

1. Adviser Qualifications

Integrity Financial Planners offers clients access to a professional financial planning and advisory service from qualified and experienced professionals.

Representatives are therefore required to meet certain qualification standards.

In April 2017, the Financial Adviser Standards and Ethics Authority (FASEA) was established to set the education, training and ethical standards of licensed financial advisers in Australia. In June 2017, FASEA was declared as the standards body under the Corporations Act 2001 to be responsible for:

- Approving degrees or high or equivalent qualifications and determining the bridging course requirements for existing advisers
- Approving foreign qualifications
- Approving and/or administering the exam
- Selecting an appropriate common term for provisional relevant providers
- Determining the continuous professional development (CPD) requirements in relation to licensees' CPD years
- Determining the requirements for the professional year
- Setting the Code of Ethics

The Standards Authority defines the Education Standard through a range of pathways for both new entrants and existing financial advisers. These set out the range of education and learning activities through which representatives will establish coverage of defined body of knowledge intended to underpin the profession and professional's capacity to competently practice.

The FASEA Education Pathways specify the range of programs and courses that both existing and new representatives can undertake to meet this requirement. This policy will apply until 1 January 2024. Please note that IFP is not responsible to assess the educational pathway of a representative, you may seek the help of any approved educational providers such as Kaplan or Deakin University.

The following five (5) pathways have been established by FASEA:

1. New Entrant – Approved Degree Pathway
2. Existing Adviser – Approved Degree Pathway
3. Existing Adviser – Relevant Degree Pathway
4. Existing Adviser – Non-relevant Degree Pathway
5. Existing Adviser – No Degree Pathway

New Entrant

Undergraduate pathway

The undergraduate pathway is an Australian Qualifications Framework (AQF) 7 Bachelor degree that meets the requirements of the AQF and Tertiary Education Quality and Standards Agency (TEQSA) Act offered by a TEQSA registered Higher Education Provider (HEP). These typically contain 24 courses offered over a three year period of full time study. FASEA will approve degrees for this purpose and they will need to contain the FASEA Financial Adviser Curriculum as a core part of the program.

Postgraduate pathway

The post graduate (career changer) pathway is an AQF 8 Graduate Diploma, typically consisting of 8 courses or more offered by a TEQSA Registered Provider and contains the FASEA Financial Adviser Curriculum as a core part of the program. FASEA will also approve Masters (AQF 9)

programs for the purposes of this pathway and they will need to contain the FASEA Financial Adviser Curriculum as a core part of that program.

Professional Year

All new Entrants must undertake a Professional Year as a Provisional Financial Adviser. This Professional Year requires all New Entrants to complete a minimum of 1500 hours of work, covering various requirements.

Please refer to the IFP Professional Year Policy for further details.

Existing Financial Adviser

Approved Degree Pathway

This pathway is for existing financial advisers who have completed a FASEA Approved AQF 7, 8 (Graduate Diploma) or 9 qualification. Refer to the Education Standard Legislative instrument and/or the FASEA Approved Degree List (on FASEA's website) for information on approved degrees.

Existing Providers are required to complete education as follows:

- Ethics and professionalism (including FASEA Code of Ethics and Code Monitoring Bodies) bridging courses.

Relevant Degree Pathway

This pathway is for existing financial advisers who have completed an AQF 7, 8 (Graduate Diploma) or 9 qualification in a related field of study that contains at least 8 courses in one or more of the designated fields of study in any combination – financial planning (includes financial advice areas of superannuation, retirement, insurance, estate planning), investments (includes all types of investments (eg shares, derivatives, foreign exchange, options, etc)), accounting, taxation/tax law (as defined by the Tax Practitioners Board (TPB)), finance law, finance, business law (as defined by the TPB) estate law, banking and economics.

A maximum of 4 courses of study is required for an existing financial adviser who already holds a relevant AQF7 (or higher) qualification.

