

CPD Policy of Providence Wealth Advisory Group Pty Ltd

Effective 31st March 2019

For the purposes of compliance with "Corporations (Relevant Providers Continuing Professional Development Standard) Determination 2018" (as amended from time to time) ("the Legislative Instrument").

CPD Year	The AFSL's CPD year shall be from 1st January to 31st December of each calendar year.
Our approach to CPD	Our approach shall be to (i) set reasonable CPD requirements for each of our relevant providers and (ii) actively assess performance against those requirements throughout the year.
POLICY SPECIFICS	
Returning from breaks	If a relevant provider returns to work after a break their CPD Plan shall be drawn so as to pro-rate requirements for the relevant year of return according to the calendar month of return to work.
Monitoring implementation of CPD plans	Each quarter (as a minimum) we will assess performance towards CPD goals. If we form the view that unacceptable gaps have developed or look likely to develop, we will caution the relevant provider (RP) to attend to their CPD more promptly and monitor them monthly for the following quarter.
Assessing and approving a minimum of 70% of CPD activities for each RP	For the purpose of section 8 of the Legislative Instrument the AFSL will annually assess and approve a minimum of 70% of each of its relevant provider's CPD for them to complete as part of their CPD Plan as qualifying CPD activities as defined by section 7 of the Legislative Instrument.
Ensuring completion of these CPD activities by each RP	The AFSL regularly (at least quarterly) assesses completion of CPD activities in pursuit of each of its relevant provider's CPD Plans.
Checking compliance with CPD Policy and the Legislative Instrument	Each year the AFSL will assess this CPD Policy document and determine the extent to which it is complying with the Legislative Instrument.

Recording and maintaining evidence of completion of and outcomes of qualifying CPD activities	<p>The AFSL will record and maintain evidence of completion of, and the outcomes of, qualifying CPD activities.</p> <p>In addition all non-qualifying CPD activities will also be tracked and reviewed.</p>
Ensuring all records required are completed and maintained	<p>The AFSL will ensure that records required by this legislative instrument are completed and maintained.</p> <p>Those records shall be:</p> <ol style="list-style-type: none"> 1. Details of all CPD assessments 2. All CPD Plans 3. Details of all CPD activities
Publication of our CPD Policy	<p>The AFSL will publish a copy of its CPD on any website that it operates or maintains as part of its AFSL business.</p> <p>The AFSL will also ensure that all of its RPs have access to a copy of this CPD Policy at all times.</p>
Relevant Provider CPD Plans	<p>The AFSL will develop a CPD Plan for each of its RPs prior to the commencement of each RP's CPD Year.</p> <p>Each CPD plan shall:</p> <p>Identify areas for improvement in, and development and extension of, the RP's competence, knowledge and skills; and</p> <p>The RP will be required to do the below subjects as a minimum:</p> <ul style="list-style-type: none"> • 5 hours Technical Competence • 5 hours Client Care and Practice • 5 hours Regulatory Compliance & Ethics • 20 hours tax related training • 20 hours minimum of General in areas related to equities, derivative, managed funds etc
Minimum CPD	Our minimum expectation is that each RP will complete 40 hours of CPD (at least 70% of which is deemed qualifying CPD activities) per CPD year.

CPD Plan for All Providence Advisers

For CPD year 1st January to 31st December each calendar year

1. Areas for improvement in, and development and extension of, my competence, knowledge and skills in coming CPD year

For example:

- Enhance 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.
- Enhance ability to act as a client-centric practitioner in advising retail clients.
- Enhance understanding of applicable legal obligations and how to comply with them.
- Enhance capacity to act as an ethical professional.
- Otherwise maintain and extend professional capabilities, knowledge and skills, including keeping up to date with regulatory, technical and other relevant development.

2. The qualifying CPD activities I will complete during the CPD year to achieve those improvements

- Minimum 40 hours total CPD required in the CPD year
- Minimum 28 hours of CPD to be qualifying CPD activities

QUALIFYING CPD ACTIVITIES Examples:

- 20 hours technical competence (min = 5 hours)
- 5 hours client care and practice (min = 5 hours)
- 5 hours regulatory compliance and consumer protection (min = 5 hours)
- 9 hours professionalism and ethics (min = 9 hours)

OTHER CPD ACTIVITIES:

- 4 hours professional or technical reading (max permitted for CPD recognition)

For the CPD commencing 1/01/2019 my QCPD activities shall be comprised of:

Detail the specific coursework the RP is expected to complete in the CPD year

Examples:

- Technical workshops led by SMART Compliance Pty Ltd
- Kaplan Training
- Inhouse training via Investment Committee meeting etc
- External conferences awarding CPD points

Background

THE NEED TO HAVE A CPD POLICY

AFSLs responsible for relevant providers must develop, adopt and maintain a written CPD Policy.

