



FLINDERS
PARTNERS
FINANCIAL SERVICES



Flinders
Partners
Financial
Services

March 31

2019

Continuing Professional Development (CPD)

Version 1.1

Scope

This policy applies to Flinders Partners Financial Services trading as Flinders Partners Financial Services in compliance with Corporations (Relevant Providers Continuing Professional Development Standard) Determination 2018. Specifically, it applies to all relevant providers (RP) authorised by the stated licensee.

Purpose

Continuing Professional Development (CPD) is an essential component of being a professional and embeds a culture of lifelong learning. This policy embeds a CPD framework and outlines the CPD requirements under Corporations Amendment (Professional Standards of Financial Advisers) Act 2017 (Cth) and Corporations (Relevant Providers Continuing Professional Development Standard) Determination 2018, which requires all individuals identified as 'relevant providers' to meet the requirements for CPD set by the Financial Adviser Standards and Ethics Authority Limited (FASEA).

This document outlines the overarching CPD policy and provides a summary of the relevant provider requirements.

This CPD policy embeds the following principles:

- CPD maintains currency of technical knowledge
- CPD enhances and extends knowledge and skills
- CPD involves critical reflection and development
- CPD is relevant and flexible
- CPD is integral to ethical and professional practice

Definitions

Act: Corporations Amendment (Professional Standards of Financial Advisers) Act 2017

CPD year: The 12-month period beginning on the day of the year included in the most recent notice given by the licensee under section 922HA of the Act.

Relevant provider: a person is a relevant provider if the person:

- (a) is an individual; and
- (b) is:
 - (i) a financial services licensee; or
 - (ii) an authorised representative of a financial services licensee; or
 - (iii) an employee or director of a financial services licensee; or
 - (iv) an employee or director of a related body corporate of a financial services licensee; and
- (c) is authorised to provide personal advice to retail clients, as the licensee or on behalf of the licensee, in relation to relevant financial products.

Provisional relevant provider: a relevant provider who is undertaking work and training in accordance with subsection 921B(4) of the Act.

Formal relevant education: includes any of the following:

- (a) a degree or equivalent qualification approved under the Corporations (Relevant Providers Degrees, Qualifications and Courses Standard) Determination 2018
- (b) a course determined in a legislative instrument under paragraph 1546B(1)(b) of the Act
- (c) education or training provided or approved by a professional association
- (d) formal education or training study towards qualifications or designations relevant to practice as a relevant provider.

Professional or technical reading: reading of relevant magazines, academic readings or journal articles that is unstructured and does not contain an assessment.

Checking Compliance with CPD policy and the legislative instrument

Each year the AFSL will assess this CPD Policy document and determine the extent to which it is complying with the Legislative Instrument.

CPD Year

Flinders Partners Financial Services CPD Year is 1 January 2019 to 31 December 2019 as per the most recent notice provided to ASIC under section 922HA of the Corporations Act 2001.

CPD obligations of relevant providers-

Total minimum target: 40 hours of 'qualifying CPD' per CPD year.

Qualifying CPD activities must include a minimum in the following areas:

CPD Area	Minimum requirement
Technical Competence	5 hours
Client Care and Practice	5 hours
Regulatory Compliance and Consumer Protection	5 hours
Professionalism and Ethics	9 hours
General	No set minimum hours

Part-time relevant providers

For reduced CPD requirements to apply, the relevant provider must be working part-time for the whole of the CPD year and must obtain prior written consent from the licensee.

Total minimum target: 36 hours of 'qualifying CPD' per CPD year.

Qualifying CPD activities must include a minimum in the following areas:

CPD Area	Minimum requirement
Technical Competence	5 hours
Client Care and Practice	5 hours
Regulatory Compliance and Consumer Protection	5 hours
Professionalism and Ethics	9 hours
General	No set minimum hours

CPD areas

A CPD activity must relate to one of the following CPD areas:

Item	CPD area	Definition
1.	Technical Competence	The activity is designed to enhance participants' technical proficiency and ability to develop and provide advice strategies that are appropriate to the objectives, financial situations and needs of different classes of retail clients.
2.	Client Care and Practice	The activity is designed to enhance participants' ability to act as a client-centric practitioner in advising retail clients.
3.	Regulatory Compliance and Consumer Protection	The activity is designed to enhance participants' understanding of applicable legal obligations and how to comply with them.
4.	Professionalism and Ethics	The activity is designed to enhance participants' capacity to act as an ethical professional.
5.	General	The activity is designed to maintain and extend participants' professional capabilities, knowledge and skills, including keeping up to date with regulatory, technical and other relevant developments, but is not in an area referred to in another item of this table.