Existing financial advisers are to complete education towards an approved Graduate Diploma as follows:

- a. Existing financial advisers who have completed a Relevant Degree are required to undertake 4 courses consisting of:
 - Financial Advice Regulatory & Legal Obligation bridging course
 - Ethics and Professionalism (including the FASEA Code of Ethics and Code Monitoring Bodies) bridging course
 - Behavioural Finance: Client and Consumer Behaviour, Engagement and Decision Making
 - FASEA approved unit (Financial Advice Capstone subject)

Recognition of Prior learning will be awarded as follows:

- b. Existing financial advisers who have completed a Relevant Degree and Advanced Diploma in Financial Planning are required to undertake:
 - FASEA Code of Ethics and Code Monitoring Bodies bridging course.

- c. Existing financial advisers who have completed a Relevant Degree and completed approved study to attain a professional designation will be required to undertake:
- FASEA approved unit (Financial Advice Capstone subject)

Non relevant/ Other degree pathway

This pathway is for existing financial advisers who have completed an AQF 7, 8 (Graduate Diploma) or 9 qualification in a non-relevant field of study. A non-relevant/other degree is a qualification at AQF 7, 8 (Graduate Diploma) or 9 qualification in a non-relevant/other field of study that does not contain at least 8 courses in one or more of the designated fields of study in any combination – financial planning, investments, accounting, taxation/tax law (as defined by the Tax Practitioners Board (TPB), finance law, finance, business law or commercial law (as defined by the TPB), estate law, banking and economics.

A maximum of 7 courses of study is required for an existing financial adviser who already holds a non-relevant AQF7 (or higher) qualification.

Existing financial advisers are required to complete education towards an approved Graduate Diploma as follows:

- a. Seven (7) courses consisting of:
- Financial Advice Regulatory & Legal Obligations bridging course
 - Ethics and Professionalism (including the FASEA Code of Ethics and Code Monitoring Bodies) bridging course
 - Behavioural Finance: Client and Consumer Behaviour, Engagement and Decision Making bridging course
 - 4 related units – to be selected by the existing adviser from a FASEA approved list of electives

Recognition of prior learning will be awarded as follows:

- b. Existing financial advisers who have completed a qualification at AQF 7, 8 (Graduate Diploma) or 9 qualification in non-relevant/other field of study that contain between 4 and 7 courses in one or more of the designated fields of study in any combination – financial planning, investments, accounting, taxation/tax law (as defined by the Tax Practitioners Board (TPB), finance law, finance, business law or commercial law (as defined by TPB), estate law, banking and economics are required to complete 5 courses:
- Finance Advice Regulatory & Legal Obligations bridging course
 - Ethics and Professionalism (including FASEA Code of Ethics and Code Monitoring Bodies) bridging course
 - Behavioural Finance: Client and Consumer behavior, Engagement and Decision Making bridging course
 - 2 related units – to be selected by the existing adviser from a FASEA approved list of electives
- c. Existing financial advisers who have completed an Advanced Diploma in Financial Planning are required to complete 5 courses:
- Financial Advice Regulatory & Legal Obligations bridging course
 - Ethics and Professionalism (including the FASEA Code of Ethics and Code Monitoring Bodies) bridging course

- Behavioural Finance: Client and Consumer behavior, Engagement and Decision Making bridging course
 - 2 related units – to be selected by the existing adviser from a FASEA approved list of electives
- d. Existing financial advisers with approved study to attain a professional designation will be required to complete 5 courses:
- Financial Advice Regulatory & Legal Obligations bridging course
 - Ethics and Professionalism (including the FASEA Code of Ethics and Code Monitoring Bodies) bridging course
 - Behavioural Finance: Client and Consumer behavior, Engagement and Decision Making bridging course
 - 2 related units – to be selected by the existing adviser from a FASEA approved list of electives
- e. Existing financial advisers with any two of Advanced Diploma in Financial Planning or approved study to attain a professional designation or between 4-7 of the related designated fields of study (as described above) in any combination will complete 3 courses:
- Financial Advice Regulatory & Legal Obligations bridging course
 - Ethics and Professionalism (including the FASEA Code of Ethics and Code Monitoring Bodies) bridging course
 - Behavioural Finance: Client and Consumer behavior, Engagement and Decision Making bridging course
- f. Existing financial advisers with an Advanced Diploma in Financial Planning, approved study to attain a professional designation and between 4-7 of the related designated fields of study (as described above) in any combination will be required to complete 1 course:
- Ethics and Professionalism (including FASEA Code of Ethics and Code Monitoring Bodies) bridging course

