be broad, covering commercial and technical issues for accountants, and non-core issues such as technology and communication skills for doctors. The SII has identified distinct learning areas, including active, reflective, self-directed and development. In terms of actual provision, both the ICAEW and the Solicitors Regulation Authority (SRA) formally authorise or accredit CPD providers.

Corporate Relationships

Most professionals use their knowledge within a corporate environment - one with its own culture and rules that will affect both attitudes and behaviour. Professional bodies, on the other hand, tend to be built around the individual membership. In practice employers can have a significant effect on individual behaviour in terms of creating a culture, setting incentives and providing both formal and on-the-job training.

Some professional bodies try to review company procedures and processes as a means of ensuring they help embed good conduct. For example, each major accountancy firm is reviewed annually by one of the accountancy professional bodies. The SRA also investigates law firms' corporate procedures. RIBA tends to provide advice to architects as employers on the commercial side of their operations.

Enforcement and Discipline

Ultimately professionalism needs to be enforced by stick as well as carrot, providing an incentive for the professional to live up to the expected standards as well as a consequence for not behaving ethically. Professional bodies use a range of sanctions from fines to expulsion and disbarring from practice. However, as in other areas of professionalism, the power of professional bodies is not unlimited and they tend to be only one player in the process of enforcement.

Hence the Government's Clementi Review of Legal Services, which led to the separation of all regulatory and discipline functions out of the Law Society and their being placed in the hands of the SRA (similarly for barristers, the Bar Council created the separate Bar Standards Board). It was felt that the Law Society had in the past not paid sufficient attention to addressing complaints and that separation would create a better service for clients. The Law Society acknowledged under pressure that there was an inherent conflict between regulatory activity and representing the profession and that separating the two has strengthened both.

7. Recommendations

A: Training

Training in ethics and conduct needs to feature in all elements of CII training from the earliest stage of membership. This is particularly important in a profession without a vocational degree. Any ethics training needs to be developed with clear buy-in from across the organisation. It is particularly important to involve the faculty boards.

Teaching ethics from the earliest stage means involving new members and those without any qualification. An online induction module should therefore be created, including substantial content on conduct and ethics in the form of some basic moral dilemmas.

In the middle tier of professional education ethics should be integrated with other topics. The Foundation Insurance Test should include at least one ethics question, and the compulsory units and modules in the Certificate and Diploma level courses should cover ethics issues.

At Advanced Diploma stage, teaching of ethics should become more distinct and explicit. The report therefore recommends the creation of a scaled-down version of the Business Ethics programme from the Fellowship Course for this stage. This would be a compulsory module examining how to approach ethical decision-making. It would also involve ethical case studies and teach-ins and seminars involving senior members of the profession.

In terms of training techniques, there should be a strong face-to-face element in ethics training, ideally involving senior practitioners to help share personal experiences. The CII should also develop case history examples based on real life ethical dilemmas.

For existing members, there should be a rolling programme of seminars led by industry practitioners. This is designed to get members at all levels used to considering ethical issues.

B: Continuing Professional Development

Continuing Professional Development is one of the few ways members can actively stay in touch with the CII when not in the examination process. The current system is reasonably flexible and allows members to tailor activity to their own careers.

The report recommends the continuation of a mandatory system with flexibility over the exact content. It does not recommend compulsory ethics CPD but does call for ethics-based events that qualify for CPD points. Local institutes should also be encouraged to hold their own dedicated ethics events, which should also qualify for points. The CII should provide background materials, such as a CD-ROM to support these events and to ensure a consistent feel.

C: Communications

It will be important to communicate the revised Code both to members so that they are aware of the expected standard and more widely so that the public come to expect and demand high standards. Members should also have the opportunity to feed back on the Code and the development of ethics.

Importantly, the report recommends a mandatory declaration that the member has read and understood the Code in the annual membership renewal. This will make clear that CII membership means signing up to certain standards of conduct.

