

# Policy - Continuing Professional Development (CPD) v1.4

Date approved	09/02/2023
Applies from	9th February 2023
Approved by	Matt Englund - COO
Policy name	Policy - Continuing Professional Development
Purpose	Imagineering FS Pty Ltd AFSL: 510873 ('IFS') implements policies and procedures to ensure our Advisers undertake continuing training to maintain and update the knowledge and skills that are appropriate for their activities.
Read in conjunction with	<ul style="list-style-type: none"><li>• <a href="#">Regulatory Guide RG 104 AFS Licensing: Meeting the general obligations</a></li><li>• <a href="#">Regulatory Guide RG 146 Licensing: Training of financial product advisers</a></li></ul>
Additional Resources	<ul style="list-style-type: none"><li>• <a href="#">Aus. Gov. - Treasury - Financial Adviser Standards</a></li><li>• <a href="#">Corporations (Relevant Providers Continuing Professional Development Standard) Determination 2018</a></li></ul>
Review	Annually
Visibility	Kearney Group Private Wealth

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## Overview.

The Corporations Act 2017 (the Act) requires that all individuals identified as a 'relevant provider' (Financial Advisers), are expected to meet the obligations for Continuing Professional Development (CPD) set by the Australian Government Treasury, Financial Adviser Standards as part of Corporations (Relevant Providers Continuing Professional Standard) Determination (Amendment) 2020.

The Financial Planners and Advisers Code of Ethics 2019 requires us to develop, maintain and apply a high level of relevant knowledge and skills.

## Aim of this policy.

Imagineering FS Pty Ltd's (IFS) aim is to help develop our Financial Advisers so they can perform and excel in their roles. It also encourages our Financial Advisers to enhance their current skill set and advance their profession into the broader community.

## Who this policy applies to.

This policy applies to Imagineering FS Pty Ltd AFSL: 510873 and Kearney Group Private Wealth CAR: 000423942 and its Authorised Representatives (Financial Advisers).

## Who this policy does not apply to.

This policy does not apply to Provisional Financial Advisers whilst undertaking their Professional Year.

IFS does not require new Financial Advisers (Provisional Financial Adviser/Provisional Authorised Representative (PAR)), under the supervision and guidance of a Financial Adviser, to complete CPD training until the completion of their Professional Year.

## Responsibilities.

### Imagineering.

IFS supports our Financial Advisers to meet and maintain an acceptable level of competence in their areas of authorisation.

To do this:

- IFS develops and maintains a 'Training Plan' for all financial advisers annually and maintains a 'CPD Register' to ensure compliance with the relevant regulatory requirements.
- All 'Training Plans' are aligned with the requirements of ASIC and this CPD Policy.
- 'Training Plans' are issued on an annual basis by IFS at the end of each calendar year, for the upcoming CPD Year. IFS's CPD Year is based on the calendar year: 01 January to 31 December.
- Where relevant IFS will:
  - Approve CPD activities and allocation of hours, including the consideration of CPD accrued with a previous Licensee.
  - Set training requirements for Financial Advisers returning after a career break.
  - Set requirements for Provisional Financial Advisers training requirements at the completion of their Professional Year.

## Training Plan.

IFS will develop 'Training Plans' in consultation with our Financial Advisers aligned with the requirements of Financial Adviser Standards and this CPD Policy, issued on an annual basis prior to the end of the calendar year each year which will:

- Assess individual training needs, having regard to the specific financial services and products that are relevant;
- Identify improvements and/or training gaps in the preceding year in competence, knowledge and skills;
- Set objectives to be met including changes in knowledge, skills and/or performance.

## Financial Adviser.

Under [Financial Adviser Standards](#) all Financial Advisers are required to:

- Collect and maintain continuous and up to date evidence of CPD activity in their 'CPD Register'.
- Participate in development programs and activities that ensure they maintain and extend their professional capabilities, knowledge and skills including keeping up to date with all regulatory, technical and other developments relevant to professional financial advice.
- Complete 40 hours of CPD each year of which 70% must be approved by IFS (including a maximum 4 hours of professional reading).