No Degree pathway

This pathway for existing financial advisers who have not completed an AQF 7, 8 (Graduate Diploma) or 9 qualification.

The maximum requirement of an existing adviser who has not completed an AQF7 or above qualification is to complete a Graduate Diploma consisting of the following:

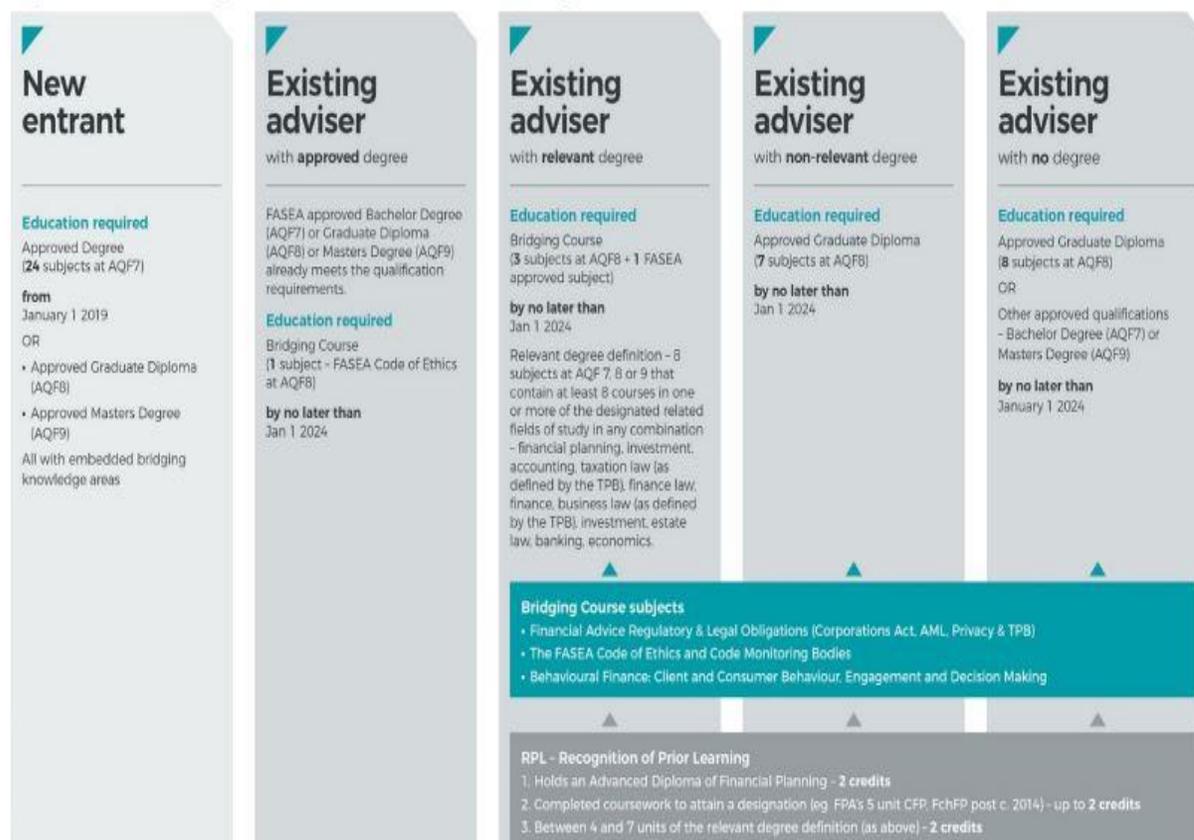
- a. Approved 8 course Graduate Diploma covering:
- Financial Advice Regulatory & Legal Obligations bridging course
 - Ethics and Professionalism (including the FASEA Code of Ethics and Code Monitoring Bodies) bridging course
 - Behavioural Finance: Client and Consumer behavior, Engagement and Decision Making bridging course
 - 5 related units – to be selected by the existing adviser from a FASEA approved list of electives