The publication of the revised Code provides an important opportunity to indicate the CII's commitment to ethics and there should be a major launch event. The media, other industry trade bodies and the FSA should all be involved. This should be the start of a campaign which should include articles in the CII in-house media, Faculty events, regional institute events and national media activity.

In terms of two-way member communication, the report recommends the creation of a helpline to talk members through the new Code, more face-to-face events and the provision opportunities for members to give feedback. We recommend regular ethics monitoring to test the effectiveness of member communications and other ethics activity.

D: The Corporate Dimension

Companies will remain the main day-to-day influence on member behaviour and set the prevailing culture. They can therefore play a vital role in helping to promote ethics. The CII maintains a relationship with many companies through a system of Chartered Title corporate membership.

This relationship should cover ethical issues from the outset. The process for assessment for Chartered Title status might include an ethics question for the responsible member. The report also recommends that Chartered Firms members should review their Codes to ensure that they are compatible with the new CII Code. Wherever possible, the CII Code itself should be consistent within companies.

Chartered title members should be involved in the full range of activity recommended in the report. They should hold in-house events dedicated to ethical issues and looking at the CII Code. They should also be asked to support CII media activity in this field and the initial development of ethics training. Corporate organisations should also be involved in providing member feedback on CII ethics activity.

This should all be brought together in a formal corporate working group to oversee this activity.

E: Industry-wide Co-operation

The CII should seek to build on the industry collaboration achieved by, for example, the progress made in retail financial services work on the retail distribution review through the “Edinburgh Declaration,” under which the CII, Chartered Institute of Bankers in Scotland (CIOBS), the Institute of Financial Planning (IFP) and the Securities and Investment Institute (SII) agreed to work together to raise standards in financial services. The CII should now look at opportunities to bring financial services and insurance bodies together to address the common ethical challenges facing the industry. There should be a cross industry working group bringing together trade and professional bodies to provide a permanent forum to address these issues. This should be preceded and supplemented by seminars to explore the issues and to suggest initial ideas.

The report recommends that the industry should aim to standardise training. As part of this there should be an industry-wide transparency and enable public understanding of the equivalent level qualifications provided by different bodies.

In parallel to this process the CII should seek to involve the FSA in ethics activity, requesting that they note the Code, are involved in the process should they wish.

F: Enforcement and Discipline

As part of enhancing professionalism the CII may have to be more willing to discipline those who do not meet the standards expected in the profession.

One important element of this will be handling those who bring the profession into disrepute, undermining the public confidence and reputation on which professionalism rests. The CII should be clear about the importance of this principle in the revised Code.

On the other hand enforcement must not be overdone. Trivial breaches of rules and behaviour, such as delays in CPD returns, should not be treated in the same manner as more serious offences.

The report also recommends that the CII look at best practice in other professional bodies and consider the option of establishing an independent disciplinary function, although any changes in this direction would only be in the long-term.

8. Conclusion

In writing this report, Open Road has tried to look at ways of fostering ethical standards in the round, using all available routes and communicating with members in a variety of ways.

We believe our report reflects emerging best practice in other professions and will be beneficial for CII and its members in future years.

We also strongly believe that an understanding of professional ethics is something which matters to members at all levels and is relevant to the way in which they do business. Ethics is not something for senior people to worry about and everyone else to ignore: it is an essential part of being a professional and it needs to be understood and applied early.

But for that to work there have to be clear signals from the leaders of the profession, from senior industry figures and companies, and consistent communication of the importance of ethics – ideally supported by the regulators and by government.

CII has taken a lead in this area which we applaud. We look forward to seeing the results.

Martin Le Jeune
Open Road

Appendix: How the report was written

The findings in the Open Road report were based on a number of sources:

- Previous experience of corporate, professional and public sector ethical practices
- A number of structured interviews with CII staff and as well as members of the Professional Standards Board
- Two focus groups with CII members (Manchester and London) in September 2008
- An on-line survey of members
- Structured interviews with other professional bodies and other experts

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