The CPD Policy must do these things:

1. Specify the AFSL's CPD year
2. Set out the AFSL's overall approach to its CPD Obligations incl those of its relevant providers
3. Describe how the AFSL will:
 - Determine how relevant providers returning from breaks will have their CPD Plans managed
 - Monitor implementation of CPD Plans by relevant providers
 - Assess and approve at least 70% of all of each relevant provider's CPD activities
 - Ensure that its responsible providers complete that 70% of approved CPD activities
 - Check compliance with the CPD Policy and the Legislative Instrument controlling it
 - Record and maintain evidence of completion of, and outcomes of qualifying CPD activities
 - Ensure all records required by the Legislative Instrument are completed and maintained

PUBLICATION OF CPD POLICY

The AFSL must publish its CPS Policy on its website and must ensure that the policy is accessible by its relevant providers.

RELEVANT PROVIDER CPD PLANS

Each relevant provider must prepare a CPD Plan for each CPD year and may amend it at any time.

Each CPD Plan must be in writing.

Each CPD Plan must:

- Identify areas for improvement in, and development and extension of the provider's competence, knowledge, skills; &
- Describe the qualifying CPD activities the provider will complete during the CPD year to achieve those improvements.

WHAT IS A QUALIFYING CPD ACTIVITY ("QCPD activity")?

It is a CPD activity that meets all these requirements:

1. Is in one of the approved CPD areas:
 - Technical Competence
 - Client care and practice
 - Regulatory compliance and consumer protection
 - Professionalism and ethics
 - General
2. Has sufficient intellectual or practical content
3. Primarily deals with matters related to the provision of financial product advice, financial advice services and financial advice business
4. Is led or conducted by 1 or more persons who are appropriate, and have sufficient standing, expertise, academic qualifications and/or practical experience excludes technical or professional reading; &
5. Is designed to enhance relevant providers' knowledge and skills in areas that are relevant to the provision of financial product advice and financial advice services.

A CPA activity may cross CPD areas but can only be allocated to one CPD area – the predominant one by content.

Formal relevant education provided by an education provider may include any of these:

1. A degree or equivalent qualification approved under the FASEA rules;
2. A course determined in a legislative instrument under s.1546B(1)(b) of the Corporations Act;
3. Education or Training provided or approved by a professional association; or
4. Formal education or training study towards qualifications or designations relevant to practice as a relevant provider.

The Table of CPD Areas

	Content of CPD Activity	CPD area
1	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.	Technical competence
2	The activity is designed to enhance participants' ability to act as a client-centric practitioner in advising retail clients.	Client care and practice
3	The activity is designed to enhance participants' understanding of applicable legal obligations and how to comply with them.	Regulatory compliance and consumer protection
4	The activity is designed to enhance participants' capacity to act as an ethical professional.	Professionalism and ethics
5	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 it is not in an area referred to in another item in this table.	General

APPROVAL OF CPD ACTIVITIES

Must be done by the AFSL for at least 70% of CPD – i.e. min 28 hours each year.
AFSL determines max number of hours for each qualifying CPD activity.

REQUIREMENTS FOR CPD

40 hours per CPD year (36 for approved part-timers)

Must include minimum CPD area allocations:

- 5 hrs Technical Competence
- 5 hrs Client care and practice
- 5 hrs Regulatory compliance and consumer protection
- 9 hrs Professionalism and ethics

Limits

- Max 4 hrs Professional or Technical reading can be counted
- Max 30 hrs can be counted from Formal relevant education

NB. If a relevant provider leads or conducts a QCPD activity they can also count hours of preparation (and first delivery) towards their points.

OTHER OBLIGATIONS IMPOSED ON AFSLs

1. Make appropriate resources and opportunities available to relevant providers;
2. Monitor implementation of relevant provider's CPD Plans;
3. Check compliance with AFSL's CPD Policies and the legislative instrument by AFSL and its relevant providers.

CAREER BREAKS

NB. The specific ways this is to be treated

RECORD KEEPING

Relevant providers must make and maintain complete and accurate records of:

1. The QCPD activities they undertake
2. When they undertake them
3. Number of hours spent on each
4. Evidence of completion of activity and outcomes of activity
5. Progress of implementation of their CPD Plan

This can be done by AFSL making and maintaining the records. Relevant provider must provide a copy of their CPD records to its AFSL upon request. Anyone required to make a CPD record must keep that records for at least 7 years after it is made.