Recognition of Prior learning will be awarded as follows:

- b. Existing financial advisers who have completed an Advanced Diploma in Financial Planning are required to complete 6 courses:

- Financial Advice Regulatory & Legal Obligations bridging course
 - Ethics and Professionalism (including the FASEA Code of Ethics and Code Monitoring Bodies) bridging course
 - Behavioural Finance: Client and Consumer behavior, Engagement and Decision Making bridging course
 - 3 related units – to be selected by the existing adviser from a FASEA approved list of electives
- c. Existing financial advisers with approved study to attain a professional designation will complete 6 courses:
- Financial Advice Regulatory & Legal Obligations bridging course
 - Ethics and Professionalism (including the FASEA Code of Ethics and Code Monitoring Bodies) bridging course
 - Behavioural Finance: Client and Consumer behavior, Engagement and Decision Making bridging course
 - 3 related units – to be selected by the existing adviser from a FASEA approved list of electives
- d. Existing financial advisers with an Advanced Diploma in Financial Planning and approved study to attain a professional designation will complete 4 courses:
- Financial Advice Regulatory & Legal Obligations bridging course
 - Ethics and Professionalism (including the FASEA Code of Ethics and Code Monitoring Bodies) bridging course
 - Behavioural Finance: Client and Consumer behavior, Engagement and Decision Making bridging course
 - 1 related unit – to be selected by the existing adviser from a FASEA approved list of electives

Diagram 1: Summary of FASEA Education Pathway



Persons seeking to become or remain authorised representatives of IFP are required to satisfy all training requirements deemed necessary by FASEA and to satisfy any other assessment criteria that may be required by IFP.

Qualifications and experience will be evaluated in terms of the financial adviser's knowledge, skills and integrity in relation to the specific areas in which the financial adviser practices.

Generally, knowledge will be assessed in relation to each of the areas, to the extent that these areas apply to the financial adviser's activities. This will require a recent completion of approved courses relating to each of these areas.

Skills and integrity will be assessed on a more subjective basis. Representatives may be required to demonstrate skills in the following areas:

- Establish relationship with client
- Identify client objectives, needs and financial situation
- Analyse client objectives, needs, financial situation and risk profile
- Develop appropriate strategies and solutions
- Present appropriate strategies and solutions to the client
- Negotiate financial plan/policy/ transaction with the client
- Co-ordinate implementation of agreed plan/ policy/ transaction
- Complete and maintain necessary documentation
- Provide on going service (optional at discretion of client)
- Act in the best interest of the client
- Claims handling (where applicable)

Authorised Representatives who do not meet the IFP's requirements may be required to operate under a restricted authority and/or undertake further studies.