The minimum hours for CPD across the mandatory categories are:

- Technical – 5 hours;
- Client Care and Practice – 5 hours;
- Regulatory Compliance and Consumer Protection – 5 hours; and
- Professionalism and Ethics – 9 hours.

The balance up to 40 hours, must consist of qualifying CPD.

- Provide evidence of CPD activities within their 'CPD Register'.
- Provide their 'CPD Register' to IFS on request or annually.
- Meet minimum requirements for specific categories per CPD Year. See – '[Requirements](#)'.
- Meet training requirements as set out in their 'Training Plan' per CPD Year.
- Seek IFS approval of CPD hours by forwarding IFS their 'CPD Register' and evidence as required.

## CPD Register

IFS requires our Financial Advisers to maintain a 'CPD Register' that includes:

- Date the qualifying CPD Activities completed.
- Qualifying CPD Activities completed.
- Name of the Provider of the CPD Activity.
- Delivery format of the Activity.
- Designation as Accredited or Non-accredited Activity.
- Total hours spent and evidence of completion of any qualifying CPD Activity.
- The progress of implementation of 'Training Plan'.
- Describe the CPD Activities to be completed during the CPD Year to achieve the improvements and objectives.

## Requirements.

CPD category	Category detail	Min. per CPD Year
Technical competence	Acting as a technically proficient professional	5
Client care and practice	Working as a client-centric practitioner	5
Regulatory compliance	Acting as a legally compliant practitioner	5
Professionalism and ethics	Acting as an ethical professional	9
General	Maintain and extend professional capabilities, knowledge and skills	No minimum
Professional reading	Technical or professional reading specifically regarding any of the above CPD categories	No more than 4 hours

### Full Time.

Financial Advisers working full time for the entire CPD Year are required to complete 40 hours of CPD Activity per CPD Year. A minimum 24 hours per CPD Year will be made up of the minimums from the CPD Categories. The remaining 16 hours must consist of qualifying CPD from the CPD categories and in line with the personalised 'Training Plan'.

### Part Time.

Financial Advisers working part-time for the entire CPD Year can apply for a reduction in minimum hours to 36 hours per year. Written applications to IFS must be accepted before adopting the reduction. A minimum 24 hours per CPD Year will be made up of the minimums from the CPD categories. The remaining 12 hours must consist of qualifying CPD from the CPD categories and in line with the personalised 'Training Plan'.

### Career Break.

Financial Advisers affected by circumstances such as medical, disability, or parental leave who are taking a leave of absence from the profession may apply for a suspension of their CPD requirements. Applications for suspension of CPD requirements will be considered where:

- No Financial Advice is to be provided during the break period.
- An application in writing is submitted with supporting documentation provided.

When Financial Advisers return after a career break, IFS will determine:

- If the break is less than two years, whether existing knowledge and skills are up to date without the requirement for additional formal education qualifications or CPD catch up and
- If the break was for two years or more, what CPD requirements exist to ensure Financial Adviser's skills are up to date with the latest regulatory and IFS requirements.

All Financial Advisers returning after a career break must submit a 'Training Plan' for approval, prorated for the remainder of the CPD Year.

### Membership Professional Association.

As a member of a Professional Association, you may be required to meet specified minimums above the IFS and Financial Adviser Standards standards.

Ensure you are aware of your requirements and advise IFS.

## Provisional Authorised Representatives (PAR).

If appointed by IFS at the completion of their Professional Year, requirements to complete CPD will be considered on a pro-rata basis and on approval of a 'Training Plan'.

## Types.

### Accredited.

In line with the Financial Adviser Standards Standard for qualifying CPD Activities, IFS will consider the following areas to determine whether to accredit CPD Activities:

- Aligns with at least one of the Financial Adviser Standards CPD categories and ASIC Knowledge Requirements;
- Delivered by a reputable provider and led by an individual/group who has appropriate expertise;
- Has an appropriate topic focus for improving ability to deliver quality financial advice;
- The activity is of an appropriate standard and level of content for Financial Advisers;
- The volume of time taken in the activity;
- The stated associated learning outcomes;
- The process for verifying the achieved outcomes.

