



Equisuper Financial Planning Pty Ltd (AFSL 455010)

Continuing Professional Development Policy

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Equisuper Financial Planning Pty Ltd, AFSL 455010

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1. Introduction

This policy applies to Equipsuper Financial Planning Pty Ltd, in compliance with *Corporations (Relevant Providers Continuing Professional Development Standard) Determination 2018*. Specifically, it applies to all relevant providers (advisors - as referred to in related policies) employed by Equipsuper Financial Planning Pty Ltd.

2. 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; and
- CPD is integral to ethical and professional practice.

It is an ongoing requirement of its Australian Financial Services Licence (AFSL) condition, that Equipsuper Financial Planning Pty Ltd implements procedures for continuing training of representatives who provide financial product advice to retail clients.

3. Roles and Responsibilities

3.1 The Board of Equipsuper Financial Planning Pty Ltd

The Board of Equipsuper Financial Planning Pty Ltd has overall responsibility for all advice provided under its AFSL and the conduct of relevant providers. It is responsible for the establishment, implementation and oversight of the Continuing Professional Development Policy, and approval of all changes to the CPD Policy.

3.2 Executive Officers / Responsible Managers

Executive Officers / Responsible Managers are responsible for ensuring that the training undertaken by relevant providers is in accordance with the CPD Policy.

4. 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 provided by Equisuper Financial Planning Pty Ltd, 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; and
- (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.

FASEA: Financial Advisor Standards and Ethics Authority.

5. CPD Year

Equisuper Financial Planning Pty Ltd, CPD Year is 1 July to 30 June as per the most recent notice provided to ASIC under section 922HA of the Corporations Act 2001.

6. 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 – Superannuation	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

Note: The above table sets out the FASEA minimum requirements in each area. However, there is the discretion to increase the minimum hours required in any of the areas.

7. 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 - Superannuation	5 hours
Client Care and Practice	5 hours
Regulatory Compliance and Consumer Protection	5 hours
Professionalism and Ethics	9 hours
General or all other activities	No set minimum hours

8. CPD activities

8.1 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 or all other activities	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.

8.2 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; and
- 4 hours of professional or technical reading.

Of the 40 hours CPD required to be completed each year by relevant providers, at least 70 per cent of the CPD activity is to be approved by Equipsuper Financial Planning Pty via the Compliance Manager / CPD Accreditor.

9. Assessment and approval of CPD plans

A training plan is documented for each relevant provider. The training plan is designed to;

- assess the relevant provider's training needs in relation to the training standards, particularly if their functions change;
- identify the relevant provider's gaps or weaknesses in the preceding year and the areas where training will be focused;
- in the event gaps are identified, assist with the development of any remediation program;

- set objectives to be met (i.e. the desired changes in the representative’s knowledge, skills and/or performance at the end of the training year);
- decide the structure of the continuing training program (including nominating the training methods);
- assess whether the relevant provider has met the objectives of the training program; and
- provide feedback sessions with the relevant provider about their performance.

The Equip Learning and Development Framework should be consulted for further information on how Equipsuper Financial Planning Pty Ltd ensures that employees who are authorised to provide advice are appropriately qualified and meet ongoing training requirements as set out in the Corporations Act 2001 and relevant ASIC Regulatory Guides.

A review will be undertaken at the end of the CPD year to assess the relevant provider’s compliance with the CPD obligation.

Any non-compliance with the CPD obligations specified in this policy will be dealt with under section 17 of this policy.

10. Approval of qualifying CPD activities

70% of 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
General or all other activities	Assessed by Compliance Manager / CPD Accreditor

10.1 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; and
- Preference is given to activities with a structured assessment component. Evidence of the successful completion of the assessment is required.

Equisuper Financial Planning Pty Ltd will ensure via engagement with an appropriately qualified CPD Accreditor that any proposed qualifying CPD activity will be assessed under the approval process.

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; and
 - The letterhead and/or signature of the provider or an appropriate authorised person.

Equisuper Financial Planning Pty Ltd via the Compliance Manager, will approve at a minimum as many activities as will enable a relevant provider to comply with their CPD requirements. However, Equisuper Financial Planning Pty Ltd 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.

11. 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; and
- 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 Compliance Manager.

It is the relevant provider's responsibility to maintain complete and accurate records within Ontrack and to ensure that they comply with the Qualifying CPD activities at a minimum.

The collection of evidence and proper record keeping must be maintained for at least 7 years.

12. Career breaks

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

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

13. Extenuating circumstances

A relevant provider may be unable to practice for a period of 2 years or more because of extenuating circumstances such as illness, medical conditions, disability or parental leave. Relevant providers affected by extenuating circumstances will be considered on a case by case basis, in consultation with the Compliance Manager. It is expected the relevant provider's CPD plan would be in accord with the plan constructed in the event of a relevant provider taking a career break.

14. Provisional (new) relevant providers

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

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

15. Existing relevant providers who are new to Equipsuper Financial Planning Pty Ltd

Equipsuper Financial Planning Pty Ltd will seek and maintain records of training undertaken by a relevant provider with a previous licensee, to the extent that this information can be obtained after reasonable inquiry.

It will be incumbent upon the relevant provider to ensure the documentation to evidence completion of CPD is available at the time of their appointment with Equipsuper Financial Planning Pty Ltd. Unless such documentation can be produced for the applicable period by the relevant provider, the recognition for prior CPD undertaken with a previous licensee will be taken as zero. It will then be the responsibility of the relevant provider to ensure they comply with the CPD training obligation for the applicable period.

16. Monitoring

Monitoring of the completion of CPD requirements by each relevant provider will be undertaken using the reporting functionality of Ontrack on at least an annual basis.

Ontrack provides a number of reports to assist with monitoring by the Compliance Manager, including the following reports/notifications listed below:

Email alerts in Ontrack:

- email alert: an email is sent to relevant providers (by CPD plan) to inform them of their progress towards their target.

Reporting within Ontrack:

- Completion report: shows CPD completed by each relevant provider;
- CPD progress report: shows relevant provider's progress towards their target; and
- Total requirement report: shows whether or not the relevant provider has met CDP requirements.

17. Tax Practitioner Board (TPB) Continuing Professional Education (CPE) Requirements

The CPD program for relevant providers is structured in such a way as to meet the knowledge requirements of FASEA CPD requirements, and therefore meet the ongoing TPB CPE requirements.

18. Non-compliance

A relevant provider *must* comply with the CPD obligations specified in this policy.

Failure to meet the specified requirements requires the licensee to notify ASIC of the relevant provider's 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*

Adherence to the CPD Policy is a relevant provider licensee and employer requirement. Relevant providers are asked to declare their completion of CPD within the annual review process. Failure to comply, or subsequently complete their CPD obligations may result in cancellation of their advice authority, and/or further disciplinary action.

In addition the Financial Planning Association (FPA) are expected to conduct CPD audits on their members. It is a FPA membership requirement that practitioner members comply with the CPD audit procedure.

19. Policy Review

Timing and circumstances for review of the Policy

The Continuing Professional Development Policy will be reviewed at least annually by the Equipsuper Financial Planning Pty Ltd Board. In addition, the Policy will be reviewed:

- At any time when there is a significant change in the business or in any significant part of it;
- At any time when there is a significant change in legislation or regulatory requirements affecting the relevant providers, the business or any significant part of it; and
- At any other time determined by the Board.