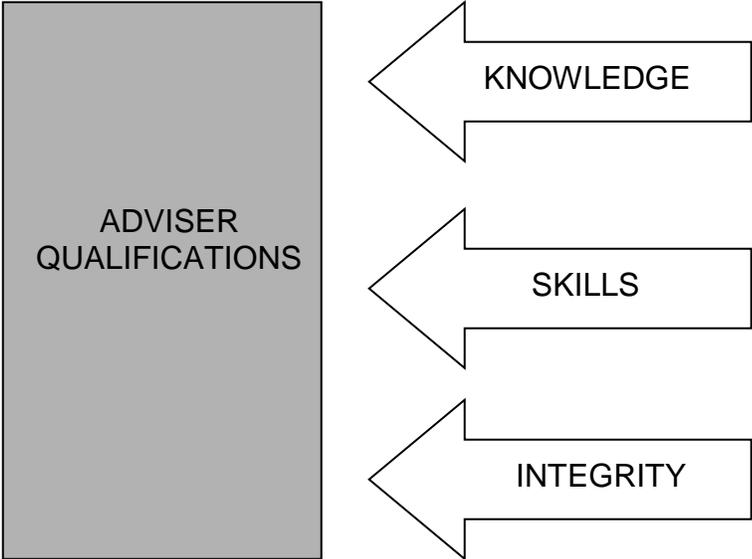


Table 1 – Summary of Relevant AQF Levels

Qualification of Hierarchy	AQF Level	Study Time
Masters	9	<ul style="list-style-type: none"> Typically 16 courses Approx 3 years of part-time study
Graduate Diploma	8	<ul style="list-style-type: none"> Typically 8 courses Approx 2 years of part-time study
Graduate Certificate	8	<ul style="list-style-type: none"> Typically 4 courses Approx 1 year of part time study
Bridging course (3 units)	No AQF outcome	<ul style="list-style-type: none"> 3 units (360 hours) Approx 2 months of part time study Will articulate into AQF qualifications
Bridging course (1 unit)	No AQF outcome	<ul style="list-style-type: none"> 1 units (120 hours) Less than 1 year of part-time study Will articulate into AQF qualifications
Degree	7	<ul style="list-style-type: none"> Typically 24 courses Approx 6 years of part-time study
Advanced Diploma	6	<ul style="list-style-type: none"> Not an approved level of qualification May provide credit and exemption – speak to Higher Education Provider
Diploma	5	<ul style="list-style-type: none"> Not an approved level of qualification May provide credit and exemption – speak to Higher Education Provider Not

2. Ongoing Training

IFP Requirements

Authorised Representatives of IFP are required to maintain and update their knowledge on an ongoing basis. IFP has an obligation to ensure that all representatives are adequately trained, and are competent, to provide those financial services: section 912A (1)(f) of the Corporations Act 2001.

Additionally, IFP has an obligation to ensure that all authorised representative meet the requirements for continuing professional development (CPD) set by the Financial Adviser Standards and Ethics Authority Limited (FASEA): section 921B(5) of the Corporations Act 2001. The mandatory CPD requirements are outlined in the Corporations (Relevant Providers Continuing Professional Development Standard) Determination 2018. This CPD Policy addresses IFP's policy on training its authorised representatives.

Authorised Representatives are required to have and implement a training plan. IFP will discuss and review training plans with each representative as part of the annual adviser review. The training period runs on a Financial Year basis (1 July and 30 June) and training plans will be allocated on Kaplan at the commencement of each year.

Refer to Doc G1 for Kaplan Ontrack users guide for details how to view your training plan.

Progress will be evaluated throughout the training period to ensure all Authorised Representatives are on track to meet their training plan.

Authorised Representatives are encouraged to undertake training through attendance at ongoing training sessions provided by IFP and other industry participants, as well as to consider upgrading their formal qualifications on an ongoing basis.

The training plans are designed to meet or exceed standards set by The Financial Adviser Standards and Ethics Authority (FASEA). IFP conducts regular Professional Development, and online training via Kaplan to assist Authorised Representatives to achieve the required 40 hours per annum of CPD activity required by FASEA.

Authorised Representatives may also be invited to participate in the annual conference for the Alpha Group members which includes training sessions.