Minimum 70% of CPD Activity (i.e. 28 hours – full-time CPD activities and 26 hours – part-time CPD activities) per CPD Year must be approved/Accredited by IFS.

### Non-Accredited.

Up to 30% of CPD Activity (i.e. 12 hours – full-time CPD activities and 10 hours – part-time CPD activities) per CPD Year can be noted as Non-Accredited CPD Activities that have not been Accredited by IFS.

Non-Accredited CPD will meet the follow criteria:

- Qualify as a CPD category/ASIC Knowledge Area;
- Content directly related to 'Training Plan';
- Completion must be evidenced – assessment/accreditation/justify for inclusion;
- Activity aims and objectives captured;
- Included in 'Training Register' as Non-Accredited.

### Tertiary Study.

CPD Activities from formal study (through an education provider/Registered Training Organisation (RTO)) may contribute to CPD total for the CPD Year.

- 20 hours can be claimed as Accredited CPD for each subject passed;
- Remaining hours may be applied as Non-Accredited CPD – where evidenced;
- Maximum of 30 hours may be claimed from formal study/tertiary study in any CPD Year.

## Approval.

### Allocating Hours.

IFS will allocate CPD hours to Activities undertaken as follows:

- 60 minutes of CPD Activity will yield 1 CPD Hour;
- Activities will be allocated in a minimum of 15 minute increments;
- Where a CPD Activity qualifies across more than one CPD category/area, it may be applied in the CPD category/area to which it predominantly relates, only if there is no double counting of hours;
- Where a CPD Activity qualifies across more than one CPD category/area, it may meet the criteria to be recorded in more than one CPD category/area, only if there is no double counting of hours;
- Leading or conducting a qualifying Activity may provide CPD hours for the number of hours spent in preparation and the first delivery of the Activity;
- CPD hours accrued in excess of total requirements in one CPD Year, may not be transferred or bought forward to offset the CPD requirements in following CPD Year.

### Providers.

Training should be provided by a reputable Provider who is a person/s and/or entity/ies with:

- Accredited standing;
- Accredited or practical expertise;
- Accredited academic qualifications;
- Relevant experience or education in the field of education;
- Declared learning outcomes;
- Demonstration of how the content or training meets learning outcomes;
- IFS verification of the Provider appropriateness;
- Evidence from the Provider which notes date, CPD category, Accreditation etc.

### Changing Licensee.

IFS may recognise the CPD undertaken under a previous Licensee when authorising a Financial Adviser after consideration of a request in writing that includes the provision of:

- 'CPD Register' from the beginning of the CPD Year & current triennium;
- 'Training Plan' for the CPD Year;
- Associated evidence for all CPD claims for inclusion.

## Qualified Tax Relevant Provider.

Prior to 01/01/2022 the Tax Practitioners Board (TPB) required all Financial Advisers in Australia who operate for a fee and provide retail advice, to complete 20 hours of Continuing Professional Education (CPE) relevant to the Tax (financial) advice, per annum.

The commencement of the Better Advice Bill 01/01/2022 released Qualified Tax Relevant Providers (previously Tax (financial) advisers) from this requirement. From the end of the transition period for the introduction of this Bill on 01/01/2023, Qualified Tax Relevant Providers will be required to complete a minimum of 5 hours each year of Continuing Professional Development requirements to maintain their capabilities to provide tax (financial) advice services.

## Allocating CPE.

IFS will consider the following when verifying CPE:

- When a CPD Activity includes 15 minutes or more of CPE, the total CPD hours will qualify toward CPE.  
e.g. attending a two hour seminar regarding a new financial product that is a tax (financial) advice service, includes a 15 minute discussion regarding the various taxation implications concerning the financial product.

As the financial product is relevant to tax (financial) advice service, the full two hours at the seminar is relevant CPE, despite the seminar covering topics other than taxation.

## Questions and Guidance.

Contact IFS by phone: +61 3 9428 8822 or email: [governance@imagineeringfs.com](mailto:governance@imagineeringfs.com) with any questions regarding this Continuing Professional Development (CPD) Policy or to request guidance to meet the requirements in this policy.