

## CPD Policy

### Scope

This policy applies to Moneyclip Management Pty Ltd ('Moneyclip Management') in compliance with Corporations (Relevant Providers Continuing Professional Development Standard) Determination 2018. Specifically, it applies to all relevant providers 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.

**Training Manager:**

Jade Colfer-Coleman has been nominated by Moneyclip Management as the Training Manager and is responsible for monitoring the accrual of CPD points by relevant providers, overseeing the creation of and adherence to training plans and reporting to the Responsible Officer, any and all, matters which may lead to breaches of the 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).

**CPD Year**

Moneyclip Management 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:

<b>CPD Area</b>	<b>Minimum requirement</b>
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

CPD plans are to be created by the provider and submitted to the Training Manager for final approval by the 30<sup>th</sup> of November each year. The Training Manager will then review the training plan and advise of any changes required by the 15<sup>th</sup> of December. This will allow the training plan to be finalised before the end of the CPD year, being the 31<sup>st</sup> of December.

## Approval of qualifying CPD activities

100% 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
Attendance at external workshops, seminars or courses	To be reviewed and approved by Training Manager
Webinars	To be reviewed and approved by Training Manager

## 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.

Moneyclip Management will approve at a minimum as many activities as will enable a relevant provider to comply with their CPD requirements. However, Moneyclip Management 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 Training Manager.

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 a relevant provider for a continuous period of 2 years or more, then they must comply with the following career break requirements.

Moneyclip Management must approve the relevant providers CPD plan for the first CPD year prior to resuming practice. Their first CPD plan may require additional CPD hours be completed to ensure Moneyclip Management 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.

### **Extenuating circumstances**

If a relevant provider has been affected by extenuating circumstances, such as illness, medical conditions, disability or parental leave, and 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.

Moneyclip Management must approve the relevant providers CPD plan for the first CPD year prior to resuming practice. Their first CPD plan may require additional CPD hours be completed to ensure Moneyclip Management 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.

### **Provisional 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.

### **Existing relevant providers new to Moneyclip Management**

CPD undertaken with a previous licensee will be reviewed. Moneyclip Management will accept any previous CPD activities completed through the Kaplan Professional Ontrack platform and will review other activities and approve where appropriate. We may require the relevant provider to undertake additional CPD to address any gaps in competence, knowledge and skills identified.

### **Monitoring**

Monitoring of the completion of CPD requirements by each relevant provider will be undertaken using the reporting functionality of Ontrack on a monthly basis.

Providers will be notified of the CPD points earned so far that year and of how many points are still required to meet requirements. Quarterly touch points will also be scheduled with the provider and Training Manager to put a plan in place for the quarter to ensure requirements are met.

### **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 providers 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*

To mitigate the possibility of Moneyclip Management ending the CPD year in breach of the 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), the Training Manager will review CPD points accumulated on a quarterly basis.

The Training Manager will also schedule quarterly touch points with each relevant provider to ensure they are aware of their progress towards meeting their requirements. If a relevant provider has not made sufficient progress towards their target by the 30<sup>th</sup> of June, the relevant provider will be notified, and a plan put in place to ensure that the CPD requirements are met before the end of the next quarter. Monthly touch points will also be scheduled with the Training Manager to monitor progress.

In the event that a relevant provider finishes the CPD year without meeting their CPD requirements, the licensee will notify ASIC of the relevant providers non-compliance with the continuing professional development standard (922HB, Corporations Amendment (Professional Standards of Financial Advisers) Act 2017). The relevant provider will be required to step down from providing financial planning advice until such time their failure to meet CPD point requirements has been remedied. They will then be placed on a forward monthly Program with the Training Manager.

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### Version control and accountable officers

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

<b>Policy Category:</b>	<b>Compliance</b>
<b>Responsible Officer:</b>	<b>Mr. S Ghoreyshi</b>
<b>Implementation Officer:</b>	<b>Mr. S Ghoreyshi</b>
<b>Review Date:</b>	<b>20-08-2019</b>
<b>Approved by:</b>	<i>Mr. S. Ghoreyshi</i>

Change and version control:

<b>Version</b>	<b>Authored by</b>	<b>Brief description of the changes</b>	<b>Date approved</b>	<b>Effective date</b>
Version 2	Jade Colfer-Coleman	Formatting & Change of Training Manager from M Hugo to J Colfer-Coleman	30.07.19	30.07.19