Representatives are required to:

- develop and maintain a Continuing Professional Development (CPD) Plan on a continuing basis that identifies areas for improvement in competence, knowledge and skills and the professional development proposals for making those improvements.
- complete at least 40 hours* per year of ongoing professional development and skill enhancement., and;
- complete the minimum knowledge targets set in their training plan each year, and
- complete any training deemed “compulsory” by the Training manager
- attend at least 50% of the IFP training days per year (unless you are exempted from this requirement by the Training Manager or Licensee).

**Please note that changes in the number of hours may be required and this will be communicated with you accordingly.*

Failure to satisfy any training requirement could result in Authorised Representative status being suspended or withdrawn.

The requirement to complete 40 hours per annum of CPD applies to all Authorised Representatives, regardless of their authorization.

CPD Procedure

Purpose

The purpose of this procedure is to ensure that all authorised representatives are adequately trained, and are competent, to provide those financial services: section 912A(1)(f) of the Corporations Act 2001. This procedure is also to ensure all authorised representative meet the CPD requirements: section 921B(5) of the Corporations Act 2001 and Corporations (Relevant Providers Continuing Professional Development Standard) Determination 2018.

Resources required

1. CPD Plan on Kaplan
2. Training Register on Kaplan

Procedure for Creating and Reviewing CPD Plan for Representative

1. Before the start of each CPD Year, IFP will prepare a CPD plan in Kaplan. This will be made available in Kaplan for each authorised representative at the start of the CPD year.
2. The CPD Plan must:

- a. identify areas for improvement in, and development and extension of, the authorised representative's competence, knowledge and skills; and
 - b. describe the qualifying CPD activities the authorised representative will complete during the CPD Year to achieve those improvements.
3. As at the time of writing this CPD Policy, each authorised representative must complete a minimum of 40 hours of qualifying CPD per CPD Year. The qualifying CPD activities must address the following:
- a. technical competence – a minimum of 5 hours;
 - b. client care and practice – a minimum of 5 hours;
 - c. regulatory compliance and consumer protection – a minimum of 5 hours;
 - d. professionalism and ethics – a minimum of 9 hours; and
 - e. general – no set minimum.

FASEA may amend its minimum requirements from time to time. Where there may be some unintended inconsistencies between this CPD Policy and the FASEA requirements, the FASEA requirements prevail.

A part-time authorised representative may seek written approval from IFP for reduced CPD requirements to apply. A part-time authorised representative is still required to complete at least 36 hours per CPD Year.

The maximum hours that each authorised representative can count towards their ongoing training per CPD Year is:

- f. no more than 30 hours of formal relevant education; and
- g. no more than 4 hours of professional or technical reading.

All of the training completed by the authorised representative must be approved by IFP. A list of qualifying CPD activities approved by IFP is included in Appendix A.

All training completed on Kaplan Ontrack will automatically be recorded on the Kaplan Training Register, which is considered the record of CPD training for each IFP authorised representative.

The authorised representative must upload all training completed outside of Kaplan Ontrack on to the Kaplan Training Register and submit evidence for assessment and approval to the Compliance Manager.

The authorised representative is responsible for maintaining copies of all training records and to provide copies of all training records to IFP upon request.

At the end of each quarter, the Compliance Manager will review the authorised representative's training register to determine if the authorised representative is on track to meeting training requirements.

Where there is a shortfall of CPD requirements, a reminder email may be sent by the Compliance Manager, followed by a formal warning. Where the authorised representative fails to comply with the Compliance Manager's instructions, the authorised representative may face suspension or termination of authorisation with IFP.

At the end of each CPD Year, the authorised representative's training register is to be reviewed to ensure that the requirements in the CPD Plan have been met. If training requirements have not been met, ASIC must be notified.

Procedure for Approving CPD Activities

4. IFP must approve at least 28 hours (i.e. 70% of a full-time authorised representative's training requirement) of CPD activities for completion by each authorised representative.
5. IFP will only approve CPD activities that satisfies the definition of a 'qualifying CPD activity'.
6. IFP will be guided by the relevant training provider on the maximum number of hours that can be counted for each qualifying CPD activity.
7. IFP will complete the form on Appendix B: Checklist for Approving CPD Activities to document its approval process.

