

## Financial Planning CPD Policy

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### Approach to continuing professional development (CPD)

Walsh Bay Partners Pty Ltd (**WBP**) Australian Financial Services Licensee (AFSL) No. 487878 acknowledges the importance of training and developing its staff by continually improving knowledge, skills and abilities.

This Policy sets out the CPD requirements for the ongoing development of WBP's relevant providers (**financial advisers**) to ensure compliance with current legislative standards.

All financial advisers must undertake comprehensive and relevant continuing professional development of at least 40 hours every CPD year to ensure they keep up with developments relevant to their respective areas of practice.

WBP will ensure that financial advisers have the appropriate resources and opportunities available to meet their CPD requirements.

WBP's CPD period is the calendar year from 1 October to 30 September.

### Process for approving CPD activities

How our financial advisers may undertake their CPD

Advisers may undertake their CPD in the following ways:

- formal relevant education (provided by an accredited education provider) including degree equivalent study to meet legislative requirements (such as bridging courses, diplomas and approved degrees) and any formal qualifications and designations relevant to the practice of the financial adviser, to a maximum of 30 CPD hours per year
- via our preferred CPD platform and content provider - Kaplan Professional (**Kaplan**)
- attendance at professional development days and workshops
- product update sessions – internal and external
- completing other professional development activities, for example those provided by professional associations, product providers and other financial services industry participants
- professional reading (four hours per annum maximum)

At least 70 per cent of all professional development activities undertaken by our financial advisers must be approved by WBP.

How we approve the CPD of our financial advisers and allocate hours to their CPD plans.

Kaplan's approach to allocating hours to CPD plans is based on the estimated length of time to complete the activity. All training completed via the Kaplan platform is automatically approved by WBP in accordance with Kaplan's estimation of CPD hours.

All other professional development activity submitted for WBP CPD approval will be assessed on a case-by-case basis by the Compliance Manager.

Approval of any CPD activity must meet all of the following requirements in accordance with the Financial Adviser Standards and Ethics Authority (**FASEA**) FPS004 *Continuing Professional Development Policy* (January 2019):

- The activity falls within one of the following CPD areas:
  - technical competence
  - client care and practice
  - regulatory compliance

- professionalism and ethics
- general
- the activity has sufficient intellectual or practical content
- the activity primarily deals with matters relating to the provision of financial product advice
- the activity is led or conducted by one or more persons who have sufficient standing, expertise, academic qualifications and practical experience\*
- the activity is designed to enhance the financial adviser's knowledge and skills in areas that are relevant to the provision of financial product advice

\* *Does not apply to an activity that consists of professional or technical reading.*

If the financial adviser conducts or leads the CPD activity, the number of hours spent conducting or leading the activity can be allocated to their CPD plan.

Process for ensuring CPD activities are provided by persons or entities that are appropriate

All training completed via the Kaplan platform is automatically approved by WBP as being provided by persons or entities that are appropriate.

All other CPD activities that form part of the 70 per cent that require WBP approval must be approved by the Compliance Manager on a case-by-case basis.

The determination of the appropriateness of the entity or person providing the CPD activity will include consideration of the following factors:

- sufficient standing
- expertise
- academic qualifications
- practical expertise

Approach to evidencing outcomes of CPD

All Kaplan professional CPD content includes associated learning objectives and outcomes and these are automatically approved as evidencing outcomes of CPD.

Similarly, any non-Kaplan content that has been accredited by a professional association is also automatically approved as evidencing outcomes for CPD.

When approving any other content, the Compliance Manager must consider the learning objectives/outcomes of the CPD content as they relate to the role of the financial adviser, prior to approving the allocation of hours to the financial adviser's CPD training plan. This is in addition to assessing the appropriateness of the person or entity providing the CPD as outlined above.

Requirements in relation to professional reading

WBP acknowledges that professional research and technical reading is an integral part of being a financial adviser. Any professional reading on the Kaplan database is automatically approved. If a financial adviser undertakes professional reading outside of Kaplan, they must keep a record of the material read, provide a brief summary of the material (may be bullet points) and calculate the CPD hours based upon the length and complexity of the article.

Approach to developing CPD plans for financial advisers

The training needs of each financial adviser will be assessed when developing the annual CPD training plan.