Maximum restrictions

In any CPD year, no more than the specified hours in each activity below may be counted as follows:

- 30 hours of formal relevant education
- 4 hours of professional or technical reading

Assessment and approval of CPD plans

The AFSL will develop a CPD Plan for each of its RPs prior to the commencement of each RP's CPD Year.

Each CPD plan shall:

- Identify areas for improvement in, and development and extension of, the RP's competence, knowledge and skills; and
- Describe the qualifying CPD activities the RP will complete during the CPD year to achieve those improvements.

For the purpose of section 8 of the Legislative Instrument the AFSL will annually assess and approve a minimum of 70% of each of its relevant provider's CPD for them to complete as part of their CPD Plan as qualifying CPD activities as defined by section 7 of the Legislative Instrument.

Approval of qualifying CPD activities

70% of all CPD activities undertaken by relevant providers must be assessed and approved by the licensee.

The following approval process is required:

Activity	Approval process
Kaplan Professional Ontrack content	Automatically approved
Kaplan Professional higher education subjects	Automatically approved to a maximum of 30 hours per subject
PD Days, Webinars, Seminars, Online Modules, Conferences and other similar CPD.	Apply for approval – see evidence requirements below.
Podcasts, reflection, reading, presenting technical content, and other similar CPD.	If evidence requirements can be met, apply for approval. If evidence requirements cannot be met, provide as much detail as possible to be counted towards 'non approved' CPD.

Assessment of qualifying CPD activities

A CPD activity must meet and provide evidence of the following requirements to be approved as a 'qualifying CPD activity':

- Clearly defined aims and learning outcomes
- Clearly defined, logical structure that follows adult learning principles
- Is current, accurate and up-to-date
- Relates to one of the FASEA CPD areas
- Is the appropriate learning level and has appropriate technical or practical content
- Deals primarily with matters related to the provision of financial product advice, financial advice services and financial advice business
- Is led or conducted by one or more persons with appropriate expertise, academic qualifications and practical experience
- Enhances advisers' knowledge and skills, and/or contributes to the maintenance of knowledge and skills in areas relevant to the provision of financial product advice and financial advice services
- Includes one or more of the following: workshop, face-face presentation, multimedia, worked examples, activities, case studies, tips, warnings, and if appropriate, reference to relevant legislation
- Preference is given to activities with a structured assessment component. Evidence of the successful completion of the assessment is required

Evidence requirements

For approval to be granted for a 'qualifying CPD activity' the following evidence is required:

- Proof of attendance/completion (e.g. certificate, digital record, transcript), which includes as a minimum:
 - The name of the activity and the provider
 - The date the activity was undertaken
 - An overview of the activity
 - A bio or CV of person(s) who developed or presented the activity, including academic qualifications and experience
 - The CPD area to which it relates
 - The duration in minutes/hours of the activity
 - The letterhead and/or signature of the provider or an appropriate authorised person.

Flinders Partners Financial Services will approve at a minimum as many activities as will enable a relevant provider to comply with their CPD requirements. However, Flinders Partners Financial Services will not approve an activity unless the activity meets the qualifying CPD activity requirements and evidence requirements set out in this policy.

Allocation of hours

CPD hours will be assessed and allocated on the estimated time taken to complete all content components (including video and/or multimedia) plus the completion of the assessment, on the basis of a 'reasonable person', with the appropriate knowledge.

Record keeping

The Kaplan Professional Ontrack platform will be used to record the completion of CPD activities. CPD plans will specify each relevant provider's:

- individual overall CPD target
- minimum requirements in each CPD area
- any other specific requirements that must be met

The platform will monitor individual progress and provide reporting.

