In the Matter of the

***FINANCIAL INSTITUTIONS ACT*, RSBC 1996, c.141**
(the "Act")

and the

INSURANCE COUNCIL OF BRITISH COLUMBIA
("Council")

and

NAVDEEP KAUR DHALIWAL
(the "Licensee")

ORDER

As Council made an intended decision on September 16, 2025, pursuant to section 231 of the Act; and

As Council, in accordance with section 237 of the Act, provided the Licensee with written reasons and notice of the intended decision dated September 29, 2025; and

As the Licensee has not requested a hearing of Council's intended decision within the time period provided by the Act;

Under authority of section 231 of the Act, Council orders that:

1) The Licensee is fined $500, to be paid by January 19, 2026;

2) The Licensee is required to complete the following courses, or equivalent courses as acceptable to Council, by January 19, 2026:

    i. Council Rules Course for Life and/or Accident & Sickness Insurance Agents; and

    ii. Continuing Education Requirements & Guidelines course

    (collectively, the "Courses"); and

3) A condition is imposed on the Licensee's life and accident and sickness insurance agent licence that failure to pay the fine in full and complete the Courses by January 19, 2026 will result in the automatic suspension of the Licensee's licence, and that the Licensee will not be permitted to complete the Licensee's 2027 annual licence renewal until such time as the Licensee has complied with the conditions listed herein.

This order takes effect on the **20th day of October, 2025.**

Janet Sinclair, Executive Director
Insurance Council of British Columbia

INTENDED DECISION

of the

INSURANCE COUNCIL OF BRITISH COLUMBIA
("Council")

respecting

NAVDEEP KAUR DHALIWAL
(the "Licensee")

1. Pursuant to section 232 of the *Financial Institutions Act* (the "Act"), Council conducted an investigation to determine whether the Licensee had acted in compliance with the requirements of the Act, Council Rules, and Code of Conduct regarding allegations that the Licensee failed to meet her continuing education ("CE") requirements for the 2023/2024 licensing period (the "Licence Period").

2. As part of Council's investigation, the Licensee was provided with an investigation report, and on August 16, 2025, she acknowledged that she had not met her CE requirements and accepted Council's proposed penalty.

3. The investigation materials and the Licensee's admission were reviewed by Council at its September 16, 2025 meeting, where it was determined that the matter should be disposed of in the manner set out below.

PROCESS

4. Pursuant to section 237 of the Act, Council must provide written notice to the Licensee of the action it intends to take under section 231 of the Act before taking any such action. The Licensee may then accept Council's decision or request a formal hearing. This intended decision operates as written notice of the action Council intends to take against the Licensee.

FACTS

5. The Licensee has held a life and accident and sickness insurance agent licence since April 16, 2018.

6. On August 15, 2024, Council staff conducted an audit based on the Licensee's 2023/2024 annual licence renewal declaration. As part of the audit, Council staff asked the Licensee to provide CE records for the Licence Period.

7. The Licensee could not demonstrate that she had obtained 15 qualifying CE credits. Although the Licensee provided proof of completion of 15 credits, five of those credits were duplicates and did not count towards the CE requirement. The Licensee explained to Council staff that, although she was

aware these courses were repeats, she had taken the classes on different dates and from "a different perspective."

ANALYSIS

8. Council determined that the Licensee failed to obtain the required CE credits for the Licence Period and is in breach of Council Rules 7(5) and 7(8), as well as section 5 ("Competence") of the Code of Conduct.

PRECEDENTS

9. Prior to making its recommendation, Council took into consideration the following precedent cases. While Council is not bound by precedent and each matter is decided on its own facts and merits, Council found that these decisions were instructive in terms of providing a range of sanctions for similar types of misconduct.

10. *Levita Bueno Velasco* (November 2023): involved a licensee who failed to complete CE credits for the 2018/2019, 2019/2020 and 2020/2021 licence periods. Although the licensee attempted to complete the outstanding CE credits, at the time of the investigation she had only completed 20 of the 45 outstanding credits. Council determined that it was appropriate to fine the licensee $1,000 for each licence period in which she had not met the CE requirements. The licensee was fined $3,000, required to take the Council Rules Course and assessed investigation costs.