Procedure for Assessing Authorised Representative returning from career Breaks

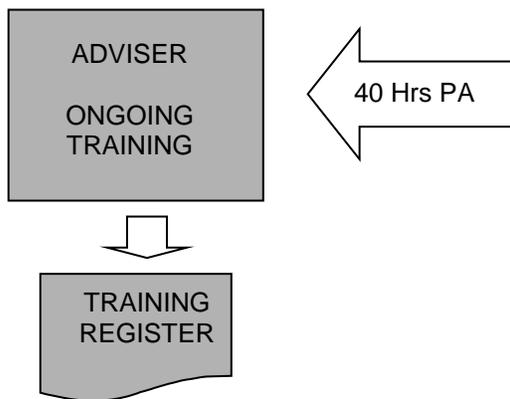
1. This section only applies to an authorised representative who has not practiced for a continuous period of 2 years or more.
2. IFP must approve the authorised representative's CPD plan for the first CPD year before the authorised representative provides advice to retail clients.
3. IFP will only approve the authorised representative's CPD plan if IFP is satisfied that the CPD plan is appropriate to address gaps in the authorised representative's competence, knowledge and skills arising from the authorised representative's absence from practice.

Procedure for Training non-advice providers

1. Non-Advice authorised representative are provided with on-the-job training. Where gaps are identified, the Compliance Manager and the non-Advice representative will select appropriate training to address the gaps and weaknesses.
2. Where non-Advice representative attend external courses and seminars, it is the responsibility of the non-Advice representative to maintain training records.

Training Register

Authorised Representatives must be able to demonstrate adherence to the ongoing training requirements. It is the responsibility of each Authorised Representative to maintain their own training register in Kaplan. IFP will upload any training details and records for your attendance at Integrity PD days. If you complete any training on Kaplan and pass the corresponding assessment this will automatically assign the relevant training to your CPD record. If you complete any other relevant training you must upload this as a training record in Kaplan by following the steps outlined in Doc G1 Kaplan Ontrack User's guide. You must also email compliance@iplan.com.au a copy of the certificate you received for this training. Once IFP has verified the certificate against the training record and approved the training, it will appear in your records as verified.



Appendix A: List of Qualifying CPD Activities

Activity	Approval process
Kaplan Professional Ontrack content	Automatically approved
Formal relevant education provided by Kaplan Professional	Automatically approved to a maximum of 30 hours per CPD Year

Appendix B: Checklist for Approving CPD Activities

IFP only approves CPD activities that satisfy the requirement of a qualifying CPD activity as defined in section 7(1) of the Corporations (Relevant Providers Continuing Professional Development Standard) Determination 2018.

CPD activity being assessed:

Criteria	Yes/No
The activity addresses at least one of the CPD areas included in <i>Table 1</i> below.	
The activity has sufficient intellectual or practical content.	
The activity primarily deals with matters related to the provision of financial product advice, financial advice services and financial advice business.	
The activity is led or conducted by 1 or more persons who are appropriate, and have sufficient standing, expertise, academic qualifications and/or practical experience.	
The activity is designed to enhance a Relevant Providers' knowledge and skills in areas that are relevant to the provision of financial product advice and financial advice services.	

Is the CPD activity approved:

Number of hours to be counted towards meeting CPD requirements: IFP will be guided by the training provider.

CPD activity approved by:

Date approved:

Table 1:

CPD area	Content of CPD activity
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.
Client care and practice	The activity is designed to enhance participants' ability to act as a client-centric practitioner in advising retail clients.
Regulatory compliance and consumer protection	The activity is designed to enhance participants' understanding of applicable legal obligations and how to comply with them.
Professionalism and ethics	The activity is designed to enhance participants' capacity to act as an ethical professional.
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.