For CPD activities undertaken and completed outside the Ontrack platform, each individual relevant provider is required to upload details into Ontrack and submit evidence for assessment and approval to the policy officer.

It is the relevant provider's responsibility to maintain complete and accurate records within Ontrack.

Career breaks

If a relevant provider has not been practicing or authorised as an RP for a continuous period of 2 years or more, then they must comply with the following career break requirements.

Flinders Partners Financial Services must approve the RP CPD plan for the first CPD year prior to resuming practice. Their first CPD plan may require additional CPD hours be completed to ensure Flinders Partners Financial Services is satisfied that it is appropriate to address gaps in the RP's competence, knowledge and skills arising from the relevant provider's absence from practice.

Subject to the outcome of the above considerations, if an RP returns to work after a break their CPD Plan shall be drawn so as to pro-rate requirements for the relevant year of return according to the calendar month of return to work. If the above assessment results in additional CPD required in the first year, these will be added to the pro-rated requirements.

Extenuating circumstances

Flinders Partners Financial Services understand there can be extenuating circumstances that can make completing the expected CPD points difficult. This includes, but is not limited to: illness, medical conditions, disability, carers leave and parental leave.

When the circumstances cause absence from work for a period of one month or longer, the following applies. For as long as the RP is not practicing as an RP, they can be granted relief from CPD for the period of absence.

If the period of absence is less than two years, the CPD Plan for the RP shall be drawn so as to pro-rate requirements for the relevant year of return according to the calendar month of return to work.

If the period of absence is greater than two years, Flinders Partners Financial Services will follow the above process for career breaks.

Provisional relevant providers

Provisional RP who are completing their Professional Year are not required to meet CPD requirements.

In the first CPD year as an RP, CPD requirements will be pro-rated for the period between the completion of the professional year and the CPD year.

Existing relevant providers new to Flinders Partners Financial Services

If an RP moves to Flinders Partners Financial Services, we may recognise some or all of their CPD completed for the current CPD year.

We do not require a review of CPD completed for previous CPD years.

The RP should provide CPD records of the current CPD year. These records will be reviewed according to the approval process outlined in this document. The RP may be required to complete additional CPD if any of the CPD completed to date is not approved by Flinders Partners Financial Services.

Monitoring

Monitoring of the completion of CPD requirements by each RP will be undertaken using the reporting functionality of Kaplan Ontrack on a quarterly basis.

If we form the view that unacceptable gaps have developed or look likely to develop we will caution the RP to attend to their CPD more promptly and monitor them monthly for the following quarter.

Non-compliance

An RP must comply with the CPD obligations specified in this policy.

Failure to meet the specified requirements requires the licensee to notify ASIC of the RP non-compliance with the continuing professional development standard (922HB, Corporations Amendment (Professional Standards of Financial Advisers) Act 2017).

922HB Obligation to notify ASIC of non-compliance with continuing professional development standard

- (1) A notice must be lodged under this section, in accordance with section 922L, in relation to a person if, at the end of a financial services licensee's CPD year:
 - (a) the person:
 - (i) is the licensee; or
 - (ii) is authorised to provide personal advice to retail clients, on behalf of the licensee, in relation to relevant financial products; and
 - (b) the person is a relevant provider; and
 - (c) the relevant provider has not complied with section 921D during the licensee's CPD year.

Note 1: A financial services licensee may obtain information from a relevant provider under section 922N for the purposes of determining whether to lodge a notice under this section.

Note 2: Subsection 921D(1) requires certain relevant providers to meet the continuing professional development standard in subsection 921B(5).