11. *Xiao Yan (Ceila) Xu* (May 2024): involved a licensee who failed to complete CE credits for the 2019/2020 and 2020/2021 licence periods. The licensee completed all outstanding CE credits and showed remorse for her failure to complete the credits. Given the licensee's efforts to self-correct and complete all outstanding continuing education credits, Council ordered that the licensee be assessed a fine of $500 for each licence period in which she did not meet the CE requirements.

MITIGATING AND AGGRAVATING FACTORS

12. Council considered several mitigating factors in this matter. The Licensee accepted and acknowledged the misconduct, which Council viewed as a mitigating factor. Further, the Licensee accepted that remedial action against her was warranted. The Licensee co-operated with Council's investigation by providing the CE credits and responding to Council's inquiries in a timely manner. In addition, when the problem was brought to the attention of the Licensee, she proceeded to complete an additional 6 CE credits.

CONCLUSIONS

13. Council took into account the significant mitigating factors when determining what fine is an appropriate response to the Licensee's failure to complete the required CE credits for the Licence Period in question. Council determined that this matter had several mitigating factors and no aggravating factors, and that similar to the *Xu* precedent, a fine of $500 was reasonable.

14. As a self-funded regulatory body, Council looks to licensees who have engaged in misconduct to bear the costs of their discipline proceedings, so that those costs are not otherwise borne by British Columbia's licensees in general. Council notes that in this particular instance, the Licensee's full co-operation and assistance in expediting the investigation process are important factors to consider when determining if costs should be assessed. In these circumstances, Council has determined that no costs be assessed against the Licensee.

INTENDED DECISION

15. Pursuant to section 231 of the Act, Council made an intended decision that:

    a. The Licensee be fined $500, to be paid within 90 days of Council's order;

    b. The Licensee be required to complete the following courses, or equivalent courses as acceptable to Council, within 90 days of Council's order:

        i. Council Rules Course for Life and/or Accident & Sickness Insurance Agents; and

        ii. Continuing Education Requirements & Guidelines course

        (collectively, the "Courses");

    c. That a condition be imposed on the Licensee's life and accident and sickness insurance agent licence that failure to pay the fine in full and complete the Courses within 90 days of Council's order will result in the automatic suspension of the Licensee's licence, and that the Licensee will not be permitted to complete the Licensee's 2027 annual licence renewal until such time as the Licensee has complied with the conditions listed herein.

16. Subject to the Licensee's right to request a hearing before Council pursuant to section 237 of the Act, the intended decision will take effect after the expiry of the hearing period.

Additional Information Regarding Fines

17. Council may take action or seek legal remedies against the Licensee to collect the outstanding fine, should this not be paid by the 90-day deadline.

Right to a Hearing

18. If the Licensee wishes to dispute Council's findings or its intended decision, the Licensee may have legal representation and present a case in a hearing before Council. Pursuant to section 237(3) of the Act, to require Council to hold a hearing, the Licensee **must give notice to Council by delivering to its office written notice of this intention within fourteen (14) days of receiving this intended decision.** A hearing will then be scheduled for a date within a reasonable period of time from receipt of the notice. Please direct written notice to the attention of the Executive Director. **If the Licensee does not request a hearing within 14 days of receiving this intended decision, the intended decision of Council will take effect.**

19. Even if this decision is accepted by the Licensee, pursuant to section 242(3) of the Act, the British Columbia Financial Services Authority ("BCFSA") still has a right of appeal to the Financial Services Tribunal ("FST"). The BCFSA has thirty (30) days to file a Notice of Appeal once Council's decision takes effect. For more information respecting appeals to the FST, please visit their website at https://www.bcfst.ca/ or visit the guide to appeals published on their website at https://www.bcfst.ca/app/uploads/sites/832/2021/06/guidelines.pdf.

Dated in Vancouver, British Columbia on the **29th day of September, 2025.**

For the Insurance Council of British Columbia

Janet Sinclair
Executive Director