Considerations include:

- the financial services the representative is authorised to provide
- previous training completed by the representative before and after they joined WBP
- the financial adviser's performance over the preceding year
- any recommendations made following an internal or external compliance audit
- any feedback received from their supervisor or manager
- any feedback or learnings from the dispute resolution process

- regulatory or business change which affects the financial advisers and/or the way they provide their financial services
- their knowledge and skill requirements with reference to FASEA's guidelines

A minimum of **28 hours** must be undertaken on qualifying CPD activities as set out below:

CPD Activity	Description	Min CPD Hours p.a.
<b>1. Technical Competence</b>	enhances technical proficiency and ability to provide advice and strategies relevant to the personal circumstances of different types of retail clients	<b>5</b>
<b>2. Client care &amp; Practice</b>	enhances ability to act as a client-centric practitioner in advising retail clients	<b>5</b>
<b>3. Regulatory Compliance &amp; Consumer Protection</b>	enhances understanding of applicable legal obligations and compliance	<b>5</b>
<b>4. Professionalism &amp; Ethics</b>	enhances capacity to act as an ethical adviser	<b>9</b>
<b>5. Other – specific to WBP requirements</b>	maintains and extends professional capabilities, knowledge and skills, including keeping up to date with other relevant developments	<b>4</b>

*All CPD plans, including any plan amendments, will be accessible to the financial adviser via Kaplan.*

## Approach to monitoring the CPD activities of financial advisers

WBP will monitor compliance with this Policy on an ongoing basis and report to the Compliance Committee at each meeting.

Whilst financial advisers are not required to complete any given number of CPD hours each month, they are encouraged to complete their CPD activities regularly throughout the year. The Compliance Manager may instruct a financial adviser to complete CPD hours if there is any chance of the minimum hours required not being attained in each of the above CPD Activities.

Any financial adviser that does not complete the requisite CPD training plan within the CPD year will be reported to ASIC in accordance with WBP's reporting obligations. Any such adviser must complete the prior year's training plan prior to commencing their new CPD year training plan and may not be permitted to provide financial advice to retail clients until the prior year plan is completed in its entirety.

## Approach to tax (financial) advice continuing professional education requirements (CPE)

WBP and those financial advisers registered with the Tax Practitioners Board (TPB), provide tax (financial) advice. All financial advisers are also required to complete CPE in relation to tax (financial) advice in accordance with the ongoing CPE requirements of the TPB.

Relevant financial advisers must complete 60 hours of tax related CPE over a three-year period, with a minimum of 7 hours each calendar year. This CPE must be provided by persons or organisations that are suitably qualified and experienced. The CPD plan for each relevant financial adviser includes, through Kaplan, TASA training.

## Approach to advisers completing their professional year

Any adviser completing their professional year in accordance with FASEA Work & Training Requirement (Professional Year) Policy FPS003, must move to a CPD plan approved by WBP with the required minimum hours as per this Policy.

## Approach to advisers working part-time

Part-time advisers must meet the minimum hours required by this policy – no pro rata is allowed.

## Approach to extenuating circumstances

Where extenuating circumstances arise due to (for example) medical issues or parental leave that cover a period of two months or more, the financial adviser is not able to resume practice until WBP has assessed any gaps in competence, skills and knowledge that may have arisen over that period and the adviser's CPD plan has been adjusted, if required.

## Approach to record keeping

WBP and its financial advisers must maintain complete and accurate records of:

- the qualifying activities the financial adviser undertakes;
- when those qualifying activities are undertaken;
- the number of hours spent on each activity;
- evidence of completion of the activity and the outcomes of the activity; and
- progress of the implementation of the financial adviser's training plan.

Until otherwise notified, records are to be maintained in Kaplan Ontrack.

The Compliance Manager or persons conducting a compliance audit must have access to Kaplan Ontrack.

WBP and each financial adviser are required to keep these records for at least 7 years after the date it was made.

Where a financial adviser leaves WBP for any reason, any records not retained on Kaplan must be provided to WBP as part of the standard off-boarding process. The record must include all CPD activities undertaken throughout their time as a financial adviser with WBP.

The records for each CPD activity must include documentation of the activities undertaken, evidence of completion and outcomes obtained.

## Review of training methods and requirements

WBP will continually develop its training methods and content.

A formal review of this Policy will be undertaken every 2 years.

**This CPD Policy takes effect from 1 January 2019**