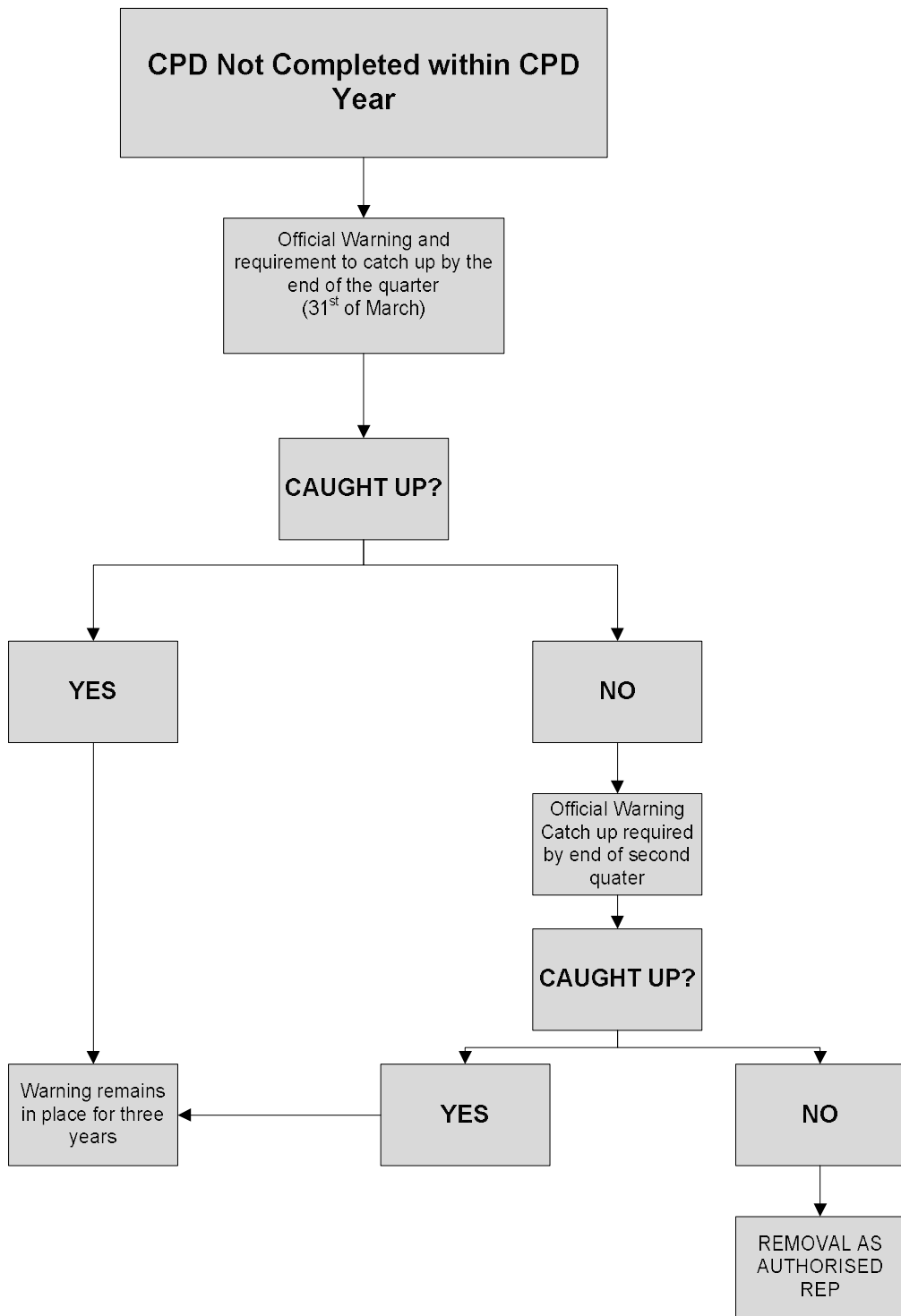
- (2) The notice must state that the relevant provider has not complied with section 921D during the licensee's CPD year.

Corporations Amendment
(Professional Standards of Financial Advisers) Act 2017

Consequences of non-compliance:

- A warning is given if CPD is not completed by the end of the CPD year, and if CPD is not completed by the end of each catch up period;
- If an RP receives three warnings, their authorised representative status will be terminated.
- Warnings remain in place for three years from the date they were given.

Please see Flow Chart on page 9.



Version control and the officers accountable

It is the responsibility of the Responsible Officer(s) to ensure compliance with this policy.

Policy Category:	CPD Policy
Responsible Officer:	Allan Williams
Implementation Officer:	Kerrie Easton
Review Date:	29 March 2019
Approved by:	Allan Williams

Change and version control:

Version	Authored by	Brief description of the changes	Date approved	Effective date